



AGENDA

LICENSING COMMITTEE

Date: THURSDAY, 24 JUNE 2021 at 7.30 pm

**Via Microsoft Teams - the public are welcome to observe
via the Council's website at <https://lewisham.public-i.tv/core/portal/home>.**

**Enquiries to: Clare Weaser
Telephone: 0208 314 7369 (direct line)
Email: clare.weaser@lewisham.gov.uk**

MEMBERS

This meeting is an open meeting and all items on the agenda may be audio recorded and/or filmed.

Councillors:

Councillor Eva Stamirowski (Chair)
Councillor Bill Brown (Vice-Chair)
Councillor Juliet Campbell
Councillor Colin Elliott
Councillor Alan Hall
Councillor Coral Howard
Councillor Caroline Kalu
Councillor Samantha Latouche
Councillor Susan Wise

Members are summoned to attend this meeting

**Kim Wright
Chief Executive
Laurence House
Catford
London SE6 4RU
Date: 15 June 2021**



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The public are welcome to attend our committee meetings, however occasionally committees may have to consider some business in private. Copies of reports can be made available in additional formats on request.

ORDER OF BUSINESS – PART 1 AGENDA

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Licensing Committee

Minutes

Date: 24 June 2021

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: Chief Executive

Outline and recommendations

Members are asked to consider the Minutes of the meeting of the Licensing Committee, held on 16 June 2021.

Recommendation

That the Minutes of the meeting of the Licensing Committee, held on 16 June 2021 be confirmed and signed.

Agenda Item 2



Licensing Committee

Declarations of Interest

Date: 24 June 2021

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: Chief Executive

Outline and recommendations

Members are asked to declare any personal interest they have in any item on the agenda.

1. Summary

1.1. Members must declare any personal interest they have in any item on the agenda. There are three types of personal interest referred to in the Council's Member Code of Conduct:

- (1) Disclosable pecuniary interests
- (2) Other registerable interests
- (3) Non-registerable interests.

1.2. Further information on these is provided in the body of this report.

2. Recommendation

2.1. Members are asked to declare any personal interest they have in any item on the agenda.

3. Disclosable pecuniary interests

3.1 These are defined by regulation as:

- (a) Employment, trade, profession or vocation of a relevant person* for profit or gain
- (b) Sponsorship –payment or provision of any other financial benefit (other than by the Council) within the 12 months prior to giving notice for inclusion in the register in respect of expenses incurred by you in carrying out duties as a member or towards your election expenses (including payment or financial benefit from a Trade Union).
- (c) Undischarged contracts between a relevant person* (or a firm in which they are a partner or a body corporate in which they are a director, or in the securities of which they have a beneficial interest) and the Council for goods, services or works.
- (d) Beneficial interests in land in the borough.
- (e) Licence to occupy land in the borough for one month or more.
- (f) Corporate tenancies – any tenancy, where to the member’s knowledge, the Council is landlord and the tenant is a firm in which the relevant person* is a partner, a body corporate in which they are a director, or in the securities of which they have a beneficial interest.
- (g) Beneficial interest in securities of a body where:
 - (a) that body to the member’s knowledge has a place of business or land in the borough; and
 - (b) either:
 - (i) the total nominal value of the securities exceeds £25,000 or 1/100 of the total issued share capital of that body; or
 - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person* has a beneficial interest exceeds 1/100 of the total issued share capital of that class.

*A relevant person is the member, their spouse or civil partner, or a person with whom they live as spouse or civil partner.

4. Other registerable interests

4.1 The Lewisham Member Code of Conduct requires members also to register the following interests:

- (a) Membership or position of control or management in a body to which you were appointed or nominated by the Council
- (b) Any body exercising functions of a public nature or directed to charitable purposes, or whose principal purposes include the influence of public opinion or policy, including any political party
- (c) Any person from whom you have received a gift or hospitality with an estimated value of at least £25.

5. Non registerable interests

- 5.1. Occasions may arise when a matter under consideration would or would be likely to affect the wellbeing of a member, their family, friend or close associate more than it would affect the wellbeing of those in the local area generally, but which is not required to be registered in the Register of Members' Interests (for example a matter concerning the closure of a school at which a Member's child attends).

6. Declaration and impact of interest on members' participation

- 6.1. Where a member has any registerable interest in a matter and they are present at a meeting at which that matter is to be discussed, they must declare the nature of the interest at the earliest opportunity and in any event before the matter is considered. The declaration will be recorded in the minutes of the meeting. If the matter is a disclosable pecuniary interest the member must take not part in consideration of the matter and withdraw from the room before it is considered. They must not seek improperly to influence the decision in any way. **Failure to declare such an interest which has not already been entered in the Register of Members' Interests, or participation where such an interest exists, is liable to prosecution and on conviction carries a fine of up to £5000**
- 6.2. Where a member has a registerable interest which falls short of a disclosable pecuniary interest they must still declare the nature of the interest to the meeting at the earliest opportunity and in any event before the matter is considered, but they may stay in the room, participate in consideration of the matter and vote on it unless paragraph 6.3 below applies.
- 6.3. Where a member has a registerable interest which falls short of a disclosable pecuniary interest, the member must consider whether a reasonable member of the public in possession of the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.
- 6.4. If a non-registerable interest arises which affects the wellbeing of a member, their, family, friend or close associate more than it would affect those in the local area generally, then the provisions relating to the declarations of interest and withdrawal apply as if it were a registerable interest.
- 6.5. Decisions relating to declarations of interests are for the member's personal judgement, though in cases of doubt they may wish to seek the advice of the Monitoring Officer.

7. Sensitive information

- 7.1. There are special provisions relating to sensitive interests. These are interests the disclosure of which would be likely to expose the member to risk of violence or intimidation where the Monitoring Officer has agreed that such interest need not be registered. Members with such an interest are referred to the Code and advised to seek advice from the Monitoring Officer in advance.

8. Exempt categories

- 8.1. There are exemptions to these provisions allowing members to participate in decisions notwithstanding interests that would otherwise prevent them doing so. These include:-
- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
 - (b) School meals, school transport and travelling expenses; if you are a parent or

guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor

- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception).

Agenda Item 3



Licensing Committee

Report title: Merkur Slots 40 Deptford High Street Deptford SE8 4AF

Date: 24 June 2020

Key decision: No.

Class: Part 1.

Ward(s) affected: New Cross

Contributors: Community Services – Crime, Enforcement & Regulation Service, Head of Law.

Outline and recommendations

Determination of New Premises Licence Application submitted by Merkur Slots UK Ltd.

After having regard to all the representations heard, Members must take such steps as they consider appropriate to promote the Licensing Objectives.

Timeline of engagement and decision-making

The Application was advertised in accordance with regulation 12 of the Gambling Act 2005.

The last day for representations was 28 April 2021.

This matter must be heard as soon as is reasonably practicable after the expiry of any period for representations.

1. Summary

1.1. Merkur Slots UK Ltd. have applied for a new Premises Licence for the purposes of the following activity:

Bingo

24 hours 7 days a week

Any Bingo Premises Licence is also also entitled to make available for use a number of

category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. For example, a premises with a total of 25 gaming machines available for use can make five or fewer category B3 gaming machines available on that premises. Premises that were licensed before 13 July 2011 are entitled to make available eight category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. There are no restrictions on the number of category C or D machines that can be made available.

- 1.2. Representations were received from sixteen interested persons on the grounds of all the licensing objectives. These representations included an objection to the application by Cllr Brenda Dacres, Ward Councillor for New Cross and Cabinet Member for Safer Communities. The representations received from interested parties have been examined by Officers and are considered not to be vexatious or frivolous. These representations were all received within the specified time.
- 1.3. When considering this application, members are advised to have regard to the following points in the Council's Statement of Principles for Gambling 2019-22:

Protection of Children and young people: Section 10.2.1 of the Statement of Principles for Gambling states that Children and Young people are allowed into bingo premises; however they are not permitted to participate in the bingo and if category B or C gaming machines are made available for use these must be separated from areas where children and young people are allowed, where it is made clear that entry is permitted only for those aged 18 or over. Appropriate signage should be provided to this effect and the area should be monitored by staff, either through direct supervision or by monitored CCTV. The Gambling Commission's Social Responsibility (SR) code 3.2.5(3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling.

Provision of Gaming Machines: Section 10.2.4 of the Statement of Principles for Gambling states that to avoid a situation where a premises holds a bingo Premises Licence primarily to benefit from the gaming machine allowance, the Licensing Authority will need to be satisfied (in line with Gambling Commission Guidance 18.4) that bingo is regularly played in any premises for which a Premises Licence is issued and that the premises presentation is clearly that of a bingo premises and readily identifiable as such to any customer using the premises

Promotion of Licensing Objectives: Section 10.2.5 of the Statement of Principles for Gambling states that in determining applications for bingo premises, the Licensing Authority shall consider the following:

- proof of age schemes
- CCTV
- entry control system
- staff numbers
- staff training
- supervision of entrances/ machine areas
- whether children are permitted on the premises and, if so, how the operator intends to prevent them from playing bingo or being able to access adult only machine areas
- notices/ signage
- opening hours
- the times and frequency of which bingo is offered
- whether bingo is offered by a caller or only electronically
- whether the premises are clearly identifiable as being licensed for the purposes of offering bingo facilities
- provision of responsible gambling information

This list is not exhaustive, and is merely indicative of example measures the Licensing Authority will expect applicants to offer to meet the licensing objectives.

2. Recommendations

- 2.1 After having regard to all the representations heard, Members must take such steps as they consider appropriate to promote the prevention of crime and disorder and public nuisance.
- 2.2 On considering an application for a premises licence (whether at a hearing or not) a licensing authority shall—
 - (a) grant it, or
 - (b) reject it.
- 2.3 Either party has a right of appeal to the Magistrates Court against a decision which should be submitted to the court within 21 days of the date of the decision letter.

