



# AGENDA

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## LICENSING COMMITTEE

**Date: TUESDAY, 21 JUNE 2022 at 7.00 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](mailto: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 Wise (Chair)  
Councillor Anifowose (Vice-Chair)  
Councillor Bill Brown  
Councillor Coral Howard  
Councillor Susan Wise (Chair)  
Councillor Yemisi Anifowose (Vice-Chair)  
Councillor Hayes  
Councillor Huyhn  
Councillor Mark Jackson  
Councillor Kestner  
Councillor Liam Shrivastava  
Councillor Luke Warner

**Members are summoned to attend this meeting**

**Kim Wright**  
**Chief Executive**  
**Laurence House**  
**Catford**  
**London SE6 4RU**  
**Date: 13 June 2022**

## ORDER OF BUSINESS – PART 1 AGENDA

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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.



## Licensing Committee

### Minutes

**Date:** 21 June 2022

**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 meetings of the Licensing Committee, held on 13 June 2022.**

#### Recommendation

That the Minutes of the meeting of the Licensing Committee, held on 13 June 2022 be confirmed and signed.

# Agenda Item 2



## Licensing Committee

### Declarations of Interest

**Date:** 21 June 2022

**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, 95 Rushey Green, London, SE6 4AF

**Date:** 21 June 2022

**Key decision:** No.

**Class:** Part 1.

**Ward(s) affected:** Rushey Green

**Contributors:** Community Services – Safer Communities 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 20<sup>th</sup> March 2022.

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

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.

Bingo facilities in bingo halls may not be offered between the hours of midnight and 9am. However, there are no restrictions on access to gaming machines in bingo halls.

- 1.2 Representations were received from three interested persons on the grounds of the licensing objectives:

*To prevent gambling from being a source of Crime & Disorder*

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

These representations included an objection to the application by Cllr James Walsh, Ward Councillor for Rushey Green. 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 following 3 objectives

- 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.

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](#)

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 21<sup>st</sup> February 2022

9.2. Premises plan

9.3. Machine plan

9.4. Local Area Risk Assessment

9.5. Three 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	Bingo is not given a statutory definition in the Act although two types of bingo are commonly understood:

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Term	Definition
	<ul style="list-style-type: none"> <li>• cash bingo, where the stakes paid make up the cash prizes that are won</li> <li>• prize bingo, where various forms of prizes are won, not directly related to the stakes paid.</li> </ul> <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 operator holds a bingo as well as a casino operating licence), will be able to offer bingo in all its forms.</p>
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"> <li>- a game that involves both an element of chance and an element of skill,</li> <li>- a game that involves an element of chance that can be eliminated by superlative skill, and</li> <li>- a game that is presented as involving an element of chance, but</li> </ul> <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"> <li>• preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,</li> <li>• ensuring that gambling is conducted in a fair and open way, and</li> <li>• protecting children and other vulnerable persons from being harmed or exploited by gambling.</li> </ul>

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Term	Definition
Interested Person	<p>A person who lives in the vicinity of the premises  A body who represents the persons who live in that vicinity  A person involved in a business in that vicinity  A body representing businesses in that vicinity  An elected member of the council</p>
Relevant Representation	<p>A representation that is specific to the premises in question, related to the four licensing objectives and/or the local licensing policy.</p>
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"> <li>• LBL Childrens Services</li> <li>• The Gambling Commission</li> <li>• HM Revenue and Customers</li> <li>• LBL Licensing Authority</li> <li>• LBL Planning Authority</li> <li>• Environmental Protection (noise)</li> <li>• London Fire Brigade</li> </ul>

## 11. Report author and contact

- 11.1. Richard Lockett, Safer Communities Service Senior Officer for Licensing  
richard.lockett@lewisham.gov.uk

**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**

*[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.]*

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):

**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):

**95 Rushey Green**

**Catford**

**London**

Postcode: **SE6 4AF**

12. Telephone number at premises (if known):

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 premises

14(a) Are the premises situated in more than one licensing authority area?

**No** *[delete as appropriate]*

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** *[delete as appropriate]*  
*[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be 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): *(dd/mm/yyyy)*

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** *[delete as appropriate]*

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** *[delete as appropriate]*

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

40 Deptford High Street, Deptford	SE8 4AF	BINGO	<b>GPL113</b>
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 Merkur Slots UK Limited's 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 Merkur Slots UK Limited's 'Working Together' document has also been supplied in support of the application, which provides an overview of the licensee's proposed operation.**

**Merkur Slots UK Limited applies extensive policies and procedures to promote the Licensing Objectives and the Applicant considers that the following licence conditions are appropriate to the proposed operation:**

- 1. The premises shall install and maintain a comprehensive CCTV system, which shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days. Viewing of recordings shall be made available upon the request of Police or an authorised officer of the Licensing Authority, subject to data protection legislative requirements.**
- 2. Notices shall be prominently displayed within the premises stating that CCTV is in operation.**
- 3. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:**
  - a. all crimes reported to the venue**
  - b. all ejections of patrons**
  - c. any complaints received concerning crime and disorder**
  - d. any incidents of disorder**
  - e. all seizures of drugs or offensive weapons**
  - f. any visit by a relevant authority or emergency service.**
  - g. any attempts by children and young persons to gain access to the premises to gamble**
  - h. any Challenge 25 Refusals.**
- 4. A think 25 proof of age scheme shall be operated at the premises where any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.**

5. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
6. The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice
7. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.
8. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by staff members.

**Part 6 – Declarations and Checklist (Please tick)**

I confirm that, to the best of my knowledge, the information contained in this application is true. I 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.

I 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
- I we understand that if the above requirements are not complied with the application may be rejected
- I 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: 18/02/2022

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: \_\_\_\_\_

*[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.]*

*[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.]*

### **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**

## Objection 1

Received: : 20 March 2022 23:57

With regards to the Change of use of the ground floor at number 95 Rushey Green, London, SE6 4AF (Use Class E) to Adult Gaming Centre (Sui Generis)

As a local resident and near neighbour I strongly object to the change of use of this property to an adult gaming centre. There is already an adult gaming centre at 116 Rushey Green almost directly opposite and several betting shops close by. Rushey Green is already plagued with anti social behaviour and much of it is focused around this type of gambling shop. It is my belief that this will encourage more antisocial behaviour in the area. At a time when the understanding of the damage that gambling addiction is wreaking on our society is becoming clearer and clearer, Lewisham council should be trying to reduce the number of gambling and adult gaming centres in the area, not increase them.

Many thanks,

## Objection 2

Dear Zara

I object to an adult gaming centre in this location.

The term "bingo" as a descriptor is not clear. Is this a participatory game such as those often found in larger premises, such as "Mecca Bingo" or non-communal games played at terminals. I am also concerned about the addition of gaming terminals of B3, B4, C and D type, as an additional automatic bolt-on to this licence type and suspect this venue will essentially become primarily a slots gambling establishment "arcade", rather than a bingo hall.

I am concerned about the co-location of an adult gambling centre adjacent to another business that is targeted at, and for, children - Kaspas. Other such venues in the vicinity attract anti-social behaviour in a an area with already some of the highest crime and disorder levels in Lewisham, and this problematic behaviour can often be found in the immediate vicinity outside of an establishment, where in this case a number of children and young people congregate with their ice creams.

Finally Rushey Green is a high deprivation Ward, even amongst other Lewisham wards. Gambling establishments disproportionately locate in these areas and can be found to attract, and target, those with least financial means. These venues often exploit vulnerable individuals, many of whom can be found in this ward.

For all of these reasons, I hope Licensing Committee will **refuse** an application.

**Councillor Walsh** (Labour)

### Objection 3

Dear Zara

I'm writing as a resident of Rushey Green and would like to bring to your attention the possible social disruption to our community by yet another adult gaming center, planned in 95 Rushey Green.

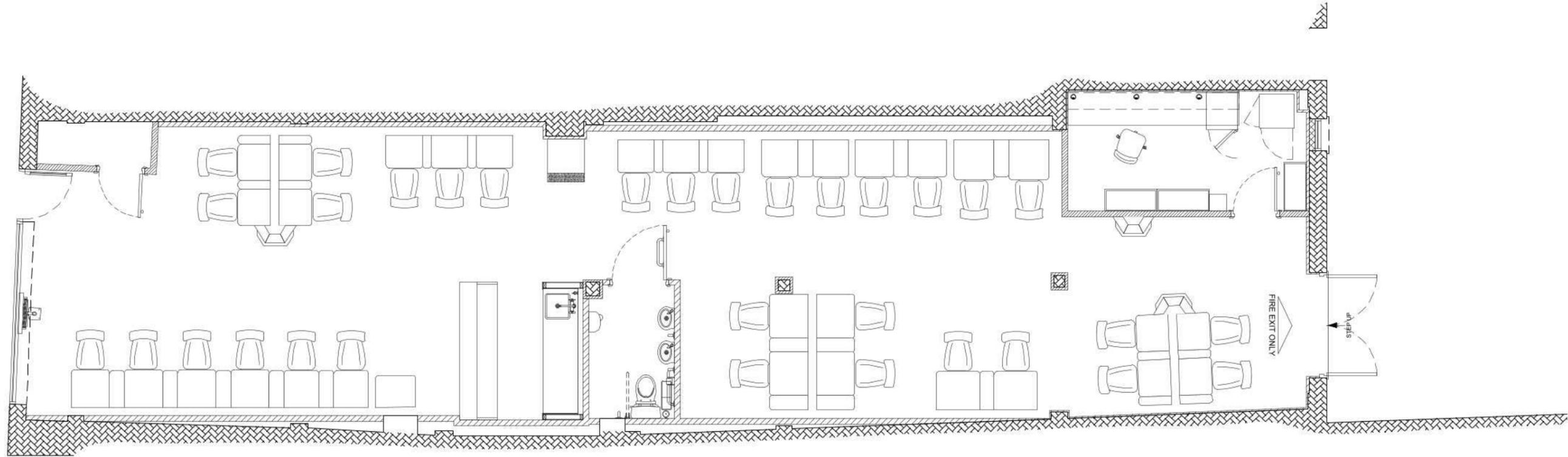
I've raised an objection on the local planning website and have learned by neighbours and the wider community that this planning application is a big concern for everyone for the following reasons:

- Alcohol related crime is higher in the vicinity of gambling centers
- there are already 2 gambling centers directly opposite the proposed location
- many children live in the same block and the site is located directly next to an ice cream and cake shop popular with children in the area.
- the plan was met with large opposition when raised with the community and the existing gambling shops are already seen as a nuisance.

This is a unique opportunity to make Rushey Green a street worthy a visit for all residents alike including families and children. An over concentration of gambling shops in this area will not benefit but burden the residents of Rushey Green.

I'm looking forward to your response.

Kind regards,



MACHINES LEGEND	
MACHINE CATERGORY	QUANTITY
CAT B3	0
CAT C	0
CAT D	0
DUOPOTS	0
TRIMAX	0
TABLETS	0
RATIO	0/0

REVISIONS

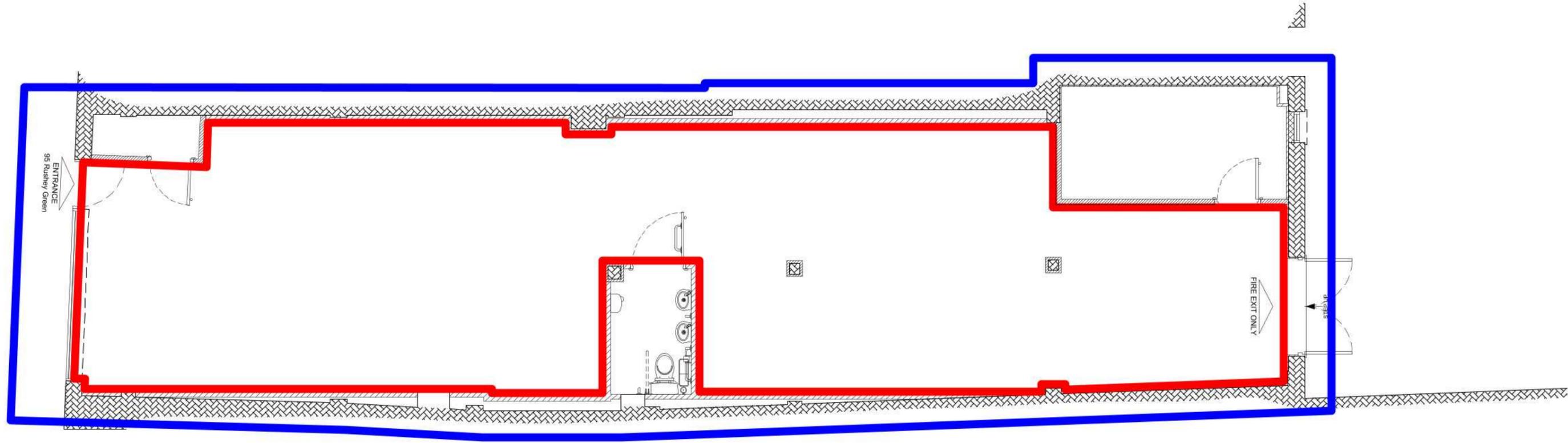
FIT OUT TYPE <b>CONCEPT 2</b>
PROJECT <b>MERKUR SLOTS</b> 95 RUSHEY GREEN CATFORD SE6 4AF
DESCRIPTION <b>PROPOSED MACHINE PLAN</b>

REFERENCE DRAWINGS
SCALE 1:75
DRAWN BY S.R.B.
DATE 19/08/21



DRAWING No. <b>999-PR-03</b>	REVISION <b>01</b>
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LICENSE PLAN LEGEND	
LINE TYPE	LINE TYPE DESCRIPTION
	AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.
	EXTENT OF PREMISES
<b>GAMBLING ACT 2005 LICENSING PLAN</b>	
Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.	

REVISIONS

FIT OUT TYPE CONCEPT 2
PROJECT MERKUR SLOTS 95 RUSHEY GREEN CATFORD SE6 4AF
DESCRIPTION PROPOSED LICENCE PLAN

REFERENCE DRAWINGS	
SCALE 1:75	
DRAWN BY S.R.B.	
DATE 19/08/21	
DRAWING No. <b>999-PR-04</b>	REVISION <b>01</b>



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# Merkur Slots, 95 Rushey Green, Catford, London, SE6 4AF

## Local Area Risk Assessment

<b>Trading Name:</b>	Merkur Slots
<b>Premise</b>	95 Rushey Green, Catford, London, SE6 4AF
<b>Local Authority:</b>	London Borough of Lewisham
<b>Premise Licence No:</b>	New application
<b>Operator Licence No:</b>	000-003266-N-103444-025 (Merkur Slots UK Limited)
<b>Company Details:</b>	Merkur Slots UK, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
<b>Name and Title of Assessor:</b>	Gill Clulow – Senior Auditor, Amanda Kiernon – Head of Compliance
<b>Date of Assessment:</b>	03.09.2021
<b>Review Date:</b>	On opening in conjunction with local staff

**Local Area Profile Risk Factors**

Local Risk Profile:	Merkur Slots, forms part of a development with residential apartments above – The Heights above. The entrance to Merva Court apartments is between the venue and Kaspas Desserts and the entrance to The Heights is the other side. Merkur Casino hold a Bingo licence issued by Lewisham Borough Council for Cashino Gaming, 97-99 Lewisham High Street, SE13 6BA which is has operated since November 2012.
Establishments of note:	Grassed areas outside the premises and along Rushey Green Road could attract youths and groups of a street lifestyle. Salvation Army, 23-25 Brownhill Road, SE6 2HE offering support for homeless and vulnerable persons.
Adjoining premises:	Kaspa's desserts and an empty unit.
Crime statistics:	In the year ending December 2020, the crime rate in Lewisham was about the same as the average crime rate across similar areas at 90.6 per 1000 , it was higher than in other Metropolitan police force areas. (police.uk). In July 2021 there were 327 crimes recorded within a half mile of SE6 4AF. Violence and Sexual offences – 74, Anti-social behaviour – 81. (streetcheck.uk)
Population:	Rushey Green, Lewisham area has a population of 16,650 residents, gender split is 50/50 male/female. 21% are aged 16yrs and under, 68% are of working age and 11% are over 65yrs (median age is 33yrs). Majority of local residents are single 55%. 83% of people in Rushey Green area claim to have good and very good health, which is above UK average. Education levels - 10.8% of workers in SE6 4AA are in elementary occupations, compared to a national average of 11.6. (2011 Census Table)
Culture:	Merkur Slots Catford area is ethnically very diverse. Only 43% of resident population identify themselves as White. There is a high concentration of residents who describe themselves as Black African or Caribbean (34%). Other sizeable ethnic groups include Mixed Ethnicity (8.4%) and Asian (12.4%). Dominating religion here is Christianity – 60% of resident population. A sizeable portion of the population (20.3%) claim to have no religion, 10.4% did not state their religious views, 6.5% is Muslim and 2% is Hindu. (streetcheck.uk)
Unemployment:	Current unemployment rate in Catford area at 4.8% which is slightly higher than 3.9% national average. Working population is younger and more active than the inner London and England averages. 50.6% of resident population is in work, 16% is retired and 13.5% are students. Main source of employment here are elementary occupations, mainly Health and social work (19%) and Accommodation and Food (15.5%). Employees predominantly work in supervisory, clerical, and junior managerial, administrative and professional roles. There is also high volume of semi-skilled, unskilled manual workers and lowest grade workers. (streetcheck.uk)
Deprivation:	In Index of Multiple Deprivation 2019, Rushey Green area has been ranked amongst 20% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation causing biggest concern are crime deprivation, barriers to housing and other services domain and living environment deprivation domain – all classified within 10% most deprived areas in the country. Education domain here is better than 48% of areas in England and Employment and Health domains are both better than in 32% of areas in UK. 26.9% of socially rented properties which is higher than the London average of 24.1%.
Local Police:	Merkur Slots Catford is situated within the Lewisham Town Centre policing neighbourhood within the Metropolitan Police Constabulary. Closest police station is: Catford Police Station, 333 Bromley Road, SE6 2RJ, the front counter at this station has closed and the nearest 24 hour station is Lewisham Police Station, 43 Lewisham High Street, SE13 5JZ. Catford Police Base is located at 4 Aitken Road, SE6 3BG.

**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 Statement of Principles for Gambling reference (2019-2022) Part B Considerations for Licensing Authority and Part C, section 10.2 Bingo Centres and London Ward Profiles Data

**Environmental Factors**

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

Licensing Objectives	Local Risks	Control Measures
<p><b>Protecting children and other vulnerable people from being harmed or exploited by gambling</b></p>	<p><b>Unemployment:</b> In the year ending December 2020, the crime rate in Lewisham was about the same as the average crime rate across similar areas at 90.6 per 1000, it was higher than in other Metropolitan police force areas. (police.uk). In July 2021 there were 327 crimes recorded within a half mile of SE6 4AF. Violence and Sexual offences – 74, Anti-social behaviour – 81. (streetcheck.uk)</p> <p><b>Deprivation:</b> In Index of Multiple Deprivation 2019, Rushey Green area has been ranked amongst 20% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation causing biggest concern are crime deprivation, barriers to housing and other services domain and living environment deprivation domain – all classified within 10% most deprived areas in the country. Education domain here is better than 48% of areas in England and Employment and Health domains are both better than in 32% of areas in UK. 26.9% of socially rented properties which is higher than the London average of 24.1%.</p> <p><b>Schools and Education</b> Rushey Green Nursery, 41 Rushey Green, SE6 4AS Rushey Green Primary School, Cuiverley Road, SE6 2LA Catford After School Club, 115 Rushey Green, SE6 4AA Holbeach Primary School, Nelgarde Road, SE6 4TP</p>	<p><b>Age Verification</b> <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Catford Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

<p>Catford County School, Engleheart Road, SE6 2HR          Little Elms Daycare Nursery Catford Green, Adenmore Road, SE6 4BS          Holy Cross Primary School, Culverley Road, SE6 2LD          Prendergast Ladywell School, Manwood Road, SE4 1SA          First Fruits Saturday School, 265 Brownhill Road, SE6 1AE          Monkey Puzzle Day Nursery Catford, 25 Bromley Road, SE6 2TS          Little Elms Daycare Nursery Catford Green, Adenmore Road, SE6 4BS          Catford College, 3 Rosenthal Road, SE6 2BY          Pavilion Nursery Catford Ltd, 1st floor, Catford Cricket &amp; Sports Club, Penerley Road, SE6 2LQ          St George's Preschool, Catford, 6 Elm Lane, SE6 4LB          Rathfern Primary School, Rathfern Road, SE6 4NL          The Family Learning School, 47 Rushey Green, SE6 4AS          Sandhurst Primary School, Minard Road, SE6 1NW</p> <p><b>Community Centres and Youth Centres</b>          The Point Catford, 401 Lewisham High Street, SE13 6NZ          Lewisham Irish Centre, 2A Davenport Road, SE6 2AZ          Lewisham Local, Unit C, Place/Ladywell, 261 Lewisham High St, SE13 6NJ          Hartley Hall, Catford, London SE6 2JS          St Mary's Centre Lewisham, 37 Ladywell Road, SE13 7UT          Abbotshall Healthy Lifestyle Centre, Abbotshall Road, SE6 1SQ          Lewisham Seventh-Day Adventist Church &amp; Community Hall, 434 Lewisham High St, SE13 6LJ          Rural Urban Synthesis Society (RUSS), 12 Church Grove, SE13 7UU</p> <p><b>Parks, play grounds and sports/leisure facilities</b>          Mountsfield Park, The Lodge, Stainton Road, SE6 1AN          Mountsfield Park Playground, Mountsfield Park, Stainton Road, SE6 1AN          Lewisham Park, 18 Lewisham Park, SE13 6QZ          Ladywell Fields, 126 Ewhurst Road, SE4 1SD          Ladywell Fields Adventure Playground, End of road, Malyons Rd, SE13 7XE          Blythe Hill Fields, 42 Blythe Hill Lane, SE6 4XJ          Riverview Walk &amp; River Pool Linear Park, London SE6 4PQ</p> <p><b>Vulnerable and addiction support services</b>          Lewisham Community Team For Adults With Learning Disabilities, 19-21 Brownhill Rd, SE6 2HG          Quo Vadis Trust, 92 Brownhill Rd, SE6 2EW          Foundation 66, 92 Bromley Rd, SE6 2UR          Africa Advocacy Foundation, 76 Elmer Rd, SE6 2ER          Lewisham Nexus Service, 84-86 Rushey Green, SE6 4HW</p>	<p>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.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to more children being problem more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified'</p> <p><a href="https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019">https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</a></p> <p><b>Vulnerability</b>          Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p>
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<p><b>Homeless shelters and food banks</b>          Catford Fridge Station Community Fridge,          Lewisham Irish Community Centre, SE6 2BY          Phoenix Community Housing, Goose on the Green,          167 Rushey Green, SE6 2RP          Lewisham Housing Options, Laurence House, 1 Catford Road, SE6 4RU          UCKG HelpCentre Catford, 1 Bromley Road, SE6 2TS          Salvation Army, 23-25 Brownhill Road, SE6 2HE          Apax Support, 36-38 Bromley Road, SE6 2TP          St Mungo's Hostel, 1 Arlington Cl, Ennersdale Rd, Hither Green, SE13 6JQ          Salvation Army Older People Service, 12-14 Lewisham Park, SE13 7PN</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b>          University Hospital Lewisham, Lewisham High St, SE13 6LH          Kaleidoscope, 32 Rushey Green, SE6 4JD          Isis-Family Health, 183-185 Rushey Green, SE6 4BD          Novum Health Partnership, The Primary Care Centre,          Hawstead Road, SE6 4JH          Hawstead Road Contraception &amp; Sexual Health Clinic, 1st Floor,          The Primary Care Centre, Hawstead Rd, SE6 4JH          The Rushey Green Group Practice, The Primary Care Centre, SE6 4JH          Parkview Surgery Health Care Centre, 186 Brownhill Road, SE6 1AT          Woolstone Medical Centre, Woolstone Rd, Forest Hill, SE23 2SG          Woodlands Health Centre, 4 Edwin Hall Pl, Hither Green Lane, SE13 6RN          Hilly Fields Medical Centre, 172 Adelaide Ave, SE4 1JN          Natures Green Medical Centre, 298 Lewisham High Street, SE13 6JZ          Fieldside Care Home, 9 Canadian Avenue, SE6 3AU          Ringstead House, 62 Ringstead Road, SE6 2BS          M Power Care Home, 22 Bromley Road, SE6 2TP          Welcome Care Home, The Welcome Home, 28 Fordel Road, SE6 1XP          Oakcroft, 41-43 Culverley Road, SE6 2LD          Alexander Care Home, 21 Rushey Mead, Ladywell, SE4 1JJ          Lewisham Park Care Home, 40 Lewisham Park, SE13 6OZ          Brownhill Care Ltd, 307 Brownhill Road, SE6 1AL          Pernerley Lodge, 34-40 Pernerley Road, SE6 2LQ          St Jude's House, 14 Canadian Avenue, SE6 3AS          Beechcroft Care Home - Akari Care, 329 Brownhill Road, SE6 1AL          Ashleigh House, 133 Bromley Road, SE6 2NZ          Penberth House, 29 Penberth Road, SE6 1ET          Nomase Home Care Agency - Home Care in London, IVY House,          Bradgate Road, SE6 4TT          Bargery Road Care Home, 104 Bargery Road, SE6 2LW</p>	<p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p><b>Customer Interaction</b>          Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>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.</p> <p><b>Player Protection</b>  <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i>  <i>Failure to provide information to customers on responsible gambling</i>  <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p>
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<p><b>Gambling premises</b></p> <p>Admiral Casino, Catford, 116-118 Rushey Green, SE6 4HW  Betfred, 197 Rushey Green, SE6 4BD  Betfred, 3 Catford Broadway, SE6 4SP  William Hill, 8, 8A Randlesdown Road, SE6 3BT  William Hill, 168 Hither Green Lane, SE13 6QA  Ladbroke, 25 Catford Broadway, SE6 4SN  Coral, 78 Rushey Green, SE6 4HW  Admiral Casino, 96 Lewisham High Street, SE13 5JH  Cashino Gaming, 97 Lewisham High Street, SE13 6AT</p> <p><b>Pawnbrokers and Loan Shops</b></p> <p>H&amp;T Pawnbrokers, 58 Rushey Green, SE6 4JD  Cash Busters, 23 Rushey Green, SE6 4AS  Cash Converters, 292-294 Lewisham High St, SE13 6JZ  Crownsavers Credit Union, 20 Catford Broadway, SE6 4SN</p> <p><b>Bus stops and other Transport links</b></p> <p>Catford Bridge Railway Station, Catford, London, SE6 4RE  Hither Green Railway Station, Hither Green, London, SE13 5NF  Ladywell Train Station, Railway Terrace, SE13 7XB  The Catford Centre (Stop A), Catford, London SE6 4JZ  Brownhill Road The Catford Centre (Stop E), Catford, London SE6 2HG  The Catford Broadway (Stop H), Catford, London SE6 4HH</p> <p><b>Locally Identified Premises</b></p> <p>The Broadway Theatre, Catford Road, SE6 4RU  Corbett Community Library, Torridon Road, SE6 1RQ  Qstix Snooker and Pool Club, 98-102 Rushey Green, SE6 4HW</p> <p><b>Public Houses and Alcohol Licensed Premise</b></p> <p>A2 Lounge Restaurant &amp; Wine Bar, 77A Rushey Green, SE6 4AF  The London &amp; Rye, 109 Rushey Green, SE6 4AF  The Jolly Farmers, 354 Lewisham High St, SE13 6LE  Fox &amp; Firkin, 316 Lewisham High St, SE13 6JZ  Drink At Bob's, 214 Hither Green Ln, SE13 6RT  Ninth Life, 167 Rushey Green, SE6 4BD  Nuvo Lounge, 177-181 Rushey Green, SE6 4BD  Black Cat, 9 Winslade Way, SE6 4JU  Catford Bridge Tavern, Station Approach, Bridge, SE6 4RE  Blythe Hill Tavern, 319 Stanstead Rd, SE23 1JB  Ladywell Tavern, 80 Ladywell Rd, SE13 7HS  Hither Green &amp; District Railwaymens Social Club, Manor Lodge,</p>	<p>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.</p> <p>'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.</p> <p>Playright App available for customers to self-manage their play and spend and can send alerts to Merkur Slots Catford if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>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.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls where received from people within the on-line sector.</p> <p><b>Deprivation</b></p> <p>Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p>
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<p>19 Beacon Road, Lewisham, SE13 6EQ Park Fever, 21a Staplehurst Road, Hither Green, SE13 5ND Fellowship &amp; Star, Randlesdown Road, Bellingham, SE6 3BT Riva Lounge &amp; Restaurant, 3-7 Bromley Road, Catford, SE6 2TS</p>	<p><b>Homelessness</b> 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.  A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p>	<p><b>Homelessness</b> 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.  A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p>
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p><b>Crime statistics:</b> Merkur Slots Catford is situated within the Rushey Green policing neighbourhood within the Metropolitan Police Constabulary. 2346 incidents of crime reported between Jan to Dec 2020 - anti-social behaviour accounted for 30.2% of reported incidents. During December 2020, 170 crimes were recorded within ½ mile of the location, violence and sexual offences – 48 (28.2%), anti-social behaviour - 42 (24.7%), burglary 12 (7.1%), public order – 12 (7.1%), other theft – 12 (7.1%). (Police.UK/Lewisham Town Centre). Crime rate for Rushey Green which is included in Lewisham Town Centre is high at 49 per 1,000 residents compared to the Borough at 7 per 1,000 residents. (Met.Police.uk).</p> <p><b>Local Police:</b> Merkur Slots Catford is situated within the Lewisham Town Centre policing neighbourhood within the Metropolitan Police Constabulary. Closest police station is: Catford Police Station, 333 Bromley Road, SE6 2RJ, the front counter at this station has closed and the nearest 24 hour station is Lewisham Police Station, 43 Lewisham High Street, SE13 5JZ. Catford Police Base is located at 4 Aitken Road, SE6 3BG.</p> <p>Crime Enforcement Regulation (CER) Service, are located at 9 Holbeach Road, Catford, SE6 4TW The CER Service is responsible for delivery of trading standards, licensing, community safety, anti-social behaviour and public nuisance functions within Lewisham. The CER Service is responsible for responding to complaints and meeting statutory requirements and responsibilities across these thematic areas. The CER Service is also responsible for:</p> <ul style="list-style-type: none"> <li>Reducing serious violence amongst those under 25 year old with particular focus on knife enabled crime, child sexual exploitation and domestic abuse.</li> </ul>	<p><b>Premise Security and violence in the workplace</b> <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 Catford 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 Catford 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><b>General Crime and Disorder</b> <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 Rushey Green 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 Metropolitan Police over reducing our involvement in any incident.</p>

<ul style="list-style-type: none"> <li>• Tackling all strands of violence against women and girls with particular focus on domestic abuse and sexual abuse.</li> <li>• Preventing hate crime occurring in Lewisham whilst increasing reporting of hate crime and public confidence.</li> <li>• Preventing vulnerable people from becoming radicalised.</li> <li>• Delivery of the National Extremism Strategy at a local level.</li> <li>• Focusing on work in relation to identified geographical hotspots, premises and people of interest. This includes business crime and community safety related issues that impact on local residents. This links with work under the strands of organised crime, including drugs as a driver for violence, firearms, human trafficking, child sexual exploitation, economic crime and cybercrime.</li> </ul> <p><b>Public Houses and Alcohol Licensed Premise</b>  A2 Lounge Restaurant &amp; Wine Bar, 77A Rushey Green, SE6 4AF  The London &amp; Rye, 109 Rushey Green, SE6 4AF  The Jolly Farmers, 354 Lewisham High St, SE13 6LE  Fox &amp; Firkin, 316 Lewisham High St, SE13 6JZ  Drink At Bob's, 214 Hither Green Ln, SE13 6RT  Ninth Life, 167 Rushey Green, SE6 4BD  Nuvo Lounge, 177-181 Rushey Green, SE6 4BD  Black Cat, 9 Winslade Way, SE6 4JU  Catford Bridge Tavern, Station Approach, Bridge, SE6 4RE  Blythe Hill Tavern, 319 Stanstead Rd, SE23 1JB  Ladywell Tavern, 80 Ladywell Rd, SE13 7HS  Hither Green &amp; District Railwaysmens Social Club, Manor Lodge, 19 Beacon Road, Lewisham, SE13 6EQ  Park Fever, 21a Staplehurst Road, Hither Green, SE13 5ND  Fellowship &amp; Star, Randlesdown Road, Bellingham, SE6 3BT  Riva Lounge &amp; Restaurant, 3-7 Bromley Road, Catford, SE6 2TS</p> <p><b>Pawnbrokers and Loan Shops</b>  H&amp;T Pawnbrokers, 58 Rushey Green, SE6 4JD  Cash Busters, 23 Rushey Green, SE6 4AS  Cash Converters, 292-294 Lewisham High St, SE13 6JZ  Crownsavers Credit Union, 20 Catford Broadway, SE6 4SN</p> <p><b>Gambling premises</b>  Admiral Casino, Catford, 116-118 Rushey Green, SE6 4HW  Betfred, 197 Rushey Green, SE6 4BD  Betfred, 3 Catford Broadway, SE6 4SP  William Hill, 8, 8A Randlesdown Road, SE6 3BT  William Hill, 168 Hither Green Lane, SE13 6QA</p>	<p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Catford will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p><b>Anti-social behaviour outside the premise</b>  Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p>
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Ladbroke, 25 Catford Broadway, SE6 4SN  
Coral, 78 Rushey Green, SE6 4HW  
Admiral Casino, 96 Lewisham High Street, SE13 5JH  
Cashino Gaming, 97 Lewisham High Street, SE13 6AT

**Residential Areas (impacted by Anti Social Behaviour)**

According to Police.uk, anti-social behaviour was the most commonly reported crime type in this area in the last 12 months (708 incidents). In December 2020, there were 42 anti-social behaviour incidents reported within half a mile of Merkur Slots Catford postcode. 3 of those incidents took place on Rushey Green.

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 policies with clear escalation and reporting processes.

There are 4 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 Catford 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.

	<p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p><b>Money Lending</b> Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>	<p><b>Bingo/Gaming Machine and Supervision</b> 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).</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 venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p><b>Customer Complaints</b> <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p>

		<p><b>Marketing</b></p> <p>Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
<p>Other</p>	<p><b>Places of worship and Religious Buildings</b></p> <p>Elim Pentecostal Church - Right Now Jesus Centre, 75A Rushey Green, SE6 4AF</p> <p>Eglise Evangelique Vie Nouvelle, 77-79 Rushey Green, SE6 4AF</p> <p>Holebeach Baptist Church, 3 Brookdale Road, SE6 4JP</p> <p>Rccg Great Beauty Tabernacle, 43 - 47 Rushey Green, SE6 4AS</p> <p>St Laurence Church, 37 Bromley Rd, SE6 2TS</p> <p>Potters House Christian Church Lewisham, St Laurence Centre, 37 Bromley Road, SE6 2TS</p> <p>Lewisham Unitarian Meeting House, 41 Bromley Road, SE6 2TS</p> <p>King's Church London - Catford, Catford Hill, SE6 4PS</p> <p>The Redeemed Christian Church of God, Freedom House, Top floor, 2 Barmeston Road, SE6 3BH</p> <p>Holy Cross RC Church, 208 Sangley Road, SE6</p> <p>Catford Assemblies of God Pentecostal Church, 1 Glenfarg Road, SE6 1XN</p> <p>Hither Green Methodist Church, Catford, SE6 1RQ</p> <p>Brownhill Road Baptist Church, 292 Brownhill Road, SE6 1AU</p> <p>Living Waters Apostolic Church, 265 Brownhill Road, SE6 1AE</p> <p>Hither Green Baptist Church, Theodore Road, SE13 6HT</p> <p>Catford Community Church, Calabash Centre, 24-26 George Ln, SE13 6HH</p>	<p><b>Ethnicity and Local Area Demographic</b></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><b>Training &amp; Social Responsibility</b></p> <p>Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>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>

All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.

Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.

Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Managers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.

**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.

**Merkur Slots Catford Premise Layout**

<p><b>Premise level:</b></p>	<p>Merkur Slots is a ground floor premises.</p>
<p><b>Premise frontage:</b></p>	<p>Merkur Slots Catford will be a property 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).</p>
<p><b>Counter Position:</b></p>	<p>Merkur Slots Catford 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"> <li>- 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.</li> <li>- Beverage and snacks are provided from the service area</li> <li>- 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</li> <li>- The CCTV monitor on the central desk allows staff to view the exterior at all times.</li> </ul>
<p><b>Floor layout:</b></p>	<p>Merkur Slots Catford 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.</p>
<p><b>Machine Positions:</b></p>	<p>Merkur Slots Catford 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>
<p><b>Hidden Areas:</b></p>	<p>Merkur Slots Catford 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.</p>

**Additional Comments**

Merkur Casino is accredited by the G4 Global Gambling Guidance Group for Responsible Gambling.

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. (Gill Clulow – Senior Auditor).

I am an IIA Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries. The last 9 years I have been working solely in the Gambling Industry (Amanda Kiernan, Head of Compliance).

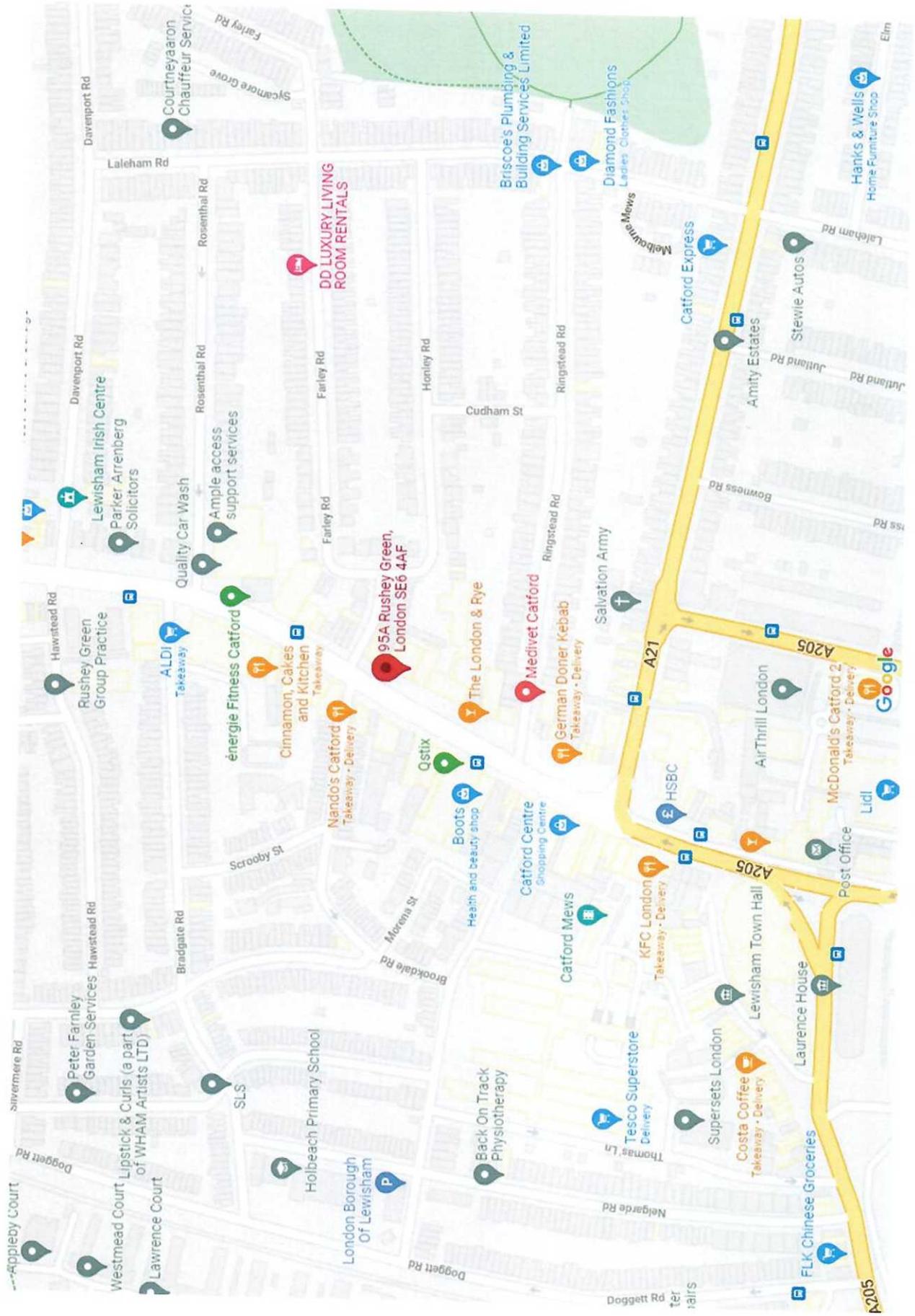
This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Merkur Slots is a national operator and employs several standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance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

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

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<b>Assessors Name:</b>	Gill Clulow
<b>Signature:</b>	
<b>Date:</b>	03.09.2021

# Merkur Slots, 95 Rushey Green, Road, Catford, SE6 4AF



**Merkur Slots, 95 Rushey Green, Road, Catford. SE6 4AF**



**LONDON BOROUGH OF LEWISHAM**

**APPLICATION FOR BINGO PREMISES LICENCE**

**95 RUSHEY GREEN, LONDON SE6 4AF**

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**SKELETON ARGUMENT ON BEHALF OF APPLICANT**

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**INTRODUCTION**

1. This is an application by Merkur Slots UK Limited (“the applicant”) for a new bingo premises licence.
2. The purpose of this skeleton argument is to help the Sub-Committee navigate the material by setting out some of the background to the application, explaining the legal context under the Gambling Act 2005, and making brief submissions dealing with the representations.
3. In considering the application, the Committee may be particularly assisted by looking at the following documents:
  - Witness statements:
    - Amanda Kiernan, Head of Compliance (pages 4-12)
    - Steve Ambrose, Operations Director (pages 13-15)
    - Andy Tipple, Head of Product (pages 16)
    - Stuart Jenkins, Licensing Consultant, Leveche, (pages 17-63)
    - Nicholas Mason, Licensing Consultant, Leveche, (pages 64-105)
  - Legal obligations to promote licensing objectives:

- Gambling Commission’s Licence Conditions and Codes of Practice applicable to non-remote bingo licences (pages 374-427)
  - Mandatory and default conditions attaching to bingo premises licences (pages 447-449)
  - Proposed licence conditions (page 3)
- Operational standards (pages 221)

### **SUMMARY**

4. The applicant is a national provider of bingo and adult gaming centres which operates to the highest standards of social responsibility and compliance.
5. It has over 220 premises. It has been granted licences at every site at which it has applied and has never suffered a regulatory intervention or review. Its sites are across a range of areas, geographically and socially. It currently trades, without regulatory concern, in Lewisham at 40 Deptford High Street and 97-99 Lewisham High Street.
6. The applicant has prepared a detailed local area risk assessment. It has also had the opportunity to meet with the police to discuss the proposed application, prior to submission of the application.
7. As a result, the applicant proposed a list of 8 individual licence conditions.
8. In the light of the conditions proposed, the Metropolitan Police are satisfied that the application is consistent with the licensing objectives and made no representation. As the Sub-Committee will be aware, the Police are its main sources of advice on crime and disorder and community protection locally, including harm from low level street disorder, and have particular knowledge in this case because they are familiar with the applicant’s existing premises.
9. The Police view is consistent with the applicant’s widespread experience, independently confirmed by Mr. Jenkins and Mr. Mason, who have covertly observed many Merkur premises.

10. There is no representation from the child protection authority or any agency or organisation concerned with the protection of vulnerable people, or the licensing or environmental health authority.

### **BACKGROUND**

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

- In addition, the applicant has offered individual licence conditions as mentioned above.

*The nature of high street bingo premises*

14. Gambling on the high street in Great Britain is dominated by betting offices, both numerically and in terms of environmental impact. As to numbers, betting offices outnumber bingo premises 12:1 (7,683 v 648<sup>1</sup>). As to impact, betting offices can bring with them social issues. Hence, when an application is made for a bingo premises licence, it is sometimes thought that it will bring with it the same kind of issues as arise at high street betting offices.
15. In fact, high street bingo premises in general and the applicant's in particular are completely different from betting offices in terms of local impact.
16. It is therefore important to try to convey why the applicant's premises trade without regulatory concern.
17. *On arrival.* It is noticeable that groups do not loiter or gather outside high street bingo premises smoking, drinking, littering and importuning passers-by. The absence of such activity is not only observable but is explained by several facts:
  - The customer demographic is different from betting offices. It is older and 50% female with customers coming in alone or with partners rather than in groups.
  - There are no "events" in bingo premises such as football matches or horse races and therefore no reason to hang around, and nowhere to cluster or socialise.
  - There are no general seating areas for people to gather inside. The premises are not fitted out for groups.
  - Alcohol is not only not sold but strictly prohibited.
  - Those under the influence of drugs or alcohol are not admitted.

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<sup>1</sup> Gambling Commission industry statistics.

- Unlike in betting offices, staff are not behind the counter taking or paying out bets. They are on the shop floor, greeting customers as they enter, which also means controlling who is permitted to enter and effectively supervising the premises.
  - Good quality CCTV systems are fitted to the exterior of the premises and are monitored. Those outside know they are under surveillance. If loitering occurs, it is dealt with.
18. The effect on the streetscape is important. Those passing high street bingo premises do not have to walk past groups of people standing or misbehaving in the street, whether during the school run, the evening or otherwise. Consistent and authoritative evidence on this topic is given by company witnesses and also by Mr Jenkins and Mr Mason.
19. *Exterior appearance.* The facades of high street bingo premises are smart, well-maintained and spotlessly clean. It is not possible to see gambling taking place inside, unlike (for example) betting offices, or pubs which admit children. There is no advertising on the exterior which might be attractive to children: this is strictly controlled by the Advertising Standard Authority's Codes of Practice which are translated into legally enforceable regulation by the Gambling Commission's Licence Conditions and Codes of Practice. The exterior contains signage explaining that Think 25 is operated, that alcohol is not permitted and that CCTV is in operation, alongside responsible gambling messaging.
20. *Upon entry.* Those entering will be greeted face to face by a uniformed member of staff. This is an opportunity to observe whether the customer appears to be under 25 (in which case Think 25 is operated), or whether there may be any other issue such as inebriation, in which case the customer will politely be asked to leave. The staff member will check whether the customer needs any other form of assistance. This interaction means that staff are aware of who is using their premises. Again, this is unlike betting offices where staff are behind a counter taking and paying out bets.
21. *Appearance.* The interiors are clean, well-lit, comfortable and carpeted. Toilet facilities are provided. Responsible gambling messaging is prominently displayed throughout the premises and on the machines. Customer information leaflets are also prominently displayed, explaining where and how to obtain help with problem gambling.

22. *Participation.* Customers have an opportunity to play bingo on tablets, which includes being linked to a national game, and to play machines, the limits for which are set by law. During their stay they will be offered tea/coffee and snacks, and will often chat with the friendly staff. When they are finished playing they wander off with zero impact on the locality.

23. *Protection of vulnerable people from being harmed or exploited by gambling.* So far as vulnerable persons are concerned:

- Alcohol is not permitted in the applicant’s bingo premises.
- Those who are intoxicated through alcohol or drugs are not permitted on the premises.
- As required by the Gambling Commission’s Licence Conditions and Codes of Practice, the applicant’s systems include processes for customer interaction and self-exclusion, operated by trained staff. Interventions are recorded electronically so that they can be overseen by independent compliance auditors.
- Customers are encouraged to use a self-help, app-based tool named Play Right to assist them with managing their gambling behaviour.
- “Stay in Control” posters and leaflets with the GamCare helpline number are located prominently in the premises, including the WC.
- All machines display responsible gambling messages with helpline contact details.

24. *Protection of children from being harmed or exploited by gambling.* As regards this objective:

- Although children are entitled to enter bingo premises as a matter of law, children are not allowed in the applicant’s premises.
- The exterior contains no advertising or marketing which might be attractive to children.

- Gambling cannot be seen from the outside unlike, say, in betting offices and sometimes pubs.
- The exterior (and the interior) contains prominent messaging stating that Think 25 is applied.
- Those entering are greeted by staff members, so that their appearance is checked immediately.
- Staff are required to log all Think 25 events electronically, with premises data checked by the applicant's audit department to ensure that the system is being properly operated.
- Third party age verification testing is conducted. In this case, the applicant has offered a condition of bi-annual testing with results supplied to the licensing authority upon request.

It is fair to report that the outward appearance, interior ambience, supervision, layout and product in bingo premises are not attractive to children, and the applicant's systems have proved more than effective to ensure that underage gambling is not an issue in its premises. It is also right to mention that, trading on busy high streets nationally, premises are almost always in close proximity to fast food outlets attractive to children, but this has not proved problematic.

25. *Security.* As stated above, the applicant does not suffer significant issues with crime and disorder. This is a function of the customer demographic, the ban on alcohol and the nature of the product, but is also because of the measures taken by the applicant to prevent it:

- Staffing levels are set following a security risk assessment. In this case, the applicant has offered a licence condition to that effect (condition 8).
- Customer numbers are low, with usually only a handful of customers in the premises. Double digit numbers occur very rarely. This means that miscreant behaviour is immediately identified, recorded and dealt with.

- The layout of the premises facilitates effective supervision. There is no space for groups to gather.
- Staff members are on the trading floor, not behind a counter.
- Good quality CCTV is used throughout (inside and out) and customers are aware they are monitored.
- The use of Staff Guard which enables staff to use a portable alarm to liaise with a central security hub and SIA-licensed staff with audio and visual feeds, and for hub staff to speak directly with customers who therefore know they are being overseen. Staff Guard personnel can liaise directly with local Police if necessary.
- Staff members do not carry floats.
- Safes are time-delayed.
- Anti-money laundering systems are used on the machines.
- The locational and social context is part of induction training for all staff.
- Staff are also trained in how to deal with difficult customers (there is a 6 week training course at the outset followed by regular refresher training).
- Any incidents are logged electronically and reviewed at national level.
- Premises are fitted with maglocks, enabling entry to be controlled when necessary.
- The applicant maintains good liaison with local Police.
- It will also join any available Betwatch scheme.

## **THE REGULATORY RECORD OF THE APPLICANT**

26. In the previous section, we have briefly described the standard controls used by the applicant to provide a safe, welcoming and pleasant environment for customers while also promoting the licensing objectives.

27. **That it does all of this to a standard of excellence is demonstrable:**

- **It has over 220 licences. It has been granted licences in every premises it has applied for.<sup>2</sup>**
- **None of its trading licence has ever been reviewed.<sup>3</sup>**

28. This is despite the range of areas in which the applicant operates, including those with high social deprivation and other social issues. Its systems, staff training, compliance monitoring and audit have proved sufficient to ensure that the licensing objectives are promoted.

29. It is a record of which the applicant is proud and guards with care. In the very rare event of any kind of issue, it will always liaise with relevant authorities to ensure that it is resolved promptly and effectively.

## **THE LAW**

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

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

*(a) in accordance with any relevant code of practice [issued by the Gambling Commission]*

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

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

*(b) in accordance with any relevant guidance issued by the Commission*

*(c) reasonably consistent with the licensing objectives (subject to (a) and (b))*

*(d) in accordance with the [authority's statement of licensing policy] (subject to (a) to (c)).*

31. The gambling licensing objectives are:

*(a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,*

*(b) ensuring that gambling is conducted in a fair and open way, and*

*(c) protecting children and other vulnerable persons from being harmed or exploited by gambling.*

32. The effect of the aim to permit in section 153 makes the Gambling Act 2005 different from the Licensing Act 2003. This is explained by the Gambling Commission in its Guidance to licensing authorities as follows:

*1.20 The Act places a legal duty on both the Commission and licensing authorities to aim to permit gambling, in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives. The effect of this duty is that both the Commission and licensing authorities must approach their functions in a way that seeks to regulate gambling by using their powers, for example, powers to attach conditions to licences, to moderate its impact on the licensing objectives rather than by starting out to prevent it altogether.*

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

*5.34 Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not*

*relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).*

34. Rather, as the paragraph makes clear, there would need to be reasons which demonstrate that the licensing objectives would not be met. That means demonstrate by evidence.

35. The following points should be noted:

- a. The section 153 test is mandatory: *“a licensing authority shall ....”*
- b. The obligation to *“aim to permit”* where (a) – (d) are satisfied is described by the Gambling Commission in its Guidance as *“the licensing authority's primary obligation.”*
- c. The *“aim to permit”* is explained in the leading textbook Patersons:

*“... it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb ‘to aim’ is defined by the OED as meaning ‘To calculate one’s course with a view to arrive (at a point); to direct one’s course, to make it one’s object to attain. Hence to have it as an object, to endeavour earnestly....’ A person who ‘aims’ to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling.”*

As the Gambling Commission Guidance says:

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

- d. In the hierarchy of considerations in section 153, the licensing objectives come third and the policy comes fourth, expressly subject to the considerations in (a),

(b) and (c). As the Guidance states (para 5.21): *“In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this guidance, and its own policy statement or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission’s codes and this guidance take precedence.”*

- e. Conditions should only be added where it is necessary to do so, and even then such conditions need to be proportionate to the circumstances requiring a response, relevant, directly related, fair and reasonable.
- f. The following considerations are legally irrelevant to the determination of an application for a premises licence:
  - i. Planning considerations. Planning and licensing are separate systems. However, an applicant which cannot obtain planning permission cannot open.
  - ii. Nuisance (see Guidance by Gambling Commission).
  - iii. A dislike of gambling.
  - iv. A general notion that it is undesirable to allow gambling premises in an area.
  - v. Moral or ethical objections to gambling.
  - vi. The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.

36. It is therefore necessary to consider whether there is evidence which demonstrates that the licensing objectives would not be met by granting a licence. This is not the same as demonstrating that an area does, or does not, have social or economic challenges. It is a question of asking whether the evidence demonstrates that this operator, with the operating model and conditions proposed, would harm the licensing objectives in a way which cannot be mitigated by conditions.

37. It is necessary to bear the above in mind when considering the representations which have been submitted by members of the public.

### **REPRESENTATIONS**

38. *Children.* It is said that the premises will trade next to premises selling desserts. As a high street operator, the applicant always trades on streets used by children and young people, or near to or even next to premises which children and young people go into such as fast food premises, confectioners and clothes shops. For the reasons stated above, this creates no issues. There is no evidence that children and young people are gaining admission to the applicant's premises and no representation by the child protection authority.

39. *Vulnerable people.* It is said that Rushey Green is a high deprivation ward. So far as vulnerable persons are concerned, the Council's policy expects a rigorous approach to their protection. The applicant's approach to protection, enforced through training, supervision and audit, is internationally accredited and has operated without criticism, either in Lewisham or in the 220 places where the applicant operates.

40. It is right to say that Lewisham's gambling policy does not presume against licensing in any particular location. It does, however, wish to see proper appraisals of risk and responsible measures introduced as a result of such appraisal. The applicant, following risk assessment, has proposed a thorough set of conditions to promote the licensing objectives. In response, no responsible authority has objected.

41. *Product.* One objector is concerned that there will be gaming machines. The nature of the premises has been fully described and is understood by the licensing authority and Gambling Commission, from whom there have been no objections. The controls on the premises, as contained in the mandatory and default conditions, the licence conditions and codes of practice, the regulations governing the gambling products and the individual licence conditions, are all relative to the product provided.

42. *Crime and disorder.* Representations raise a fear of crime and disorder. This is dealt with above. In short, the applicant does not contribute to crime and disorder, and the Police have not objected.

43. *Need / character of area.* It is said that there is no need for these premises and better uses could be devised for the area. Neither of these are relevant to licensing, as the Sub-Committee will be advised.

### **CONCLUSION**

44. In conclusion:

- The applicant is a highly competent organisation, regulated by the Gambling Commission, and one whose corporate systems, staff training, management and audit are directed towards promotion of the licensing objectives.
- It is part of a group which operates 220 licensed gambling premises in a wide variety of locations of higher and lower crime, deprivation and population density.
- Despite that, it has never experienced a regulatory complaint, review of a trading venue or prosecution.
- There is no evidence before the Council that it has failed to promote the licensing objectives elsewhere, including in Lewisham.
- The type of premises, their layout, their customer demographic, the low numbers of customers simultaneously using premises and the quality of management mean that issues of crime and disorder are rare.
- The premises, if licensed, will be subject to strict regulatory requirements, deriving from: the Licence Conditions and Codes of Practice; machine stake, prize and numbers limits, and mandatory and default premises licence conditions.
- Following a risk assessment, the applicant has offered a set of individual licence conditions which are designed to protect the licensing objectives at this site in this location.
- As a result, there are no representations from responsible authorities.

- The applicant has a strong track record of co-operation with local statutory bodies. In the unlikely event of an untoward consequence, it will work to resolve the issue promptly and efficiently.

45. For these reasons, it is submitted that the test in section 153 is fully met. Conversely, taking into account the competence and track record of the applicant (nationally and locally), its legal obligations under the Act, Regulations and codes, and the comprehensive suite of individual licence conditions to which it is proposing to submit, it has not been demonstrated that the licensing objectives are unlikely to be met.

46. Accordingly, the Council is respectfully invited to grant the application as asked.

**PHILIP KOLVIN QC**  
**13<sup>th</sup> June 2022**

**11 KBW**  
**Temple EC4**

**MERKUR SLOTS, 95 RUSHEY GREEN, LONDON, SE6 4AF**

**LICENSING SUB-COMMITTEE HEARING**

**21 JUNE 2022**

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**Merkur Slots, 95 Rushey Green, Catford**  
**Proposed Licence Conditions**

1. The premises shall install and maintain a comprehensive CCTV system, which shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days. Viewing of recordings shall be made available upon the request of Police or an authorised officer of the Licensing Authority, subject to data protection legislative requirements.
2. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
3. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:
  - a. all crimes reported to the venue
  - b. all ejections of patrons
  - c. any complaints received concerning crime and disorder
  - d. any incidents of disorder
  - e. all seizures of drugs or offensive weapons
  - f. any visit by a relevant authority or emergency service.
  - g. any attempts by children and young persons to gain access to the premises to gamble
  - h. any Challenge 25 Refusals.
4. A think 25 proof of age scheme shall be operated at the premises where any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
5. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
6. The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice
7. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.
8. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by staff members.

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## LICENSING SUB - COMMITTEE HEARING – 21 JUNE 2022

### SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

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1. I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries, including High Street Retail and Optical Health. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe (the parent company of Merkur Slots UK Limited), responsible for all internal and external audit policies and procedures. During 2018 a merge of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the Merkur organisation.
2. Merkur operates a national estate of over 220 licensed bingo, adult gaming centre and family entertainment centre premises.
3. Merkur is a leading national operator of bingo premises with clear and proactive policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with Responsible Authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
4. Merkur has full authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which Merkur has put in place to ensure that it implements effective player protection, anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Licence Conditions and Codes of Practice.
5. Merkur Slots UK Limited, has never had a review of a trading premises licence, which evidences the high standard of operation applied across the Company's licensed estate. Two premises licences were subject to review applications last year in Enfield, but both applications were rejected by the Authority without a hearing, as the substance of both applications was based on objections to gambling in principle rather than identifying any concerns with the proposed operation at the premises.
6. Merkur holds key positions within the Bingo Association and BACTA (the trade association for the amusement and gaming machine industry in the UK) Executive and Social Responsibility Committees, working closely with these groups to innovate and promote Compliance and Social Responsibility within the industry.
7. Merkur has over 50 Personal Management Licence Holders throughout its operational structure, all of whom are aware of their roles and responsibilities in regard to the Licence Conditions and Codes of Practice (LCCP). Legal obligations are placed upon personal licence holders to promote the Licensing Objectives whilst undertaking their respective duties.
8. Merkur has appointed a dedicated team of compliance auditors that work independently of its Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. The Company conducts a minimum of two compliance audits per year in each venue. Audits include Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification records. During the audits, premises staff are tested on their level of knowledge and understanding of all relevant criteria. Venues may be re-visited and any additional training needs addressed. Records of incidents, interactions, self-exclusion breaches and age

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

9. Merkur operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the Gambling Commission's Licence Conditions and Codes of Practice and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice and sample window displays can be seen in the supporting documents.
10. Venue window displays are designed in consideration of premises' location, particularly in busy high street areas where Children and Young Persons may pass by, and maintain the Company's focus that all gambling should be carried out in a socially responsible manner. Direct line of sight into premises is blocked by appropriate window displays and barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.

### **Relationship with the Responsible Authorities and Interested Parties**

11. Merkur takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
12. For the purposes of the original bingo premises licence application, the local Police Licensing Team were initially approached on the 7<sup>th</sup> July 2021.
13. The local Police licensing Team advised that they did not have any concerns with gambling premise specifically and did not have any concerns with the hours proposed for the premises.
14. The local Police Licensing Team explained that the area surrounding Rushey Green was subject to anti-social behaviour, street drinking and begging and they would welcome a set of conditions to show how the proposed premise would alleviate these. Subsequently, a bespoke set of conditions was offered within the application, for which the local Police Licensing Team confirmed they were happy with on the 1<sup>st</sup> September 2021.
15. All other responsible authorities, including the Licensing Authority, Child Protection team and Gambling Commission did not raise any concerns regarding Merkur's bingo premises licence proposals and did not object to the application.
16. It is rare for our venues that operate throughout the night to attract customers leaving alcohol licensed venues as the entertainment offering is significantly different. Merkur Slots UK Limited's late night operation appeals to shift workers and employees of the late night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
17. All Merkur venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools are designed to ensure minimal conflict and successful implementation of our strict policies. In our experience, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate regardless of premises location.
18. Merkur's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are Continually promoted.

19. Merkur has considered local police crime statistics and the premises location along with the Council's Statement of Licensing Principles under the Gambling Act 2005. We understand that the local area may suffer with general crime and disorder and nuisance, albeit not specifically associated with gambling premises. It has been our consistent experience in the majority of circumstances that we do not experience the kind of difficulties sometimes experienced by betting offices in terms of crime and disorder and nuisance, due to our different clientele, product, layout and management. A position which is supported by the police comments. Nevertheless, lines of communication will be maintained with the local police and the Licensing Authority to ensure that local knowledge is continuously shared and that the premises adapt to any emerging risks or local concerns identified.
20. We have identified local providers of vulnerability support services within the local area risk assessment and we will endeavor to contact any relevant organisations and invite feedback on any local concerns that can be incorporated into premises training and evaluation. The Company is also committed to working with all Responsible Authorities to ensure that any emerging risks are identified, incorporated into the premises risk assessment and effectively addressed

### **Merkur Compliance – Protection of Children and Vulnerable**

21. Merkur was selected by the Gambling Commission as one of the first top 40 licensees to prepare an annual assurance statement due to its size and scale of operation. Annual Assurance Statements enable an annual comprehensive review of the business, completed at Board level, in consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.
22. In August 2020, Praesepe Limited, Merkur's parent Company, and Merkur's brand premises obtained G4 Global Gambling Guidance Group accreditation, which can be seen in the supporting documents. G4 is a group of international experts in the field of problem gambling and responsible gambling and accreditation is awarded to responsible operators. Audit reports identified that 'Customer care is of an exemplary standard in all Merkur Venues, regulatory compliance policies and procedures are excellent...and provide a strong foundation for consistent approaches to Responsible Gambling across the (Company's) estate'.
23. In February 2022, Merkur were subject to the G4 follow up audit where it retained its accreditation status. The auditor commended the senior management training in regards to gambling harm and social responsibility (YGAM), noted that Merkurs Safer Gambling ethics shine through as priority and customer care is a strong focus of the business. The auditor further noted that staff loyalty, enthusiasm and knowledge were all of a high standard.
24. Merkur operates training upon recruitment and then 6-monthly refresher training programmes for all employees. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, Licence Conditions and Codes of Practice, the Licensing Objectives under the Gambling Act 2005 and 'Safeguarding Children & Vulnerable People', which focus on assisting staff to recognise and respond to indicative behaviours of potential problem gambling and vulnerability and how to conduct effective customer interaction. Initial six-week, classroom based, induction training is completed for all new venue teams and includes customer interaction role play and exposure to operation and customers in live venues. Following site opening, new teams are provided regular follow up and support. The Company also incorporates accredited Social Responsibility and Interaction training for its premises management

- teams. Excerpts from the Company's training platform are provided in the supporting documents.
25. Merkur has two National Training Centres where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are rigorously trained to take appropriate action, such as where to offer gambling control support including managing time spent playing (time outs), controlling stake limits, providing information on gambling support agencies such as GambleAware, offering participation in the Bingo Association's national self-exclusion scheme and refusing service, where deemed necessary.
  26. Merkur ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction. As part of this process, customer play, duration and spend is monitored and customer interactions are triggered to ensure play remains responsible.
  27. Following a customer interaction, customers may be offered a variety of self-help measures, where appropriate, such as the Playright App to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst ensuring that the Company's policies and procedures are effectively implemented.
  28. Merkur has undergone Gambling Commission inspection and Company training and compliance policies and procedures comply with the Licence Conditions and Codes of Practice attached to the Company's Operating Licence.
  29. Examples of some of Merkur's responsible gambling information have been provided in the supporting documents.
  30. As part of Merkur's continuing commitment to high standards of staff training and compliance, the Company engaged the services of the charities YGAM (Young Gamers & Gamblers Education Trust) and Betknowmore to assist with the development and provision of additional Safer Gambling training and resources for venue and area managers. This training has been designed to complement our existing face to face training, is City and Guilds accredited and has been delivered to over 200 venue and area managers to date.
  31. In October 2020, Merkur launched its 360 Safer Gambling Program, which was developed in consultation with the Global Gambling Guidance Group (G4) and comprises an Advisory Board of Senior Executives and external specialists. The program cements the Company's commitment to safer gambling and includes the establishment of a Customer Experience Group, which provides customer feedback on the effectiveness of the Company's customer interaction, safer gambling tools, messaging and support services.
  32. Merkur promotes the use of the customer self-help tool called Playright. All venues have the capability for customers to sign up to the App and staff are fully trained and able to advise on its use. This responsible gambling tool enables customers to set time limits on their machine play. Subject to the customers' set permissions, the system has the ability to send an alert to the venue should the customer enter at a time they have chosen not to gamble. This alert would then trigger a customer interaction.
  33. All Merkur's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Age verification test purchasing and mystery shopper visits are frequently carried out by third party companies (Check Policy and Store Checker) and test results can be provided to the Licensing Authority upon request. Merkur prides itself on its high standard of venue compliance and its test purchase success rates nationally.

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

### **Site location**

35. The premises was previously a Barclays Bank.
36. An updated detailed local area risk assessment has been supplied in the supporting documentation, designed in consideration of London Borough of Lewisham's Gambling Statement of Licensing principles, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
37. Local analysis is an invaluable tool to direct local resources and assists with the identification of potential risks and the development of local training and partnership to ensure that potential risks are mitigated and that gaming in Merkur Slots premises remains responsible.
38. Merkur is an experienced operator with premises in many large cities and towns across the country, each with their own local profiles and risk. Merkur effectively and responsibly operates in these areas, some of which are subject to greater and lower levels of general crime and disorder and deprivation. The Company's responsible gambling safeguards, security measures and strictly controlled marketing practices are proven to be effective and management will always adapt to local circumstances.
39. As a result of the Company's commitment to responsible operation and the resources directed to responsible play, none of Merkur's operational premises licences have been subject to review proceedings or revocation.
40. Merkur Slots UK Limited operates two licensed gambling premises within the Council's jurisdiction at Merkur Slots, 40 Deptford High Street, and Cashino, 97-99 Lewisham High Street. No concerns have been raised by the authorities surrounding the operation of these premises.

### **Underage Gambling**

41. Merkur's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
42. By law, licensed bingo premises can permit under 18s on the premises and can also apply for a premises licence under the Licensing Act 2003. However, Merkur's premises are strictly adult only, operate Think 25 and will not obtain a licence under the Licensing Act 2003.
43. Unlike many other licensed operators, such as some licensed betting premises and adult gaming centres, the Merkur Slots venue will apply our strict marketing and advertising policy, ensuring that advertising is not appealing to underage individuals and that line of site into the venue is restricted. This will ensure that children and young persons cannot see into the premises, preventing exposure to ambient gambling with all gaming activities hidden from view.
44. Merkur Slots customer demographics are up to 50% female with an average age over 30.

45. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
46. To ensure the effectiveness of the Company's Think 25 policy, venues regularly undergo random test purchasing and details can be provided to local authorities upon request.
47. In our experience venues are not more susceptible to access by underage individuals due to the nature of our gaming services and customer demographics. This is consistently seen across our licensed estate and Merkur's products do not appeal to underage individuals.
48. The Company's partnership approach and high standard of staff training, customer monitoring and interaction has continued to ensure that all potential risks are mitigated and the occurrence of incidents remains minimal.

### **Crime and Vulnerability**

49. It is rare for our premises to be associated with anti-social behaviour or crime and disorder but our staff training procedures and security measures, including external CCTV, are designed to monitor customer behaviour and external areas for anti-social behaviour. Company policy ensures that appropriate steps are taken to minimise any risks and we record and report any incidents or concerns to Company management, for internal review and assessment, and local authorities.
50. Merkur is an experienced operator with a proven history of operating premises in some challenging areas and incidents relating to crime and disorder are rare.
51. All staff training is developed to consider local area characteristics and Merkur Slots operates on the basis that its controls and best practice are adopted at all times.
52. Local premises management will always work with local authorities under the Act, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.
53. It is rare for our venues that operate late at night to attract customers leaving alcohol licensed venues as the entertainment offering is significantly different. Merkur's late night operation appeals to shift workers and employees of the late night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
54. Merkur operate a business-wide Anti-Money Laundering (AML) policy, which is reviewed annually, and ensures that the risks of money laundering in these premises are low. The premise layout is designed to allow customer supervision at all times. All machines within the premises are linked to a central machine data capture system, which allows the venues to individually analyse live transactional activity for money laundering. All AML incidents, rare as they are, are reported by the venue staff via a tablet which also provides an automated email alert to myself, as the dedicated AML manager.
55. All Merkur Slots venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools are designed to ensure minimal conflict and successful implementation of our strict policies. In our experience, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate regardless of premises location.
56. As an Operating Licence holder, Merkur Slots UK Limited provides details of incident records and self-exclusion to the Gambling Commission as part of its Regulatory Returns

and compliance process. Whilst incidents across our licensed estate are rare, all records are regularly evaluated to ensure that premises operate safely and responsibly.