3. Policy Context

- 3.1. Decisions by Members of the Licensing Committee should have regard to the Gambling Act 2005 and the promotion of the three Licensing Objectives at all times, which includes the following:
 - (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.
- 3.2. Members should also have regard to the Licensing Authority's Statement of Gambling Policy 2019-22.
- 3.3. Decisions made will link in with the following objectives under the Council's Corporate Strategy – Building an Inclusive Local Economy and Building Safer Communities.

4. Financial implications

- 4.1. Applicants have the right of appeal against any decision by the Licensing Committee. Therefore there would likely be costs for the Authority in seeking legal support should an appeal be brought by the applicant.

5. Legal implications

- 5.1 The Licensing Authority is a public authority under the Human Rights Act 1998. Therefore the licensing authority is required to act compatibly with the convention rights in the exercise of their functions. Article 6 (1) of the Convention provides that everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial hearing established by law.
- 5.2 A Premises Licence is a possession for the purpose of the Human Rights Act 1998. The right to hold a licence is a qualified rather than an absolute right. Therefore the right to hold a licence may be interfered with if it affects the interests of local residents or others. Such interference may be justified if it is necessary and proportionate to

promote the licensing objectives.

6. Equalities implications

6.1 The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

6.2 In summary, the Council must, in the exercise of its functions, have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- advance equality of opportunity between people who share a protected characteristic and those who do not.
- foster good relations between people who share a protected characteristic and those who do not.

6.3 It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed above.

6.4 The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.

6.5 The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

6.6 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

- [The essential guide to the public sector equality duty](#)
- [Meeting the equality duty in policy and decision-making](#)
- [Engagement and the equality duty: A guide for public authorities](#)
- [Objectives and the equality duty. A guide for public authorities](#)
- [Equality Information and the Equality Duty: A Guide for Public Authorities](#)

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- 6.7 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

<https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance#h1>

7. Climate change and environmental implications

- 7.1. Any decision made by Members must fall in line with the Gambling Act 2005, to that end there are no climate change or environmental considerations.

8. Crime and disorder implications

- 8.1. Under the Gambling Act 2005, one of the 3 licensing objectives is preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- 8.2. It is the a requirement of the Gambing Act 2005 that any decision made by the Licensing Committee must not negatively impact on the Licensing objectives.

9. Background papers

- 9.1. Application received 31 March 2021
- 9.2. Premises plan
- 9.3. Local Area Risk Assessment
- 9.4. Copy of Merkur Slots UK Limited's Operational Standards
- 9.5. Copy of Merkur Slots UK Limited's 'Working Together'
- 9.6. Fifteen Representations as served

10. Glossary

Term	Definition
Appeal	asking a court to overturn a lower court's decision. If the decision of a court is disputed it may be possible to ask a higher court to consider the case again by lodging an appeal.
Bingo	<p>Bingo is not given a statutory definition in the Act although two types of bingo are commonly understood:</p> <ul style="list-style-type: none"> • cash bingo, where the stakes paid make up the cash prizes that are won • prize bingo, where various forms of prizes are won, not directly related to the stakes paid. <p>Cash bingo is the main type of bingo played in commercial bingo premises. They also offer prize bingo, largely as games played in the intervals between main stage games. This means that only premises with a bingo premises licence, or a large casino premises licence issued under the Act (where the</p>

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Term	Definition
	operator holds a bingo as well as a casino operating licence), will be able to offer bingo in all its forms.
Gaming & game of chance	<p>In the Gambling Act 2005 “gaming” means playing a game of chance for a prize.</p> <p>A “game of chance”—</p> <p>(a) includes—</p> <ul style="list-style-type: none"> - a game that involves both an element of chance and an element of skill, - a game that involves an element of chance that can be eliminated by superlative skill, and - a game that is presented as involving an element of chance, but <p>(b) does not include a sport.</p>
Licence	an authority to do something.
Licensee	the holder of a licence to do something.
Licensing Authority	<p>The Council (London Borough of Lewisham)</p> <p>Under section 2 of the 2005 Act, the licensing authority's area is the area for which the authority acts.</p>
Licence Objectives	<p>Under section 1 of the 2005 Act the Licensing Authority must promote the following 3 objectives</p> <ul style="list-style-type: none"> • 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, and • protecting children and other vulnerable persons from being harmed or exploited by gambling.
Interested Person	<p>A person who lives in the vicinity of the premises</p> <p>A body who represents the persons who live in that vicinity</p> <p>A person involved in a business in that vicinity</p> <p>A body representing businesses in that vicinity</p> <p>An elected member of the council</p>

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Term	Definition
Relevant Representation	A representation that is specific to the premises in question, related to the four licensing objectives and/or the local licensing policy.
Responsible Authorities	<p>Public bodies that must be notified of all applications and who are entitled to make representations in relation to Premises Licences, as follows:</p> <ul style="list-style-type: none"> • LBL Childrens Services • The Gambling Commission • HM Revenue and Customers • LBL Licensing Authority • LBL Planning Authority • Environmental Protection (noise) • London Fire Brigade

11. Report author and contact

- 11.1. Lisa Hooper, Crime, Enforcement & Regulation Manager,
lisa.hooper@lewisham.gov.uk, 020 8314 6324.

**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

Regional Casino <input type="checkbox"/>	Large Casino <input type="checkbox"/>	Small Casino <input type="checkbox"/>
Bingo <input checked="" type="checkbox"/>	Adult Gaming Centre <input type="checkbox"/>	Family Entertainment Centre <input type="checkbox"/>
Betting (Track) <input type="checkbox"/>	Betting (Other) <input type="checkbox"/>	

Do you hold a provisional statement in respect of the premises? Yes No

If the answer is "yes", please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: _____ Other name(s): _____

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: **Merkur Slots UK Limited**

7. The applicant's registered or principal address:

**Seebeck House
1A Seebeck Place
Knowlhill
Milton Keynes
Postcode: MK5 8FR**

8(a) The number of the applicant's operating licence (as given in the operating licence):
000-003266-N-103444

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: **N/A**

9. Tick the box if the application is being made by more than one organisation.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): **Merkur Slots**

11. Address of the premises (or, if none, give a description of the premises and their location):

**40 Deptford High Street
Deptford
Postcode: SE8 4AF**

12. Telephone number at premises (if known): **N/A**

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

Ground floor, high street location.

14(a) Are the premises situated in more than one licensing authority area? **No**

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made:**

N/A

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **No**

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence. **N/A**

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates: **N/A**

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued):

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **No**

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?
Yes

19(b). If the answer to question 19(a) is yes, please provide full details:

97-99 Lewisham High Street, London

SE13 6BA

BINGO

GPL106

20. Please set out any other matters which you consider to be relevant to your application:

The Applicant operates a national estate of licensed bingo premises which include the provision of bingo tablets and Bingo Plus and Bingo Express terminals. Substantive facilities for non-remote bingo will be made available in accordance with legislative provisions.

The operator has full authority to provide licensed bingo by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are implemented and policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.

A copy of the applicants Operational Standards has been provided in support of the application and full copies of the Applicant's policies and procedures are available, if required.

A copy of the applicants 'Working Together' document has also been supplied in support of the application, which provides an overview of the licensee's proposed operation.

Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

We confirm that the applicant(s) have the right to occupy the premises.

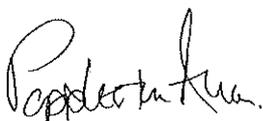
Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name:	Poppleston Allen		
Date:	31 March 2021	Capacity:	Solicitors for & on behalf of the applicant
22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity: Signature:			
Print Name:	_____		
Date:	_____	Capacity:	_____
<p><i>[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]</i></p> <p><i>[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]</i></p>			

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

Felix Faulkner

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

0115 9349 172

24. Postal address for correspondence associated with this application:

**Felix Faulkner
Poppleston Allen
37 Stoney Street
The Lace Market
Nottingham
Postcode: NG1 1LS**

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

f.faulkner@popall.co.uk

Merkur Slots, 40 Deptford High Street, SE8 4AF

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	40 Deptford High Street, Deptford, SE8 4AF
Local Authority:	London Borough of Lewisham
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-025 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
Name and Title of Assessor:	Gill Clulow – Senior Compliance Auditor
Date of Assessment:	1.4.2021
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots, a former William Hill Bookmakers, licensed for gambling by the London Borough of Lewisham. There is residential accommodation above this and most units on the High Street. The High Street is vibrant and ethnically diverse with a range of retailers and food outlets catering for the local population. SE8 4AF is a mixed residential and non-residential postcode in Lewisham. Merkur Slots operates a Bingo licensed Premises at 97-99 Lewisham High Street which is open 24/7.
Establishments of note:	Deptford Reach, 64 Speedwell St, SE8 4AT, Deptford Action Group For The Elderly, 71 Deptford High St, SE8 4AA, Deptford Salvation Army Centre, Mary Ann Gardens, SE8 3DP
Adjoining premises:	The venue is located between Fu Quing Chao Shi Chinese supermarket and Star Pizza Takeaway
Crime statistics:	<p>Deptford High Street, Lewisham, London, SE8 4AF is within the New Cross policing neighbourhood, under the Metropolitan Police Service force area.</p> <p>In February 2021 there were 251 crimes reported within a half mile radius of the venue – Anti-social behaviour (93), Violence and sexual offences (63), Criminal Damage and Arson (20). (streetcheck.uk).</p> <p>In the year ending September 2020 crime rates in Lewisham were 90.2/1000 about the same as similar areas such as Croydon, Hounslow, Newham – all areas in which Merkur Slots operate currently. When compared to other areas in the Metropolitan Police force area crime rates were lower than the average. (police.uk)</p>
Population:	<p>In the 2011 census, there were 66 people resident in SE8 4AF, of which 40 were male and 26 were female. The area containing Deptford High Street, Lewisham, London consists predominantly of flats, which is common in inner cities, student neighbourhoods and poorer suburban settings. Around 50% of the population live alone.</p>
Culture:	<p>Deptford High Street, Lewisham, London can be considered more ethnically diverse than the UK average with 48% white compared to UK average of 86%. 14% of the area are Black African, 7.3% Chinese, 7.1% other Asian, 5.8% Black Caribbean.</p>
Unemployment:	<p>Census 2011 showed 41.4% of working age population in full time employment, 3.4% in part time employment and 3.4% were students. No one industry was substantially larger than others – the largest industries were Accommodation/food and education at – 2.4%, then professional and scientific, retail and health.</p>
Deprivation:	<p>In relative terms Lewisham has become less deprived since 2015. It is now ranked 63rd most deprived LA, compared to 48th in 2015, 31st in 2010 and 39th for 2007. However, relative to London, Lewisham has become more deprived moving from 10th most deprived to 7th. Increasing in Income, Employment, Education and Health and Disability.</p>
Local Police:	Lewisham Police Station, 43 Lewisham High St, SE13 5JZ



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 London Borough of Lewisham local authority Statement of Gambling Principles 2019, reference section 10 for Bingo Centres and Lewisham Council Borough Profile 2011.

Environmental Factors

In preparing this assessment Praesepe 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 football. 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: Census 2011 showed 41.4% of working age population in full time employment, 3.4% in part time employment and 3.4% were students. No one industry was substantially larger than others – the largest industries were Accommodation/food and education at – 2.4%, then professional and scientific, retail and health.</p> <p>Deprivation: In relative terms Lewisham has become less deprived since 2015. It is now ranked 63rd most deprived LA, compared to 48th in 2015, 31st in 2010 and 39th for 2007. However, relative to London, Lewisham has become more deprived moving from 10th most deprived to 7th. Increasing in Income, Employment, Education and Health and disability.</p> <p>Schools and Education Tidemill Academy, 11 Giffin St, SE8 4RJ Kush Academy, 190-196 Deptford High St, SE8 3PR Deptford Park Primary School, Evelyn St, SE8 5RL Addey and Stanhope School, 472 New Cross Rd, SE14 6TJ Deptford Green School, 61 Edward St, E14 6AN St Joseph's Catholic Primary School, Crossfield St, SE8 3PH Lewisham College, 1 Deptford Church St, SE8 4RX Bellerbys College London, Bounty House, Stowage, Greenwich, SE8 3DE Coventry University London, 1st Floor, Bounty House, Stowage, SE8 3DE Coventry University Greenwich Campus, Royal Hill, SE10 8RG</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 Praesepe 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 West Bromwich 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>

Goldsmiths, University of London, 8 Lewisham Way, SE14 6NW

Community Centres and Youth Centres

Community Hall, Evelyn St, SE8 5QW
Lewisham Indo Chinese Community, 33 Clyde St, SE8 5LW
Deptford Lounge, 9 Giffin St, SE8 4RJ
Riverside Youth Club, 185 Grove St, SE8 3QQ
Deptford Church Hall, 131 Deptford High St, SE8 4NS
Second Wave Youth Arts, 1 Creek Rd, SE8 3BT

Parks, play grounds and sports/leisure facilities

Ferranti Park, Creekside, Deptford, SE8 3DW
Fordham Park, New Cross, SE14 6LU
Margaret McMillan Park, 54 Glenville Grove, SE8 4BP
Mary Ann Gardens, 43 Mary Ann Gardens, SE8 3DP
Deptford Park, 23 Scawen Rd, SE8 5AE
Richard MacVicar Deptford Adventure Playground, New King St, Deptford, London SE8 3JB

Vulnerable and addiction support services

Deptford Action Group For The Elderly, 71 Deptford High St, SE8 4AA
Deptford Methodist Church and Mission, Mary Ann Gardens, SE8 3DP
Deptford Reach, 64 Speedwell St, SE8 4AT
The Samaritans of Lewisham Greenwich and Southwark, 1-5 Angus St, SE14 6LU
Centrepoint, 204 Evelyn St, SE8 5BZ

Homeless shelters and food banks

Lewisham Refugee & Migrant Network, 341 Evelyn St, SE8 5QX
Bench Outreach, 14 New King St, SE8 3HS
Deptford Reach, 64 Speedwell St, SE8 4AT
999 Club, 21 Deptford Broadway, SE8 4PA
The Bear Church, Shaftesbury Christian Centre, Frankham St, SE8 4RN
Deptford Salvation Army Centre, Mary Ann Gardens, SE8 3DP

Pawnbrokers and Loan Shops

H&T Pawnbrokers, 72 Deptford High St, SE8 4RT
Cash Xchange, 184 Deptford High St, SE8 3PR
H&T Pawnbrokers, 121 Lewisham High St, SE13 6AT
Cash Converters, 292-294 Lewisham High St, SE13 6JZ
Everyday Loans, 39 Lewis Grove, SE13 6BG

Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.

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.

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.

Results of age verification checks and third-party results are shared with the Gambling Commission.

Proof of Age scheme in place with application forms available in the venue.

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.

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 participate 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>

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.

Medical Centres, Care Homes and Mental Health facilities
 Deptford Surgery, 502-504 New Cross Rd, SE14 6TJ
 Deptford Medical Centre, 2 Pearson's Ave, SE14 6TG
 Kingfisher Medical Centre, 3 Kingfisher Square, SE8 5DA
 Speedwell Mental Health Centre, 62 Speedwell St, New Cross, SE8 4AT
 Grove Medical Centre, Windlass Pl, SE8 3QH
 Waldron Health Centre, Waldron Health Centre, SE14 6LD

Gambling premises

Merkur Cashino, 97 High St, Lewisham, SE13 6AT
 Admiral Casino, 96 Lewisham High St, Lewisham, SE13 5JH
 Paddy Power, 52 Deptford High St, SE8 4RT
 Paddy Power, 175 Deptford High St, SE8 3NU
 Ladbrokes, 48/50 Deptford High St, SE8 4NS
 Coral, 321 Evelyn St, SE8 5QX
 William Hill, 403 New Cross Rd, SE14 6LA
 Jennings Bet, 242A Evelyn St, SE8 5BZ
 Ladbrokes, 54-56 Lewisham High St, SE13 5JH
 Jennings Bet, New SE8 4AF
 William Hill, 174 New Cross Rd, SE14 5AA
 Betfred, 33-35 Lewis Grove, SE13 6BW

Residential Areas

Housing types are typically flats/apartments and terraced which make up 82% of the housing stock which are mainly rented with 50% occupied by single persons.

Bus stops and other Transport links

Deptford High Street, New Cross, SE14 6TQ
 Deptford Bridge Station, Greenwich, SE8 4HH
 Deptford Bridge, Saint John's, London
 Deptford Train Station, Deptford, SE8 4BZ
 Deptford Bridge, DLR, Greenwich, London

Public Houses and Alcohol Licensed Premise

Job Centre, 120-122 Deptford High St, SE8 4NP
 White Swan, 217 Deptford High St, SE8 3NT
 Red Lion & Wheatsheaf, 45 Deptford High St, SE8 4AD
 Winemakers Deptford, 209 Deptford High St, SE8 3NT
 Little Crown, 495 New Cross Rd, SE14 6TQ
 STOCKTON, 2 Deptford High St, SE8 4AF
 Badger Badger, 139 Deptford High St, SE8 3NU
 Royal Standard, 86 Tanner's Hill, SE8 4PN

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).

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.

Customer Interaction

Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).

Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.

Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.

Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.

Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.

All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.

Player Protection

To identify signs associated with problem gambling and people who may be at risk of gambling related harm
Failure to provide information to customers on responsible gambling
Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews

Plume Feathers, 5-9 Deptford High St, SE8 4AD
 Taproom, Unit 2, St Paul's House, 3 Market Yard, SE8 4BX
 The Dog & Bell, 116 Prince St, SE8 3JD
 Star and Garter, 490 New Cross Rd, SE14 6TJ
 The Duke, 125 Creek Rd, SE8 3BU
 Dirty Apron, 4 Deptford Market Yard, 133 Deptford High Street, SE8 4BX
 Royal Albert, 460 New Cross Rd, SE14 6TJ
 The Black Horse, 195 Evelyn St, SE8 5RE
 The Brookmill, 65 Cranbrook Rd, SE8 4EJ
 Bluetroat Bar, Arch 2 Deptford Station, Deptford High St SE8 4NS
 The Bunker, 46 Deptford Broadway, SE8 4PH
 The Venue, 2a Clifton Rise, SE14 6JP
 Shades Snooker & Pool Club, 197-199 Deptford High St, SE8 3NT
 Marcella, 165A Deptford High St, SE8 3NU
 M and D Japanese, 117 Deptford High St, SE8 4NS
 The Tapas Room, Deptford Market Yard, 133 Deptford High St, SE8 4BX

Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.

'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.

Playright App available for customers to self-manage their play and spend and can send alerts to Merkur Slots West Bromwich if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer.

Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling

Socially Responsible messaging is implemented on all digital B3 and Cat C machines.

All machines display Gamble Responsibly stickers with helpline contact details.

Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees.

They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.

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

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.

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.

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.

Staff are trained how to manage situations with homeless people seeking refuge.