### **Local Concerns**

57. The representations received from the Interested Parties identify the potential for increased anti-social behavior and the increased risk to vulnerable people and children in the area should the Licensing Sub-Committee be minded to grant the current premises licence application.
58. Merkur has provided an updated, detailed local area risk assessment, reviewed local area statistics and demographics, consulted with the local police licensing team and reviewed the Council's detailed policies in order to effectively identify any potential risks to the proposed operation.
59. Merkur will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to individuals who may be under the influence of alcohol or drugs and work in partnership with the local police in the unlikely event that any incidents of crime or disorder occur.
60. Merkur Slots premises, from experience, are not attractive to young persons and sites rarely have issues with young person's attempting to gain access. All our premises are over 18s and operate a Challenge 25 policy.
61. Merkur Slots premises usually only have low numbers of customers within the premise at any one time, with members of staff continually walking around. This safeguards the premises that in the rare event a young person will attempt to enter the premises, they would be intercepted and challenged for their ID at the earliest opportunity.
62. The Company's detailed training procedures and evaluation tools have been designed to mitigate any local risk to the Licensing Objectives, with a particular focus on the protection of children and the vulnerable from harms associated with gambling. As part of Merkur's Socially Responsible Gambling Policy, customers are continually monitored and interactions completed where concerns are identified. As part of the interaction process, customer play is assessed to trigger customer affordability and source of funds enquiries to ensure that all gaming remains controlled. I have described the Company's approach above, and it will of course be implemented in these premises.
63. Should the Committee members be minded to grant the new licence application subject to the bespoke licence conditions, we believe all potential operational risks will be effectively mitigated.
64. Merkur understands that local risk assessment and staff training is a live matter, which is regularly assessed and adapts to any emerging or changing risks in the locations in which it operates. Merkur Catford will be no exception.
65. Due to the nature of the gaming that is provided at Merkur venues, it is rare for customers to congregate outside, unlike betting premises, as there is no ongoing entertainment such as a sporting event. It is also rare for our venues to have significant customer numbers at any one time with total customer numbers almost always in single figures. Customers leaving our premises rarely cause concern to our local neighbours.
66. Merkur is committed to partnership working and will always engage with local Betwatch, Pubwatch, or other similar schemes to share best practice and local knowledge of venue operation or identified risks, whether or not they strictly relate to gambling premises.

## **Premises Operation**

67. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the Licensing Objectives and a copy of our Policies and Procedures has been provided as part of our hearing bundle.
68. The Merkur Slots premises layout has been developed to facilitate customer observation and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate continuous observation and customer interaction.
69. Merkur Slots staff members are not restricted to counter positions that may be found in other licensed venues, such as betting premises. Our staff are actively encouraged to move throughout the premises and proactively engage with all customers, particularly on entry, not only to implement our Think 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.
70. All Merkur's staff members actively monitor and manage the area immediately outside their premises and record all incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.
71. All Merkur premises operate extensive CCTV throughout customer facing areas and also external areas to assist with monitoring customer behaviour and that of other individuals in the immediate vicinity of the premises. CCTV displays are appropriately situated to ensure that all customer areas are monitored.
72. Staff numbers and premises operation are regularly risk assessed, incorporating monitoring of premises operation, internal compliance audit completed by our field based compliance team, evaluation of customer numbers and feedback from Responsible Authorities and Interested Parties. These effective measures ensure that premises are able to quickly adapt to any emerging risk or local concern.
73. It is very rare for our premises to employ dedicated SIA registered door staff as, in our experience, this is almost never necessary. However, staff numbers and rotas are continuously reviewed to adapt to customer numbers and cognisance is taken of police advice.

## **Conclusion**

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

77. I can state that it is rare for our premises to be the cause of, or otherwise associated with, crime, disorder or nuisance to nearby premises due to the nature of our gaming premises and our customer base.

78. Merkur continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

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

Date: 07/06/2022

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## LICENSING SUB - COMMITTEE HEARING – 21 JUNE 2022

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### SUPPLEMENTAL STATEMENT – STEVE AMBROSE

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

10. Our venue teams seek to form genuine relationships with local police, town centre groups, support services and Betwatch or Pubwatch schemes should they be available. Our staff are proud of the areas in which they live and work and do not wish to see any level of anti-social behaviour.
11. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers and offering tea and snacks.
12. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained not only to enable effective premises management but also to ensure that customers can be continually monitored and assisted where necessary. As part of our commitment to working with local authorities, we will always liaise with local police licensing teams to ensure that where local police concerns are identified, sufficient staff members are on site during premises hours of operation,
13. Customer monitoring, interaction and any incidents including implementation of our Think 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Merkur Slots UK Limited's independent audit team can regularly monitor all records.
14. The Company's audit department collates and evaluates monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.
15. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours.
16. Machine emptying is only carried out when customer numbers are low and security systems implemented, which include activating the premises maglock and ensuring sufficient staff remain on duty.
17. Merkur Slots UK Limited's venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor.
18. Venues are equipped with our staff guard system. The system allows direct communication with a central monitoring station through audio and CCTV. The central monitoring station would then contact the relevant emergency services in case of incident.
19. Having considered the comments from the local Police Licensing Team, we proposed a bespoke set of conditions within the application which we believe will adequately safeguard the premises operation if granted. These conditions were approved by the local Police Licensing Team, who along with all the other local Responsible Authorities, did not make a representation.
20. We have considered the local concerns raised by the Interested Parties and believe that should the Committee members be minded to grant the new premises licence subject to the bespoke licence conditions proposed, all perceived operational risks and fears should have been effectively addressed.
21. In our local area risk assessment we have identified a number of organisations that provide support services to local vulnerable individuals. Merkur is committed to working in partnership with local authorities and any organisations identified to discuss local concerns, ensuring that local risks are identified and incorporated into our risk assessment and management training.

22. All of these features mean that our premises provide safe and congenial environments and do not impact on their localities. In my experience, while concerns are sometimes expressed by local residents and some authorities with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises actually open.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 07/06/2022

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**LICENSING SUB-COMMITTEE HEARING – 21 JUNE 2022**

**SUPPLEMENTAL STATEMENT - ANDY TIPPLE**

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1. I am Currently Head of Product for Merkur Casino UK and have over 35 years' experience in the Gaming Industry and have held a multitude of positions ranging from Arcade Manager, Service Manager to Gaming Manager. This experience has enabled me to gain an understanding of the intricacies of operating across all our gaming platforms.
2. Merkur Slots UK Limited operates over 220 'High Street Bingo' premises, bingo clubs, Family Entertainment Centres and Adult Gaming Centres throughout Great Britain.
3. The development of High Street Bingo has occurred because customers are becoming less interested in attending large, sub-regional bingo halls and increasingly wish to play bingo with a portable electronic terminal rather than marking numbers off a card. Accordingly the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals, as well as on paper, with gaming machines in accordance with the permission provided by a bingo premises licence. The Gambling Commission is fully aware of the presentation of bingo in our high street premises.
4. In our premises, customers can move around with the terminal, choosing to play while standing or in seating provided around the premises.
5. As for gaming machines, the governing legislation provides strict limits on the types of machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.
6. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
7. Across Merkur Slots UK Limited's venues the average stake placed is between 30p and 40p. Only 20% of the gaming machines provided may be category B3s. The remainder, being the category C gaming machines, have the same stake and prize levels as those offered in pubs.
8. Following successful grant of the new bingo premises licence, we have proposed that there will be 12 B3 machines, 29 Cat C machines and 20 bingo Tablets. Details of the gaming content provided in the bingo tablets has been provided in the supporting documentation. In line with the proposed premises closing time, both bingo and gaming machine activities will be available until midnight each day.
9. All Merkur Slots UK Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling. Full written details of the training and the Company's operating procedures have been provided in the hearing bundle.
10. As stated above, electronic bingo is a natural evolution of 'traditional bingo' and has been operated nationally for many years since the inception of the Gambling Act 2005 and is approved and understood by the Gambling Commission.

Mr Andy Tipple, Head of Product, Merkur Slots UK Limited

Date: 07/06/2022



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant**

**Leveche Associates Limited**

### **Merkur Slots**

**95 Rushey Green, Catford, London SE6 4AF**

#### **Introduction**

1. I have been instructed to conduct independent observations on the proposed Merkur Slots premises at 95 Rushey Green, Catford, London SE6 4AF and the surrounding area.
2. The premises is currently closed and not trading.
3. Concerns have been raised in respect of the application for a premises licence under the Gambling Act 2005. The concerns are that a premises of this type will encourage anti-social behaviour, criminality, create additional noise and attract vulnerable members of the community.
4. The premises come under the jurisdiction of Lewisham Town Centre Ward of Lewisham Council.

## **Personal - Stuart Jenkins**

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

## **Observations**

10. I carried out my observations of 95 Rushey Green, Catford, London SE6 4AF and the surrounding area between 20:00 hours on Saturday 14<sup>th</sup> May and 06:00 hours on Sunday 15<sup>th</sup> May 2022.
11. The weather was overcast during my deployment.
12. The area felt safe with members of the public going about their business, working, shopping, socialising and enjoying the night-time economy.
13. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
14. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.

15. The proposed Merkur Slots premises is situated on Rushey Green, London SE6. The premises are close to the junction with Honley Road. Rushey Green itself runs north to south with two-way vehicular traffic travelling passed the venue with pedestrians able to pass the premises in either direction on foot - (See Image B).
16. The premises appear to be a refurbished retail unit. Rushey Green links Lewisham High Street in the north and Bromley Road in the south.
17. During the observations vehicular and pedestrian traffic was varied. The road remained consistently busy with vehicular traffic, but this was reduced in the early hours of the morning.
18. The area is controlled by red route restrictions both on Rushey Green and the immediate surrounding side streets. The current restrictions are Monday - Saturday 07:00 hours -19:00 hours.
19. My observations concentrated on the commercial area of Rushey Green from the Broadway Theatre and Lewisham Town Hall Chambers, south of the premises close to the junction with Catford Broadway and Rosenthal Road to the north of the premises towards Lewisham High Street. 95 Rushey Green is approximately 600 metres (5-minute walk) from Lewisham Town Hall Chambers.
20. The area of observations is densely populated with large numbers of retail premises, that include mini supermarkets, butchers, cafes, hairdressers, estate agents, pawn brokers, restaurants, barbers and fast-food shops which service the transient and residential population alike. These commercial premises were located on both sides of the road with numerous residential premises behind them.
21. To the right and directly next to the premises is the entrance to a residential apartment block called Merva Court. Commercial premises then run south of the premises with Kaspas Desserts at 97 Rushey Green, then Korona Polish Delicatessen and Costa Coffee.
22. To the left and directly next to the premises is the entrance to another residential block called The Heights which is located above and adjacent to the premises. Commercial premises then run north starting with CF Catford Gym, Catford Food Centre (Off Licence) which is open 24/7, followed by empty retail premises and then Robinson – Jackson Estate Agents at the junction with Honley Road.
23. The rear of the building is accessed via Merryfields Way off Honley Road, SE6.
24. Directly next door to the premises is Kaspas Desserts at 97 Rushey Green which is popular with young and old customers alike.
25. There are two traditional Betting Shops close to the premises. Coral Bookmakers 78 Rushey Green which opens Monday to Saturday 08:00 hours - 22:00 hours and Sundays 10:00 hours - 22:00 hours and Jennings Bet Bookmakers 130 Rushey Green which opens Monday to Saturday 09:00 hours - 22:00 hours and Sunday's 10:00 hours to 22:00 hours. Both of these premises are on the opposite footway and to the south - Images

26. There is an Admiral Casino at 116-118 Rushey Green. The premises are licensed to operate 24 hours a day 7-days a week. They are on the opposite side of the road to the proposed Merkur Slots premises and to the south – (Images B1, B2 & B77).
27. The London and Rye (Wetherspoons) Public House is at 109 Rushey Green on the same side of the road as the proposed Merkur Slots premises – (Images B40 & B62).
28. The area is well served by public transport with bus routes 47, 54, 75, 136, 185, 199, 208, N136 and N199. The buses travel in either direction between Sydenham in the south and Lewisham in the north. There is plenty of car parking available in nearby side streets though this was restricted in places by residents permits or pay meters. Catford and Catford Bridge Mainline Rail Stations are situated to the south though some distance from the premises.
29. Schools in the area include the Holy Cross Catholic Primary School, Rushey Green Primary School and Holbeach Primary School. All are located to the south of the premises, and none are in the immediate vicinity.
30. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
31. Photographic images of what was seen during the observations at Rushey Green and the surrounding area were taken to support my findings and are documented in Appendix B (77 Images).

### **Covert Observations**

32. I conducted my covert observations from 20:00 hours on Saturday 14<sup>th</sup> May 2022 to 06:00 hours on Sunday 15<sup>th</sup> May 2022.
33. At 20:00 hours I arrived in the area of the proposed Merkur Slots premises 95 Rushey Green and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
34. On my arrival I found that the majority of the retail premises were closed leaving open the restaurants, 24-hour mini supermarkets, fast-food outlets, casino and late licenced premises such as pubs and nightclubs.
35. Between 20:00 hours and 00:01 hours pedestrian and vehicular traffic remained high with people moving up and down Rushey Green socialising and enjoying the premises that were open.
36. Kaspas Desserts had a steady stream of customers throughout the evening until it closed at 00:01 hours. The premises was equally busy with customers eating in and takeaways. Up until 21:00 hours I saw one group of four teenagers, aged between 16 and 18 years purchasing a takeaway but after that I only observed

adults using the venue. I saw no vulnerable persons using the restaurant or hanging around the premises – (Images B4, B12, B45 & B73).

37. The traditional betting shop premises both closed by 22:00 hours. I did not observe any issues or problems with their operation – (Images B7, B23 & B30).
38. The main two late licensed premises open for the vast majority of the evening were Silks Nightclub and The Ninth Life. Both venues were policed by licensed SIA door staff and appeared not to have any incidents. As customers left these venues they were easily able to access public transport, taxis or their own vehicles. There was no signs of drunkenness or anti-social behaviour caused by customers from the venue and none of them appeared to walk past 95 Rushey Green – (Images B47, B57, B58, B67 & B75).
39. Between 00:01 hours and 06:00 hours vehicular traffic remained constant however pedestrian traffic was very light – (Images B47, B57, B58, B67 & B75).
40. Between 05:19 hours and 05:39 hours I conducted a covert visit to the Admiral Casino, 116-118 Rushey Green. At 05:19 hours I went to the front door of the premises where I saw clear signage stating no under 18 entry and no alcohol sales and entered the premises – (Images B11, B39, B71 & B72).
41. On entering the premises almost immediately, I was greeted by a male member of staff in smart corporate clothing. He asked me if I needed any help with the gaming machines or choosing one to play. I declined his offer and looked around the premises deciding which gaming machine to play.
42. I saw the premises was a medium sized open space with a variety of gaming machines all around the room. The floor was carpeted and the venue had a relaxed atmosphere. I found a traditional style fruit machine to play on the left-hand side of the premises.
43. Once I was seated, after a couple of minutes, the male staff member offered me free soft drinks and water. I asked if I could buy an alcoholic drink, but the staff member explained they weren't licensed to sell alcohol. I politely declined the offer of a soft drink or water and carried on playing the gaming machine I was using. Before leaving me, he stated that the premises were closing very soon.
44. At the time of my visit there were three female customers playing the machines. All three were casually dressed and aged between 35 - 50 years. There appeared to be two male security staff and one male member of staff.
45. The customers were all quietly enjoying playing the machines. They were clearly not being pressurised or encouraged to spend money and they were not vulnerable or drunk.
46. There were no alcoholic drinks available. The hot and soft drinks were prepared on site.
47. During my visit no more customers came into the venue.

48. Whilst I was in the venue, I saw the staff wiping down surfaces and completing a low-profile patrol around the premises checking on customers' needs and making sure they weren't underage or vulnerable.
49. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
50. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 05:39 hours - (Image B72).
51. Throughout the night delivery drivers on scooters were continually coming and going from the fast-food takeaway venues along Rushey Green. These delivery drivers were a real danger to pedestrians as they rode their scooters on the footpaths at speed whilst engaged in collecting deliveries. On two occasions I saw pedestrians almost get hit by scooters riding on the footpaths – (Images B8 & B12).
52. I continued my observations until 06:00 hours when I left the area.
53. On Wednesday 1<sup>st</sup> June 2022 between 06:55 hours and 07:10 hours I revisited 95 Russey Green to review the size of the driveway and public footway immediately in front of the premises. The driveway immediately in front of the premises is 412cm (4.12M) deep by the full width of the property which meets the public footpath. The footpath itself is 231cm (2.31M) deep to the road. There is ample room to accommodate future customers entering and leaving the venue safely. The other premises in immediate vicinity to 95 Russey Green have similar or less frontage before the public footpath – (Image B77).

## **Conclusion**

54. I found the premises I carried out covert visit to, Admiral Casino 116-118 Rushey Green SE6, to have smart, well-lit, and professional looking frontage. At the time of my visits, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around.
55. People entering these premises were vetted before being allowed entry to ensure drunken or other vulnerable people didn't gain access to the premises.
56. At the time of my observations, I didn't see any drunkenness, anti-social behaviour or begging in the area.
57. People leaving the late licensed premises didn't hang around the streets or try to gain entry to the 24-hour gaming venue open at that time. They were able to get home on public transport, taxi, private car or on foot. During the period of

observation from 03:00 hours the area was quiet. There was no evidence of anyone waiting for public transport.

58. It is clear the existing 24-hour adult gaming centre doesn't lead to or result in people, who have been on a night out, staying in the high street any longer than they had planned to.
59. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises were well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
60. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
61. Merkur Slots UK and their premises operate in support of the principles of 'Secured by Design', the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
62. In conclusion, from my visits it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
63. From my observations I cannot see any evidence to support the concerns raised in the objections at this time. The addition of a 24-hour 7 day a week Merkur Slots premises will not impact on the environment, infrastructure, or local community.
64. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**01/06/2022**



## **Appendix B**

Observation Images  
14th/15th May 2022

### **Mercur Slots**

95 Rushey Green,  
Catford  
London  
SE6 4AF

### **Leveche Associates Ltd**

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

14th/15th May 2022



Image B1

20:11hrs - Front of 95 Rushey Green Catford

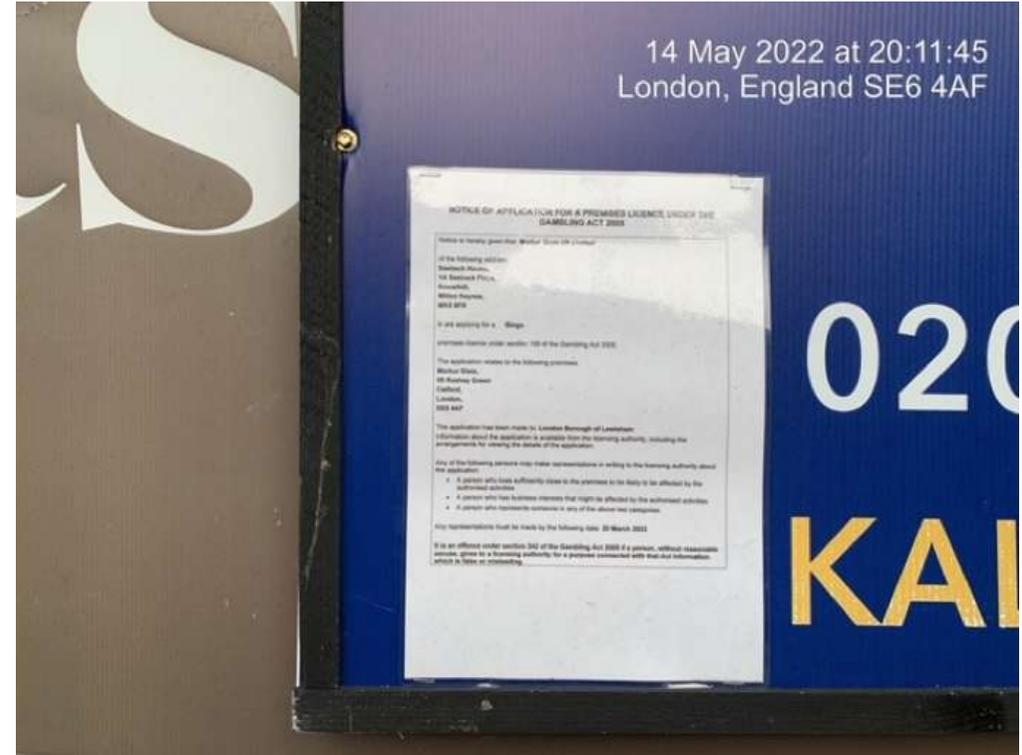


Image B2

20:11hrs - Notice of Application  
Bingo Premises Licence Gambling Act 2005

14th/15th May 2022



**Image B3**

20:12hrs - Looking north front of 95 Rushey Green



**Image B4**

20:12hrs - Front of 95 Rushey Green looking south

14th/15th May 2022



**Image B5**

20:12hrs - Opposite 95 Rushey Green looking south



**Image B6**

20:12hrs - Opposite 95 Rushey Green looking north

14th/15th May 2022



**Image B7**

20:17hrs - Coral Bookmakers 78 Rushey Green opposite premises



**Image B8**

20:18hrs - Kaspas Desserts 97 Rushey Green

14th/15th May 2022



**Image B9**

20:18hrs - The London & Rye Wetherspoons PH



**Image B10**

20:21hrs - Jennings Bet Bookmakers 130  
Rushey Green south of premises

14th/15th May 2022



**Image B11**

20:26hrs - Admiral Slots 116 Rushey Green



**Image B12**

20:46hrs - Kaspas Desserts 97 Rushey Green

14th/15th May 2022



**Image B13**

22:22hrs - Front of 95 Rushey Green



**Image B14**

22:22hrs - Kaspa's Desserts 97 Rushey Green

14th/15th May 2022



**Image B15**

22:23hrs - Coral Bookmakers 78 Rushey Green



**Image B16**

22:23hrs - Opposite 95 Rushey Green looking north



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**Image B17**

22:23hrs - Opposite 95 Rushey Green looking south



**Image B18**

22:26hrs - Rear of 95 Rushey Green

14th/15th May 2022



**Image B19**

22:28hrs - Poundland 80 Rushey Green



**Image B20**

22:29hrs - The London & Rye Wetherspoons PH

14th/15th May 2022



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**Image B21**

22:29hrs - Admiral Slots 116 Rushey Green



**Image B22**

22:30hrs - Hunter Gold Shop 122 Rushey Green

14th/15th May 2022



**Image B23**

22:31hrs - Jennings Bet Bookmakers  
130 Rushey Green



**Image B24**

22:34hrs - Silks Bar 177-181 Rushey Green

14th/15th May 2022



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**Image B25**

22:34hrs - Catford Centre looking north towards Rushey Green



**Image B26**

22:42hrs - Admiral Slots 116 Rushey Green

14th/15th May 2022



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**Image B27**

22:43hrs - Rushey Green looking north towards premises



**Image B28**

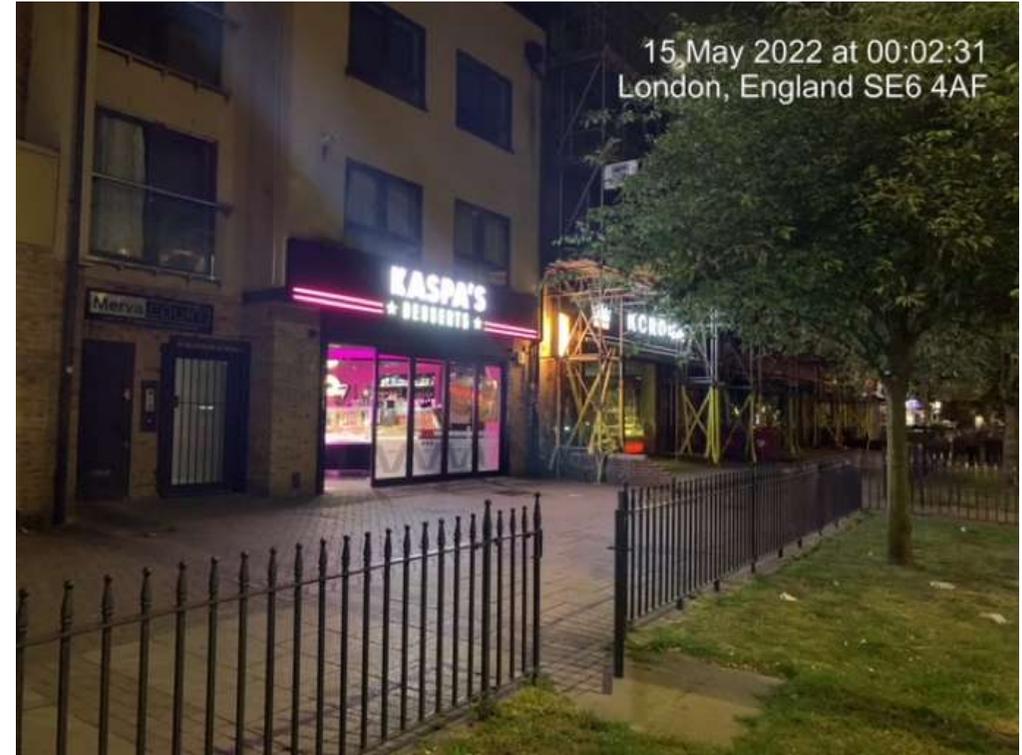
22:43hrs - Rushey Green looking towards Catford Centre.

14th/15th May 2022



**Image B29**

00:02hrs - Front of 95 Rushey Green



**Image B30**

00:02hrs - Kaspas Desserts 97 Rushey Green

14th/15th May 2022



**Image B31**

00:03hrs - Opposite 95 Rushey Green looking south



**Image B32**

00:03hrs - Coral Bookmakers 78 Rushey Green

14th/15th May 2022



**Image B33**

00:03hrs - Poundland 80 Rushey Green



**Image B34**

00:06hrs - Rushey Green looking towards  
Catford Centre

14th/15th May 2022



**Image B35**

00:06hrs - Rushey Green looking north towards Admiral Slots



**Image B36**

00:07hrs - Jennings Bet Bookmakers 130 Rushey Green



**Image B37**

00:10hrs - Silks Bar 177-181 Rushey Green



**Image B38**

00:10hrs - Catford Centre looking north towards Rushey Green

14th/15th May 2022



**Image B39**

00:15hrs - Admiral Slots 116 Rushey Green



**Image B40**

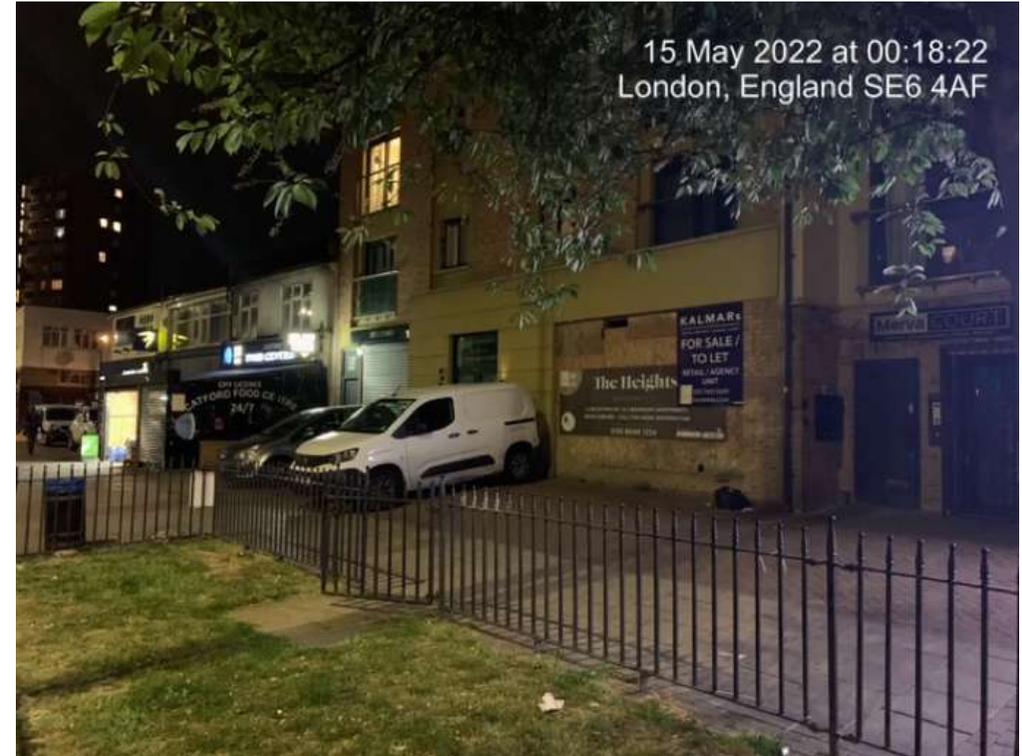
00:16hrs - The London & Rye Wetherspoons PH

14th/15th May 2022



**Image B41**

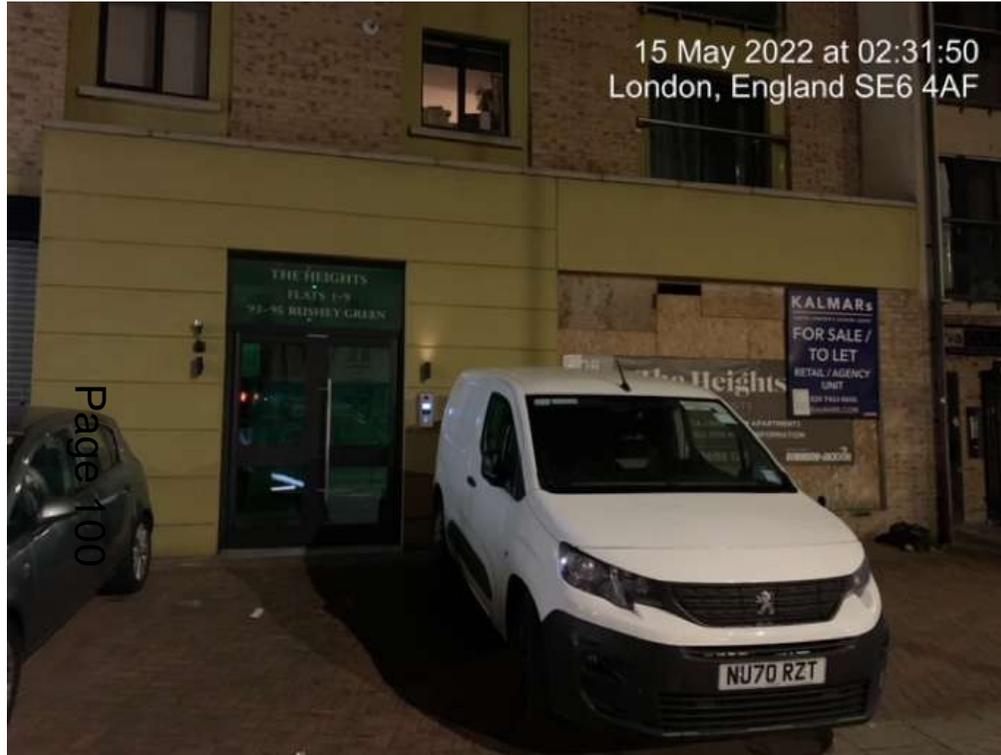
00:17hrs - Kaspas Desserts 97 Rushey Green



**Image B42**

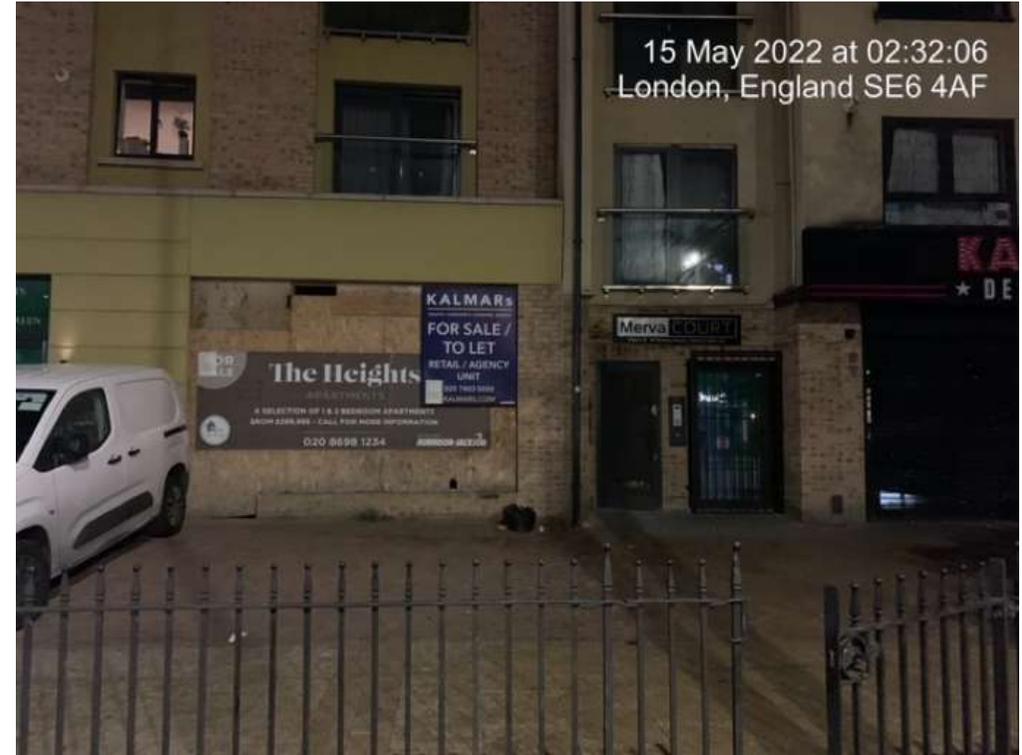
00:18hrs - Front of 95 Rushey Green

14th/15th May 2022



**Image B43**

02:31hrs - Entrance to The Heights Rushey Green



**Image B44**

02:32hrs - Entrance to Merva Court Rushey Green

14th/15th May 2022



**Image B45**

02:32hrs - Looking south front of Kaspas Desserts Rushey Green



**Image B46**

02:32hrs - Opposite 95 Rushey Green looking north

14th/15th May 2022



**Image B47**

02:32hrs - Opposite 95 Rushey Green looking south



**Image B48**

02:32hrs - Poundland 80 Rushey Green

14th/15th May 2022



**Image B49**

02:32hrs - Coral Bookmakers 78 Rushey Green opposite premises



**Image B50**

02:33hrs - The London & Rye Wetherspoons PH

14th/15th May 2022



**Image B51**

02:35hrs - Admiral Slots 116 Rushey Green



**Image B52**

02:36hrs - Jennings Bet Bookmakers 130 Rushey Green

14th/15th May 2022



15 May 2022 at 02:36:08  
London, England SE6 4AA

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**Image B53**

02:36hrs - Jennings Bet Bookmakers  
130 Rushey Green



15 May 2022 at 02:36:15  
London, England SE6 4AA

**Image B54**

02:36hrs - Rushey Green looking towards  
Catford Centre.