<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: High Street, Lewisham, London, SE8 4AF is within the New Cross policing neighbourhood, under the Metropolitan Police Service force area. In February 2021 there were 251 crimes reported within a half mile radius of the venue – Anti-social behaviour (93), Violence and sexual offences (63), Criminal Damage and Arson (20). (streetcheck.uk). In the year ending September 2020 crime rates in Lewisham were 90.2/1000 about the same as similar areas such as Croydon, Hounslow, Newham – all areas in which Merkur Slots operate currently. When compared to other areas in the Metropolitan Police force area crime rates were lower than the average. (police.uk)</p> <p>Local Police: Lewisham Police Station, 43 Lewisham High St, SE13 5JZ</p> <p>Public Houses and Alcohol Licensed Premise Job Centre, 120-122 Deptford High St, SE8 4NP White Swan, 217 Deptford High St, SE8 3NT Red Lion & Wheatstheaf, 45 Deptford High St, SE8 4AD Winemakers Deptford, 209 Deptford High St, SE8 3NT Little Crown, 495 New Cross Rd, SE14 6TQ STOCKTON, 2 Deptford High St, SE8 4AF Badger Badger, 139 Deptford High St, SE8 3NU Royal Standard, 86 Tanner's Hill, SE8 4PN Plume Feathers, 5-9 Deptford High St, SE8 4AD Taproom, Unit 2, St Paul's House, 3 Market Yard, SE8 4BX The Dog & Bell, 116 Prince St, SE8 3JD Star and Garter, 490 New Cross Rd, SE14 6TJ The Duke, 125 Creek Rd, SE8 3BU Dirty Apron, 4 Deptford Market Yard, 133 Deptford High Street, SE8 4BX Royal Albert, 460 New Cross Rd, SE14 6TJ The Black Horse, 195 Evelyn St, SE8 5RE The Brookmill, 65 Cranbrook Rd, SE8 4EJ Bluethroat Bar, Arch 2 Deptford Station, Deptford High St SE8 4NS The Bunker, 46 Deptford Broadway, SE8 4PH The Venue, 2a Clifton Rise, SE14 6JP Shades Snooker & Pool Club, 197-199 Deptford High St, SE8 3NT Marcella, 165A Deptford High St, SE8 3NU M and D Japanese, 117 Deptford High St, SE8 4NS The Tapas Room, Deptford Market Yard, 133 Deptford High St, SE8 4BX</p>	<p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</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 High street, Deptford 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 High Street, Deptford 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 Swale - Chalkwell 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 Kent 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>
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Pawnbrokers and Loan Shops
 H&T Pawnbrokers, 72 Deptford High St, SE8 4RT
 Cash Xchange, 184 Deptford High St, SE8 3PR
 H&T Pawnbrokers, 121 Lewisham High St, SE13 6AT
 Cash Converters, 292-294 Lewisham High St, SE13 6JZ
 Everyday Loans, 39 Lewis Grove, SE13 6BG

Gambling premises
 Merkur Cashino, 97 High St, Lewisham, SE13 6AT
 Admiral Casino, 96 Lewisham High St, Lewisham, SE13 5JH
 Paddy Power, 52 Deptford High St, SE8 4RT
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 Coral, 321 Evelyn St, SE8 5QX
 William Hill, 403 New Cross Rd, SE14 6LA
 Jennings Bet, 242A Evelyn St, SE8 5BZ
 Ladbrokes, 54-56 Lewisham High St, SE13 5JH
 Jennings Bet, New SE8 4AF
 William Hill, 174 New Cross Rd, SE14 5AA
 Betfred, 33-35 Lewis Grove, SE13 6BW

Residential Areas (Impacted by Anti Social Behaviour)

Housing types are typically flats/apartments and terraced which make up 82% of the housing stock which are mainly rented with 50% occupied by single persons.
 In July 2020 Anti-social behaviour was concentrated around supermarkets on Deptford High Street with 11 incidents.
 January 2018 saw a 3 year PSPO in place in the Borough of Lewisham which was to prohibit the use of psychoactive substances and unauthorised encampments in public spaces, as well as extend existing dog control orders to include: Dogs on leads in all London Squares in Rushley Green, Dogs on leads 'zone' in Beckenham Place Park, and a dog free zone in Manor House Park.

The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).
 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.

Merkur Slots High Street, Deptford 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.

Anti-social behaviour outside the premise

Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.

Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.

Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

Money Laundering

Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.

Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.

There are 2 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.

Adequate staff will always be maintained and subject to regular review and risk assessment.

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm 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 High street, Deptford 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.

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

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

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

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.

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.

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.

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.

Maglock systems will be deployed during times of public houses closing.

Money Lending

Money lending is not tolerated within our premises.

Suspicions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.

Ensuring that gambling is conducted in a fair and open way

Bingo/Gaming Machine and Supervision
The premise 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).

Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs 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.

Customer Complaints

Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.

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.

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.

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.

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).

External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.

All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.

Other	Places of worship and Religious Buildings	Ethnicity and Local Area Demographic
	<p>Catholic Church of Our Lady of The Assumption, 131 Deptford High St, SE8 4NS</p> <p>The Shaftesbury Christian Centre, 72 Deptford High St, SE8 4RT</p> <p>Deptford Methodist Church and Mission, 1 Creek Rd, Greenwich, SE8 3BT</p> <p>St Paul's Church, Mary Ann Gardens, SE8 3DP</p> <p>Deptford Potter's House Church, 21 McMillan St, Greenwich, SE8 3EZ</p> <p>Deptford Salvation Army Centre, Mary Ann Gardens, SE8 3DP</p> <p>Trinity Vineyard Church, Greenwich, SE8 9BF</p> <p>St Nicholas Church, Deptford Green, Greenwich, SE8 3DQ</p> <p>New Cross Road Baptist Church, 466 New Cross Rd, New Cross, SE14 6TI</p> <p>St Luke's Church, 190 Evelyn St, SE8 5DB</p> <p>Saint Mark's Centre, 2 Harton St, SE8 4DQ</p> <p>Olivet Deptford Baptist Church, 146-160 Edward St, New Cross, SE14 6DX</p> <p>Mountain of Fire and Miracles Ministries, Church, 465 New Cross Rd, New Cross, SE14 6TA</p> <p>New Testament Church of God, Bawtree Rd, SE14 6ET</p> <p>New Cross Congregational Church, 2 Bawtree Rd, SE14 6ET</p> <p>Deptford Islamic Centre, 226 Childers St, SE14 6ED</p> <p>Baraka Mosque, 1UY, 199 Lewisham Way, Saint John's, SE4 1UY</p> <p>Lewisham Bengali Mosque, 10 Clifton Rise, New Cross, SE14 6JP</p> <p>Madina Jammeh Masjid, 248-250 Westerry Rd, Isle of Dogs, E14 3AG</p> <p>Muslim Cultural Centre, 10 Clifton Rise, New Cross, SE14 6JP</p> <p>Lewisham Islamic Centre, 363-365 Lewisham High St, SE13 6NZ</p> <p>The Akwaaba Centre, Grinling Pl, SE8 5HG</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 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</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>Praesepe have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Praesepe 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>Bingo Association, 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 Bimonthly and Compliance Auditors twice yearly.</p>

		<p>COVID 19 All staff receive training on COVID-19 guidelines. Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise. Masks made available to customers. Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced. COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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Merkur Slots High Street, Deptford Premise Layout

Premise level:	Merkur Slots High street, Deptford is a ground floor premises with residential accommodation above.
Premise frontage:	Merkur Slots High Street, Deptford 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 High Street, Deptford 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 High Street, Deptford 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 High Street, Deptford 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 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 High Street, Deptford 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

I have worked in the Gaming Industry for 25 years, in operations as a venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management. During my time in the industry, I have managed venues and areas in many locations from market towns such as Loughborough to large cities like Glasgow and Luton.

When completing a Local Area Risk Assessment for a new venue the process I would follow were lockdown restrictions were not in place would be to remotely research the area and complete my initial assessment this would then be followed by a physical visit to the location and surrounding area, accompanied by a member of the operations team. Following this visit I would then review and update my initial report. However due to current lockdown restrictions I have not completed a physical visit to the location and my assessment has been completed remotely.

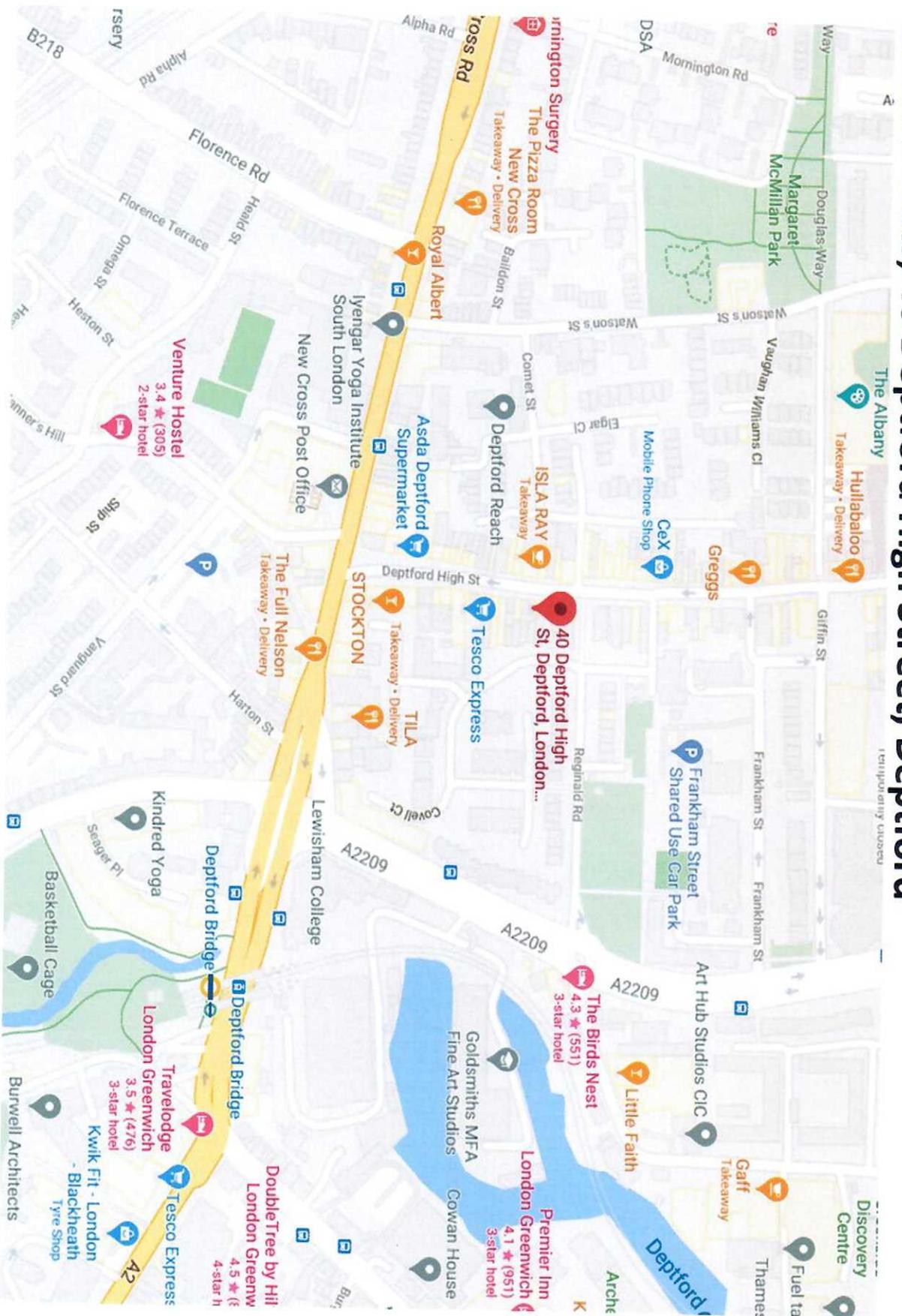
Once lockdown restrictions are eased and retail and hospitality in the area reopen and the town returns to more normal levels of trading a physical visit will be made and any appropriate adjustments made to the Risk Assessment. A review will additionally be carried out once the venue is open and local knowledge of the staff can be amalgamated.

This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Praesepe 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, Praesepe 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 a greater risk of gambling related harm.

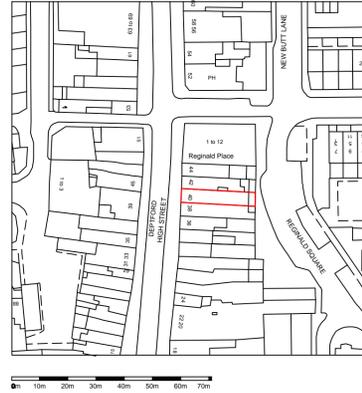
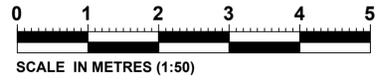
Assessors Name:	Gill Clulow
Signature:	
Date:	1.04.2021

Merkur Slots, 40 Deptford High Street, Deptford



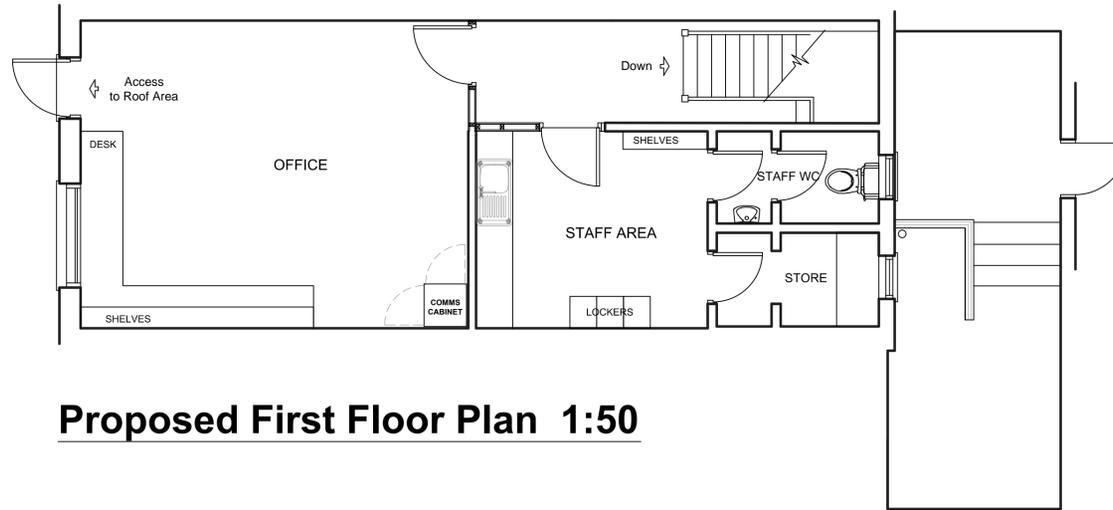
Merkur Slots, 40 Deptford High Street, Deptford – Shop frontage example



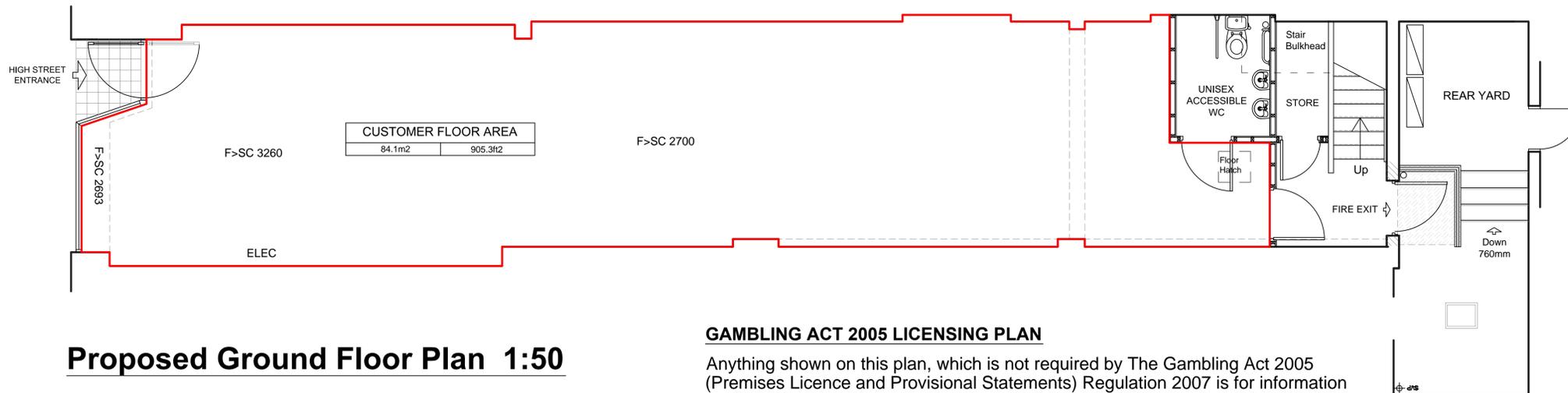


Location Plan 1:1250

FLAT ROOF



Proposed First Floor Plan 1:50



Proposed Ground Floor Plan 1:50

GAMBLING ACT 2005 LICENSING PLAN

Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licence and Provisional Statements) Regulation 2007 is for information purposed only and **does not** form part of the premises licence.

— Area in which facilities will be provided for gaming.

Rev	Date	Description
A	25-01-2021	Fire Exit to Rear Yard shown



Address
40 DEPTFORD HIGH STREET
DEPTFORD
LONDON
SE8 4AF

Title
LICENCE PLAN

Drawn	Date	Scale
JAM	22/01/2021	1:50 @ A1
Customer Area	84.1M2	
Drawing Number	DHS/DEP/03	Revision A

McKeowns
Plans for Construction
301 Alvechurch Road, Birmingham, B31 4UB Tel: 0121 433 4745
Licence Plan

Objection 1

Dear licensing team,

I'm writing to object to the license for yet another gambling business at No.40 Deptford High street which has applied for bingo license (which is obviously not going to be bingo but rather slot machines with extra gambling games accessible through the site's tech devices).

I, my husband and business partner Dan, and many of our customers believe this is the worst possible thing for the high street right now. As a high street business owner who's business is situated a few doors down from the site I fear of what it will bring to the street and how it will affect our business. We already have issues with so many beggars, homeless, addicted and drunks on the high street that affect the safety of the community and our business. We've had our business directly affected by them, to mention a few - stolen goods from shop, indecent exposure, verbal abuse on many occasions, urinating on shopfront, disruption of our evening customers when asking them for money. We can see they congregate around existing betting shops and there's a lot of fights and shouting happening almost on a daily basis. Bringing yet another business that is going to encourage gambling and draw these types of people into the high street is in my eyes very irresponsible and quite surprising that the council would allow such a business to open, knowing all it knows about poverty and crime in Deptford.

We live in Deptford and rent our flat from Bench, which is a charity trying to tackle homelessness and addiction in Deptford. We've been chatting to them often and they said this issue has been getting worst over the past years in Deptford and the surrounding area. There's a few charities around Deptford that aim to help with these issues and yet there are so many betting betting shops on the high street doing the exact opposite of help. These charities bring a lot of vulnerable people into the area, many of whom are trying to better their life but the presence of these shops must make it impossible. These are highly addictive & vulnerable people and I believe bringing another business like it to the area will make things much worst for the people that have addiction issues, the kids that pass this site a few times a day and think it's absolutely fine to play games for money and for the community as a whole. The fact that they want to open 24/7 is just scary. How is this suppose to be safe??? Who's going to monitor it? I can't imagine 2 people (which is the company's usual number of staff on site) will be able to manage the violence, crime and possible disruption this is likely cause. Who's going to protect the staff? There's going to be a lot of money on site, this will bring more criminals to the street and our business could also become a target (robbery/fake notes/stealing). It could bring even more drug dealing and knife crime, there's been so many stabbings in the area the past two years.