14th/15th May 2022



**Image B55**

02:40hrs - Silks Bar 177-181 Rushey Green



**Image B56**

02:40hrs - The Ninth Life PH Catford Centre

14th/15th May 2022



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**Image B57**

02:40hrs - Catford Centre looking north  
along Rushey Green



**Image B58**

04:14hrs - Front of 95 Rushey Green

14th/15th May 2022



**Image B59**

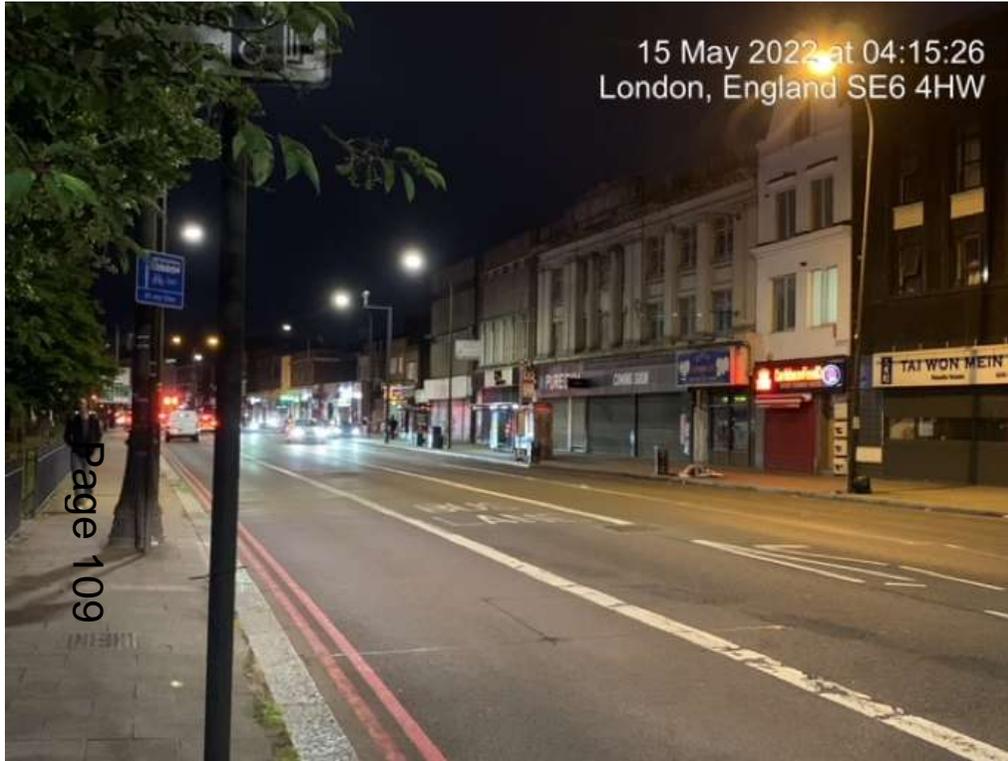
04:15hrs - Poundland 80 Rushey Green



**Image B60**

04:15hrs - Rushey Green looking north

14th/15th May 2022



**Image B61**

04:15hrs - Rushey Green looking south



**Image B62**

04:16hrs - The London & Rye Wetherspoons PH

14th/15th May 2022



**Image B63**

04:16hrs - Rushey Green looking south towards Catford Centre



**Image B64**

04:18hrs - Admiral Slots 116 Rushey Green

14th/15th May 2022



**Image B65**

04:19hrs - Jennings Bet Bookmakers  
130 Rushey Green



**Image B66**

04:22hrs - Silks Bar 177-181 Rushey Green

14th/15th May 2022



**Image B67**

04:28hrs - Looking north front of 95 Rushey Green



**Image B68**

05:15hrs - Front of 95 Rushey Green



**Image B69**

05:15hrs - Front of 95 Rushey Green looking south



**Image B70**

05:15hrs - Front of 95 Rushey Green looking north

14th/15th May 2022



**Image B71**

05:18hrs - Admiral Slots 116 Rushey Green



**Image B72**

05:40hrs - Admiral Slots 116 Rushey Green

14th/15th May 2022



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**Image B73**

05:45hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green.



**Image B74**

05:45hrs - Looking north opposite 95 Rushey Green

14thMay 2022



**Image B75**

05:45hrs - Looking south opposite 95 Rushey Green



**Image B76**

05:45hrs - Poundland, 80 Rushey Green

14th May 2022

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**Image B77**

05:46hrs - Front of 95 Rushey Green

**END OF OBSERVATION**



## **Independent Observation Report**

**Mr Nicholas Mason – Consultant**

**Leveche Associates Limited**

**Merkur Slots**

**95 Rushey Green, Catford, London SE6 4AF**

### **Introduction**

1. I have been instructed to conduct independent observations on the proposed Merkur Slots venue at 95 Rushey Green, Catford, London SE6 4AF and the area around these premises.
2. Concerns have been raised regarding an application for a premises licence under the Gambling Act 2005 and that this will encourage anti-social behaviour, criminality, additional noise and attract vulnerable members of the community.
3. The premises come under the jurisdiction of Lewisham Town Centre Ward of Lewisham Council.

### **Personal Summary – Nicholas Mason**

4. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
5. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for the risk assessment and management of intelligence led operations by covert means, including the disruption of organised crime groups infiltrating the licensing industry.

6. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
7. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into MPS through other UK crime authorities / Police forces.
8. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
9. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
10. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
11. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

### **Site Observations**

12. I attended the location of Merkur Slots proposed site at 95 Rushey Green, Catford, London SE6 4AF on Wednesday 11<sup>th</sup> May 2022 and carried out observations from 08:00hrs to 17:00hrs.
13. The premises are a reconditioned retail unit situated on Rushey Green which connects to Bromley Road in the south and Lewisham High Street in the north. Rushey Green generally runs north to south with two-way vehicular traffic passing the venue. The area is controlled by 'Red Route' restrictions both on Rushey Green and immediate surrounding side streets, Monday - Saturday 07:00hrs -19:00hrs - Image A1, A8, A9.
14. Residential apartment premises known as 'Merva Court' with an entrance door to the right of the premises and 'The Heights' with an entrance door to the left of the premises are located above and adjacent to the premises. To the rear there is an access road known as Merryfields Way but there is no obvious rear access to the proposed Merkur premises - Image A5, A33, A36, A37.
15. My observations concentrated on the commercial area of Rushey Green from the Broadway Theatre and Lewisham Town Hall Chambers located to the south close to the junction with Catford Broadway and up to north of the premises towards Lewisham High Street. There are commercial premises located on both sides of the road and behind these are numerous residential premises.
16. The area of observations is populated with a large number of retail premises, that include mini supermarkets, butchers, cafes, hairdressers, estate agents, pawn

brokers, restaurants and fast-food shops which service the surrounding residential and commercial area.

17. Immediately next door to the premises is Kaspas Desserts which could provide an attraction to local young people. Next to that is the Korona Polish Delicatessen - Image A35, A54
18. There are two traditional Betting Shops in the immediate vicinity of the subject premises. Coral Bookmakers, 78 Rushey Green is opposite the premises and advertises opening times of Monday to Saturday 08:00hrs - 22:00hrs and Sunday 10:00hrs - 22:00hrs. Jennings Bet Bookmakers, 130 Rushey Green is located approximately 100 yards south with advertised opening times of 09:00hrs - 22:00hrs Monday to Saturday and Sunday 10:00hrs to 22:00hrs - Image A6, A25.
19. At 116-118, Rushey Green is Admiral Slots Casino on the opposite side of the road and south of the premises. Admiral Slots are licensed to operate 24 hours a day 7 days a week at this location - Image A21.
20. There is one public house in the area of observations, The London and Rye Wetherspoons pub situated on the same side of the road as the premises, 30 yards south with the Korona Polish Delicatessen, Costas coffee shop and Ssnet Grocery store in between. There are no other public houses that could be considered close to the venue - Image A18, A19.
21. The area is well served by public transport with bus routes 47, 54, 75, 136, 185, 199, 208, N136 and N199 and in either direction towards Sydenham in the south and Lewisham in the north. There was ample car parking available in nearby side streets though this was restricted in places by residents permits or pay at meter. Catford and Catford Bridge rail Stations are located to the south though some distance from the premises - Image A11, A13, A58,
22. There are a number of schools in the area including Holy Cross Catholic Primary School, Rushey Green Primary School and Holbeach Primary School to the south though none of these are in the immediate vicinity of the premises.
23. Photographic images of what was seen during my observations were obtained to support my findings. These images are documented in Appendix A.

### **Covert Observations**

24. On Wednesday 11<sup>th</sup> May 2022 my observations commenced at 08:00hrs and concluded at 17:00hrs. I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
25. At times relevant to schooling of children I focused on the number of children in the vicinity of the premises

26. On commencing observations the area was very busy with vehicular traffic, adult pedestrians and school children walking past the premises or using the local bus stops, clearly on route to school. It was quiet outside the premises and there was no evidence of anti-social behaviour or criminality - Image A3, A4, A5. After 09:00hrs pedestrian traffic was never particularly busy with wide footpaths both outside the front of the premises and on the opposite side of the road allowing pedestrian traffic to flow freely.
27. The area felt safe with members of the public going about their business, working, shopping and socialising.
28. The weather was warm but overcast for the morning. From 12:00hrs it was raining with the rain getting heavier in the afternoon.
29. At 08:55hrs I observed an apparently homeless male seated on the pavement and begging outside the Greggs Bakers located opposite and south of the premises - Image A31.
30. Throughout the morning local authority workers were cleaning the streets/surrounding area and maintaining the areas of grassland - Image A33.
31. At 11:55hrs, prior to opening, the security shutters were raised on the Kaspas Desserts premises at 95 Rushey Green. The premises advertise their opening times as 12:00hrs - 23:00hrs - Image A36.
32. From approximately 12:00hrs - 13:00hrs, around lunch time for school children, I was in Rushey Green at various locations. I did not observe any school children near or in the vicinity of the premises between these times. No school children entered Kaspas Desserts premises during this time - Image A38.
33. From approximately 15:00hrs - 16:00hrs the area was busier with school children passing by, parents with their young children and older children travelling home from local schools. They were on foot and / or using the local bus routes. During this period the rain was heavier. I was able to observe Rushey Green and in particular the location of the potential Merkur premises, Kaspas Desserts, Coral Bookmakers and Admiral Slots - Image A52, A53, A55, A57, A58.
34. I saw numerous school age children, walk past the front of the premises either on the same side of the road or on the opposite side waiting at the bus stop, clearly travelling home from local schools.
35. I did not see any children of school age hanging around or trying to enter the local bookmakers or the Admiral Slots adult gaming centre.
36. During this period I observed the Kaspas Dessert Shop at 97 Rushey Green, it was not busy. At 15.34hrs I saw a young girl of about 7 years of age with a female adult enter the premises. At 16:03hrs I saw 3 school children, aged approximately 12 years, enter the premises. No other school age children entered the premises.

37. At 17:00hrs, with no evidence of any criminality or anti-social behaviour I concluded my observations and left the area.

## **Summary**

38. One of the key concerns is the perception that this type of premises will attract anti-social behaviour and crime of various type.

39. I have visited numerous licensed premises across the UK and have found the Merkur premises have professional and attentive staff who manage the premises effectively.

40. Merkur premises have clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons.

41. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy amusement arcade or a high street bookmakers. The premises style is one of a low-key carpeted lounge with no more than a handful of mature customers during opening times.

42. During the course of my observations I did not witness any criminality or anti-social behaviour apart from one incident of begging outside Greggs Bakers south of and on the opposite side of the road to the premises. There was no excessive noise, littering, street drinking, drug dealing or groups of youths loitering.

43. Merkur premises support the principles of 'Secured by Design', the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.

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

**Nick Mason - Consultant**  
**Leveche Associates Limited**  
**12<sup>th</sup> May 2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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## **Appendix A**

Observation Images

11th May 2022

### **Merkur Slots**

95 Rushey Green

Catford

London

SE6 4AF

### **Leveche Associates Ltd**

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

11th May 2022



Image A1

08:13hrs - Front of 95 Rushey Green Catford

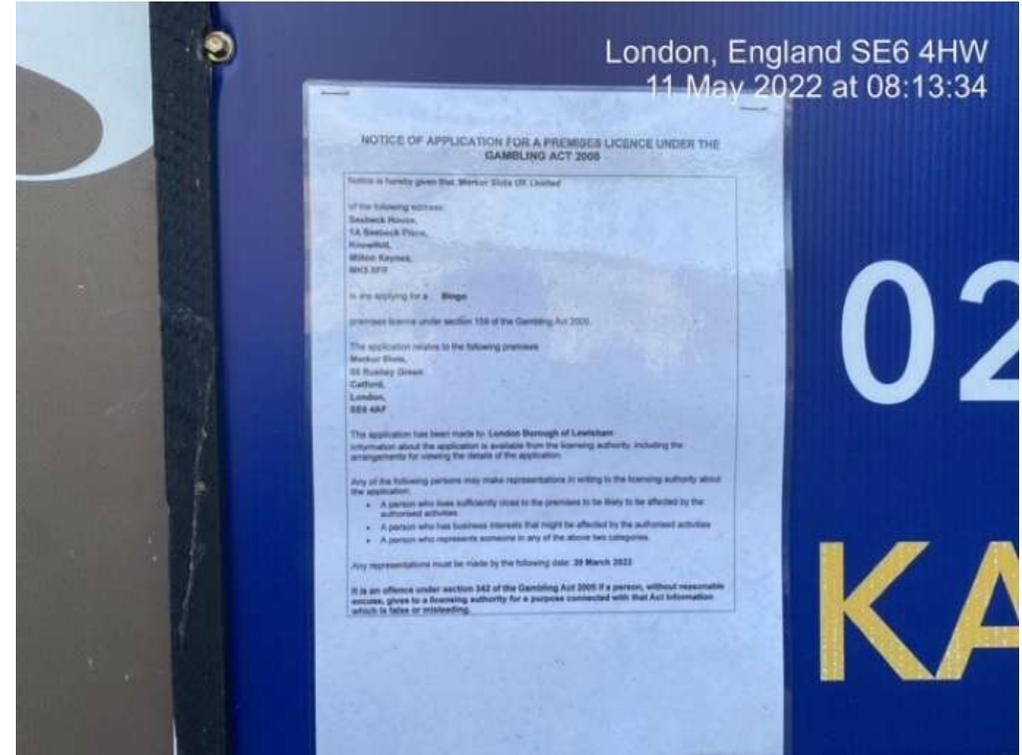


Image A2

08:13hrs - Notice of Application  
Bingo Premises Licence Gambling Act 2005

11th May 2022



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**Image A3**

08:13hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green



**Image A4**

08:13hrs - Front of 95 Rushey Green looking south

11th May 2022



**Image A5**

08:14hrs - Front of 95 and Kaspas Desserts,  
97 Rushey Green looking north



**Image A6**

08:14hrs - Coral Bookmakers 78 Rushey Green  
opposite premises

11th May 2022



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**Image A7**

08:15hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green



**Image A8**

08:15hrs - Opposite 95 Rushey Green looking south

11th May 2022



**Image A9**

08:15hrs - Opposite 95 Rushey Green looking north



**Image A10**

08:20hrs - Looking south towards premises

11th May 2022



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**Image A11**

08:20hrs - Bus stop north of premises



**Image A12**

08:22hrs - Rushey Green looking north towards Lewisham

11th May 2022



**Image A13**

08:29hrs - Rushey Green looking south towards Aldi and premises



**Image A14**

08:31hrs - Outside Aldi looking south

11th May 2022



**Image A15**

08:33hrs - H & T Pawnbrokers 58 Rushey Green



**Image A16**

08:35hrs - Looking south towards premises

11th May 2022



**Image A17**

08:37hrs - Costa Coffee Rushey Green



**Image A18**

08:39hrs - Looking north towards Costa Coffee and premises

11th May 2022



**Image A19**

08:39hrs - The London & Rye Wetherspoons PH



**Image A20**

08:40hrs - Rushey Green south of premises

11th May 2022



**Image A21**

08:40hrs - Admiral Slots 116 Rushey Green



**Image A22**

08:44hrs - Hunter Gold Shop 122 Rushey Green

11th May 2022



**Image A23**

08:44hrs - Rushey Green south of premises towards Catford Centre



**Image A24**

08:44hrs - Rushey Green looking north towards premises

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11th May 2022



**Image A25**

08:46hrs - Jennings Bet Bookmakers 130  
Rushey Green south of premises



**Image A26**

08:47hrs - Looking south towards Catford Centre

11th May 2022



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**Image A27**

08:49hrs - Looking south towards Catford Centre



**Image A28**

08:51hrs - Looking north from Broadway Theatre Catford Centre

11th May 2022



**Image A29**

08:55hrs - Looking north Rushey Green towards premises



**Image A30**

08:55hrs - Looking south towards Catford Centre

11th May 2022



**Image A31**

08:55hrs - Homeless person begging outside Greggs Bakers



**Image A32**

11:49hrs - 95 Rushey Green

11th May 2022



**Image A33**

11:50hrs - Local authority workmen Rushey Green



**Image A34**

11:55hrs - Looking south towards premises

11th May 2022



**Image A35**

11:56hrs - Kaspas Desserts



**Image A36**

11:56hrs - Merva Court entrance next to Kaspas Desserts

11th May 2022



**Image A37**

11:59hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green



**Image A38**

12:27hrs - Front of 95 and Kaspas Desserts  
looking south

11th May 2022



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**Image A39**

12:28hrs - Opposite front of 95 Rushey Green



**Image A40**

12:28hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green

11th May 2022



**Image A41**

12:28hrs - Looking south opposite 95 Rushey Green



**Image A42**

12:29hrs - Merryfields Way rear of premises

11th May 2022



**Image A43**

12:29hrs - Rear of 95 Rushey Green



**Image A44**

12:52hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green

11th May 2022



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**Image A45**

12:52hrs - Looking south front of Kaspas Desserts Rushey Green



**Image A46**

12:52hrs - Looking north opposite front of 95 Rushey Green

11th May 2022



**Image A47**

14:38hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green



**Image A48**

14:38hrs - Looking north opposite front of  
95 Rushey Green

11th May 2022



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**Image A49**

14:38hrs - Looking south opposite front of 95 Rushey Green



**Image A50**

14:59hrs - Front of 95 and Kaspas Desserts 97 Rushey Green

11th May 2022



**Image A51**

15:03hrs - Looking north from Costa Coffee  
Rushey Green



**Image A52**

15:03hrs - Looking north towards Coral  
Bookmakers Rushey Green

11th May 2022



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**Image A53**

15:04hrs - Rushey Green south of premises



**Image A54**

15:32hrs - Korona Polish Delicatessen  
99 Rushey Green

11th May 2022



**Image A55**

15:33hrs - Rushey Green south of premises



**Image A56**

15:33hrs - Rushey Green looking north towards Coral Bookmakers

11th May 2022



**Image A57**

15:35hrs - Rushey Green looking north



**Image A58**

15:37hrs - Admiral Slots 116 Rushey Green

11th May 2022



**Image A59**

16:02hrs - Rushey Green looking north



**Image A60**

16:02hrs - Rushey Green looking south

11th May 2022



**Image A61**

16:07hrs - Bus stop south of premises



**Image A62**

16:10hrs - Looking south opposite 95 Rushey Green

11th May 2022



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**Image A63**

16:10hrs - Looking north opposite 95 Rushey Green



**Image A64**

16:10hrs - Front of 95 and Kaspas's Desserts  
97 Rushey Green

11th May 2022



**Image A65**

16:33hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green



**Image A66**

16:34hrs - Rushey Green looking north towards  
premises

11th May 2022



**Image A67**

16:35hrs - Admiral Slots 116 Rushey Green



**Image A68**

16:37hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green

11th May 2022



**Image A69**

16:50hrs - Front of 95 and Kaspas Desserts  
97 Rushey Green



**Image A70**

16:50hrs - Looking south opposite 95 Rushey Green

11th May 2022

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**Image A71**

16:50hrs - Looking north opposite 95 Rushey Green



## **Independent Covert Licensing Visit Report**

**Mr Nicholas Mason – Consultant**

**Leveche Associates Limited**

**Merkur Slots**

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

### **Introduction**

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots premises at 91, High Road, Wood Green, N22 6BB.
2. The premises are currently trading with a Bingo Premises License issued under the Gambling Act 2005 by Haringey Borough Council.

### **Personal Summary – Nicholas Mason**

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment

and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

## **Observations**

10. On Tuesday 1<sup>st</sup> June 2021 between approximately 19:50hrs and 20:15hrs I covertly visited Merkur Cashino, 91 High Road, Wood Green, London N22 6BB. The premises sits amongst a number of other betting and gaming premises on a busy high street.
11. The front display of the premises was smart and well-lit. It was clean, well maintained and looked professional.
12. The premises are advertised as being open for 24 hours per day.
13. The glass on the front door of the premises was displaying some information including a warning that CCTV was in operation, no smoking and over 18's only.
14. I entered the premises and immediately in front of me and to the right was a large branded Merkur display sign that provided Covid-19 information regarding then use of hand sanitisers, social distancing, face coverings and what to do if you were feeling unwell.
15. Also in this area was a hand sanitiser station that I was able to use and next to this a QR Code and information re social distancing and the wearing of face masks in respect of Covid-19 regulations.
16. There was no other additional information in this area.
17. As I moved into the premises I saw that there a series of gaming machines on both sides. To the right-hand side each gaming machine area was defined by a solid hoarding that prevented customers seated next to each other making

contact. To the left-hand side these hoardings were not in place but there were signs that stated due to Covid-19 restrictions the machine was not in operation on every other machine. This allowed for social distancing between customers playing the machines without the need for the dividing hoarding.

18. On the left-hand side and further into the premises was the staff reception desk area. There was a Perspex screen at the desk which staff could stand behind. This area was also used for the preparation of refreshments with a facility to make hot drinks. The area was clean and tidy and additional hand sanitisers were adjacent to this location.
19. As I walked towards the reception area I was greeted by a female member of staff who asked that I check in on the Covid-19 app and use the hand sanitiser that was available around the premises. I explained that I was unable to use the app and she took my name and telephone number which was properly recorded on a log she obtained from behind the reception counter.
20. This member of staff was wearing the dark blue branded Merkur uniform waistcoat and trousers and was of smart appearance, wearing a face mask. Pinned to her waistcoat was a Challenge 25 badge and a name badge identifying her as Melisa. I did not see any other member of staff.
21. I walked through the premises which was relatively quiet with only a small number of customers using machines. At the rear of the premises and to the left was the fire exit. As I approached this area I saw an elderly female customer standing in the door area, not wearing a face mask and smoking a cigarette. I did not see this woman after she had finished her cigarette. This particular incident has been reported to those that instruct Leveche Associates Ltd. As I walked through the premises there did not appear to be any pressure on the customers to use the machines and spend money and they were not vulnerable or drunk.
22. I used a number of the gaming machines and while doing so I was offered a free drink by the staff member Melissa which I declined.
23. During my visit I asked to use the toilet facilities that were situated on the left hand side of the premises just past the reception area. The member of staff Melissa showed me the toilet and explained that it was a unisex facility. I entered the toilet which I found to be clean and in good condition. On the rear of the door was a toilet cleaning check sheet showing that the toilets had last been checked at 20:00hrs. Additionally, a Gamcare poster was situated above the toilet and this was supported by leaflets that were available for customers to take away. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.
24. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend money and I found the premises clean and tidy.
25. Having played on a number of machines I left the premises at approximately 20:15hrs.

## Summary

26. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
27. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
28. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
29. At the time of my visit on Tuesday 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
30. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
31. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**  
**Leveche Associates Limited**  
**06/06/2021**



## **Independent Covert Licensing Visit Report**

**Nicholas Mason – Consultant  
Leveche Associates Limited**

### **Merkur Slots**

**403- 405, Green Street, Upton Park, Plaistow E13 9AU**

#### **Introduction**

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots premises at 403-405, Green Street, Upton Park, Plaistow E13 9AU.
2. The premises are currently trading with a Bingo Premises License issued under the Gambling Act 2005 by Newham Borough Council.

#### **Personal Summary – Nicholas Mason**

1. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
2. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

3. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
4. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
5. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
6. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
7. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

## **Research**

8. As part of my research into Merkur Slots Limited gaming venues and their operation I have previously visited these premises.
9. On Friday 8<sup>th</sup> January 2021 at 18:10hrs and Thursday 11<sup>th</sup> February 2021 between 16:00hrs to 16:25hrs I attended the Merkur Slots premises at 403-405 Green Street, Plaistow E13 9AU.
10. At the time of these visits the premises were closed due to UK Government Covid-19 restrictions. However, the front of the premises were clean, of smart appearance and had what appeared to be new signage displayed across the front fascia.
11. The premises are situated on a busy road with residential accommodation close by and other retail premises.
12. The area is served by a number of bus routes and additionally Upton Park London Underground Station is approximately 100 metres east of the premises. During these visits the area was relatively quiet with few pedestrians and minimal vehicular traffic.
13. I saw no evidence of street drinking, begging, anti-social behaviour or any other criminality and I did not see any groups of youths in the area at that time.

## **Observations**

14. On Tuesday 1<sup>st</sup> June 2021 between approximately 15:35hrs and 16:15hrs I covertly visited the Merkur Slots premises at 403-405, Green Street, Upton

Park, Plaistow E13 9AU. The front display of the premises was smart and well-lit. It was clean, well maintained and looked professional.

15. The premises are advertised as being open for 24 hours per day.
16. I entered through the front door and immediately in front of me was an information board displaying the Merkur Slots logo. The information displayed on this board included:
  - i. The premises license.
  - ii. The premises certificate of insurance.
  - iii. The company code of practice which as its first heading had the information that persons under 18 were prohibited from entering the premises.
  - iv. The licensing objectives under The Gambling Act 2005.
  - v. A Gamcare information poster advertising help for those who may be experiencing issues with Gambling.
  - vi. That CCTV is in operation.
  - vii. The premises are a no smoking venue.
  - viii. Think 25, where customers may be challenged for ID if they appear under 25.
  - ix. QR Code and information re social distancing and the wearing of face masks in respect of Covid-19 regulations.
17. As I entered the premises I was greeted by a male member of staff who asked that I check in on the Covid-19 app and use the hand sanitiser that was available around the premises. I explained that I was unable to use the app and he took my name and telephone number which was properly recorded on a log he obtained from behind the reception counter. This member of staff was wearing black trousers, a black fleece jacket which displayed a Challenge 25 badge and a name badge, though I was unable to make out his name. He was a black male and had medium length dreadlock style hair and was wearing a black face mask. I asked about the machines in the premises and he explained how they operate. His attitude was friendly, helpful and informative.
18. As I moved into the premises I saw that there a series of gaming machines on both sides. Each gaming machine area was defined by a solid hoarding that prevented customers seated next to each other making contact. Where these hoardings were not in place there were signs that stated due to Covid 19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines without the need for dividing hoarding that was situated in other parts of the venue.

19. Further into the premises and on the right-hand side was a staff reception area with a Perspex screen. Standing behind this was another member of staff, a white male aged about 35, smartly dressed in a black waistcoat, black trousers and a white shirt. This area also provided a facility to prepare drinks and was clean and tidy.
20. I walked through the premises and found it was quiet. There was a white male customer who was casually dressed with a black baseball cap, black trousers and was seated at one machine. There was a second customer, an Asian male dressed all in black. He was talking loudly on a mobile-phone whilst using a gaming machine. There was clearly no pressure on the customers to use the machines and spend money and they were not vulnerable or drunk.
21. I used a number of the gaming machines whilst in the premises. I was offered free drinks, tea, coffee or a soft drink by the male member of staff that had greeted me on entry. I explained to him that this was my first time at a Merkur Slots premises and he subsequently provided me with a gift bag that consisted of a pen, facemask, battery pack, USB cable and two chocolates. Additionally, he offered me a membership form and a rewards card that I accepted.
22. During my visit I asked to use the toilet facilities. The member of staff who greeted me upon arrival took me to the toilet that was at the rear of the premises. Access was by use of a key that he obtained from a drawer in the reception area. I entered the toilet at about 16:00hrs which I found to be clean and in good condition. On the wall was a toilet cleaning check sheet showing that the toilets had last been checked at 14:00hrs. Additionally there was the same Gamcare poster I had seen on entry to the premises and this was supported by leaflets that were available for customers to take away. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.
23. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend money and I found the premises clean and tidy. The staff member I spoke to was helpful and friendly.
24. Having played on a number of machines I left the premises at 16:16hrs.

## **Summary**

25. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
26. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in

support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside, unlike some other gaming and betting premises.

27. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
28. At the time of my visit on Tuesday 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
29. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
30. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**  
**Leveche Associates Limited**  
**04/06/2021**



## **Independent Covert Licensing Visit Report**

**Nicholas Mason – Consultant  
Leveche Associates Limited**

**Merkur Slots**

**456, Holloway Road, London N7 6QA**

### **Introduction**

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots premises at 456, Holloway Road, London N7 6QA.
2. The premises has an Adult Gaming Centre Premises Licence issued under the Gambling Act 2005 by Islington Borough Council.

### **Personal Summary – Nicholas Mason**

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means

including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

## **Observations**

10. On Tuesday 1<sup>st</sup> June 2021 between approximately 20:50hrs and 21:25hrs I covertly visited the Merkur Slots premises at 456, Holloway Road, London N7 6QA.
11. Situated on the corner of Holloway Road at the junction with Camden Road, this is a larger Merkur premises than I have previously visited. The front display of the premises is smart and well-lit with a clean, well maintained and professional appearance.
12. The premises are advertised as being open for 24 hours per day.
13. The front door of the premises was controlled by a door supervisor monitoring entry and exit. He was a white male, smartly dressed in a dark suit, wearing a face mask and displaying an SIA licence on his right arm. There was also a side door in Camden Road though this was closed for access to the premises.
14. The glass on the front door of the premises displayed information including a warning that CCTV was in operation, no smoking and over 18's only.
15. I entered the premises being greeted by the door supervisor as I did so. In the entrance area was information regarding Covid-19 and the use of hand sanitisers, social distancing and face coverings. I was able to use the hand sanitiser situated at this location.
16. Adjacent to this was an information board displaying the premises licences and rules and there was further clear signage in relation to CCTV in operation.

17. As I moved into the premises I observed numerous gaming machines situated along the walls of the premises and in the central floor area. The premises itself is generally an L-shape lounge with a staff reception area to the left and then another area extending to a smoking area and the toilets. Each gaming machine area was defined by a solid hoarding that prevented customers seated next to each other making contact. Where these hoardings were not in place there were signs that stated due to Covid 19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines.
18. The staff reception area had a Perspex screen at the counter, this also provided a facility to prepare drinks and was very clean and tidy. There were two female members of staff on duty, one with a dark complexion and dark hair wearing a name badge identifying her as Dina and a white woman with brown hair wearing a name badge identifying her as Rosalind. Both were smartly dressed wearing the Merkur branded dark suits and white shirts. Both were displaying the Challenge 25 badge. I provided my details to staff for track and trace at the reception desk.
19. I walked through the premises and found it was relatively quiet. There were four male customers inside the premises who were all casually dressed. There was also an elderly woman who had a push chair and was periodically walking through the premises looking at different machines. Customers appeared to be making the effort to wear face masks though these were not always properly in place. When I arrived there was a black male customer dressed in blue cargo style work clothing who spent about 10 minutes speaking to the two female staff members that were standing behind the reception area. The customers were clearly not being pressurised or encouraged to spend money and they were not vulnerable or drunk.
20. I used a number of the gaming machines whilst in the premises. Whilst sat playing a high value machine the staff member Rosalind approached me and explained details of an ongoing Merkur offer, 'Matchplay Membership' handing me a card to be retained for later use. She then took me to another high value machine which, with her assistance I played.
21. Whilst playing another high value machine I was approached by the other female member of staff known as Dina. She offered me a slice of pizza that she was holding on a cardboard plate but I declined the offer.
22. During my visit I observed the door supervisor periodically patrol the inside of the premises before returning to the front door.
23. During my visit I asked to use the toilet facilities. The member of staff Rosalind directed me to the rear of the premises where there was a door marked smoking area. Through this door and on the right was a Unisex Disabled Toilet. The door had a keycode lock but was unlocked and the code was not required. I entered the toilet which was clean and had the

appearance of being recently refurbished. There was a toilet cleaning check sheet showing that the toilets had last been checked at 20:00hrs. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.

24. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend extra money and I found the premises clean and tidy. The staff I spoke to were helpful and friendly.
25. Having played on a number of machines I left the premises at approximately 21:25hrs.

## **Summary**

26. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
27. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
28. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
29. At the time of my visit on Tuesday 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
30. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
31. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**





## **Independent Covert Licensing Visit Report**

**Nicholas Mason – Consultant  
Leveche Associates Limited**

### **Merkur Slots**

**157, High Street North, East Ham E6 1JB**

#### **Introduction**

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots, 157, High Street North, East Ham E6 1JB.
2. The premises has an Adult Gaming Centre Premises Licence issued by Newham Borough Council.

#### **Personal Summary – Nicholas Mason**

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

## **Observations**

10. On Tuesday 1<sup>st</sup> June 2021 between approximately 17:00hrs and 17:30hrs I covertly visited Merkur Slots, 157, High Street North, East Ham E6 1JB.
11. The front display of the premises was smart and well-lit though older than some of the other Merkur premises I have visited. It appeared well maintained though the area itself was let down by a local authority bin situated on the pavement outside that had a number of sealed bin bags that were spilling onto the pavement.
12. The premises are advertised as being open for 24 hours per day.
13. There appeared to be two doors allowing access to the premises but the door to the left displayed a sign directing customers to use the other door. I entered via the front door on the right where two fire extinguishers and various signage was displayed. The information displayed included:
  - i. The premises license.
  - ii. The premises certificate of insurance.
  - iii. That CCTV is in operation.
  - iv. The premises are a no smoking venue.
14. Adjacent to the signage was a hand sanitiser station that I was able to use and next to this a QR Code and information re social distancing and the wearing of face masks in respect of Covid-19 regulations.
15. I entered the premises and immediately started to play a low value gaming machine. From here I was able to observe that there were gaming machines throughout the length of the floor. Each gaming machine area was defined by

a solid hoarding that prevented customers seated next to each other making contact. Where these hoardings were not in place there were signs that stated due to Covid 19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines without the need for dividing hoarding that was situated in other parts of the venue.

16. I was approached by a female member of staff who I would describe as black, aged about 35 years with dark hair wearing a face mask. She was dressed smartly in a dark blue branded Merkur Slots waistcoat and trousers. Pinned to the waistcoat was a name badge showing her name to be Gloria and a 'Challenge 25' badge. She asked if I needed anything and I told her I was fine.
17. Having played the low value machine I walked further into the premises and saw the reception area was situated to the left-hand side. There was a Perspex screen at the desk. This area was also used for the preparation of refreshments with a facility to make hot drinks. The area was clean and tidy and additional hand sanitisers were adjacent to this location.
18. I observed a number of customers, 6 male customers playing machines to the right and a male and female to the left-hand side at the rear of the premises. There was clearly no pressure on the customers to use the machines and spend money and they were not vulnerable or drunk.
19. I used a number of the gaming machines whilst in the premises. Whilst sat playing a machine at the rear of the premises I was approached by the member of staff Gloria who asked if I would like a free drink which I declined.
20. I asked to use the toilet facilities and was taken to the toilet that was close to the Reception area. The toilet door was closed and secured with a digital lock. The member of staff, Gloria used the keypad to unlock the door and I entered. The toilet area was dated but clean, there was a mop and bucket situated to the right-hand side of the toilet. On the rear of the toilet door was a cleaning check sheet showing that the toilets had last been checked at 15:00hrs. Additionally there was the Gamcare leaflets offering assistance to people dealing with Gambling issues and available for customers to take away. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.
21. I returned to play a machine at the rear of the premises and was approached by a different member of staff, a black male who was smartly dressed wearing a Merkur waistcoat, a Challenge 25 badge and a name badge giving a name of Soloman. He asked if I had provided details for Check and trace as part of the Covid-19 regulations. I said I had not and he took my name and telephone number which he recorded on a log sheet.
22. Whilst I remained at this Gaming machine, the staff member Gloria returned and explained details of an ongoing Merkur offer handing me a card to be retained for later use.

23. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend excessive amounts of money and I found the premises clean and tidy.
24. Having played on a number of machines I left the premises at approximately 17:30hrs.

## **Summary**

25. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
26. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
27. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
28. At the time of my visit on Tuesday 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
29. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
30. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**  
**Leveche Associates Limited**  
**04/06/2021**



## **Independent Covert Licensing Visit Report**

**Nicholas Mason – Consultant  
Leveche Associates Limited**

**Merkur Slots**

**62, East Street, Barking IG11 8EQ**

### **Introduction**

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots premises at 62, East Street, Barking IG11 8EQ.
2. The premises are currently trading with a Bingo Premises Licence issued under the Gambling Act 2005 by Barking and Dagenham Borough Council.

### **Personal Summary – Nicholas Mason**

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

## **Research**

10. As part of my research into Merkur Slots Limited gaming venues and their operation I have previously visited these premises.
11. On Thursday 11<sup>th</sup> February 2021 at 16:42hrs, I attended the Merkur Cashino (Slots) premises at 62
12. East Street, Barking IG11 8EQ. The premises were closed and not trading at this time due to UK Government Covid-19 restrictions.
13. The location of these premises differs somewhat to other Merkur premises I have visited previously in that it is in a 'pedestrian only' controlled zone with no vehicular traffic and a market place with a number of stalls outside the front.
14. During my visit in February, though some of the Market Stalls were trading, this area was relatively quiet, something I attributed to the UK Government Covid-19 restrictions.
15. This Merkur premises had clearly been subject to recent renovation and the front of the premises were clean, of smart appearance. and had what appeared to be new signage displayed across the front fascia.
16. It is situated in what would normally be a busy retail hub with a concentrated residential area close by.

17. At the time of my February observations I saw no evidence of street drinking, begging, anti-social behaviour or any other criminality. There were no groups of youths in the area.

## **Observations**

18. On Tuesday 1<sup>st</sup> June 2021 between approximately 18:10hrs and 18:30hrs I covertly visited Merkur Slots, 62 East Street, Barking IG11 8EQ.

19. On the day of my visit the premises were advertised as being open from 09:00hrs until midnight.

20. The front display of the premises was smart and well-lit. It was clean, well maintained and looked professional. There was a push button keypad for the lock situated to the right of the front door and above this a doorbell. There was litter in front of the premises but this was clearly from the adjacent Market Stalls.

21. The glass on the front door of the premises displayed information including a warning that CCTV was in operation, no smoking and over 18's only. As I entered the premises I saw the opening times displayed and then immediately to the left was an information board displaying the Merkur Slots logo. The information displayed on this board included:

- i. The premises license.
- ii. The premises certificate of insurance.
- iii. The company code of practice which as its first heading had the information that persons under 18 were prohibited from entering the premises.
- iv. The licensing objectives under The Gambling Act 2005.
- v. A Gamcare information poster advertising help for those who may be experiencing issues with gambling.
- vi. That CCTV is in operation.
- vii. The premises are a no smoking venue.
- viii. Think 25, where customers may be challenged for ID if they appear under 25.
- ix. No alcohol notice.
- x. Strictly over 18's only notice.
- xi. Notice of Bingo rules.

22. As I entered the premises, a customer, a white male dressed in a grey track-suit was leaving and he was followed by a female with long dark hair. She

was clearly staff from the premises and was wearing a mask. She asked me to use the hand sanitiser as I entered which I agreed to, she then left the premises.

23. I was greeted by a female member of staff who I would describe as a white lady, approximately 45 years old with ginger hair that was in a pony tail. She was smartly dressed wearing a white shirt, dark waistcoat and dark trousers. On the waistcoat was pinned a Challenge 25 badge. She asked that I check in on the Covid-19 app and use the hand sanitiser that was available around the premises. I explained that I was unable to use the app and after I had used the hand sanitiser she invited me further into the premises to the reception area where she recorded my details on a Tablet.
24. The reception area was located along the right-hand wall of the premises, about halfway along with a Perspex screen at the counter. This area also provided a facility to prepare drinks and was clean and tidy. Standing behind the counter was another female member of staff with long brown hair and wearing similar clothing to the first member of staff I had spoken to. I was offered a drink which I declined.
25. As I moved into the premises I saw that there was a series of gaming machines on both sides. Each gaming machine area was defined by a solid hoarding that prevented customers seated next to each other making contact. Where these hoardings were not in place there were signs that stated due to Covid-19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines without the need for dividing hoarding that was situated in other parts of the venue.
26. I used a number of the gaming machines whilst in the premises. While playing a high value machine on the right-hand side I was able to observe a female customer who was seated in the area closest to the reception. She was wearing a mask and talking to staff whilst she played a machine.
27. I subsequently walked through the premises and found it to be quiet with no other persons present. The one customer that was present was clearly under no pressure to use the machines and she did not appear vulnerable or drunk.
28. During my visit I asked to use the toilet facilities. The female member of staff who greeted me upon arrival took me to the toilet and explained that the gentlemans toilet was out of order. I was directed to the ladies toilet that was near the rear of the premises and a rear exit door. The toilet door was unlocked and I entered. The toilet area was clean and in good condition and had clearly been subject to recent refurbishment. On the wall was a toilet cleaning check sheet for week ending 06/06/21 showing that the toilets had last been checked at 18:00hrs. In a plastic rack next to this were the Gamcare leaflets that were available for customers to take away, providing information to people dealing with gambling issues. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.

29. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend money and I found the premises clean and tidy. The staff member I spoke to was helpful and friendly.
30. Having played on a number of machines I left the premises at approximately 18:30hrs.

## **Summary**

31. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
32. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure they operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
33. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
34. At the time of my visit on Tuesday 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
35. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
36. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**  
**Leveche Associates Limited**  
**05/06/2021**



## **Independent Covert Licensing Visit Report**

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

**Merkur Slots  
847 High Road, North Finchley, N12 8PT**

### **Introduction**

1. I have been instructed to conduct an independent covert visit on the venue at Merkur Slots, 847 High Road, North Finchley, N12 8PT.
2. The premises has a Bingo Premises Licence issued under the Gambling Act 2005 issued by Barnet Council.
3. The premises are situated on a large busy high road. The area is densely populated with a large number of retail premises which include large supermarkets, mini supermarkets, betting shops, late licensed bars, hairdressers and fast-food restaurants.
4. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

### **Personal – Stuart Jenkins**

5. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.

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

### **Covert Observations**

1. On Wednesday 2<sup>nd</sup> June 2021 I conducted a covert licensing visit to Merkur Slots, 847 High Road, North Finchley, N12 8PT. My visit took place between 23:00 hours and 23:30 hours.
2. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
3. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open from 08:00 hours to Midnight.
4. I went to the front door of the premises and entered. Once inside the entrance I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
  - i. The premises licence.
  - ii. The company codes of practice.
  - iii. It was a no smoking venue.
  - iv. Think 25 poster.
  - v. GamCare poster.

- vi. QR Code – NHS test & trace poster, information on social distancing and a face mask poster stating that they must be worn in the premises. All were in support of the current COVID19 regulations.
5. On entering the premises, I was greeted by a black female member of staff in smart corporate fleece top, dark trousers and white shirt with a Challenge 25 badge displayed. She asked me to check in on the premises QR Code NHS app and use the hand sanitiser before I could fully enter the premises. I used the hand sanitiser but I was unable to use the app so she recorded my name and telephone number on a registration sheet.
6. Once inside I saw there were a series of gaming machines stretching from the front to the back of the premises. On the right-hand side there were gaming machines and a reception desk with a Perspex screen about half way down. On the left-hand side there were more gaming machines leading to the back of the venue into an alcove. There was a customer toilet too.
7. The female staff member asked me what machines I wanted to use, and I stated I wanted to play a traditional style fruit machine. She offered me free soft drinks, water, tea and coffee. I asked for a black coffee which she went to prepare. I walked around the venue deciding on which machine to play. I saw that the venue enforced social distancing and saw the hardboard panels used on every other machine to make sure customers did not sit directly next to each other whilst using the machines.
8. I chose to play a gaming machine towards the back of the premises on the right. As I walked around the premises, I saw there were only two other customers in the venue. Both were white males aged around 40 years of age and were not wearing masks. They were both casually dressed and quietly playing the machines. They were clearly not being pressurised or encouraged to spend money and they were not vulnerable or drunk.
9. I accepted a black coffee which I consumed on the premises. There were no alcoholic drinks available. The hot drinks were prepared behind the reception desk which was clean and tidy.
10. Whilst playing the machine I saw the black female member of staff and the black male of staff who appeared towards the end of my visit were not wearing masks at any time during my visit. I was unable to establish if the people not wearing masks had an exemption and I have informed those that instruct Leveche Associates Limited.
11. I visited the toilet which was clean and tidy with ample handwashing facilities and hand sanitiser and was clearly cleaned regularly. On the wall I saw a toilet cleaning date & time sheet showing that the toilets had been checked and cleaned recently. Also, on the wall was a GamCare poster and holder with leaflets in it that customers could take away with them.
12. No one was pressurised or encouraged to spend money and I did not see anyone who was vulnerable, drunk or underage.

13. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
14. I left the premises at 23:35 hours.

## **Summary**

15. I found the premises to have a smart, well-lit and professional looking frontage. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing, begging or groups of youths hanging around.
16. From my visits to this and other Merkur Slots and Cashino Premises, I have found professional and attentive staff managing them. The premises were well run and there are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside.
17. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
18. In conclusion, from my visit it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
19. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**06/06/2021**



## **Independent Covert Licensing Visit Report**

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

**Merkur Cashino (Slots)  
478 High Road, Wembley HA9 7BH**

### **Introduction**

1. I have been instructed to conduct an independent covert visit on the venue at Merkur Cashino (Slots), 478 High Road, Wembley HA9 7BH.
2. The premises has an Adult Gaming Centre Premises Licence issued under the Gambling Act 2005 by Brent Council.
3. The premises are situated on a large busy high road. The area is densely populated with a large number of retail premises which include mini supermarkets, betting shops, late licensed bars, hairdressers and fast-food restaurants.
4. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

### **Personal – Stuart Jenkins**

5. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.

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

### **Covert Observations**

10. On Wednesday 2<sup>nd</sup> June 2021 I conducted a covert licensing visit to Merkur Cashino (Slots), 478 High Road, Wembley HA9 7BH. My visit took place between 21:00 hours and 21:40 hours.
11. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
12. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open for 24 hours per day.
13. I went to the front door of the premises and entered. Once inside the entrance I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
  - i. The premises licence.
  - ii. The company codes of practice.
  - iii. It was a no smoking venue.
  - iv. Think 25 poster.
  - v. GamCare poster.

- vi. QR Code – NHS test & trace poster, information on social distancing and a face mask poster stating that they must be worn in the premises. All were in support of the current COVID19 regulations.
14. On entering the premises, I was greeted by a female member of staff of South Asian appearance in smart corporate dark trousers and white shirt. She asked me to check in on the premises QR Code NHS app and use the hand sanitiser before I could fully enter the premises. I used the hand sanitiser but I was unable to use the app so she recorded my name and telephone number on a registration sheet.
15. Once inside I saw there were a series of gaming machines stretching from the front to the back of the premises. On the right-hand side there were gaming machines and a change machine. On the left-hand side there was a reception desk with a Perspex screen and at the back there was a toilet for customers use and an office.
16. The female staff member asked me what machines I wanted to use, and I stated I wanted to play a traditional style fruit machine. The female showed me a couple of the machines and then I walked around the venue deciding on which machine to play. I saw that the venue enforced social distancing and saw the hardboard panels used on every other machine to make sure customers did not sit directly next to each other whilst using the machines.
17. I chose to play a gaming machine towards the front of the premises. When I had I walked around the premises, I saw a white male about 30 years of age playing the machines directly in front of the cashier desk. This male was not wearing a face mask. He was casually dressed and quietly playing the machines. He was clearly not being pressurised or encouraged to spend money and he was not vulnerable or drunk.
18. Whilst in the premises I was offered free soft drinks, water, tea and coffee. I accepted a black coffee which I consumed on the premises. There were no alcoholic drinks available.
19. Whilst playing the machine I was approached by the other member of staff, a white female with a name badge that said 'Lydia' on it. She was smartly dressed in dark corporate attire with a white shirt. She asked me if I would like to choose a scratch card from a selection she had in her hand. I chose one and won a £10 voucher for use in a machine of my choice. I noticed that Lydia was not wearing a face mask and nor was her colleague. I was unable to establish if the people not wearing masks had an exemption and I have informed those that instruct Leveche Associates Limited.
20. I visited the toilet which was clean and tidy with ample handwashing facilities and hand sanitiser and was clearly cleaned regularly. There was a toilet cleaning date & time sheet showing that the toilets had been checked and

cleaned recently. Also, there was a GamCare poster and holder with leaflets in it that customers could take away with them.

21. During my visit another mature male of South Asian appearance, aged about 35 years, came into the premises and played the gaming machines. He wore a mask whilst in the venue.
22. No one was pressurised or encouraged to spend money and I did not see anyone who was vulnerable, drunk or underage.
23. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
24. I left the premises at 20:40 hours.

## **Summary**

25. I found the premises to have smart well-lit and professional looking frontage. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing, begging or groups of youths hanging around.
26. From my visits to this and other Merkur Slots and Cashino Premises I have found professional and attentive staff managing them. The premises were well run and there are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside.
27. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
28. In conclusion, from my visit it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
29. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

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

06/06/2021



## **Independent Covert Licensing Visit Report**

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

**Merkur Cashino (Slots)  
304 Neasden Lane, Neasden, London NW10 0AD**

### **Introduction**

1. I have been instructed to conduct an independent covert visit on the venue at Merkur Cashino (Slots), 304 Neasden Lane, London NW10 0AD.
2. The premises has an Adult Gaming Centre Premises Licence issued under the Gambling Act 2005 by Brent Council.
3. The area is populated with a number of retail premises which include mini supermarkets, betting shops, licensed bars, hairdressers and fast-food restaurants.
4. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

### **Personal – Stuart Jenkins**

5. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.

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

### **Covert Observations**

10. On Wednesday 2<sup>nd</sup> June 2021 I conducted a covert licensing visit to Merkur Cashino (Slots), 304 Neasden Lane, London NW10 0AD. My visit took place between 19:45 hours and 20:30 hours.
11. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
12. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open for 24 hours per day.
13. I went to the front door of the premises and entered. Once inside I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
  - i. The premises licence.
  - ii. The company codes of practice.
  - iii. It was a no smoking venue.
  - iv. Think 25 poster.
  - v. GamCare poster.

- vi. QR Code – NHS test & trace poster, information on social distancing and a face mask poster stating that they must be worn in the premises. All were in support of the current COVID19 regulations.
14. I was greeted by a male member of staff in smart corporate dark trousers, white shirt and dark waist coat with a Challenge 25 badge. He asked me to check in on the premises QR Code NHS app and use the hand sanitiser before I could fully enter the premises. I used the hand sanitiser but I was unable to use the app so he recorded my name and telephone number on a registration sheet.
  15. Once inside I saw there were a series of gaming machines stretching from the front to the back of the premises. On the right-hand side there were gaming machines, a change machine and beyond that a staff counter with a Perspex screen. On the left-hand side were further machines and at the back a toilet for customers use. At the rear of the premises there was a door leading to a smoking area and outside seating.
  16. The male staff member asked me what machines I wanted to use, and I stated I wanted to play a traditional style fruit machine. The male showed me around the venue explaining to me which machines might be of interest to me and how they worked. He also explained to me that the venue enforced social distancing and pointed to the hardboard panels on every other machine to make sure customers did not sit directly next to each other when using the machines.
  17. I chose to play one of the machines to the rear of the premises. As I walked into the premises there were two males playing on the machines. One was about 40 years old of Mediterranean appearance and the other was about 30 years old of East Asian appearance. They were both casually dressed and quietly playing the machines. They were clearly not being pressurised or encouraged to spend money and they were not vulnerable or drunk.
  18. Whilst in the premises I was offered free soft drinks, bottled water, coffee and snacks – crisps and pop corn type foods. I accepted a bottle water and a black coffee which I consumed on the premises. There were no alcoholic drinks available.
  19. I visited the toilet which was clean and tidy with ample handwashing facilities and hand sanitiser and was clearly cleaned regularly. On the wall I saw a toilet cleaning date & time sheet showing that the toilets had been checked and cleaned recently. There was a GamCare poster and holder with leaflets in it that customers could take away with them.
  20. During my visit other mature males came into the premises and played the gaming machines. Their ages ranged between 27 to 50 years of age. Everyone I saw in the venue was wearing a face mask. At one stage I was offered a fresh new face mask by the staff member who also offered them to

all customers. He stated they were available for anyone who wanted to enter the venue but may have lost their mask.

21. No one was pressurised or encouraged to spend money and I did not see anyone who was vulnerable, drunk or underage.
22. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
23. I left the premises at 20:30 hours.

## **Summary**

24. I found the premises to have smart well-lit and professional looking frontage. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing, begging or groups of youths hanging around.
25. From my visits to this and other Merkur Slots and Cashino Premises I have found professional and attentive staff managing them. The premises were well run and there are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside.
26. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
27. In conclusion, from my visit it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
28. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**06/06/2021**



## **Independent Covert Licensing Visit Report**

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

**Merkur Cashino (Slots)**  
**19 The Concourse, Edmonton Shopping Centre,**  
**Edmonton Green, London N9 0TQ**

### **Introduction**

1. I have been instructed to conduct an independent covert visit on the venue at Merkur Cashino (Slots), 19 The Concourse, Edmonton Shopping Centre, London N9 0TQ.
2. The premises has a Bingo Premises Licence issued under the Gambling Act 2005 by Enfield Council.
3. The premises are situated within a 26 acre retail park next to a large bus garage. The area is densely populated with a large number of retail premises which include large supermarkets, mini supermarkets, coffee shops, late licensed bars, hairdressers and fast-food restaurants.
4. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

## **Personal – Stuart Jenkins**

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

## **Covert Observations**

10. On Thursday 3rd June 2021 I conducted a covert licensing visit to Merkur Cashino (Slots), 19 The Concourse, Edmonton Shopping Centre, London N9 0TQ. My visit took place between 00:10 hours and 00:45 hours.
11. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
12. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open for 24 hours per day.
13. I went to the double doors and tried to enter but found the doors were locked. I knocked on the doors and after a short time the doors were opened by a tall well built white male in a dark suit wearing a face mask. I saw that he was wearing an SIA licence.

14. The male invited me in and directed me to the QR NHS app on the wall which I scanned. He then asked me to sanitise my hands which I did with the sanitiser provided.
15. Once inside the entrance I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
  - i. The premises licence.
  - ii. The company codes of practice.
  - iii. It was a no smoking venue.
  - iv. Think 25 poster.
  - v. GamCare poster.
  - vi. QR Code – NHS test & trace poster, information on social distancing and a face mask poster stating that they must be worn in the premises. All were in support of the current COVID19 regulations.
16. I was then led by the door supervisor towards the back of the premises to the cashier desk which had a Perspex screen. There I was greeted by a white female member of staff who had a corporate uniform of dark trousers, white shirt and a dark waist coat. She asked me if I wanted anything to drink and I asked for a black coffee.
17. Other free refreshments were also available such as soft drinks, water and tea. There were no alcoholic drinks available.
18. I saw there were a series of gaming machines stretching from the front to the back of the premises. On the right-hand side there were gaming machines leading to the cashier desk. On the left-hand side there were more machines. There was also a customer toilet available for use.
19. I then walked around the venue deciding on which machine to play. I saw that the venue enforced social distancing and saw the hardboard panels used on every other machine to make sure customers did not sit directly next to each other when using the machines.
20. I chose to play a gaming machine near the reception desk on the right. After a short time, the female member of staff came over to me with my coffee wearing her face mask and handed me my coffee.
21. There were five mature males in the premises quietly playing the gaming machine at the time of my visit. Their age range was between 30 to 50 years

and they were all casually dressed. All were socially distanced and wearing masks.

22. I visited the toilet which was locked and had to be opened by the female member of staff. The toilet was clean and tidy with ample handwashing facilities and hand sanitiser and was clearly cleaned regularly. There was a toilet cleaning date & time sheet showing that the toilets had been checked and cleaned recently. Also, there was a GamCare poster and holder with leaflets in it that customers could take away with them.
23. Towards the end of my visit, I did notice a male who I believed to be another member of staff working at the back of the cashier desk out of my line of sight.
24. No one was pressurised or encouraged to spend money and I did not see anyone who was vulnerable, drunk or underage.
25. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
26. I left the premises at 00:45 hours.

## **Summary**

27. I found the premises to have smart well-lit and professional looking frontage. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing, begging or groups of youths hanging around.
28. From my visits to this and other Merkur Slots and Cashino Premises I have found professional and attentive staff managing them. The premises were well run and there are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside.
29. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
30. In conclusion, from my visit it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.

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

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**06/06/2021**



## **Independent Covert Licensing Visit Report**

**Nicholas Mason – Consultant  
Leveche Associates Limited**

**Merkur Cashino (Slots)**

**Unit 2 - 8, Eleanor Cross Road, Waltham Cross EN8 7LA**

### **Introduction**

1. Leveche Associates Limited have been instructed to conduct an independent covert visit to Merkur Cashino (Slots), Unit 2 - 8, Eleanor Cross Road, Waltham Cross EN8 7LA.
2. The premises has a Bingo Premises License issued under the Gambling Act 2005 by Broxbourne District Council.

### **Personal Summary – Nicholas Mason**

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a

Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

## **Observations**

10. On Tuesday 8<sup>th</sup> June 2021 between approximately 18:25hrs and 18:45hrs I covertly visited Merkur Cashino (Slots) at Unit 2 - 8, Eleanor Cross Road, Waltham Cross EN8 7LA.
11. The premises is situated in a paved pedestrian area with numerous retail outlets surrounding it. At the time of my visit the area was quiet with very little pedestrian traffic.
12. The premises were advertised as being open from 09:00hrs until 22:00hrs.
13. As I approached the front display of the premises, I could see that it had been recently refurbished. It was smart, well-lit, clean and looked professional.
14. The design of the frontage meant I was unable to see into the premises from the street with frosted effect glass on the doors and posters in the windows. Displayed on the entry door glass was information including a warning that CCTV was in operation, no smoking, over 18's only and the need to wear a face mask to comply with Covid-19 regulations.
15. As I entered the premises, I saw immediately to the right was an information board displaying the Merkur Slots logo. The information displayed on this board included:
  - i. The premises license.

- ii. The premises certificate of insurance.
- iii. The company code of practice which as its first heading had the information that persons under 18 were prohibited from entering the premises.
- iv. The licensing objectives under The Gambling Act 2005.
- v. A GamCare information poster advertising help for those who may be experiencing issues with gambling.
- vi. That CCTV is in operation.
- vii. The premises are a no smoking venue.
- viii. Think 25, where customers may be challenged for ID if they appear under 25.
- ix. No alcohol notice.
- x. Strictly over 18's only notice.
- xi. Notice of Bingo rules.

16. To the left of me was a hand sanitiser machine that I used and a large branded Merkur display sign that provided Covid-19 information regarding the use of hand sanitizers, social distancing, face coverings and what to do if you were feeling unwell.
17. On my left I saw a female customer who was seated playing a gaming machine. She was wearing a face mask, a black gillet jacket, blue/white jogging pants and had dark brown hair. I later heard the staff refer to her as Margaret.
18. As I walked through the premises, I saw that there were a series of gaming machines on both sides. Each gaming machine area was defined either by a solid hoarding that prevented customers making contact, and where that was not present there were signs that stated due to Covid 19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines without the need for dividing hoarding that was situated in other parts of the venue.
19. I walked towards the rear of the premises where a reception area was located. This had a Perspex Screen on the counter and an area used for the preparation of refreshments with a facility to make hot drinks. It was clean and tidy and additional hand sanitizers were adjacent to this location.
20. Standing behind this counter was a female member of staff. She was wearing a full perspex face shield and the Merkur Slots branded waistcoat and trouser suit. Pinned to her waistcoat was a Challenge 25 badge and a name badge

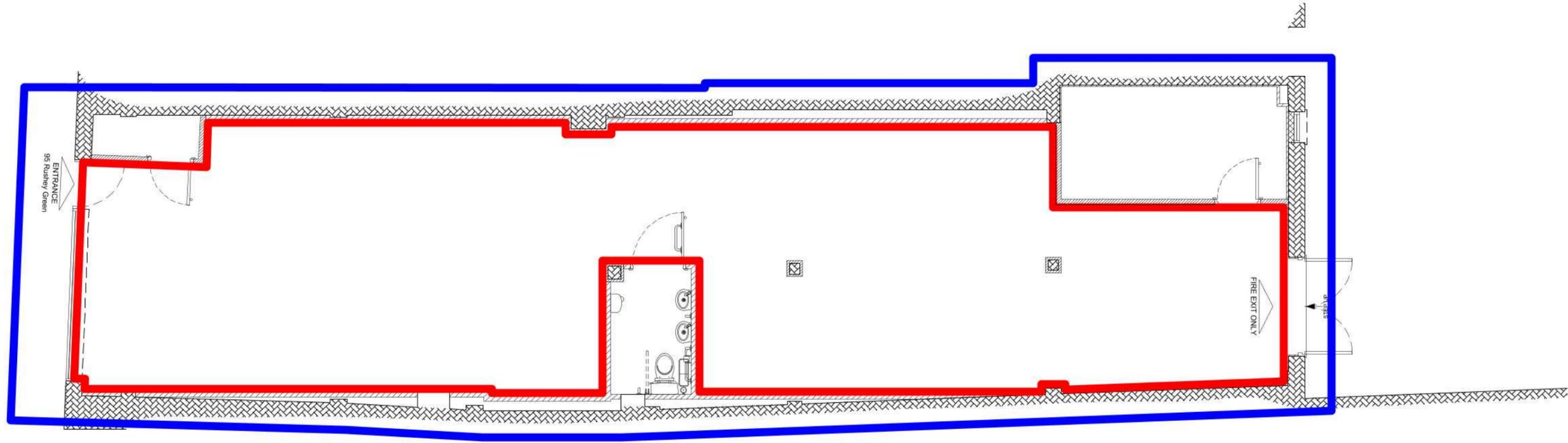
identifying her as Sally. She said hello and I then continued to look at gaming machines on the right-hand side of the premises.

21. The staff member Sally came from behind the counter and asked if she could help. I asked her if she could change two £5 notes into a £10 note which she did at a cash machine next to me. I then sat down and played a high value gaming machine.
22. While I was seated a door to my left and at the rear of the premises opened and I saw another female staff member appear pushing a mop and bucket. She to was wearing the branded Merkur clothing, displaying the Challenge 25 badge and a name badge that identified her as Michelle.
23. Whilst I sat playing the machine the staff member Sally approached me and offered me a drink and snacks, both of which I declined. She also explained details of an ongoing Merkur offer, 'Rainbow Riches Party £5 Matchplay' and enquired if I was interested in membership which I also declined.
24. I finished playing the machine then asked the staff member Sally if I could use the toilet facilities. She obtained a key from the reception area and then led me through a door at the rear of the premises to the toilet. The toilet door was unlocked and I entered. The toilet area was clean, in good condition and had clearly been subject to recent refurbishment. On the wall was a toilet cleaning check sheet for week ending 13/06/21 showing that the toilets had last been checked at 17:00hrs. In a plastic rack on the wall were the GamCare leaflets that were available for customers to take away, providing information to people dealing with gambling issues. There was soap available to wash hands and a hot air blower to dry.
25. On returning from the toilet, I asked Sally to show me the promotion game which I then played. I saw that there was another female customer in the premises playing a machine close to me and to my right. She was wearing dark clothing and a full-face mask. I heard the staff refer to her as Maria.
26. Whilst playing the promotional game the staff member Sally approached me and asked if I had the Covid-19 app. I said I did not so she recorded my name and telephone number on a tablet.
27. Aside from the two females I have described there were no other customers in the premises. Those who were there were clearly under no pressure to use the machines and did not appear vulnerable or drunk.
28. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend money and I found the premises very clean and tidy. The staff member I spoke to was helpful and friendly.
29. Having played on a number of machines I left the premises at approximately 18:45hrs.

## Summary

30. I have visited numerous gaming premises including those operated by Merkur Slots, or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
31. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
32. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
33. At the time of my visit on Tuesday 8th June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
34. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
35. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**  
**Leveche Associates Limited**  
**08/06/2021**



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

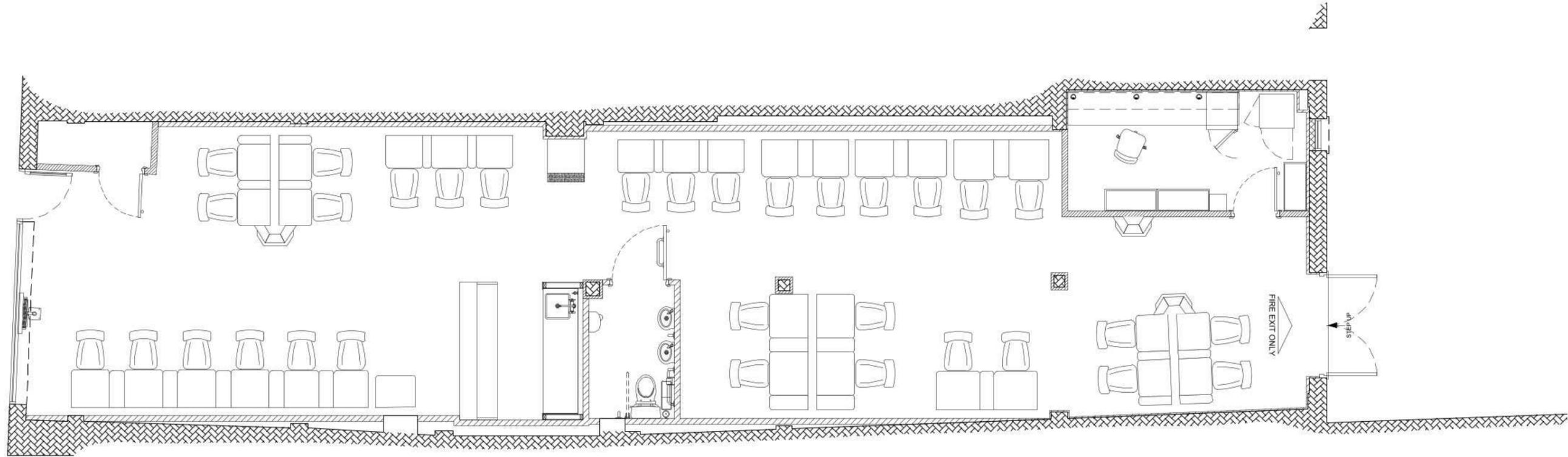
REVISIONS

FIT OUT TYPE CONCEPT 2
PROJECT MERKUR SLOTS 95 RUSHEY GREEN CATFORD SE6 4AF
DESCRIPTION PROPOSED LICENCE PLAN
<b>152</b>

REFERENCE DRAWINGS	
SCALE 1:75	
DRAWN BY S.R.B.	
DATE 19/08/21	
DRAWING No. <b>999-PR-04</b>	REVISION <b>01</b>



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MACHINES LEGEND	
MACHINE CATERGORY	QUANTITY
CAT B3	0
CAT C	0
CAT D	0
DUOPOTS	0
TRIMAX	0
TABLETS	0
RATIO	0/0

REVISIONS

FIT OUT TYPE CONCEPT 2
PROJECT MERKUR SLOTS 95 RUSHEY GREEN CATFORD SE6 4AF
DESCRIPTION PROPOSED MACHINE PLAN

REFERENCE DRAWINGS
SCALE 1:75
DRAWN BY S.R.B.
DATE 19/08/21

153

DRAWING No. 999-PR-03	REVISION 01
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# Merkur Slots, 95 Rushey Green, Catford, London, SE6 4AF

## Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	95 Rushey Green, Catford, London, SE6 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 Auditor, Amanda Kiernan – Head of Compliance
Date of Assessment:	11.02.2022
Review Date:	On opening in conjunction with local staff

## Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots, forms part of a development with residential apartments above – The Heights above. The entrance to Merva Court apartments is between the venue and Kaspas Desserts and the entrance to The Heights is the other side. Merkur Casino hold a Bingo licence issued by Lewisham Borough Council for Cashino Gaming, 97-99 Lewisham High Street, SE13 6BA which is has operated since November 2012.
Establishments of note:	Grassed areas outside the premises and along Rushey Green Road could attract youths and groups of a street lifestyle. Salvation Army, 23-25 Brownhill Road, SE6 2HE offering support for homeless and vulnerable persons.
Adjoining premises:	Kaspa's desserts and an empty unit.
Crime statistics:	In the year ending June 2021, the crime rate in Lewisham was about the same as the average crime rate across similar areas at 88.98 per 1000, it was higher than in other Metropolitan police force areas. (police.uk). In December 2021 there were 260 crimes recorded within a half mile of SE6 4AF. Violence and Sexual offences – 82, Anti-social behaviour – 49. (streetcheck.uk)
Population:	Rushey Green, Lewisham area has a population of 16,650 residents, gender split is 52/48 male/female. 12% are aged 16yrs and under, 63% are of working age and 25% are over 65yrs (median age is 33yrs). Majority of local residents are single 55%. 83% of people in Rushey Green area claim to have good and very good health, which is above UK average. Education levels - 10.8% of workers in SE6 4AA are in elementary occupations, compared to a national average of 11.6. (2011 Census Table)
Culture:	Merkur Slots Catford area is ethnically very diverse. Only 43% of resident population identify themselves as White. There is a high concentration of residents who describe themselves as Black African or Caribbean (34%). Other sizeable ethnic groups include Mixed Ethnicity (8.4%) and Asian (12.4%). Dominating religion here is Christianity – 60% of resident population. A sizeable portion of the population (20.3%) claim to have no religion, 10.4% did not state their religious views, 6.5% is Muslim and 2% is Hindu. (streetcheck.uk)
Unemployment:	Current unemployment rate in Catford area at 5.1% which is slightly higher than 3.9% national average. Working population is younger and more active than the inner London and England averages. 50.6% of resident population is in work, 16% is retired and 13.5% are students. Main source of employment here are elementary occupations, mainly Health and social work (19%) and Accommodation and Food (15.5%). Employees predominantly work in supervisory, clerical, and junior managerial, administrative and professional roles. There is also high volume of semi-skilled, unskilled manual workers and lowest grade workers. (streetcheck.uk)
Deprivation:	In Index of Multiple Deprivation 2019, Rushey Green area has been ranked amongst 20% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation causing biggest concern are crime deprivation, barriers to housing and other services domain and living environment deprivation domain – all classified within 10% most deprived areas in the country. Education domain here is better than 48% of areas in England and Employment and Health domains are both better than in 32% of areas in UK. 26.9% of socially rented properties which is higher than the London average of 24.1%.
Local Police:	Merkur Slots Catford is situated within the Lewisham Town Centre policing neighbourhood within the Metropolitan Police Constabulary. Closest police station is: Catford Police Station, 333 Bromley Road, SE6 2RJ, the front counter at this station has closed and the nearest 24hour station is Lewisham Police Station, 43 Lewisham High Street, SE13 5JZ. Catford Police Base is located at 4 Aitken Road, SE6 3BG.