All businesses are restricted with their opening hours - and we as license holders have to make sure we do our best to keep everyone safe, this responsibility must be taken seriously. I don't believe this business should be allowed to open at all. We have enough to deal with with the existing sites. If for some reason it will, then the opening hours must be regulated and reduced to reasonable hours (opening not too early or late) and the visibility of the interior from the outside not to be able to be seen by passers by, restricted advertising on windows. This could help protect the children and vulnerable people, which is the one of the license's main objectives. But please do not let it go ahead, let's start changing the area so that its safe and it's economy has a chance to recover.

I really hope the council will see sense and not allow this license or any other license application from this business to be granted. Life after pandemic is going to be so much harder for the vulnerable, there's going to be increase in crime numbers and we should be making sure we do our best to avoid it as much as possible. And not let it happen if we have the choice.

I'm happy for you to contact me if there's anything else you need from me or you think might help with this issue.

Objection 2

To Whom It May Concern,

I am a local resident, I live in Deptford for over 9 years, the last 3 of them on the High Street at the mention address.

I am aware of an application that has been submitted for a new gambling premises at 40 Deptford High Street, which intends to be open 24 hours a day, 7 days a week.

I would like to express my concern about this new business so close to the property I live. I strongly oppose to the opening of this new business in a neighbourhood that has already too many social problems and enough gambling shops.

I can see daily how people with addiction struggles around the streets, how the crime had increased considerably over the last years. Recently I myself was victim of a thief who stole my phone from my hands on the high street just a couple of meters away from my home at daylight, I am aware that this happens constantly, another similar crime happened only couple of minutes after I gave my statement to the police and a couple of days after another person was stabbed because he tried to hold to his phone, this is a problem that is happening now on daily basis and the police hasn't been able to manage this situation. I think the last thing the police needs now is more crime in the area and I think another gambling shop will bring crime, insecurity and disorder to this streets.

People will gather at the entrance of this place as they do on the other gambling shops, many of them with drugs, gambling and alcohol problems. If this business will open 24 hours they will be there 24 hours! I am sure this is fine under daylight with the street full of people, but what happens when everyone has gone home and the

street is nearly empty at night and early mornings; will I have to be afraid every time I am back home from a late shift at work or from a night out?

As a woman of this community I feel frustrated and defenceless, I feel that none think about us. We are already going through hard times, a young lady was raped recently not far away from here during the daytime, it is the council responsibility to avoid creating environments where these awful crimes can be committed again!

Will I ever feel safe again if you open a 24 hours gambling shop, No I won't; I will be scared to do an early shift at work and walk by myself to the station, I will feel afraid to go to the supermarket for something at night time.

It horrifies me the idea that this gambling shop will be creating just a new meeting point for people with addiction, just under my house, where the shop at 36 leaves their fruit stands, they will probably just sit there, as they used to do at the anchor pedestal that was removed; this will probably happen because it is just next to the new 24 hours gambling shop and I will be afraid to go out, scared to even open my front door and deal with people that don't have boundaries and under the influence of certain substances don't have most of the time even respect.

It really concerns me how this all can affect, not only me but everyone who works, lives, shops or has business on the high street. As I said before this gambling shops are a source of crime and disorder, I believe Deptford High Street has enough of it! I see every day how the security forces from Asda, Tesco and Iceland have to deal with this situation constantly! Drunk people coming, stealing from the shops; I saw it just a few hours ago, that is what pushes me to write to you, to ask you not to accept this business request.

Kids on their way home from the Addey and Stanhope school, watching this environment, keeping this in mind on their young minds, is that the example we want to set for future generations? For them to believe that certain types of behaviour are right?

I don't think it is fair to the community, to these vulnerable people with addiction that will have one more reason to stay up all night huddled around the new 24 hours attraction, increasing their intake of substances and falling into the addiction of gambling, that can be as complicated as the others and most of the times are linked to each other, what they need is help, what this community, this neighbourhood needs is more places where to improve their life skills, where to help them to recover; not one more place to drag them into something worse and this time open 24 hours.

So I please ask you one more time, not only asking, I beg you not to follow with the process of approval for the opening of this new premises.

Please don't give us, the community one more reason to be afraid at night, don't give the vulnerable people one more reason to complicate more their life.

Objection 3

To Whom It May Concern:

The management of Bench Outreach objects to the above proposal. Bench Outreach is a charity working with vulnerable people in Lewisham, especially with residents of the Evelyn and New Cross wards, who will be immediately and adversely affected by this development. Our objections are raised on the following grounds:

- **It contravenes Lewisham Council's aim of protecting children and other vulnerable persons from being harmed or exploited by gambling.**

According to the council's own Joint Strategic needs Assessment, Lewisham has one of the highest proportion of working-age residents on out-of-work benefits at 9.1%. This contributes to extremely high levels of child poverty, estimated at over 35% in the Evelyn and New Cross wards. A business that exists solely to encourage gambling would not be a welcome addition in an area in which poverty is already highly visible.

- **It contravenes Lewisham Council's aim of protecting vulnerable adults from abuse and exploitation.**

The premises are close to three local charities working with people with mental health issues, substance use issues and alcohol dependence – all of whom are vulnerable to exploitation. The premises are also adjacent to a pawnbrokers shop, and across the road from CEX, another business that gives cash for goods. Approving a gambling licence for premises close to shops which provide high-interest cash loans is inappropriate and will put those already in difficult circumstances at risk of increased debt.

I look forward to your response,

Objection 4

Dear sir or madam

We object to the application by Merkur Slots for a bingo licence at 40 Deptford High Street on the following grounds:

1. Preventing gambling being a source of crime or disorder.

The proposed premises is in New Cross ward - this ward already suffers levels of anti-social behaviour that are almost twice the level recorded overall in Lewisham borough, and more than twice the national average.

<https://www.observatory.lewisham.gov.uk/crime-and-community-safety/report/view/30a1abb2a53f42fa87dea33c0c73c342/E05000449>

Recorded crimes of every type except shoplifting are consistently much higher in New Cross than the average across the borough, and it has the third highest level of crime of all the borough's wards.

Deptford High Street has existing high levels of anti-social behaviour and ongoing problems with street drinking and drug dealing. The detrimental impact this has to our community is keenly felt by residents and traders, so much so that officers from the local Safer Neighbourhoods Team have told us they conduct a monthly walkabout on Deptford High Street with licensing officers from Lewisham Council to try and address the problem. This clearly indicates the direct relationship between these problems and existing licensed activities.

Street drinkers and drug dealers regularly congregate outside existing gambling premises (Paddy Power and Jennings in particular) The disorder and anti-social behaviour that this generates has a severe impact on nearby shops, and traders are of the clear opinion that further gambling establishments will exacerbate this problem.

Despite many years of hardship, Deptford High Street, with its regular market, has clung on to its reputation as a family-friendly shopping destination, but local business owners are concerned that the presence of what would be a fourth gambling business in a run of just thirty shops will further undermine this positive reputation and be a backward step for local businesses and the community as a whole. The Deptford Society supports this view and asks the committee to also consider this in the light of the added vulnerability that Covid now brings to the resilience of local businesses and community.

2. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The premises is based in New Cross ward, very close to the border with Evelyn ward. Both wards have extremely high levels of deprivation and child poverty.

In Evelyn ward, 30% of children live in low income families, and in New Cross this figure is 28%; this is double the figure reported across Lewisham borough and the national average, both of which are around 15%. In both of these wards, 22% of children under 16 live in families with absolute low income, compared to 15.5% across the borough. A business that exists solely to encourage gambling, and that has the potential to operate on a 24/7 basis, would not be a welcome addition to an environment in which poverty is already highly visible.

The proposed premises is in close proximity to two primary schools and a secondary school; another secondary school and a college are within a short walk of the site. During lunchtime

and after school, large numbers of unsupervised pupils from both secondary schools come to the High Street for refreshment and to socialise.

Regarding the protection of children and young persons, the Gambling Commission states in their Adult Gaming Centre guidance for licensing authorities:

21.3 Licensing authorities will wish to have particular regard to the location of and entry to AGCs to minimise the opportunities for under-18s to gain access. This may be of particular importance in areas where young people may be unsupervised for example, where an AGC is in a complex, such as a shopping centre or airport. Licensing authorities should consider whether their statement of policy can be used to reflect such locally based considerations.

The proposed premises is at a high-profile location on the high street and the young people of the area will pass it at least twice a day, on their way to and from schools and nurseries. The presence of such a business in the middle of a popular shopping street will lead to gambling being normalised in the eyes of these children and young adults.

Deptford is also a focus for organisations that provide important support services to vulnerable adults; at least seven different organisations and charities are based on Deptford High Street or adjoining streets. The help that these places provide means that Deptford is either home to or each day brings a population of adults who are already experiencing severe difficulties in managing their affairs. Aside from the obvious risk to the lives of these vulnerable adults and any dependent children they may have, granting this licence would do a considerable disservice to the efforts of these organisations to rehabilitate their clients.

The social deprivation detailed above is, in itself a form of vulnerability with debt being a well known result of poverty. The fact that the proposed premises is on a road with no less than three pawnbroker shops and a long established money lenders providing short term high interest cash loans, proves that this is an area with above average susceptibility to negative gambling and will put those already in difficult circumstances at risk of increased and uncontrolled debt. The developing economic effects of Covid 19 are likely to make these issues even more acutely felt in the local area

Objection 5

Dear sir/madam,

I would like to object to the application for a gambling licence at 40 Deptford High Street. I also object to the change of use application for the same reasons.

I am a local resident, my details are below. I object to the application for the following reasons:

To prevent gambling from being a source of crime & disorder:

Adult gaming centres require staff to mingle with customers which makes them more vulnerable to robbery, often involving weapons. As well as making them a magnet for crime, it puts staff at high risk.

The nature of the business means that large amounts of cash are present on site, adding to their attraction for criminals.

Recorded crimes of every type except shoplifting are consistently much higher in New Cross than the average across the borough, and it has the third highest level of crime of all the borough's wards.

Deptford High Street already suffers existing high levels of drug dealing, anti-social behaviour and street drinking.

To protect children & other vulnerable persons from being harmed or exploited by gambling:

Both New Cross ward and Evelyn ward have extremely high levels of deprivation and child poverty. In Evelyn ward, 30% of children live in low income families, and in New Cross this figure is 28%; this is double the figure reported across Lewisham borough and the national average, both of which are around 15%. In both of these wards, 22% of children under 16 live in families with absolute low income, compared to 15.5% across the borough. A business that exists solely to encourage gambling, and that has the potential to operate on a 24/7 basis, would not be a welcome addition to an environment in which poverty is already highly visible.

The proposed premises is very close to two primary schools and a secondary school; another secondary school and a college are within a short walk of the site. During lunchtime and after school, large numbers of young people visit the High Street for refreshment and to socialise.

Deptford is a focus for organisations that provide support services to vulnerable adults; at least seven different organisations and charities are based on Deptford High Street or adjoining streets. Some of the people they seek to support are already struggling with addiction issues and many are in difficult financial circumstances. Granting this licence would seriously undermine the efforts of these organisations to rehabilitate their clients.

I have volunteered at Deptford Reach and seen the impact gambling has had on vulnerable individuals in the area first hand. I object to this application and urge the council not to add another gambling premises to the high street.

Objection 6

Hello

I would like to strongly object to a 24 hr gambling Licence being granted to Mekur Slots for the following reasons.

1. Deptford High Street already has a culture of street drinking and drug dealing, this would further be exacerbated as anyone selling drugs would have a legitimate reason to be in the area if they were in the vicinity of the Mekur Slots.
2. Numerous school students use the High Street for lunch and could be subjected to influence and harassment from the people loitering outside the premises.
3. Deptford High Street is a residential area and having a 24 hour gambling establishment would not be justified as the area is already stricken with poverty and addiction. These premises would most likely affect the most vulnerable and poor of the borough.

Objection 7

To whom it may concern,

I am a local resident living very close to the High Street with a young family and I wish strongly to object to the proposed licence on the following grounds:

1. Deptford High Street is not just a commercial high street but a thriving residential street. Neither the proposed use nor the proposed operating hours are compatible with such residential occupation.
2. The inevitable noise and disturbance caused by gamers arriving and leaving the premises 24 hours a day is not compatible with the many flats above High Street premises. The availability of gambling throughout the night is surely premised on a ready supply of customers - from the bars along the High Street, which are also pushing for longer and longer operating hours. These two phenomena are obviously not unconnected. The effect, in combination, on the levels of disturbance in the High Street will be unacceptable. There are many families with young children living on and around the High Street.
3. The cumulative impact of the increasing number of gambling sites along the High Street in an area of extreme poverty and deprivation will be fundamentally negative and damaging to the local community.
4. There are many High Street organisations that provide support services to vulnerable adults. At least seven different organisations and charities are based on Deptford High Street or adjoining streets. Some of the people they seek to support are already struggling with addiction issues and many are in difficult financial circumstances. Granting this licence would seriously undermine the efforts of these organisations to rehabilitate their clients

5. The premises are very close to two primary schools and a secondary school and nearby there is another secondary school and a college. The High Street becomes a popular place for young people to congregate before and after school. Actively promoting gambling along the High Street sends out a dangerous message to these young people.

6. Being a regulated, closed-door activity, the proposed use offers the opposite of what in urban design terms is called an 'activated frontage'. Active, permeable, transparent frontages are encouraged as a source of vitality and interest along walkable streets. Gambling premises have an entirely negative impact in this regard, being effectively 'dead spots', detrimental to the bustling nature of a historic market street. These premises in particular are of significant historical value within the Deptford High Street Conservation Area even though they have been woefully mistreated in recent years. The nature of the proposed operation does not offer much hope that the historic frontage will be restored, so granting this licence will only help accelerate the decline of a Conservation Area already designated 'At Risk' by Historic England - the only High Street CA so designated in Lewisham.

7. However well managed the operators may claim their premises to be, adult gambling sites such as this are inevitably associated with increased levels of drug dealing, anti-social behaviour and drinking. New Cross already has crime levels twice as high as the borough average. Granting this licence would only exacerbate that situation.

Objection 8

As a Deptford resident I would like to formally object to the licence application for a proposed new gambling premises at [40 Deptford High Street](#) submitted by Merkur Slots (and change of use planning application at the same address).

As a local resident I am concerned about the impact another gambling establishment will have on the community. Whilst I respect a person's choice to gamble (i.e. I am not opposed to gambling), I am concerned that another shop opens the door for vulnerable persons in the community to be further exploited by gambling. We already receive branded betting slips (with brand names of the already existing local gambling businesses) through our post box which we believe are trying to entice us to bet. Given already existing high levels of deprivation and poverty in Deptford and the wider Lewisham area, I believe a further gambling establishment (especially one that could be open 24/7) would contribute further to this hardship by encouraging locals to gamble.

Further, given that gambling is known to be addictive, I think that opening another gambling establishment would fly in the face of all the good work done locally by organisations who work with vulnerable adults experiencing addiction and financial issues.

Lastly there are already high levels of drug dealing, anti-social behaviour and street drinking and participants of such activities tend to congregate around the gambling establishments. I

believe we should be moving towards making Deptford a safer, more empowered and healthier community, not encouraging businesses that put those goals at risk.

Objection 9

I would like to lodge my strong objection to the application submitted by Merkur Slots for a 'bingo' license at 40 Deptford High Street.

The reasons for my objection are as follows:

1. **High likelihood that this will increase levels of crime in the area due to:**
 - Large amounts of cash onsite. This is likely to make it a target, as well as a high risk factor for staff, especially those who are working there overnight.
 - An increase in already prolific drug dealing, anti social behaviour and open drinking. An additional gambling site that operates for 24 hours a day will undoubtedly draw people who are already involved in the aforementioned activities.
 - High levels of deprivation in the area, driving people to desperation.
2. **Another gambling site will contribute to vulnerable people, particularly young people, being exploited by gambling**
 - This is an area with very high levels of deprivation and child poverty. A business that is open 24 hours a day and that exists to promote gambling will likely exacerbate this
 - Many of these young people go to school near the proposed site and socialise on the high street at lunchtime. There is a risk that this site, along with the many others in the area that have been granted licenses, normalises gambling
 - We have a network of brilliant charities living locally that support those in vulnerable situations, e.g. the 999 Club. Addiction issues are a key aspect that they look to support people with - granting another gambling license of this sort risks undermining that work.

I am surprised that this application is being considered at all as we should not be adding to the already unacceptably high number of gambling sites in the area. This area has been historically deprived and we should be granting licenses and premises to those who will contribute positively to the lives of those in the area, rather than exacerbate entrenched issues.

Objection 10

I would like to object to the application submitted by Merkur Slots for a 'bingo' license at 40 Deptford High Street.

I am an interested party because I live locally - . I live within a one minute walk of the proposed license.

I want to object because of two key reasons:

1. **There is a good chance that this license will contribute to further crime and disorder in the local area**
 - Gambling sites have large amounts of cash onsite and this is likely to make it a target, as well as a high risk factor for staff
 - The area already suffers from high levels of drug dealing, anti social behaviour and open drinking - an additional gambling site (especially one open 24 hours a day) is only likely to contribute to this - while shoplifting levels are already higher in this ward than average across the borough, and I worry this will contribute
 - This area has a high level of deprivation
2. **Another gambling site will contribute to vulnerable people, particularly young people, being exploited by gambling**
 - This is an area with very high levels of deprivation and child poverty - nearly double the percentage of households in Evelyn and New Cross Ward have children living in low income families compared to Lewisham more broadly. A business that is open 24 hours a day and that exists to promote gambling has the potential to exacerbate this
 - Many of these young people go to school near the proposed site and socialise on the high street at lunchtime. There is a risk that this site, along with the others that have been granted licenses, normalises gambling
 - We have a network of brilliant charities living locally that support those in vulnerable situations, e.g. the 999 Club. Addiction issues are a key aspect that they look to support people with - granting another gambling license of this sort risks undermining that work

Objection 11

I am a resident living within a few hundred metres of the High Street.

I strongly object to the above application for the following reasons;

I am very concerned that licensing activities such as this will encourage crime and disorder on and around the High Street; it is the case that there are already high levels of drug dealing and other anti-social behaviour on the high st and the large quantities of cash held on site would make the establishment a target for robbery putting staff and customers at risk.

I am concerned about the impact the proposal would have on the valued work being carried out by voluntary organisations representing and rehabilitating the homeless and other vulnerable adult groups 7 of such groups exist in the area and their efforts could easily be undermined by allowing this property to be used in the way.

I am concerned about the impact such an establishment might have on the younger people within our community; it is often the case that schoolchildren from the 2 primary and one secondary school nearby use the high street for socialising and to buy lunch and after-school snacks - the presence of this gambling establishment all normalise the activity of gambling which I believe would be extremely detrimental to the children's well-being.

Objection 12

Here we are trying to gentrify the area and make it suitable for families and then along comes another chancer trying to get in to corrupt the downtrodden and the vulnerable people of our society.