**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 Statement of Principles for Gambling reference (2019-2022) Part B Considerations for Licensing Authority and Part C, section 10.2 Bingo Centres and London Ward Profiles Data

**Environmental Factors**

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

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited gambling	<p><b>Unemployment:</b> Current unemployment rate in Catford area at 5.1% which is slightly higher than 3.9% national average. Working population is younger and more active than the inner London and England averages. 50.6% of resident population is in work, 16% is retired and 13.5% are students. Main source of employment here are elementary occupations, mainly Health and social work (19%) and Accommodation and Food (15.5%). Employees predominantly work in supervisory, clerical, and junior managerial, administrative and professional roles. There is also high volume of semi-skilled, unskilled manual workers and lowest grade workers. (streetcheck.uk)</p> <p><b>Deprivation:</b> In Index of Multiple Deprivation 2019, Rushey Green area has been ranked amongst 20% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation causing biggest concern are crime deprivation, barriers to housing and other services domain and living environment deprivation domain – all classified within 10% most deprived areas in the country. Education domain here is better than 48% of areas in England and Employment and Health domains are both better than in 32% of areas in UK. 26.9% of socially rented properties which is higher than the London average of 24.1%.</p> <p><b>Schools and Education</b> Rushey Green Nursery, 41 Rushey Green, SE6 4AS Rushey Green Primary School, Culverley Road, SE6 2LA Catford After School Club, 115 Rushey Green, SE6 4AA Holbeach Primary School, Nelgarde Road, SE6 4TP</p>	<p><b>Age Verification</b> <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Catford Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p> <p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is</p>

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<p>Catford County School, Engleheart Road, SE6 2HR          Little Elms Daycare Nursery Catford Green, Adenmore Road, SE6 4BS          Holy Cross Primary School, Culverley Road, SE6 2LD          Prendergast Ladywell School, Manwood Road, SE4 1SA          First Fruits Saturday School, 265 Brownhill Road, SE6 1AE          Monkey Puzzle Day Nursery Catford, 25 Bromley Road, SE6 2TS          Little Elms Daycare Nursery Catford Green, Adenmore Road, SE6 4BS          Catford College, 3 Rosenthal Road, SE6 2BY          Pavilion Nursery Catford Ltd, 1st floor, Catford Cricket &amp; Sports Club, Penderley Road, SE6 2LQ          St George's Preschool, Catford, 6 Elm Lane, SE6 4LB          Rathfern Primary School, Rathfern Road, SE6 4NL          The Family Learning School, 47 Rushey Green, SE6 4AS          Sandhurst Primary School, Minard Road, SE6 1NW</p> <p><b>Community Centres and Youth Centres</b>          The Point Catford, 401 Lewisham High Street, SE13 6NZ          Lewisham Irish Centre, 2A Davenport Road, SE6 2AZ          Lewisham Local, Unit C, Place/Ladywell, 261 Lewisham High St, SE13 6NJ          Hartley Hall, Catford, London SE6 2JS          St Mary's Centre Lewisham, 37 Ladywell Road, SE13 7UT          Abbotshall Healthy Lifestyle Centre, Abbotshall Road, SE6 1SQ          Lewisham Seventh-Day Adventist Church &amp; Community Hall, 434 Lewisham High St, SE13 6LJ          Rural Urban Synthesis Society (RUSS), 12 Church Grove, SE13 7UU</p> <p><b>Parks, play grounds and sports/leisure facilities</b>          Mountsfield Park, The Lodge, Stainton Road, SE6 1AN          Mountsfield Park Playground, Mountsfield Park, Stainton Road, SE6 1AN          Lewisham Park, 18 Lewisham Park, SE13 6QZ          Ladywell Fields, 126 Ewhurst Road, SE4 1SD          Ladywell Fields Adventure Playground, End of road, Malyons Rd, SE13 7XE          Blythe Hill Fields, 42 Blythe Hill Lane, SE6 4XJ          Riverview Walk &amp; River Pool Linear Park, London SE6 4PQ</p> <p><b>Vulnerable and addiction support services</b>          Lewisham Community Team For Adults With Learning Disabilities, 19-21 Brownhill Rd, SE6 2HG          Quo Vadis Trust, 92 Brownhill Rd, SE6 2EW          Foundation 66, 92 Bromley Rd, SE6 2UR          Africa Advocacy Foundation, 76 Elmer Rd, SE6 2ER          Lewisham Nexus Service, 84-86 Rushey Green, SE6 4HW</p> <p><b>Homeless shelters and food banks</b>          Catford Fridge Station Community Fridge,          Lewisham Irish Community Centre, SE6 2BY</p>	<p>20% higher than the industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' <a href="https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019">https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</a></p> <p><b>Vulnerability</b>          Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p>
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	<p>Phoenix Community Housing, Goose on the Green, 167 Rushey Green, SE6 2RP Lewisham Housing Options, Laurence House, 1 Catford Road, SE6 4RU UCKG HelpCentre Catford, 1 Bromley Road, SE6 2TS Salvation Army, 23-25 Brownhill Road, SE6 2HE Apax Support, 36-38 Bromley Road, SE6 2TP St Mungo's Hostel, 1 Arlington Cl, Ennersdale Rd, Hither Green, SE13 6JQ Salvation Army Older People Service, 12-14 Lewisham Park, SE13 7PN</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b> University Hospital Lewisham, Lewisham High St, SE13 6LH Kaleidoscope, 32 Rushey Green, SE6 4JD Isis-Family Health, 183-185 Rushey Green, SE6 4BD Novum Health Partnership, The Primary Care Centre, Hawstead Road, SE6 4JH Hawstead Road Contraception &amp; Sexual Health Clinic, 1st Floor, The Primary Care Centre, Hawstead Rd, SE6 4JH The Rushey Green Group Practice, The Primary Care Centre, SE6 4JH Parkview Surgery Health Care Centre, 186 Brownhill Road, SE6 1AT Woolstone Medical Centre, Woolstone Rd, Forest Hill, SE23 2SG Woodlands Health Centre, 4 Edwin Hall Pl, Hither Green Lane, SE13 6RN Hilly Fields Medical Centre, 172 Adelaide Ave, SE4 1JN Natures Green Medical Centre, 298 Lewisham High Street, SE13 6JZ Fieldside Care Home, 9 Canadian Avenue, SE6 3AU Ringstead House, 62 Ringstead Road, SE6 2BS M Power Care Home, 22 Bromley Road, SE6 2TP Welcome Care Home, The Welcome Home, 28 Fordel Road, SE6 1XP Oakcroft, 41-43 Culverley Road, SE6 2LD Alexander Care Home, 21 Rushey Mead, Ladywell, SE4 1JJ Lewisham Park Care Home, 40 Lewisham Park, SE13 6QZ Brownhill Care Ltd, 307 Brownhill Road, SE6 1AL Penerley Lodge, 34-40 Penerley Road, SE6 2LQ St Jude's House, 14 Canadian Avenue, SE6 3AS Beechcroft Care Home - Akari Care, 329 Brownhill Road, SE6 1AL Ashleigh House, 133 Bromley Road, SE6 2NZ Penberth House, 29 Penberth Road, SE6 1ET Nomase Home Care Agency - Home Care in London, IVY House, Bradgate Road, SE6 4TT Bargery Road Care Home, 104 Bargery Road, SE6 2LW</p> <p><b>Gambling premises</b> Admiral Casino, Catford, 116-118 Rushey Green, SE6 4HW Betfred, 197 Rushey Green, SE6 4BD Betfred, 3 Catford Broadway, SE6 4SP</p>	<p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p><b>Customer Interaction</b> Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>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.</p> <p><b>Player Protection</b> <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>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.</p> <p>'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.</p> <p>Playright App available for customers to self-manage their play and spend and can send alerts to Merkur Slots Catford 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</p>
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	<p>Jennings Bet, 130-134 Rushey Green Road, SE6 4HQ  William Hill, 8, 8A Randlesdown Road, SE6 3BT  William Hill, 168 Hither Green Lane, SE13 6QA  Ladbrokes, 25 Catford Broadway, SE6 4SN  Coral, 78 Rushey Green, SE6 4HW  Admiral Casino, 96 Lewisham High Street, SE13 5JH  Cashino Gaming, 97 Lewisham High Street, SE13 6AT</p> <p><b>Pawnbrokers and Loan Shops</b>  H&amp;T Pawnbrokers, 58 Rushey Green, SE6 4JD  Cash Busters, 23 Rushey Green, SE6 4AS  Cash Converters, 292-294 Lewisham High St, SE13 6JZ  Crownsavers Credit Union, 20 Catford Broadway, SE6 4SN</p> <p><b>Bus stops and other Transport links</b>  Catford Bridge Railway Station, Catford, London, SE6 4RE  Hither Green Railway Station, Hither Green, London, SE13 5NF  Ladywell Train Station, Railway Terrace, SE13 7XB  The Catford Centre (Stop A), Catford, London SE6 4JZ  Brownhill Road The Catford Centre (Stop E), Catford, London SE6 2HG  The Catford Broadway (Stop H), Catford, London SE6 4HH</p> <p><b>Locally Identified Premises</b>  The Broadway Theatre, Catford Road, SE6 4RU  Corbett Community Library, Torrison Road, SE6 1RQ  Qstix Snooker and Pool Club, 98-102 Rushey Green, SE6 4HW</p> <p><b>Public Houses and Alcohol Licensed Premise</b>  A2 Lounge Restaurant &amp; Wine Bar, 77A Rushey Green, SE6 4AF  The London &amp; Rye, 109 Rushey Green, SE6 4AF  The Jolly Farmers, 354 Lewisham High St, SE13 6LE  Fox &amp; Firkin, 316 Lewisham High St, SE13 6JZ  Drink At Bob's, 214 Hither Green Ln, SE13 6RT  Ninth Life, 167 Rushey Green, SE6 4BD  Nuvo Lounge, 177-181 Rushey Green, SE6 4BD  Black Cat, 9 Winslade Way, SE6 4JU  Catford Bridge Tavern, Station Approach, Bridge, SE6 4RE  Blythe Hill Tavern, 319 Stanstead Rd, SE23 1JB  Ladywell Tavern, 80 Ladywell Rd, SE13 7HS  Hither Green &amp; District Railwaymens Social Club, Manor Lodge,  19 Beacon Road, Lewisham, SE13 6EQ  Park Fever, 21a Staplehurst Road, Hither Green, SE13 5ND  Fellowship &amp; Star, Randlesdown Road, Bellingham, SE6 3BT  Riva Lounge &amp; Restaurant, 3-7 Bromley Road, Catford, SE6 2TS</p>	<p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>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.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector.</p> <p><b>Deprivation</b>  Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p><b>Homelessness</b>  Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p>
Preventing gambling being a source of crime or disorder, being associated with crime and	<p><b>Crime statistics:</b>  Merkur Slots Catford is situated within the Rushey Green policing neighbourhood within the Metropolitan Police Constabulary. 2449 incidents of crime reported between Jan to Dec 2021 - anti-social behaviour and violence and sexual offences, both accounted for</p>	<p><b>Premise Security and violence in the workplace</b>  <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>disorder or being used to support crime</p>	<p>19.4% of reported incidents. During December 2021, 260 crimes were recorded within ½ mile of the location, violence and sexual offences – 82 (31.5%), anti-social behaviour – 49 (18.8%), burglary 12 (7.1%), drugs – 25 (9.6%), other theft and public order – 20 (7.7% each). (Police.UK/Lewisham Town Centre). Crime rate for Rushey Green which is included in Lewisham Town Centre is high at 49 per 1,000 residents compared to the Borough at 7 per 1,000 residents. (Met.Police.uk).</p> <p><b>Local Police:</b> Merkur Slots Catford is situated within the Lewisham Town Centre policing neighbourhood within the Metropolitan Police Constabulary. Closest police station is: Catford Police Station, 333 Bromley Road, SE6 2RJ, the front counter at this station has closed and the nearest 24hour station is Lewisham Police Station, 43 Lewisham High Street, SE13 5JZ. Catford Police Base is located at 4 Aitken Road, SE6 3BG.</p> <p>Crime Enforcement Regulation (CER) Service, are located at 9 Holbeach Road, Catford, SE6 4TW The CER Service is responsible for delivery of trading standards, licensing, community safety, anti-social behaviour and public nuisance functions within Lewisham. The CER Service is responsible for responding to complaints and meeting statutory requirements and responsibilities across these thematic areas. The CER Service is also responsible for:</p> <ul style="list-style-type: none"> <li>• Reducing serious violence amongst those under 25year old with particular focus on knife enabled crime, child sexual exploitation and domestic abuse.</li> <li>• Tackling all strands of violence against women and girls with particular focus on domestic abuse and sexual abuse.</li> <li>• Preventing hate crime occurring in Lewisham whilst increasing reporting of hate crime and public confidence.</li> <li>• Preventing vulnerable people from becoming radicalised.</li> <li>• Delivery of the National Extremism Strategy at a local level.</li> <li>• Focusing on work in relation to identified geographical hotspots, premises and people of interest. This includes business crime and community safety related issues that impact on local residents. This links with work under the strands of organised crime, including drugs as a driver for violence, firearms, human trafficking, child sexual exploitation, economic crime and cybercrime.</li> </ul> <p><b>Public Houses and Alcohol Licensed Premise</b> A2 Lounge Restaurant &amp; Wine Bar, 77A Rushey Green, SE6 4AF The London &amp; Rye, 109 Rushey Green, SE6 4AF The Jolly Farmers, 354 Lewisham High St, SE13 6LE Fox &amp; Firkin, 316 Lewisham High St, SE13 6JZ Drink At Bob's, 214 Hither Green Ln, SE13 6RT</p>	<p>Merkur Slots Catford 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 Catford 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><b>General Crime and Disorder</b> <i>To identify aggressive customers to prevent crime and disorder Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for Rushey Green 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 Metropolitan Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Catford will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p><b>Anti-social behaviour outside the premise</b></p>
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Ninth Life, 167 Rushey Green, SE6 4BD  
 Nuvo Lounge, 177-181 Rushey Green, SE6 4BD  
 Black Cat, 9 Winslade Way, SE6 4JU  
 Catford Bridge Tavern, Station Approach, Bridge, SE6 4RE  
 Blythe Hill Tavern, 319 Stanstead Rd, SE23 1JB  
 Ladywell Tavern, 80 Ladywell Rd, SE13 7HS  
 Hither Green & District Railwaymens Social Club, Manor Lodge,  
 19 Beacon Road, Lewisham, SE13 6EQ  
 Park Fever, 21a Staplehurst Road, Hither Green, SE13 5ND  
 Fellowship & Star, Randlesdown Road, Bellingham, SE6 3BT  
 Riva Lounge & Restaurant, 3-7 Bromley Road, Catford, SE6 2TS

#### **Pawnbrokers and Loan Shops**

H&T Pawnbrokers, 58 Rushey Green, SE6 4JD  
 Cash Busters, 23 Rushey Green, SE6 4AS  
 Cash Converters, 292-294 Lewisham High St, SE13 6JZ  
 Crownsavers Credit Union, 20 Catford Broadway, SE6 4SN

#### **Gambling premises**

Admiral Casino, Catford, 116-118 Rushey Green, SE6 4HW  
 Betfred, 197 Rushey Green, SE6 4BD  
 Betfred, 3 Catford Broadway, SE6 4SP  
 William Hill, 8, 8A Randlesdown Road, SE6 3BT  
 William Hill, 168 Hither Green Lane, SE13 6QA  
 Jennings Bet, 130-134 Rushey Green Road, SE6 4HQ  
 Ladbrokes, 25 Catford Broadway, SE6 4SN  
 Coral, 78 Rushey Green, SE6 4HW  
 Admiral Casino, 96 Lewisham High Street, SE13 5JH  
 Cashino Gaming, 97 Lewisham High Street, SE13 6AT

#### **Residential Areas (impacted by Anti Social Behaviour)**

According to Police.uk, anti-social behaviour was the most commonly reported crime type in this area in the last 12 months (708 incidents). In December 2020, there were 42 anti-social behaviour incidents reported within half a mile of Merkur Slots Catford postcode. 3 of those incidents took place on Rushey Green.

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 4 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 Catford 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.

		<p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p><b>Money Lending</b> Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p> <p>Page 217</p>		<p><b>Bingo/Gaming Machine and Supervision</b> 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).</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 venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p><b>Customer Complaints</b> <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained</p>

		<p>and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p><b>Marketing</b>  Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
<p>Other</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 218</p>	<p><b>Places of worship and Religious Buildings</b>  Elim Pentecostal Church - Right Now Jesus Centre, 75A Rushey Green, SE6 4AF  Eglise Evangelique Vie Nouvelle, 77-79 Rushey Green, SE6 4AF  Holebeach Baptist Church, 3 Brookdale Road, SE6 4JP  Rccg Great Beauty Tabernacle, 43 - 47 Rushey Green, SE6 4AS  St Laurence Church, 37 Bromley Rd, SE6 2TS  Potters House Christian Church Lewisham, St Laurence Centre, 37 Bromley Road, SE6 2TS  Lewisham Unitarian Meeting House, 41 Bromley Road, SE6 2TS  King's Church London - Catford, Catford Hill, SE6 4PS  The Redeemed Christian Church of God, Freedom House, Top floor, 2 Barmeston Road, SE6 3BH  Holy Cross RC Church, 208 Sangley Road, SE6  Catford Assemblies of God Pentecostal Church, 1 Glenfarg Road, SE6 1XN  Hither Green Methodist Church, Catford, SE6 1RQ  Brownhill Road Baptist Church, 292 Brownhill Road, SE6 1AU  Living Waters Apostolic Church, 265 Brownhill Road, SE6 1AE  Hither Green Baptist Church, Theodore Road, SE13 6HT  Catford Community Church, Calabash Centre, 24-26 George Ln, SE13 6HH</p>	<p><b>Ethnicity and Local Area Demographic</b>  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><b>Training &amp; Social Responsibility</b>  Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p>

		<p>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 Bi monthly and Compliance Auditors twice yearly.</p> <p><b>COVID 19</b> All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>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 Catford Premise Layout

Premise level:	Merkur Slots is a ground floor premises.
Premise frontage:	Merkur Slots Catford 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 Catford 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"> <li>- 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.</li> <li>- Beverage and snacks are provided from the service area</li> <li>- 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</li> <li>- The CCTV monitor on the central desk allows staff to view the exterior at all times.</li> </ul>
Floor layout:	Merkur Slots Catford 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 Catford 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 Catford 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.

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Additional Comments

Merkur Casino is accredited by the G4 Global Gambling Guidance Group for Responsible Gambling.

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. (Gill Clulow – Senior Auditor).

I am an IIA Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries. The last 9 years I have been working solely in the Gambling Industry (Amanda Kiernan, Head of Compliance).

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

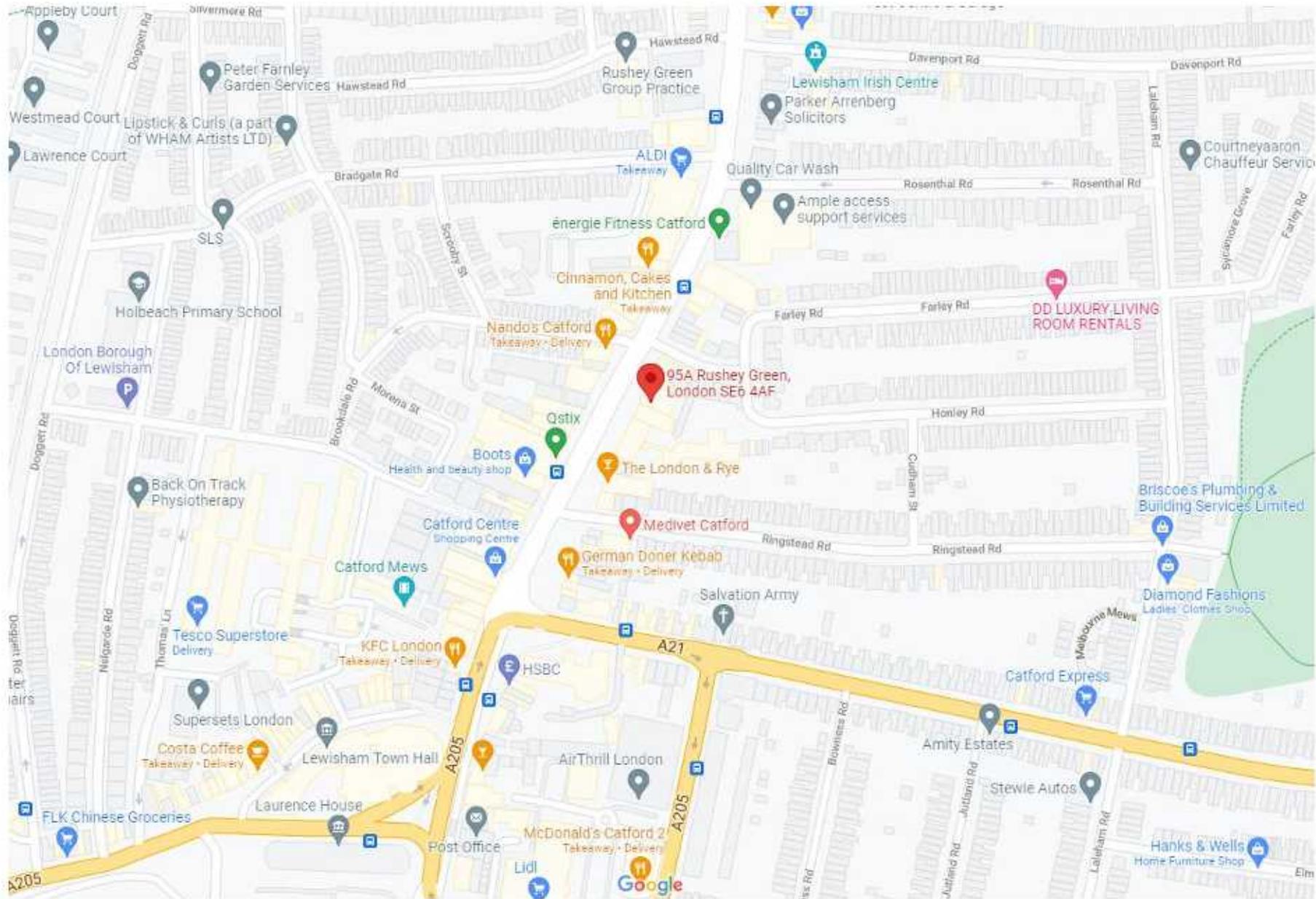
Where relevant, Merkur Slots has also considered any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However, the company does not operate discriminatory policies against any identified groups based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

Assessors Name:	Gill Clulow
Signature:	
Date:	11.02.2022

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# Merkur Slots, 95 Rushey Green, Road, Catford, SE6 4AF

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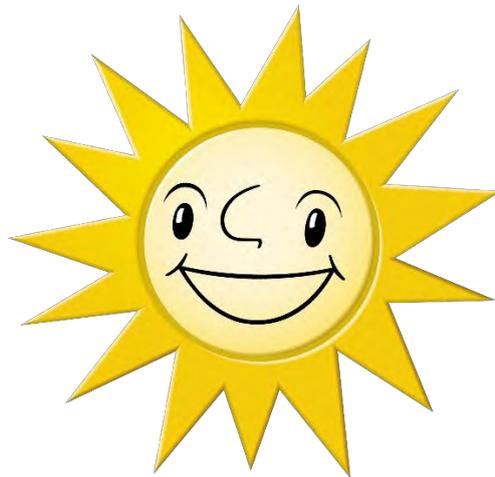


Merkur Slots, 95 Rushey Green, Road, Catford. SE6 4AF, shop Front example

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# **Merkur Slots: Social Responsibility, Operational Compliance & Training Documents**



**MERKUR**  

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**SLOTS**

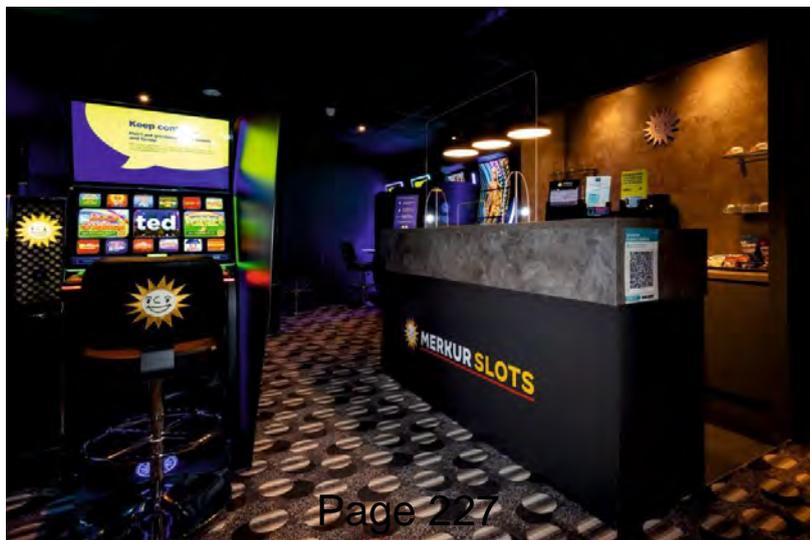
**Social Responsibility,  
Operational Compliance  
& Training Documents**

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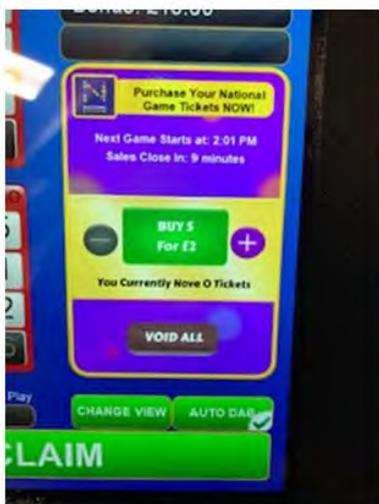
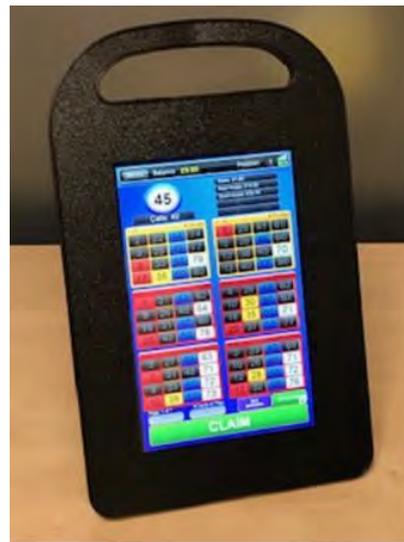
# LICENSING OBJECTIVES



Image Library of a customer Journey in our Venues



# LICENSING OBJECTIVES





## SAFER GAMBLING

Our MERKUR brands are setting new standards of player protection with the launch of 360 - a programme which cements the company's continuous commitment to social responsibility. 360 has been developed following close consultation with the Global Gambling Guidance Group (G4) whose accreditation programme helps organisations to establish a responsible gambling culture and implement initiatives that minimise the harms caused by problem gambling. G4's wide-ranging audit, which included a cultural assessment based on interviews conducted among staff working at all levels of the organisation, was documented in a dedicated Gauselmann UK-specific Action Work Programme.



# 1. Keeping crime out of gambling

Whilst crime is considered 'low/medium risk' in our business, we have to be mindful of the fact crime still exists and our venues could be considered as a target for money laundering gained from the proceeds of crime and terrorist financing, i.e. drug money, TITO technology to conceal 'fake notes', life style and spending habits.



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



Dedicated Learning & Development Team and National training centres.



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



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



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



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



Policies and training on anti-money laundering, 6 month refresher training



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



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

## 2. Ensuring gambling is conducted fairly and openly

We have to ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

**MARKETING CODE OF PRACTICE**  
A GUIDE TO GETTING OUR ADVERTISING AND PROMOTIONS RIGHT – EVERY TIME!

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

**LEGAL - DECENT - HONEST - TRUTHFUL**

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

**LEGAL - DECENT - HONEST - TRUTHFUL**

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

18+ BeGambleAware.org

PLAY SENSIBLY PLAY ENJOYABLY PLAY AFFORDABLY

**MERKUR SLOTS**

**GAMBLING COMMISSION**

Licence conditions and codes of practice  
April 2020

Gambling advertising: protecting children and young people  
Advertising Code (with breakdown and examples)

**CAP**



All promotional activity is controlled centrally to remain compliant to our Code of Practice.

All venues have clear information boards in venue with how to get support, complain and provide feedback

**PLAYING THE MACHINES**  
Staying in Control

18+ BeGambleAware.org

PLAY SENSIBLY PLAY ENJOYABLY PLAY AFFORDABLY

**MERKUR SLOTS**

**COMPLAINTS & DISPUTES POLICY**

Unresolved complaints or disputes regarding operations or any other gambling related issues should be brought to the attention of the Duty Manager on the site.

If the complaint or dispute cannot be resolved by the Duty Manager, the matter will be referred to the Area Manager for review, within 7 working days. The Area Manager will complete the complaint form for return to the Area Manager. The form will also be logged at the head office of Merkur Slots.

If the matter cannot be resolved by the Area Manager, the complainant should write to the Operations Director, Casino Services Ltd, Seabree House, 58 Southbank Road, Milton Keynes, MK9 1JF.

If the Operations Director is unable to resolve the complaint or dispute to the customer's satisfaction, then the customer may refer the matter to the body with which the company has an arrangement for alternative final party dispute resolution.

Alternative dispute resolution is provided by:  
Resolution: Resolution Centre for Casino and Gaming  
10 Spa Street, London, EC2A 4PU

18+ BeGambleAware.org

PLAY SENSIBLY PLAY ENJOYABLY PLAY AFFORDABLY

**MERKUR SLOTS**

Our leaflets clearly outline processes to support our customers

### 3. Protecting children and vulnerable people from being harmed or exploited by gambling

We have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18s only. As a company we operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.



Our venues have 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared to other leisure and gambling sectors that sit around 80%.

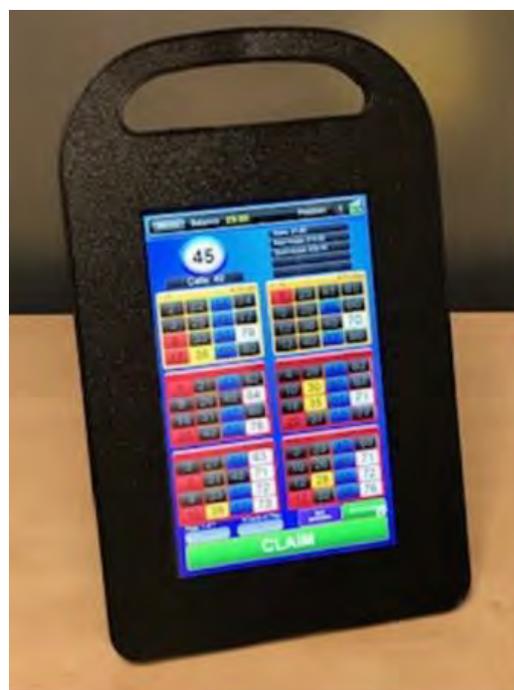


All employees complete on-boarding and six-monthly refresher training on “The Essentials of Compliance and Social Responsibility” and “Safeguarding Children and Vulnerable People”.



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

# Bringing Traditional Bingo to the High Street



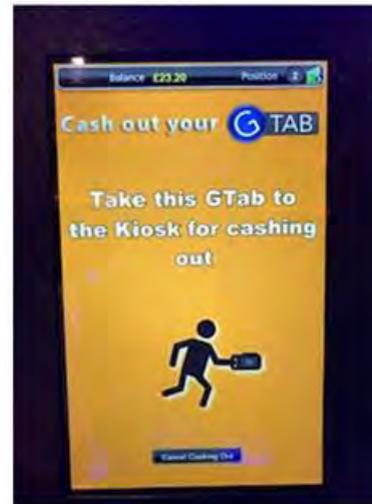
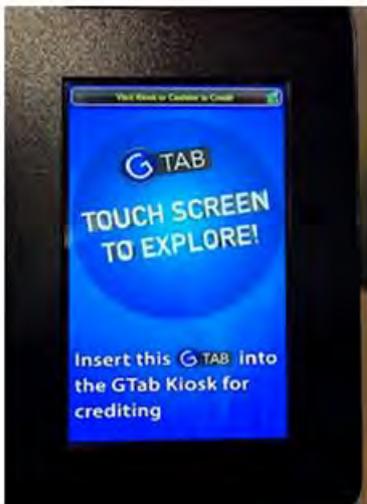
G-Tab is a multi-purpose gaming device offering live link Bingo Games, Bingo Variant Games and participation in the National Bingo Game which is played twice daily. Bingo tablets are bingo machines that provide games of both remote and non-remote bingo with remote bingo being the linked games operated via WiFi and the internet on licensed premises. Complies with the appropriate Gambling Commission Technical Standards and Machine Guidance.

## Standalone Tablet Terminal

Bingo numbers announced and shown live on the top display



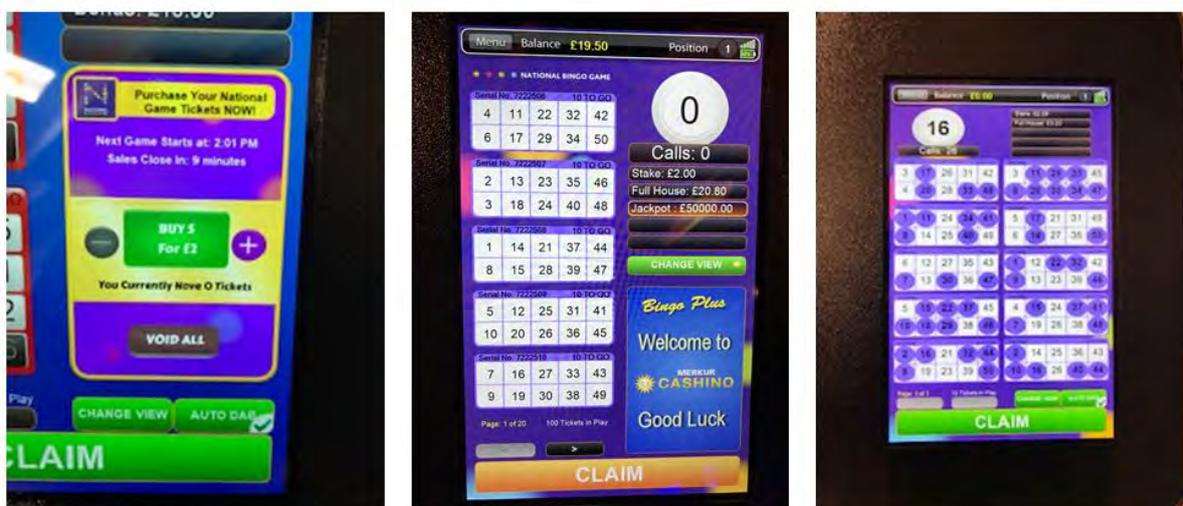
Charges to play clearly displayed



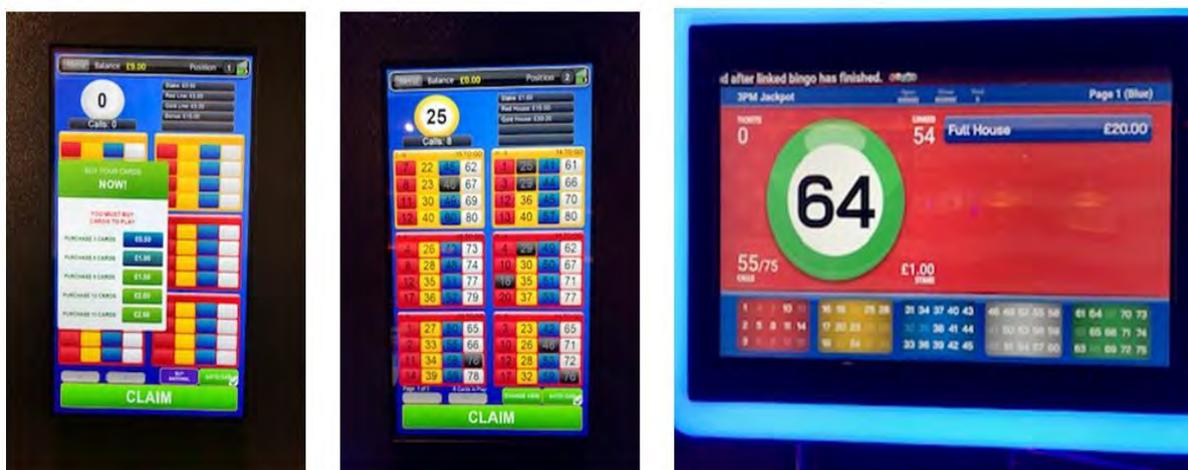
Customers cannot stake-up once game has commenced

Making all traditional forms of Bingo like 'Shutter Bingo' played at the sea-side or 'main-stage' Bingo played in Clubs available.