I am the opticians on the high street, and despite getting no help in the pandemic, i have soldered on and revamped my place to try to attract a more civil and caring set of individuals to come to Deptford.

What i have learnt is when you have gaming establishments such as these, there is a greater propensity for thefts and miscellaneous crimes such as drug dealing and muggings.

This used to be the case when Corals was near me, the hunger to get rich quick by any means necessary made my stretch of the high street a no go area for mums and children after school and the characters that hung around the shop and the constant smell of ganja was not a positive sign of improvement.

Now you are all clever people, tell me why these establishments dont open in affluent areas?

Simple, they feel they can play on the misery of the locals and it is left to us to pick up the pieces.

To feed their addictions, a large section need to steal, guess who they steal from?

If you are not part of the solution to make deptford better ten you are the problem.

I dont need to write this as you should know how vulnerable the folks are in Deptford and new cross.

Please stop this nonsense and make a stand and say this will not be actioned as consent.

Try doing something right for once for the people of Deptford and New Cross

Objection 13

I wish to object to the proposal to install yet another gambling outlet in Deptford High Street (at No. 40).

As a local resident, who lives just off the High Street, I can see that this is a bad idea on several counts. As regards vulnerable young people another gambling facility, open all hours, will just help to normalize gambling when the Council should be helping to do the opposite. The High Street is close to schools, is part of the route taken to and from school by many local schoolchildren, and would be an unwelcome example of how to spend leisure time. Such outlets also make parenting much harder – especially for those forced to work unsocial hours who find it difficult to supervise their children.

Another gambling outlet will also aggravate levels of petty crime and street drinking in the area. Many have lost their jobs as a result of the pandemic – the young have suffered most

– so we need schemes to help them to employment, not outlets that will encourage them into a life of crime.

I understand that the Council needs income and does not want shops to stand empty, but gambling outlets only exacerbate local problems (shop-lifting, tagging, litter etc.), which then require more money to be spent to alleviate them. There are already more than enough gambling premises in the High Street. Those living above shops there already suffer from street noise. It cannot be a wise course to make the street the gambling Mecca of Lewisham.

Objection 14

I would like to object the proposed planning application for 40 Deptford High Street.

Judging by the other gambling shops open around the area, it is a source of congregation for local dealers and also plenty of crime and disorder happens around them. People are often threatening and intimidating particularly at night and this would be a huge concern on what seems on already overly-populated gambling sector on the high street.

I am not opposed to gambling in the slightest, it's just there is no security or anything else like it to protect people in the area when these places are open and I would strongly advise against opening another for fear of the community and good people who already live here and who do not need another shop put up.

Regards,

27th April 2021

Dear Sir/Madam,

Re: Gambling License Application for 40 Deptford High Street

We, as a school are very concerned that Lewisham Council has received a gambling licence application for the above address. We object to the licence being issued due to specific concerns under the following 2 categories:

- To prevent gambling from being a source of Crime & Disorder
- To protect children & other vulnerable persons from being harmed or exploited by gambling

Our primary school is based in Deptford, which is one of the most deprived and disadvantaged areas in the country, falling within the 2nd most deprived decile (bottom 20%) in the Indices of Deprivation for England (2019).

Within the Evelyn ward, 30% of children live in low-income families and 47% of our children are in receipt of the PPG (Pupil Premium Grant). These families are already living in difficult financial circumstances. We support a high percentage of these families by making referrals to the Food Bank, providing food hampers, clothing vouchers as well as referring to other charities for grants for beds, bedding and white goods. During the last year, our support in these areas has had to increase as families have found themselves in more need.

In Deptford High Street, there are already four gaming/gambling shops, which we believe is an imbalance and is not supportive of families managing financially. Parents who are struggling can see these shops as a way to try to boost their finances. However, the reality is that the loss of any income will have a significant negative impact on their children and their wellbeing. Furthermore, we are concerned that our children may come to see gambling as normalised and not recognise the impact this has on their families.

Outside of our school, the children and families already see and witness anti-social behaviour; street drinking and can see and smell the use of other substances. They experience people begging and hear them being abusive when people who are struggling themselves refuse them. Some of our students have voiced their concerns about their own and others safety when making their way home after school. Pupils have made contact with the local MP, Vicky Foxcroft.

We do not believe that the introduction of another gambling/gaming establishment would make a positive contribution to the environment and would risk significant negative impact on our children and families.

Yours sincerely,

Lorraine Stewart
Headteacher

Jacqueline Vincent
Family Liaison Officer

RE: New Gambling Premises Licence Application - 40 Deptford High Street SE8 4AF - Message (HTML)

FILE MESSAGE

Ignore X Meeting
Junk Delete Reply Reply Forward More
Delete Respond
Move OneNote Move
Mark Categorize Follow
Unread Tags
Translate Related Select
Zoom Zoom

Fri 02/04/21 00:05
Dacres, Cllr Brenda
RE: New Gambling Premises Licence Application - 40 Deptford High Street SE8 4AF

To: Licensing
Cc: Maslin, Cllr Paul

[Click here to download pictures.](#) To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dear Licensing Team,

I would like to raise objections to this new gambling licence application. Deptford High Street is already saturated with gambling establishments and they have been a source of anti-social behaviour, including street drinking, open drug dealing, and public urination. This establishment, and is in close proximity to two primary schools, two secondary schools, nurseries, and other premises and organisation which are used and support children and young people, who are already vulnerable and susceptible to gambling establishment in the area see its influence on a daily basis. It sends the wrong message to our young people who use, and travel along Deptford High Street. Deptford is a highly deprived area and the addition of yet another gambling establishment will add to the harm and exploitation of already vulnerable people in the area, for example homeless people, those with drug and alcohol problems, which is a prevalent issue in the area. There is Deptford Reach, a local charity which assist the most vulnerable in our society, including those affected by homelessness drug and alcohol addiction, and mental health issues. There is also the homeless charity, The 999 Club in close proximity. Their service users are extremely vulnerable and could also be harmed and exploited by the granting of a gambling license at this premises.

I urge that this license not be granted.

Thank you & kind regards,
Brenda

Cllr Brenda Dacres
One of three New Cross Labour Councillors
Cabinet Member for Safer Communities
Email: Cllr_brenda.dacres@lewisham.gov.uk



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.

- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming 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 Cashino Gaming Limited premises operate digital CCTV and customer areas are supervised.
- Cashino Gaming 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 Cashino Gaming 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.
- Cashino Gaming Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Cashino Gaming 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.
- Cashino Gaming operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Cashino Gaming does not operate a single-manning policy between 8pm 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.

Cashino Gaming 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 attend our National Training Centre for a thorough 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 the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

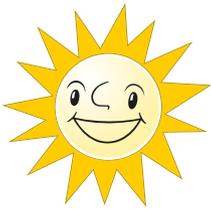
Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- 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 Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of 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.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- 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.
- 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, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

WORKING TOGETHER





PART OF THE GAUSELMANN GROUP

A Strong Partner For More Than 60 Years



Praesepe is a subsidiary of the family run Gauselmann 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.

Praesepe employs over 1,600 people (61% female*) over the 5 Bingo Clubs, 160 High Street Gaming centres (73 High Street Bingos and 87 Adult Gaming Centres) and 5 Family Entertainment Centres under three main brands:



Merkur Cashino is an established brand in the UK and represents the very best in terms of exciting “slot gaming” and high street bingo 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.



Merkur Slots is a new up and coming brand in the UK bringing the latest fun slots & bingo experience in smaller sized high street locations.



Beacon Bingo clubs are very important to our customers in their local communities. Our teams strive to deliver not just great service but a bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.

HIGH STREET BINGO



What is it?

Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



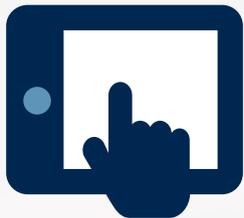
Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



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



Our customers can attend and play bingo at any time with the numbers auto-called.



The market on the high street has evolved with venues now providing Electronic Bingo Tablets.



Our Bingo terminals offer B3, Cat C and Cat D products with an average stake of between 30-40p stake.



Bingo is available for play from 9am until midnight.

Bingo Terminals





RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

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

GAMBLING COMMISSION

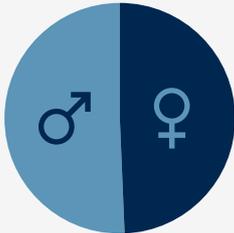
Praesepe is regulated by the Gambling Commission and Licensing Authorities



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



We are immensely proud of the fact that we have never had a licence revoked or even reviewed . Incidents are extremely rare. We simply do not generate noise and anti social behaviour.



Our venues operate a Think 25 policy whereby any person's 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 52 % Male / 48% Female



Our venues have 3 external age test visits per year with a compliance rate of over 94% for the last 3 years, compared to other industries that sit around 80%.

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Praesepe also has a number of socially responsible gambling tools, management and training 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.

IHL SMART 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.



PlayRight app installed in all venues that is a self help tool for customers to manage their gambling.

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Compliance



Training Centre



PlayRight App



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.

Praesepe also engages with the **Bingo Association** and **Bacta** trade groups:



- Senior Manager representation Divisional meetings.
- Operations Director is the Vice Chair for division 3 representing Adult Gaming Centres.
- 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 Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



Benefits for your High Street Include:



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



Increased footfall to the high Street.



Linked trips with other shops helping to support other businesses.



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



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

COMMUNITY & CHARITY



Praesepe has raised in excess of £1.2m for good causes since 2005 and currently supports the Bacta Charitable Trust.

Praesepe PLC

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1A Seebeck Place
Knowlhill
Milton Keynes

phone 01908 351200

email info@praesepeplc.com



Please contact us.