**National Bingo Game**, linked to all Bingo Clubs (such as Mecca and Buzz) played twice daily (2pm and 7pm) at £2.00 for 5 tickets, maximum tickets 100 per position, making £40 maximum stake which is within the Bingo Association guidelines. Prize money including the National Jackpot is based on the number of cards in play, including bonus lines and is clearly displayed on the main display caller's unit, prior to the game commencing and on the individual tablets throughout the game.



**Live Link Bingo** played throughout the day from 50p for 3 cards, maximum 15 cards per position, making maximum stake of £2.50 per game. The prize money, based on number of cards in play, including bonus lines is clearly displayed on the main display caller's unit, prior to the game commencing, and on the individual tablet throughout the game.

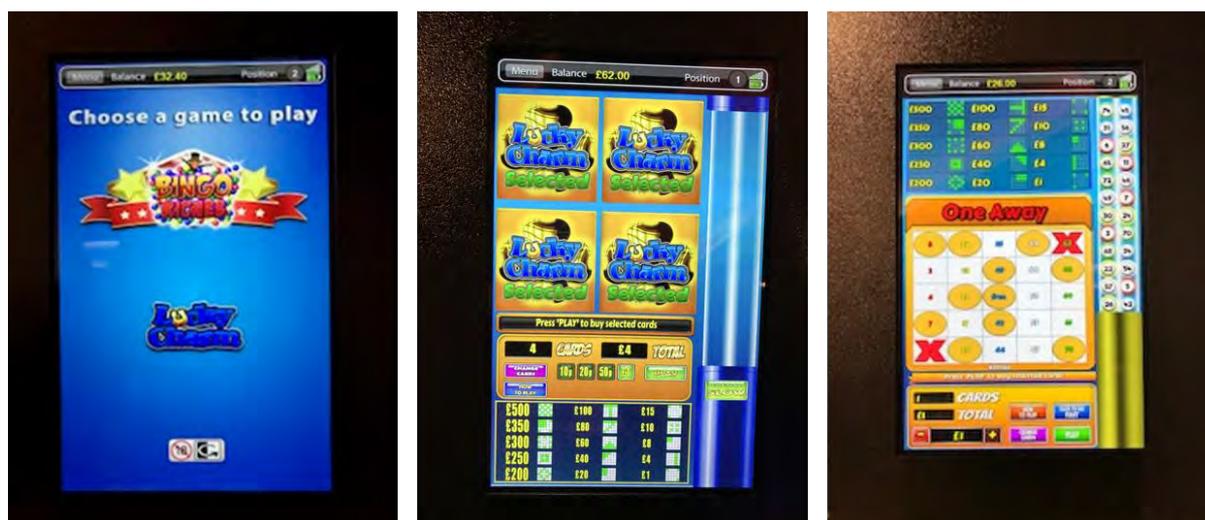


**Bingo Variant (BV) Games** are available 9:00 till midnight. The game of bingo stands alone on the tablet and does not connect via remote communication to a server or link to games across premises.

**Bingo Riches:** play from 10p (25p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £40 on 10p stake.



**Lucky Charm:** play from 10p (20p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £50 on 10p stake.



**Low stake games:**

The device also offers the player a choice of games which can be played from as little as 5p (maximum £1) a game all of which comply with Cat C technical standards.

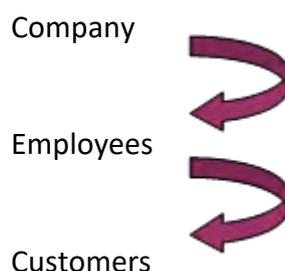
## SOCIAL RESPONSIBILITY POLICY

### STATEMENT OF INTENT

The responsibility for an individual's gambling is their own. Merkur Casino UK, operating the brands Merkur Slots and Merkur Bingo, recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

### WHAT IS SOCIAL RESPONSIBILITY?

Social responsibility is about going above and beyond what is called for by the law. Ideally, proactively identifying signs of problem behaviours is better than reacting to a problem. We apply our social responsibility through three levels:



Social responsibility is being responsible to people, for the actions of people, and for actions that affect people. Casino Gaming has clear policies, procedures and codes of practice which outline and support the development of the way in which staff intervene where there is a suspected problem and the Company then monitors and supports the development of the awareness and knowledge of its staff in dealing with such interventions.

The idea of being responsible to customers has actually long been embedded in the ethics of business, treating a customer with respect, attention and genuinely caring about what the customer wants and needs. As a Company we understand our responsibility to help people.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives. These are to:

- Keep crime out of gambling
- Ensure that gambling is conducted in a fair and open way; and
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling.

It is our responsibility to ensure that we comply with these licensing objectives at all times.

## COMPANY

Our Statement of Intent is published and available to all our employees.

To support the licensing objectives and in addition to our Social Responsibility Policy we also have: -

- Sensible gambling procedures including Self Exclusion
- 'Think 25' policy

## EMPLOYEES

The Company ensures that all employees are inducted responsibly into our organisation through: -

- Induction checklist
- Employee Handbook
- Reviews and sign off at 4,8,12 weeks

The above documentation includes comprehensive coverage of the following: -

- Social Responsibility Policy
- Sensible gambling procedures
- 'Think 25' policy

Ongoing training is available to all our employees and we provide a Customer Care training programme, that specifically trains our staff about problem gambling and how to interact with customers who may be affected (including arrangements for self exclusion), whilst also covering the following areas:

- Customer care
- Conflict management
- Social responsibility

In addition employees will receive refresher training every 6 months.

## CUSTOMER

Information is clearly provided to the customer to enable them to understand the machine/game they are playing and the percentage returns that apply on all games.

The customer is made aware of and given advice on problem gambling through appropriate advertising, notices, information and Staying In Control leaflets on site. Further information including sources of help and support is available via the following organisations: -

- Citizens advice <https://www.citizensadvice.org.uk>
- Gamble Aware <https://www.begambleaware.org>
- GamCare <https://www.gamcare.org>
- GamesAid <https://www.gamesaid.org>
- Gam-Anon <https://www.gam-anon.org>
- Gamblers Anonymous <https://www.gamblersanonymous.org.uk>
- Gordon Moody Association <https://www.gordonmoody.org.uk>
- Action for Children Charity <https://www.actionforchildren.org.uk>
- National Debtline <https://www.nationaldebtline.org>
- Leeds Community Gambling Service (via Gamcare)

The implementation of the following policies and procedures and through Customer Care Training ensures that this is consistent throughout the Company: -

- Social Responsibility Policy
- Sensible gambling Procedure
- 'Think 25' policy



Stefan Bruns  
Chief Executive Officer



Mark Schertle  
Chief Operating Officer



Boris Lungen  
Chief Financial Officer

## **POWERS OF THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS & OTHER OFFICERS**

### **STATEMENT**

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

The Company acknowledges its obligation to ensure that staff co-operate with the Gambling Commission's Enforcement Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises.

- The Company must provide the Gambling Commission with any information that they suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a license condition or a code of practice provision having the effect of a license condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating License.
- The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as: -
  - the numbers of people making use of the facilities and the frequency of such use.
  - the range of gambling activities provided by the licensee and the number of staff employed in connection with them.
  - the licensee's policies in relation to, and experience of, problem gambling.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

## **RIGHTS OF GAMBLING COMMISSION ENFORCEMENT OFFICERS**

- A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed.
- A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed.
- Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating license or premises license is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating license.
- Entry may also be made to assess the likely effects of activity when application has been made for a premises license.
- The powers of the constable, enforcement officer or authorised person can include inspection of any part of the premises or any machine, anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions.
- The power of inspection must be exercised only at a reasonable time.
- The enforcement officer or authorised person must provide evidence of his identify and authority.
- A constable, enforcement officer or authorised person may use reasonable force to enter a premise.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online UPSKILL Training platform hosts Essential of Compliance & Social Responsibility workbook and online quiz to be completed every 6 months by all employees.

## PROCEDURE

Visits by Gambling Commission Enforcement Officers may be pre-arranged or unannounced, however: -

In all circumstances the employee must ask for identification from the visitor to establish that they are a Gambling Commission Enforcement Officer.

The Duty Manager must attend the Enforcement Officer without delay.

The visitor must also be requested to sign into the visitors log book.

Staff are to co-operate at all times with the Commission's Enforcement Officers in the proper performance of their compliance functions.

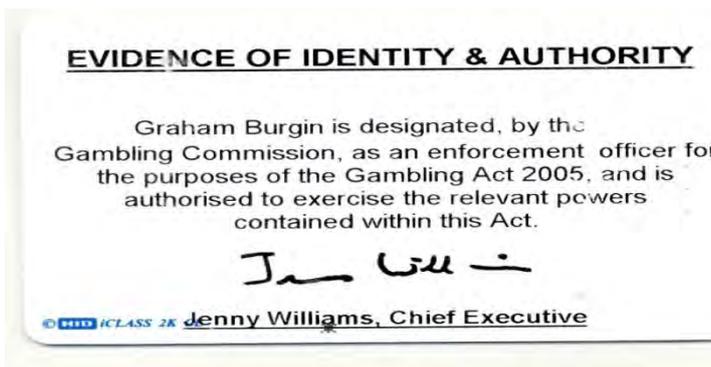
The Enforcement Officer may remove copies of documents as required.

### **Gambling Commission Sample ID**



**Front of card** Contains the Following:

1. Officers Name
2. Photo ID
3. Serial Number
4. Date of Issue
5. Gambling Commission Contact Details



**Back of card** contains the following:

1. Evidence of the Officers Identity
2. Signature of the Gambling Commission Chief Executive

## **MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS**

### 1. Introduction

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

New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering Regulations 2007 ("the Regulations"). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As of 31st October 2016 new money laundering regulations come into force. The regulations are applicable to the License Conditions & Codes of Practice (LCCP). Whilst our venues/sector is considered "Low Risk", this does not mean that there is "no risk" within our trading sectors.

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

### 2. Money Laundering Definition

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

### 3. Policy

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

Merkur Casino UK has appointed a designated Money Laundering Officer (MLO), Mrs. Amanda Kiernan.  
Email: [amandakiernan@praesepeplc.com](mailto:amandakiernan@praesepeplc.com)

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

#### 4. Disclosure Procedure

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

All incidents should be reported to your line Manager.

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

#### 5. Cash Handling

Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of: -

- Monetary stakes introduced to machines (gross takings where available)
- Money introduced to refloat machines
- Token transactions
- Customer refunds due to machine malfunctions
- Money removed from machines (net takings where available). Where gross takings and net takings information is not available the operation will provide an explanation to the Commission

- Ticket In Ticket Out (TITO) vouchers from machines in arcades can be used for money laundering. Vouchers can be cashed in at a later date and criminals will use a range of outlets to disguise the origin of funds

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

## **KEEPING ALCOHOL OUT**

At Merkur Slots we have clear rules and guidelines on the consumption and influence of alcohol.

### **INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL ON ENTRY**

In all our sites individuals who are deemed to be under the influence of excessive alcohol should be prevented from entering any of our premises.

#### **Procedure**

When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence of alcohol and ask the individual to leave the premises.

Should the individual resist or refrain from leaving the premises in the first instance a Manager or Duty Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the staff on duty the police should be called to assist.

All incidents should be recorded fully on the premises log.

### **ALCOHOL CONSUMPTION ON SITE**

Dependent upon which type of site you are on depends on the rules that need to be applied.

#### **Bingo Clubs**

Customers may purchase alcoholic drinks on site within the licensing regulations of the premises; however customers must not bring alcohol onsite to be consumed.

#### **AGC's/High Street Bingo**

Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

Customers should be approached to either leave the premises or stop drinking on site.

## **EXCESSIVE CONSUMPTION**

### **Procedure**

For sites where alcohol may be purchased and a customer consumes to excess to the extent that their behaviour becomes inappropriate or disruptive they should in the first instance be prevented from consuming any more alcohol and should be requested to behave appropriately or be asked to leave the premises, usually by a duty manager.

Where the individual refuses to leave the premises then the police should be contacted for further assistance.

## DEALING WITH AN AGGRESSIVE CUSTOMER

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

### **WHAT CAUSES AGGRESSION AND VIOLENCE?**

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

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

### **WHAT ARE SOME OF THE CAUSES OF VIOLENCE?**

There are two aspects to consider:

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

## IDENTIFYING AN AGGRESSIVE OR VIOLENT CUSTOMER

There are tell tale signs so the key thing is to observe customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour.

These are some of the signs that can help in predicting the likelihood of imminent violence:

- Muscles tensed?
- Facial expression?
- Balanced to move?
- Fingers or eyelids twitching?
- Pacing about?
- Withdrawn on approach?
- Voice - change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing - increase in respiration?
- Tears?
- Offensive weapon carried or available?

## PROCEDURE

Quite simply whenever there is an incident you should: -

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

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

- Be alert and consider if you need further assistance.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move - stay on person's weak side where possible.
- Consciously lower pitch and volume of voice.
- Speak clearly and slowly and don't stop talking because the other person doesn't answer.

- Try to get the person talking.
- Listen to what the person says and how it is said.
- Try to identify the source of concern and help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation - buy time to think, to plan, to obtain assistance.
- Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.
- Do not argue! You really cannot win because the other person does not have to be logical. If you lose the argument and have to back off, your position is weakened. You may get so involved, if you do not carefully measure your own response, that you might, in the end, lose some of your own self-control.
- Do not give orders!
- Never make promises you cannot keep.
- Do not disagree where it is not necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.
- Control your behaviour in body language, feelings and expression.
- In conversation with the person being confronted use expressions such as:
  - o "I know you have a problem", "I know you are upset", "I believe you when you say something is wrong". Keep your voice at a calm, even pace.

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

- Always consider if you need further assistance from a colleague, if the person becomes abusive in their language or behaviour they should be asked to leave immediately (remember to refund their stake money). If they refuse to leave then assistance from management or the police should be sought.

## **PREVENTING STAFF FROM BEING ABUSED**

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

At no time should a member of staff intervene physically in the removal of an individual from a site.

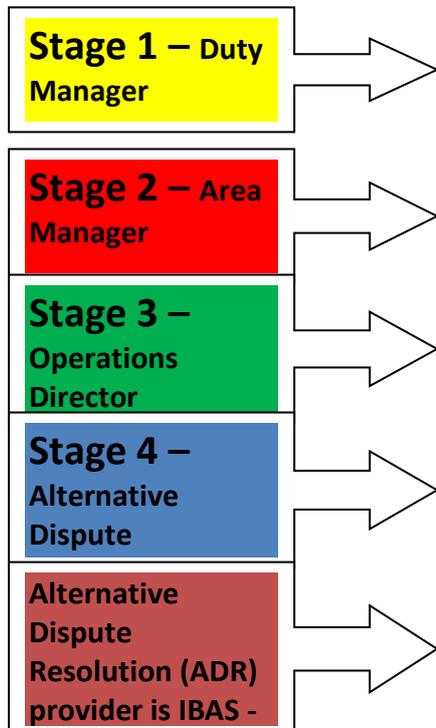
All incidents should be fully recorded on the IHL Smart Tablet incident log.

## COMPLAINTS PROCEDURE

The Company's written complaints procedure is available as a separate leaflet.

Cashino venues operate a 4 stage complaints procedure as below.

If you receive a visit from the Gambling Commission/Local Authority they may ask you who our **Alternative Dispute Resolution (ADR)** provider is so ensure you know the answer – see details below.



# COMPLAINTS & DISPUTES POLICY

Unresolved complaints or disputes regarding repayments or any other issue should be brought to the attention of the Duty Manager in the first instance.

If the complaint or dispute cannot be resolved by the Duty Manager, the matter will be referred to the General Manager for action, within 7 working days. The Duty Manager will complete the relevant form for referral to the General Manager. The form will also be logged at the head office of Merkur Slots.

If the matter cannot be resolved by the General Manager, the complainant should write to: The Operations Director, Merkur Slots Ltd., Seebeck House, 1A Seebeck Place, Knowlhill, Milton Keynes MKS 8FR.

If the Operations Director is unable to resolve the complaint or dispute to the customer's satisfaction, then the customer may refer the matter to the body with which the Company has an arrangement for alternative third party dispute resolution.

Alternative dispute resolution is provided by:  
(IBAS) Independent Betting Adjudication Service Limited  
P.O. Box 62639, London EC3P 3AS



**MERKUR SLOTS**

18+ BeGambleAware.org

PLAY SENSIBLY

PLAY ENJOYABLY

PLAY AFFORDABLY

## **MARKETING AND PROMOTIONAL GUIDELINES**

### **POLICY**

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

### **COMPLIANCE**

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

We adopt the general principles that our advertising is:

- legal, decent, honest and truthful.
- prepared with a sense of responsibility to consumers and to society.
- respectful to the principles of fair competition generally accepted in business.
- not intended to bring advertising into disrepute.

Specifically we ensure that:

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

# MARKETING CODE OF PRACTICE

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

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

### LEGAL - DECENT - HONEST - TRUTHFUL

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

GUARANTEED JACKPOT WINS FOR EVERYONE! ❌

PLAY THIS AND DOUBLE YOUR MONEY! ❌

YOU WILL WIN A FORTUNE! NO TERMS AND CONDITIONS ❌

BEST BEFORE END ✔️

OVER 18 ONLY 18 ✔️

18 ✔️

THINK 25 ✔️

FREE TO ENTER? ✔️

PLAY LONGER WIN MORE ❌

✔️

### LEGAL - DECENT - HONEST - TRUTHFUL

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

18+ BeGambleAware.org   

PLAY SENSIBLY

PLAY ENJOYABLY

PLAY AFFORDABLY



## MARKETING AND PROMOTION

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

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

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

### Procedure

All Marketing and Promotions must be compliant.

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

### For Bingo Sites

- ☐ Operations Director
- ☐ General Manager
- ☐ Marketing Manager

### For AGC's

- ☐ Operations Director
- ☐ Marketing Manager

## **ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS**

### **POLICY**

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. It is illegal for any person who is under 18 years of age to be permitted entry to any Licensed Premises.

### **PROCEDURE**

- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Licensed Premises.
- Any person known to be under 18 years of age will be refused entry.
- Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry or when it comes to the attention of staff. Members of staff are trained to 'think 25'.
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. If at any time there is suspicion of forged documents these incidents will be recorded and reported.
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. Acceptable forms of identification include those that carry the PASS logo (e.g. Citizen card, Validate and the Government's own Connexions card); a driving licence (including a provisional licence) with photograph, or a passport and military identification cards.
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.

- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.
- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.
- Any attempts by under-18s to enter the premises or designated area(s) are brought to the attention of the Duty Manager immediately and recorded as an entry on a IHL SMART Tablet. Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence.
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s attempting to gamble in an adult-only environment, and under-18s are not allowed to retain any prize.
- Consideration will be given to permanently excluding from our Licensed Premises any adult who has previously and repeatedly attempted to gain entry when accompanied by a child or young person or, should entry have been gained, if the offence was committed knowingly or recklessly. Notwithstanding, that adult shall be required to stop gambling immediately and told to leave the premises.
- In instances where a child or young person repeatedly attempts to gamble on premises or in designated area(s) restricted to adults, or where repeated oral warnings have been issued, consideration will be given to reporting the matter immediately to the Gambling Commission and, where appropriate, police or local education welfare department.
- Consideration is to be given to reminding customers of their parental responsibilities and to assess whether there is a need to develop procedures for dealing with young or otherwise vulnerable children left unattended in the vicinity of our premises.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log.

## **EMPLOYMENT OF CHILDREN AND YOUNG PERSONS**

### **POLICY**

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

### **COMPLIANCE**

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in: -

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on the Licensed Premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence. All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

### **IT IS STRICT COMPANY POLICY THAT: -**

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Licensed Premises are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.

## **CUSTOMER INTERACTION**

**REMEMBER** reporting an Interaction is **NOT** the same as reporting an Incident.  
An Interaction is a **Gambling related issue** with a customer.

### **POLICY**

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

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

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

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

New Customer interaction – formal guidance was introduced by the Gambling Commission 31st October 2019. A copy is available to read in this section of your Compliance folder. Customer interaction consists of the following 3 parts;

### **Procedure**

**PART 1; Identify and observation** – behavior or activity you have spotted or something the customer tells you.

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

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

The above 3 parts include the following;

- Behaviours may include intense mood swings, aggression, hysteria, remorse, excessive ATM use, time and money spent, damage to property, violence or the threat of violence to staff or other customers.
- The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not. [SmartINCIDENT app on IHL tablet]
- Staff are aware of where customers can be directed for confidential advice should they be approached by them for help. This Includes the Staying in Control information leaflet which includes GamCare Helpline details.
- Members of staff are trained to deal with the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained for consideration.
- All venue staff should be aware of those customers that are frequent visitors or deemed to be "high value" players. Monitoring and interaction will take place with every customer during every visit. It is this interaction that may lead the Duty Manager to intervene or take appropriate action, possibly via the Machine Administration Reconciliation System (MARS), which is able to monitor the spend of particular customer on specific machines, who may be deemed "high value", and therefore potentially more at risk. Appropriate action would then be taken on a player by player basis.
- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.
- All Customer Interactions must be logged on the IHL SMART Tablet.
- Members of staff are trained as part of their 3 month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.

## **SELF EXCLUSION**

### **POLICY**

Whilst most customers are able to enjoy and control their gambling, Merkur Slots recognises its duty of care to those who cannot. Accordingly we provide a self – exclusion facility for those customers to request their exclusion for a fixed period of time, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months each.

New regulations were implemented by the Gambling Commission and as from 6th April 2016, all gaming operators have to be part of a multi operator self-exclusion scheme, referred to as MOSES.

**IF A CUSTOMER WISHES TO SELF-EXCLUDE IMMEDIATELY, WITHOUT MEETING WITH THE AREA MANAGER/DUTY MANAGER/SUPERVISOR OR WITHOUT A FURTHER VISIT TO OUR PREMISES, THEN THEIR DECISION MUST BE RESPECTED. THE DUTY MANAGER OR SUPERVISOR SHOULD ASSIST THE CUSTOMER IN THE COMPLETION OF A SELF EXCLUSION REQUEST IMMEDIATELY, SO THAT THE CUSTOMER NEED NOT MAKE A FURTHER VISIT TO THE GAMING PREMISES. PLEASE NOTE: YOU WILL NEED A WIFI CONNECTION IN ORDER TO ACCESS THE IHL HUB AND THE SmartEXCLUSION PAGE ON THE TABLET.**

### **Procedure - Using the SmartEXCLUSION Tablet**

When a customer has requested that they be refused entry to our premises, the customer and the Area Manager/Duty Manager/Supervisor will formally acknowledge and document their request on the SmartEXCLUSION tablet, available at all Cashino venues. For further information please refer to the “SmartEXCLUSION User Guide” available at the venue.

#### **Self-exclusion is sector specific:-**

- **AGC LICENSED PREMISES** - 0.25km – 1km exclusion zone.
- **BINGO LICENSED PREMISES** – Traditional Bingo Clubs eg Beacon, Mecca and Buzz plus High Street Bingo’s – National exclusion zone

**Please Note:** the staff member dealing with the self-exclusion process should make the customer aware that if they self-exclude from a Slots Venue with a Bingo Licence, they will be self-excluded from ALL High Street Bingo’s and Traditional Bingo clubs in the UK. Therefore, you need to know what type of Premises Licence you hold at your venue. It will either be ADULT GAMING CENTRE PREMISES LICENCE (AGC) or BINGO PREMISES LICENCE. The tablet is set up to select your sector type by default, either AGC or BINGO. You will need to explain to ALL CUSTOMERS who wish to self-exclude, that it is sector specific and that they need to visit other establishments in your local area if they frequent premises operating Bingo, AGC, Licensed Betting Shops and Casinos licenses in order for them to self-exclude from **ALL gambling premises**.

The customer will be asked to assist us in applying the exclusion by allowing you to take an up-to-date photograph. The SmartEXCLUSION tablet has a built-in web cam for this purpose. You will be prompted by the on-screen instructions when to take a photo of the customer during the self- exclusion process. **A photo is a mandatory requirement. The photo should be taken of head and shoulders only.**

The Area Manager/Duty Manager/Supervisor will confirm the customer’s exclusion for a minimum period of not less than six months, nor more than 12 months.

The exclusion will apply to all Adult Gaming Centre (AGC) venues within a radius of 0.25km – 1 km, if your venue holds an AGC license and ALL Bingo licensed premises – Traditional and High Street if your premises hold a Bingo License.

**It must be made clear to the customer that they may not revoke the self-exclusion during this time.**

Once the customer has entered their electronic signature on the tablet and the self-exclusion is confirmed, the information will be retained on the tablet at the venue and electronic notification sent out to other similar licensed premises, nationally for Bingo licensed premises and within a 0.25km – 1km radius for AGC licensed premises.

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

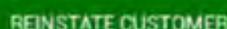
Please note on the photo gallery,

- Exclusions which are live have no coloured border.
- Exclusions which are in the 6 month ‘cooling off’ period have a **RED** border. These photos will remain on the tablet for 6 months. If the customer does not return to gambling within the 6 months period, photo will automatically disappear and be archived.
- Exclusions in the 24 hour ‘cooling off period have a **BLUE** border. This will be visible for customers who have reinstated and wish to resume gambling and will disappear after the 24 hour period.

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

A red rectangular button with the text "REPORT BREACH" in white capital letters.

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

A green rectangular button with the text "REINSTATE CUSTOMER" in white capital letters.

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

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

First Name: **dummy**

Last Name: **test**

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

As of 6th April 2016 you no longer need to add any self-exclusions **completed on the tablet** to 'LOG E – Self Exclusion' as the new SmartEXCLUSION tablet acts as the electronic log. (See details below for old style paper Self Exclusions).

#### **PROCEDURE – Using the old paper Self Exclusion Request Forms which have yet to expire**

**PLEASE NOTE:** You will need to retain any previous paper copies of SELF EXCLUSION REQUEST FORMS on file, until such time they have expired and the 'END DATE' is reached. This could be up to 2020. Do not throw them away as they are proof that a customer self-excluded prior to 6th APRIL 2016, when the regulations changed. You will also need to retain the paper copy of the SELF EXCLUSION REVIEW FORM. This form will need to be completed if a customer wishes to return to our premises and resume gambling. You will only need to use this form for paper copies of self-exclusions which are not on the tablet.

**PLEASE NOTE:** For old style paper self-exclusions you have in your Compliance folder, which are still active, (see 'end date'), the Duty Manager or any other authorised person and the customer will review the request and record the process on a self-exclusion review form and attach this to the original self-exclusion request form. If the customer wishes to extend their self-exclusion, this will need to be completed on the tablet as a new entry for a minimum period of 6 months.

You will need to record on LOG E, any actions for old style paper Self Exclusion Request Forms you still have on file i.e. customer breach, customer review/resume gambling and 24 hour cooling off period.

**If the customer does wish to continue gambling after the expiry of an exclusion period then a 24 hour cooling off period must be taken before gambling is resumed.**

**Paper self-exclusion request forms should be destroyed 6 months after the end date due to the data protection act.**

**PLEASE NOTE:** Self-exclusion social responsibility code provision 3.5.1 is a condition of our Licence Conditions and Codes of Practice – (LCCP)

## SELF EXCLUSION PROCEDURE FLOWCHART

CUSTOMER:

Requests to be excluded.

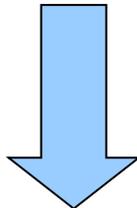
AREA MANAGER/DUTY MANAGER/SUPERVISOR:

Goes through the implications, for a minimum period of not less than six months, nor more than 12 months, with the customer, upon request, having the option to extend one or more periods for at least a further six months each. Advises the customer of the GamCare Self-Assessment test (on tablet) before self-excluding.

CUSTOMER AND  
AREA MANAGER/DUTY MANAGER/SUPERVISOR:

Completes the customer exclusion request using the SmartEXCLUSION tablet and follows the on screen instructions.

CUSTOMER:



Must allow a photograph to be taken using the built in webcam using the SmartEXCLUSION tablet.

AREA MANAGER/DUTY MANAGER/SUPERVISOR:

Explains to customer the exclusion is sector specific and applies to other similar operating premises in the locality within the default 0.25km – 1 km radius.

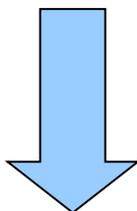
CUSTOMER:

Once customer has electronically signed and Duty Manager confirmed the self-exclusion on the SmartEXCLUSION tablet, the customer must now leave the site.

MANAGER:

Checks the SmartEXCLUSION tablet and photo gallery includes the customer in question. Informs Team Members and any regular relief staff. Make new starters aware if they start during the exclusion period.

MANAGER/DUTY STAFF



Must record a breach on the Smart EXCLUSION tablet when a customer who has elected to self-exclude themselves tries to enter the premises.

AFTER THE END OF THE EXCLUSION PERIOD:

Customers will be offered support and advice should they wish to resume gambling. They should return to the venue where they originally self- excluded from to complete the re-instatement process. If this is the case a 24 hour cooling off period is put in place. Information will also be provided on how to extend the self-exclusion period should they wish to do so.

See above instructions for old style paper self-exclusion request forms which have expired and reached the end date and the process to follow.

Full operating instructions for your SmartEXCLUSION tablet are available at all venues. Please refer to the SmartEXCLUSION User Guide available at your venue.

**SELF EXCLUSION REVIEW FORM**

**Please note: this form should only be used for old style paper self-exclusions on file. You do not need to use this form for self-exclusions on the SmartEXCLUSION tablet.**

Company: .....

Site Name: .....

Site Address: .....

Post Code: .....

Customer Name: .....

Customer Date of Birth: .....

Customer Address: .....

Post Code: .....

Self-Exclusion agreement start date: .....End Date:.....

Customer's Decision: ..... .....
--

**Request to resume access and gambling following the self-exclusion period.**

I confirm that I voluntarily no longer wish to be self-excluded from this site and other venues in the locality to which the agreement applies; that all options have been explained to me by the Company.

Signature: ..... (Customer)

Date:.....Time.....

Signature: ..... (Appointed Manager)

Date:.....Time.....

**I have experienced a "cooling off" period of 24 hours and can resume gambling as of:**

Date:.....Time:.....

**Please note:** if the customer wishes to be reinstated on the Membership database, a copy of this form needs to be emailed to Tracey Chapman – (Memberships) at Cashino Head Office, Milton Keynes.  
Email:[traceychapman@praesepeplc.com](mailto:traceychapman@praesepeplc.com)

**Please note:** Log E needs to be updated with these details in your Compliance folder for old style paper self-exclusion forms only pre 6<sup>th</sup> April 2016.

**Please retain this form on file for your records for a further 12 months from date signed.**

## SOCIAL RESPONSIBILITY & CODES OF PRACTICE

### PREMISES LOGS

The Logbook contains the following:

- NEW:**        **Venue Monthly Compliance Log Check Summary**
- LOG A:**        **Attempts By Children And Young Persons To Access Adult Areas** – Recorded electronically using **Age Verification app** on IHL tablet
- LOG B: 1**       **Customer Interaction - Gambling Related “At Risk” Customers** – Recorded electronically using the **SmartINTERACTION app** on IHL tablet.
- LOG B: 2**       **Customer Incidents – Not Gambling Related** – Recorded electronically using **SmartINCIDENTS app** on IHL tablet.
- LOG C:**        **Customer Complaints and Disputes** (paper Log)
- LOG D:**        **Customer Incidents Requiring Police Assistance** – Recorded electronically using **SmartINCIDENT app** on IHL tablet.
- LOG E:**        **Self-Exclusion Log** (Now Obsolete) - Was used for old paper Self Exclusions Forms which are not on the tablet and retained in Compliance Folder.
- LOG F:**        **Incidents Relating To Aggressive Customers and Alcohol** – Recorded electronically using **SmartINCIDENT app** on IHL tablet.
- LOG G:**        **Staff Training Summary** – paper log to be signed and dated every 6 months by **all staff**, when they complete “Essentials of Compliance” training module. **Venue Managers** to check the log is up to date at the end of the month and sign the Log Check Summary to verify the log is correct.  
**(this will remain as a paper Log and will not be on the tablet)**

**NOTE:** You can download and print these Premises Logs on Upskill > Knowledge Base > Categories > Cashino Compliance Folder Content

(MERKUR Premises Logs – section 5 - Updated April 2019 – V1.6)

## Venue Monthly: Compliance Log Check Summary

Venue Name	Month and Year		
<b>Log</b>	<b>Description</b>	<b>Total No.</b>	<b>Comments</b>
<b>A</b>	<b>Attempts by children and young persons to enter venue</b> [Age Verification app on tablet as of 9th July 2018]		
<b>B 1</b>	<b>Customer Interactions related to Problem Gambling</b> [SmartINTERACTION app on tablet as of 8th April 2019]		
<b>B 2</b>	<b>Customer Incidents <b>not</b> related to Problem Gambling</b> [SmartINCIDENT app on tablet as of 1st October 2018]		
<b>C</b>	<b>Customer Complaints and Disputes</b> [paper log]		
<b>D</b>	<b>Customer Incidents Requiring Police Assistance</b> [SmartINCIDENT app on tablet as of 1st October 2018]		
<b>E</b>	<b>Paper Self-Exclusions, Attempts to enter, Attempts to Gamble</b> [complete for any paper self- exclusion forms you have on file] further information on log sheet		
<b>F</b>	<b>Incidents Relating to Aggressive Customers and Alcohol</b> [SmartINCIDENT app on tablet as of 1st October 2018]		
<b>G</b>	<b>Summary of Staff Training: Essentials of Compliance Only (EOC)</b> [paper log to be completed & signed by <u>ALL STAFF</u> for EOC training]	<b>NA</b>	<b>NOTE:</b> Please check at the end of each month training dates on Log G correspond with Upskill EOC dates

Document to be completed checked and signed monthly by Venue Manager or designated person at the end of each month.

Area Manager check and sign every 8 weeks.

<b>Signed Venue Manager</b>		<b>Date</b>	
<b>Signed Area Manager</b>		<b>Date</b>	<b>Comments</b>
<b>Signed Auditor/Compliance Manager</b>		<b>Date</b>	<b>Comments</b>

(Regulatory reports to the Gambling Commission are for the period 1st April to 31st March each year)

SITE ADDRESS and NUMBER: .....

**LOG G: SUMMARY OF STAFF TRAINING – Page 1**

**TO BE COMPLETED SIGNED AND DATED BY ALL EMPLOYEES EVERY 6 MONTHS FOR UPSKILL – ESSENTIALS OF COMPLIANCE TRAINING (EOC) AND QUIZ**

Management and staff have declared that they have read and understood the following training documents and are fully aware of Company policy and procedures relating to them:

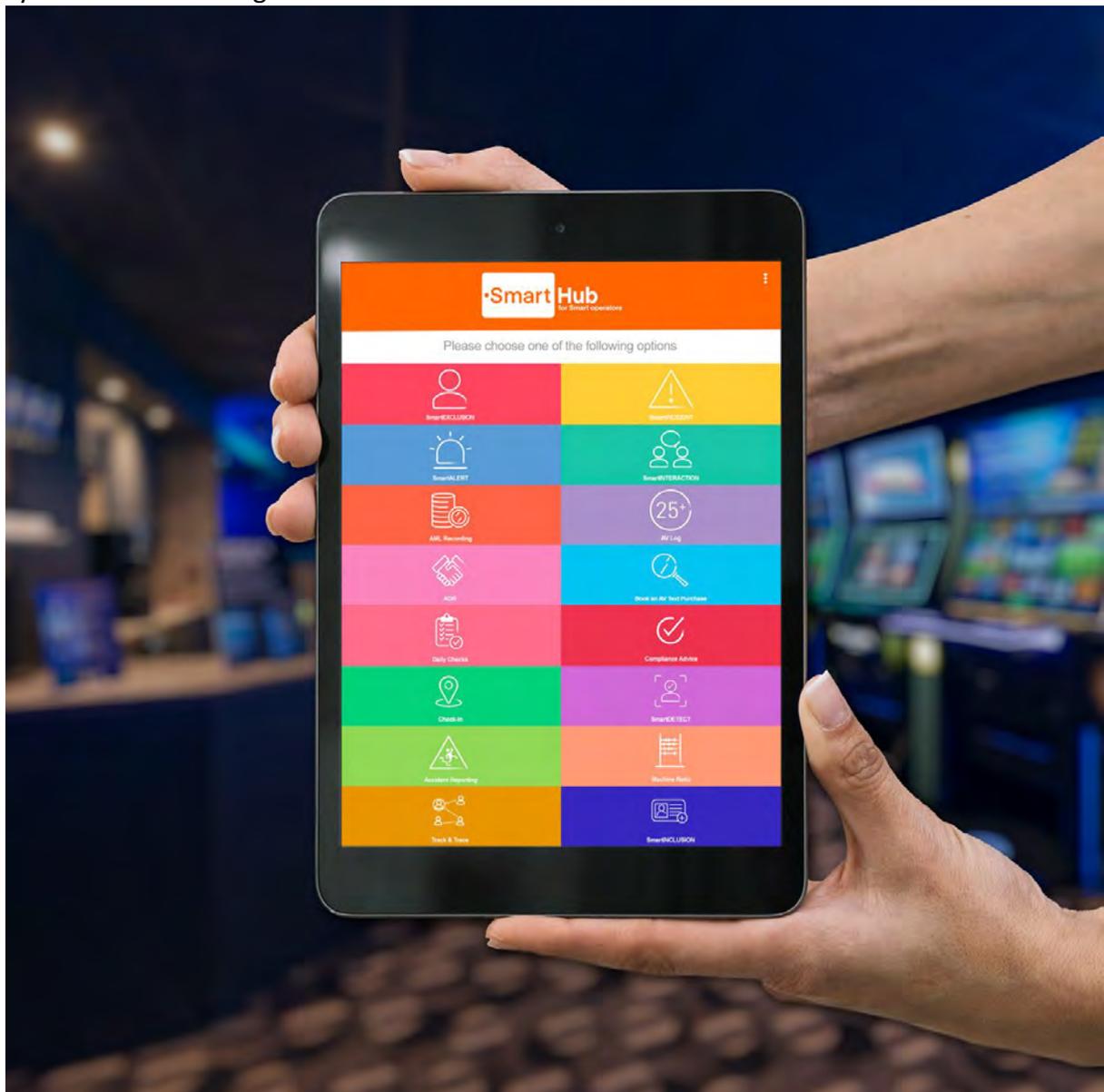
1. Access to Gambling by Children and Young Persons	6. Money laundering and Proceeds of Crime Act 2002
2. Access to Premises by the Gambling Commission’s Enforcement Officers	7. Self-Exclusion
3. Advertising Standards and Marketing	8. Customer Interaction for “At Risk” customers
4. Fair and Open Practice and Alternative Dispute Resolution/IBAS	9. Incidents relating to Aggressive Customers and Alcohol
5. Information on how to Gamble Responsibly and Help for Gamblers with problems	10. Employment of Children and Young Persons

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Name	Position in Company	Training Date EOC Quiz	Staff Signature	Next Training Date Due in 6 months	Leaving Date	1	2	3	4	5	6	7	8	9	10
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

**QUICK GUIDE: for recording information using the IHL tablet and the remaining paper Logs**

Our teams use a tablet system, designed by IHL, allowing us to digitally log a number of areas. This system is also linked live to the National Self-Exclusion scheme. An Image of this system is below along with a breakdown of details behind the icons.



## **SOCIAL RESPONSIBILITY & CODES OF PRACTICE PREMISES LOGS**



**Age Verification app** - all ID checks for customer(s) you suspect being under the age of 25 are to be recorded on the tablet (remember we operate a Think 25 policy).



**SmartINTERACTION app** - If you are approached by a customer, or you instigate a conversation with regards to “AT RISK” customers who may have a **gambling problem**, if you offer “Staying In Control” Leaflet, and discussions regarding self-exclusion, you need to record the incident on the tablet.

**LOG C (paper log) - Customer Complaints & Disputes** - If a customer has a complaint regarding our business, you need to record the complaint on log C and follow the 4 stage complaints procedure. Further details are available in your Compliance folder.



**SmartINCIDENT App** – the app should be used to record all incidents types 1-6 as listed below. On the Log Check Summary Venue Managers will need to record how many incidents you have each month for; **Log B2 - Customer Incidents (not gambling related), Log D - Customer Incidents Requiring Police Assistance and Log F - Incidents Relating to Aggressive Customers and Alcohol**. You can view this information by selecting “View Incidents” and “incident Type” on the tablet and adding up the total for each of these incidents for the month in question.

Listed below are the incident types on the tablet. Further information can be recorded by selecting the drop down box.

Incident Types:

1. Incident relating to aggressive behaviour
2. Incident relating to barred or previously barred customer
3. Incident relating to alcohol
4. Incident relating to drugs
5. Incident relating to disturbance inside / outside / near premises
6. Venue Staff Training (Training Only)

**LOG E Self Exclusion (paper log) – you only need to complete this log if you have any customers who are still self-excluded on the old paper Self Exclusion Request Form.** Be sure to find out if you still have any valid forms in your venue! (you may not have any, as it varies from venue to venue). Some of these forms may not end until April 2020! You should complete the necessary columns if a customer attempts to enter and gamble in your venue. If a customer wishes to return to gambling a paper Self-Exclusion Review Form needs to be completed in the first instance, then update the last 2 columns on Log E once the customer has had their 24 hour cooling off period.

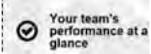


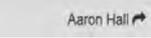
**SmartEXCLUSION App** (current method) on IHL tablet, to be completed if a customer wishes to self-exclude. Ensure all staff check the tablet daily at the start of each shift to familiarise themselves with any new photos which will appear in the top left hand corner of the photo carousel for new self-excluded customers, as the tablet will update automatically each day! Please refer to the Self Exclusion Policy page 3, in the Compliance folder for staff training information.

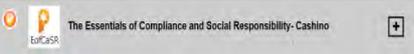
A copy of all User Guides for the tablet are available in your venue for reference purposes. You can also view and download these documents on Upskill > Knowledge Base > Categories > see IHL .....

**LOG G – Staff Training Summary** - keep Log G in the Compliance folder with other Premises Logs in section 5. (This log will remain as a paper based Log and will not be available in electronic format on the tablet). At the end of each month check all information is up to date on Log G and training dates for all staff corresponds with Upskill. Sign and date the Log Check Summary and add any comments. To check the dates are correct, log in to Upskill, select E Learning, then select the following:

**Employee** – select  and follow the steps 1,2,3 below;

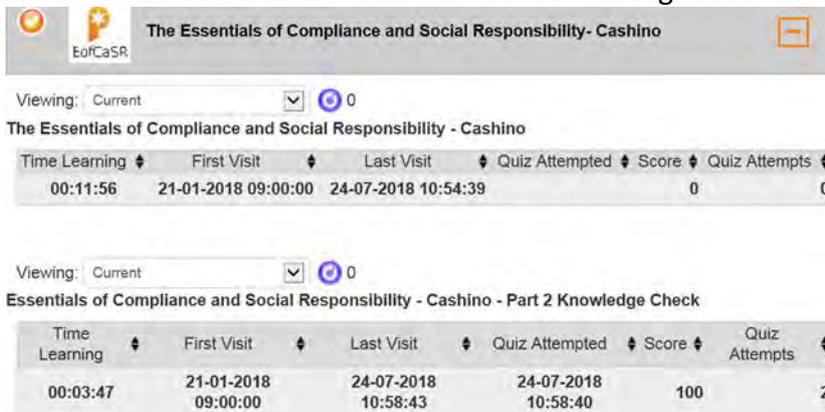
**Venue Managers** - select  to view a list of all staff members at your venue and follow steps 1.2.3 below

1.  select employee name and click on the arrow to open up the profile

2.  select the + sign to open up the training module

**PLEASE NOTE: All staff must complete part 1 fully before they complete part 2 Knowledge Check, or it will show as “incomplete” on Upskill.**

3. This is the date which should be recorded on Log G in column “Training date EOC quiz”



The screenshot shows two views of a training module. The top view is the main module page, and the bottom view is the 'Part 2 Knowledge Check' page. Both views show a table with columns for Time Learning, First Visit, Last Visit, Quiz Attempted, Score, and Quiz Attempts.

Time Learning	First Visit	Last Visit	Quiz Attempted	Score	Quiz Attempts
00:11:56	21-01-2018 09:00:00	24-07-2018 10:54:39	0	0	0

Time Learning	First Visit	Last Visit	Quiz Attempted	Score	Quiz Attempts
00:03:47	21-01-2018 09:00:00	24-07-2018 10:58:43	24-07-2018 10:58:40	100	2

Please **do not** remove and file away paper logs from the Compliance folder, until you are advised. The Gambling Commission, Area Managers, Auditors and Compliance Managers will need to review the content to check venues are being **Socially Responsible**.

## THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

- Merkur Slots UK Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Merkur Slots UK Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Merkur Slots UK Limited premises operate digital CCTV and customer areas are supervised.
- Merkur Slots operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Merkur Slots premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Merkur Slots UK Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Merkur Slots operate a robust late night working policy, which is fully supported by a full-time Night Manager.

- Merkur Slots 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.
- 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.

## Compliance Policy

### Why:

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Merkur Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

### Best Result:

All employees are fully aware of the importance of following policy and processes in regards to compliance and social responsibility. The business is run in line with the license conditions and codes of practice at all times and all employees work together to ensure the 3 licensing objectives are met.

### Worst Result:

Employees are not aware of the policy and processes in regards to compliance. The company is not operated in line with the 3 licensing objectives and the license conditions and codes of practice. The business is put at risk of its license being lost.

### The 3 licensing objectives:

- **Keep crime out of gambling**
- **Ensure that gambling is conducted in a fair and open way**
- **Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling**



### What:

- Employees must complete compliance training before being able to work with customers in any venue
- It is the responsibility of the Lead Supervisor to ensure that all employees are correctly trained and up to date with compliance training
- It is the responsibility of employees to check that they have completed all relevant compliance training on their inform people/upskill account regularly
- Employees must always follow the policies and processes in regards to compliance which are found in the Compliance and Social Responsibility folder

### When:

- The policies and processes which form compliance and social responsibility apply at all times of operation.

### Who:

- All employees have a responsibility to ensure that the business is operated in a way which is compliant at all times.

### Related / supporting documents:

- The compliance and social responsibility folder.

### Order of who to contact if in need of help / advice:

- Lead Supervisor
- Cluster Manager
- Compliance Manager

## CCTV Policy

### Why:

CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue area covered by CCTV at all times.

### Best Result:

The CCTV system is only accessed by those with authority to do so. Camera angles are never changed without the correct authority. The security of the venue is increased

### Worst Result:

The CCTV is accessed by those who should have no access, data is lost. Cameras are moved without authorization causing a loss of coverage of key areas. The security of the venue is compromised

### What:

- The CCTV system should be switched on and recording at all times.
- Any faults with the CCTV System should be communicated to your Cluster Manager immediately and the IT department.
- CCTV should always cover: The front and rear exits, All machines, The offices and The GeWeTe
- The CCTV should be checked daily to ensure its working correctly and the time and date are all correct.
- Information in regards to the CCTV should never be disclosed to any 3<sup>rd</sup> parties.
- Placing and adjusting of the cameras should only be completed by IT with authorisation from AM/OD.
- Records should be kept to show who has access to the CCTV password and username.
- Decorations should be not placed in areas which obscure the CCTV monitors
- The CCTV should be in a security cabinet
- The key to the Security Cabinet to be locked in the Key Cabinet

**When:**

- The CCTV should be checked daily to ensure correct function.

**Who:**

- The Lead Supervisor has responsibility for the CCTV system being checked and fully functional.

**Order of who to contact if in need of help / advice:**

- Cluster Manager.
- Commercial Administrator

## Machine Fraud Policy

### Why:

Machine fraud is a threat which is ever present. Employees should be aware of the ways in which fraud can take place and what to do in the event of spotting a "customer" defrauding a machine.

### Best Result:

All employees are aware of the policy in regards to machine fraud and what to look out for. Machine fraud is reduced and the income for the business protected.

### Worst Result:

Employees fail to identify fraud taking place resulting in loss of income. Further venues are targeted. The employees responsible may be subject to disciplinary processes.

### What:

- The venue floor should never be left unattended.
- Employees should be thoughtful in regards to customers who they are not familiar with
- Employees should be given access to photos of known fraudsters by the Cluster manager
- Known fraudsters shall be asked to leave immediately upon entrance with no explanation needed to be given
- Following any machine being defrauded, at the earliest opportunity the duty manager must send an email to the security address with as much evidence and information as possible
- Employees are not to endanger themselves or customers at any time when dealing with a fraudster.

### When:

#### **Fraud may be taking place when**

- Machines are being played with large amounts of credit. Normally people do not play with large credit in the machine (be aware that some customers may have won a jackpot and have that credit sitting in their balance)
- Machines going empty regularly or a large succession of tickets being collected.
- Suspicious activity – Large amounts of customers coming into the venue and dispersing or trying to distract employees.
- Customers with their hands over the coin mechanism, display or pay out tray.

- Large amounts of coins (one pounds and ten pence coins) being separated into denominations in the payout tray.
- Customers leaving the venue with machines still having money left in the bank.

### **Who:**

- All employees have a responsibility for protecting the business from machine fraud.
- The Cluster manager should provide employees with photos of known fraudsters
- The duty manager should inform the security email address following machine fraud taking place

### **Order of who to contact if in need of help / advice:**

- Lead Supervisor
- Cluster Manager
- Area Manager

### **How:**

#### **If you suspect that machine fraud is taking place either:**

- Activate staff guard and ask the customer to leave the venue if you feel comfortable to do so

#### **Or:**

- Do not alert the suspect(s)
- Inform the duty manager who will telephone the police.
- Continue to watch the suspect(s) and try not to alert their attention that you have identified them

#### **Following a fraud**

1. Information should be gathered from the CCTV and stored on a memory stick.
2. This information should be provided by email to [security@merkur-casino.com](mailto:security@merkur-casino.com) as soon as possible to prevent another venue being targeted in the local area
3. The Area Manager should be contacted to inform them of the event.
4. Income protection should be informed.

## **Machine Ratio Check Policy**

### **Why:**

The quantity of B3 Machines which a venue is permitted to have is limited, in general to 20% of its total machines. Checks need to be completed to ensure that at all times every venue operates within its correct ratio.

### **Best Result:**

The Machine Ratio Check policy is completed and the venue complies with legislation and operates within the legal ratio for B3 Machines.

### **Worst Result:**

The Machine Ratio Check policy is not completed and the venue operates more B3 machines than it is legally allowed.

### **What:**

- MC105 should be completed
- Completed MC105 should be emailed to [Incomeprotection@praesepeplc.com](mailto:Incomeprotection@praesepeplc.com)

### **When:**

- After any Machine Move.
- When any Machine or Tablet is reported as out of order and not repaired on the next visit by the Service Engineer.

### **Who:**

- The Duty Manager at the time of the move/removal.

### **Related / supporting documents:**

- MC105 Machine Ratio Check Record.

**Order of who to contact if in need of help / advice:**

- Area Manager
- Income protection
- Gaming Machines.

**How:**

**Complete the MC 105 Machine Ratio Check Record**

**MACHINE RATIO CHECK RECORD**



<b>Venue Name</b> <input style="width: 90%;" type="text"/>	<b>Venue No</b> <input style="width: 90%;" type="text"/>
<b>Date of Move</b> <input style="width: 90%;" type="text"/>	<b>Week No</b> <input style="width: 90%;" type="text"/>
<b>Name</b> <input style="width: 90%;" type="text"/>	<b>Signature</b> <input style="width: 90%;" type="text"/>

AREA 1 - MAIN	AREA 2 - SUB DIVISION
Total number of B3 Machines <input style="width: 40px;" type="text"/> Total number of Car C Machines <input style="width: 40px;" type="text"/> Total number of Car D Machines <input style="width: 40px;" type="text"/> Total No of Car C/D Tablets <input style="width: 40px;" type="text"/> Total No of Twin player Inills (count as 2 machines). <input style="width: 40px;" type="text"/> (Do not include any Class 2) <input style="width: 40px;" type="text"/> <b>Total</b> <input style="width: 40px;" type="text"/> a	Total number of B3 Machines <input style="width: 40px;" type="text"/> Total number of Car C Machines <input style="width: 40px;" type="text"/> Total No of Car C Tablets <input style="width: 40px;" type="text"/> Total No of Car C/D Tablets <input style="width: 40px;" type="text"/> Total No of Twin player Inills (count as 2 machines). <input style="width: 40px;" type="text"/> (Do not include any Class <input style="width: 40px;" type="text"/> )
Total number of B3 allowed legal ratio - (a) divided by 5 <input style="width: 40px;" type="text"/> b	Total number of B3 allowed legal ratio - (A) divided by <input style="width: 40px;" type="text"/> b
Total number of B3 Machines (b) actual count: <input style="width: 40px;" type="text"/> c	Total number of B3 Machines (b) actual count: <input style="width: 40px;" type="text"/> c
<b>Total number of actual B3 (c) must not exceed number allowed</b>	<b>Total number of actual B3 (c) must not exceed number allowed</b>

This form must be emailed to [IncomeProtection@praesepepla.com](mailto:IncomeProtection@praesepepla.com)

If your B3 actual total exceeds the allowed legal ratio you must contact your Area Manager immediately and email this form to [gamingmachines@praesepepla.com](mailto:gamingmachines@praesepepla.com)

Confirm action taken:

MC105-V1

Walk around the venue and complete all the relevant sections with the correct number of machines in the main area of the venue

Email Completed document

Complete all relevant sections with correct number of machines if the venue has a 2nd licensed area

## Staff Guard / P.A Policy / Staff Alarm

### Why:

The security of employees is of the utmost importance; therefore personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.

### Best Result:

The staff guard and MPA fobs are carried by employees at all times as per policy. This increases the security of our employees and guests. Employees become more comfortable in their roles knowing they have methods of contacting assistance in emergency situations.

### Worst Result:

The staff guard and MPA fobs are not carried by employees which reduces the safety of employees and guests. During events when emergency assistance is needed, it is not acquired.

### What:

- Employees should always carry a mobile panic alarm (MPA) or staff guard fob on their person while at work. (ideally both should be carried)
- Activation of staff guard should be prioritised over using the MPA in circumstances which do not require immediate police attention.
- Staff guard should be tested at least once per week – Recorded on MC141 (Note: it is recommended to test the system during times of higher customer numbers, as it makes the customers aware that staff have a communication link to a security service)
- **Employees should not be hesitant to use staff guard** – This is a service which we pay for, there are no issues with false alarms or over usage. Use as often as necessary.
- Employees should be more thoughtful about using the MPA system, and should only activate it in times of imminent physical threat or robbery, or anything which police would usually be called for. This is a system which is linked directly to police. Inappropriate use of this device may lead to the venue losing the right to use it altogether.

- Staff guard and the MPA system should only be used if it is safe to do so – never endanger colleagues or customers during a situation arising when it would not be safe to active either system.
- For Static alarms ensure that the reset key is available at all times.

### **When:**

- The staff guard unit should be tested once per week.
- The staff guard unit should be activated whenever staff are feeling uncomfortable or threatened.
- The MPA system should be used only when immediate police assistance is required

### **Who:**

- The MPA unit and/or Staff guard fob should be carried by employees at all times.
- All venue employees should have access to these devices
- All venue employees should have received training on how to use these devices.

### **Related / supporting documents:**

- MC141 – Staff guard test record

### **Order of who to contact if in need of help / advice:**

- Cluster Manager
- Commercial administrator
- For any technical issues regarding staff guard call: 01623 649013 (This is a 24hr line but it's best to call during normal business hours Out of hours, the number transfers straight to an engineer so he may be woken by the call Do not press the fob if you have maintenance issues – dial this number as directed)

## How:

### To operate the Staff Guard unit:

1. Slide cover up on fob and press the red button – this dials Staff Guard.
2. A blue light will flash on the unit which shows that it's dialing.
3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds.

#### **IF YOU ARE IN IMMEDIATE DANGER SAY:**

**CALL THE MANAGER** - This is our pass phrase that tells them to call for **IMMEDIATE POLICE ASSISTANCE**

However, they will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

If you say: **"Stand By"**

They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say **"Standing by"** every few minutes to assure/remind you that they are still there.

Say: **"Stand down"** once you no longer need



### **How to make a test call:**

Once per week a test call must be made:

1. Press the fob (red button) and wait for a response. Say, "Just a test call" and give the password when asked.

The password is your venue name and number.

2. They will confirm the test and end the call



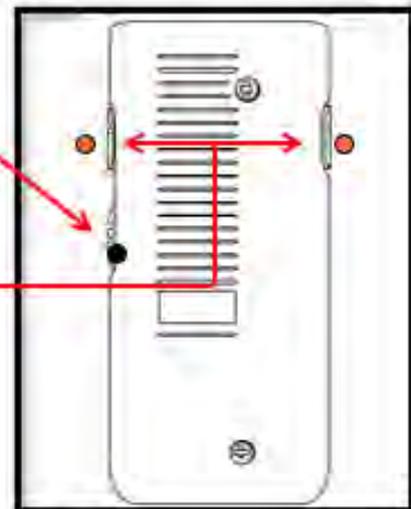
### **MOBILE PANIC ALARMS (MPA)**

Mobile Panic Alarms are designed to offer staff the security of a personal attack alarm at all times whilst they are at work. The MPAs should be worn by staff members and key holders should be issued with one to keep with them at all times. MPAs are not to be taken off site and should not be taken home.

1. Slide the black button downwards to unlock the orange buttons
2. Press the two orange side buttons together

**The panic alarm does not work if you press only one button**

**The black button should be kept in the locked position to prevent false activations**



### HOW IT WORKS

The MPA transmits a signal to a receiver on site. This signal is then transmitted INSTANTLY to an alarm control centre who inform the local Police. The Police will aim to attend site in less than 5 minutes when a MPA is activated as this is given priority over a normal 999 call.

**CAUTION** – The transmitter range will be affected by the condition of the MPA aerial, always ensure your MPAs are in good condition. If the MPA is defective or damaged, contact the Commercial Administrator to arrange a repair/replacement straight away.

## EMERGENCY

**MPA's should only be used when there is the threat of serious injury to staff or customers.**

Example of when to use;

- ✦ Any physical violence is carried out towards a member of staff or customer;
- ✦ When the threat of physical violence is considered imminent; or
- ✦ The site is subject to a robbery.

At all other times ring the police directly. The number is displayed on the office notice board.

## COMPLAINTS

**Any** problems with the MPA should be addressed to your Line Manager who will inform the Commercial Administrator.

## HOW TO TEST YOUR MPAs

1. Call your alarm supplier, a list of numbers is provided below.
2. Tell the alarm operative you want to test your MPAs, give them your site name (Merkur Slots), site address and site password.
3. The alarm operative will then tell you that they have disconnected the signaling, at which point you will be asked to activate each MPA in turn.
4. For example; you will press MPA 1 when instructed to by the alarm operative and they will tell you if a signal has been received, you will then move on to MPA 2 and the alarm operative will tell you if a signal has been received, you will then move on to MPA 3 etc. etc.
5. You will do this until all of your MPAs have been tested.
6. After each individual MPA test, the alarm operative will tell you if the signal has been received or not. If not, your MPA is faulty and will need to be repaired or replaced. In this instance, please report it to the Commercial Administrator straight away.
7. You will need to log that you have carried out an MPA test on your MPA Test Record Sheet, which should be maintained in your Premises Log in your Compliance Folder.

Alarm Provider	Contact
JUSTICE	08452570090
ABEL	0844 800 3022
METRO	0115 983 38011
GEM	0844 879 1703
CHUBB	0344 879 1730
ADT	0344 800 1999 option 5
LSG	08452000088

#### **WHAT TO DO AFTER THE MPA TESTING EXERCISE**

When the MPA testing exercise has been completed the alarm company will reactivate the signalling and the police response will be reinstated.

You will then need to reset your alarm control panel.

If you have a fob operated system, press your fob against your keypad, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately hold your fob up to the keypad once again to unset the system. Your system will now be reset.

If you have a code operated system, input your code, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately input your code, as if you are opening and this will unset the system. Your system will now be reset.

## Smoking / Vaping Policy

### Why:

The smoke free laws passed on 1st July 2007 prevent smoking in work places and other public places. Therefore to remain compliant with the law smoking should only be permitted in designated areas for employees and customers alike.

### Best Result:

All employees and customers observe the smoke free policy and only smoke in areas in which smoking is permitted. We are compliant with the law.

### Worst Result:

Employees and customers do not observe the smoking policy, the customer experience is negatively affected and we are not compliant with the law. Employees found smoking inside the premises may face disciplinary action.

### What:

- Smoking is strictly prohibited within venues
- Customers should not be allowed to smoke inside doorways or toilets
- Where possible there should always be a place to dispose of finished cigarettes
- Should the venue have no smoking area at the back of the venue, there should be steps taken to keep the front of the venue looking presentable at all times
- Vaping is allowed within our venues however these devices should not produce excess vapour
- Employees are not permitted to vape while on shift and therefore must take designated breaks to vape as smokers do. Employees must not vape in the venue.
- Employees who smoke / vape must cover their uniform while smoking and when possible smoke separately from customers
- No smoking signs should be clearly displayed

### When:

- It is illegal for anyone to smoke inside the premises at any time.
- This policy is applicable at all times.



### **Who:**

- This policy relates to both employees and customers.
- All employees are responsible for ensuring that this policy is followed at all times.

### **Order of who to contact if in need of help / advice:**

- Lead Supervisor
- Cluster manager
- Area manager



# **SMOKEFREE**

**ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS - CODE PROVISION 3.2.4 ACCEPTABLE PROOF OF AGE DOCUMENTS INCLUDE:**

MILITARY ID CARD



ANY IDENTIFICATION CARRYING THE 'PASS' LOGO



Driving License with photocard



Passport



The law states that licensees must only accept identification which:

1. The ID contains a photograph from which the individual can be identified
2. Clearly states the individuals date of birth
3. Is valid
4. Is legible and has no visible signs of tampering or reproduction

## MERKUR SLOTS TRAINING

Learning & Development team have created a training programme for the Merkur Slots team using a variety of learning methods to explore the role. This should help the teams retain and gain knowledge of the business and the industry, and prepare them for what their role entails.

### Learning Methods

- *Merkur Slots workbooks* are the main tool for training and allows the trainer and trainee to follow a structured training plan. This can be adapted to fit in with the needs of the business (training venue), and allows trainees to see all aspects of the role
- *E learning modules* covers detailed courses and a test at the end to evaluate knowledge gained. There are several courses trainees must complete and pass on the first day and they are as follows; Essentials of Compliance and Social Responsibility, Age Verification, COVID – 19, Safeguarding Children and Vulnerable People, Health & Safety and Lone Working
- *Role Play scenarios* allow our teams to practise how they would deal with aggressive customers, customer interactions and difficult situations when dealing with a customer
- *Knowledge quizzes* are used to evaluate the trainees' knowledge. They are mainly used for compliance, policies and procedures, and how to use our systems
- *Practical on the job training* is completed within a "live" venue. Trainees will be supported while they learn, and they have the opportunity to demonstrate in a "real life" situation what they have learned

Using the resources available within each area, we have worked together with the operation to ensure both support and training is provided for each Merkur Slots venue, prior to and during the first weeks of opening.

This is a five-week training plan and the new teams are fully trained and supported by others who have previous operational knowledge and experience, as well as the learning and development team.

## **Training teams: Who is involved and timeframes**

### **Prior to Venue Opening:**

- Technical Trainers (from Operations) and Operational Support Teams (from Operations) are identified, based on location and experience by the area managers
- Technical Trainers, receive a virtual training session with an Operations Training Manager (member of L&D), using the zoom platform to give them the necessary skill training as well as the understanding of the resources (workbook) and the process of training delivery
- Merkur Slots workbooks and training packs are sent to the training venues
- During week one, the technical trainers are supported by either an Operations Training Manager or Support Manager from the Learning and Development team. The Learning and Development team help deliver the training within the training venue, as well as demonstrating best practices of training to the technical trainers
- During week two the training is provided by the technical trainers in the training venue, giving the Merkur slots team the opportunity to gain practical experience and knowledge
- In week three, preparations begin for the opening of the new Merkur Slots venue. Three days will still be within the training venue, and practical training will continue. However the Lead Supervisor will spend time with an Operations Training manager, mixed with virtual and personal training to cover their responsibilities, soft skills and further training on systems
- The last two days of that week are spent with the Technical Trainers or Operational Support Teams, setting up and preparing the new venue for opening and taking in deliveries

Learning & Development, along with Operations, will identify if the Merkur slots team is predominantly new, that they will still need guidance and support for the first couple of weeks after opening.

### **Opening the Venue & Post Opening:**

- During the first week, the Merkur Slots team will have the support of the areas Operational Support Team on every shift, along with a member of the Learning and Development team
- The Operational Support Team will be there for a full second week, there after as and when the Merkur Slots venue require further support

The Operational Support Team, along with the L&D team are there to spot opportunities to fill any identified knowledge gaps, coaching the team, continuously evaluate the team's knowledge, as well as demonstrating best practices and providing guidance. This will provide the new Merkur Slots team with more experience within their own venue when it opens.

### Lockdown Changes:

During this current National Lockdown in England, we have had to adapt how we deliver the training to the Merkur Slots teams.

- Induction day training is provided by a support manager. This will be delivered virtually as well as using our current e learning courses
- Two-day Virtual training will be delivered by an Operations Training Manager
- Practical training (3 days) in a closed venue prior to opening with Technical Trainers
- Operational Support Teams, Learning and Development will still support on first week of opening. OST will support as per current training plan
- Lead Supervisor to have virtual one day training to cover systems more in depth and soft skills with Operations Training Manager
- Technical Trainers will be fully briefed on their role and the process change on a one-day virtual training with Operations Training Manager



This training content has been modified and developed using the current workbook and all the resources we currently have available.

## Safeguarding Children & Vulnerable People

The following scripts and screenshots are excerpts taken from the training module on safeguarding children and vulnerable people. This Interactive training is refreshed by all employees across the company every 6 months.

### **1. Introduction**

Our suite of Compliance training seeks to ensure you understand the Gambling Act and its 3 main objectives and that you follow the businesses defined processes to ensure we operate within the law.

Within the Gambling Act we have a duty to protect children and vulnerable people. Safeguarding is the responsibility of everyone in our business and this session explains why its so important and how you can play your part.

### **2. What Is Safeguarding (Lesson 1)**

Safeguarding is a term usually associated with children; it makes us think about the protection of children, social services, abuse and the mistreatment of children. As a socially responsible operator, MERKUR Casino UK and its operating businesses take a different view on Safeguarding and what it means:

#### **The term actually means:**

*Something that serves as a protection or defence or that ensures safety*

**For most of our customers gambling is an enjoyable hobby and a social event, however; we must be aware of players that may become addicted to gambling.**

**When a Customers gaming changes from enjoyment/social to a problem or addiction we MUST safeguard. Safeguarding is very much an action required within our business.**

We Should:

- ✓ Train staff on how to recognise and respond to indicators of concern
- ✓ Train staff to know how to protect their own safety if customers behave aggressively
- ✓ Make information and advice about gambling responsibly generally and discretely available, and provide contact details about where to get help
- ✓ Interact with customers to spot warning signs of a problem
- ✓ Offer/explain the Play Right App to help control time spent playing
- ✓ If the customer opts to self exclude make sure you provide the right information and follow the process for self exclusion (detailed in Compliance training)
- ✓ Encourage customers to register or become members so we have a point of contact

## Children (Lesson 2)

The protection of children is vitally important to us as a business. We have a separate and detailed training module dedicated to this area (Age Verification) as well as the Essentials of Compliance Training.

<p>The Challenge 25 scheme <b>MUST</b> be operated by ALL staff and only recognised proof of age accepted (for example photo driving licence or passport; PASS cards)</p>	<p>Signage <b>MUST BE</b> prominently displayed at all points of entry regarding the prohibition of under 18's</p>	<p>Signage <b>MUST BE</b> displayed on machines highlighting age restrictions</p>
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### Vulnerable People (Lesson 3)

The **Gambling Commission** puts a high priority on the social responsibilities operators have to **protect** vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of vulnerable adults.

It's not possible to tell who is at risk by looking at them. Most customers are **in control** and enjoy the **social** element of gambling

Safeguarding means we have to look a little deeper and think about **those at risk of developing a problem.**

It's about the **signs and signals** we **see and hear** whilst our customers are in our premises.

Social responsibility/Safeguarding is about **using your eyes and ears** to understand who is vulnerable.

Click on the + signs to understand more about those people at risk:

Risks Factors: Developing a problem	+
Risk Factors: Impact	+
Managing The Risks	+

## The Stages of Change (Lesson 4)

Gambling becomes a problem when people are not in control. Staying in control is vitally important and is the ethos we at MERKUR Slots and MERKUR Bingo all work too.

When someone starts to change their gambling behaviour, there are often different stages of awareness that they move through. These include:

Stage One - No problem	+
State Two - Awareness	+
Stage 3 - Wanting to Make a Change	+
Stage 4 - Take Action	+
Stage 5 - Sticking to it	+
Stage 6 - Final Stage - Self Exclusion	+

Often the person who's gambling doesn't think that he or she has a problem; they don't see the subtle changes. Sometimes **YOU** will spot the problem first, because the customer might be convincing him/herself that everything is fine when really it isn't. It's important to use positive communication rather than being confrontational or critical. It's also important to be genuine and talk to the customer in a natural way.

For example:



Once you've started the conversation, listen carefully to what they have to say in response and be patient. Don't jump in or cut them off mid sentence, as this might drive them back into their shell or make them turn defensive. Being calm and caring is really important as is knowing what advice and support we can offer

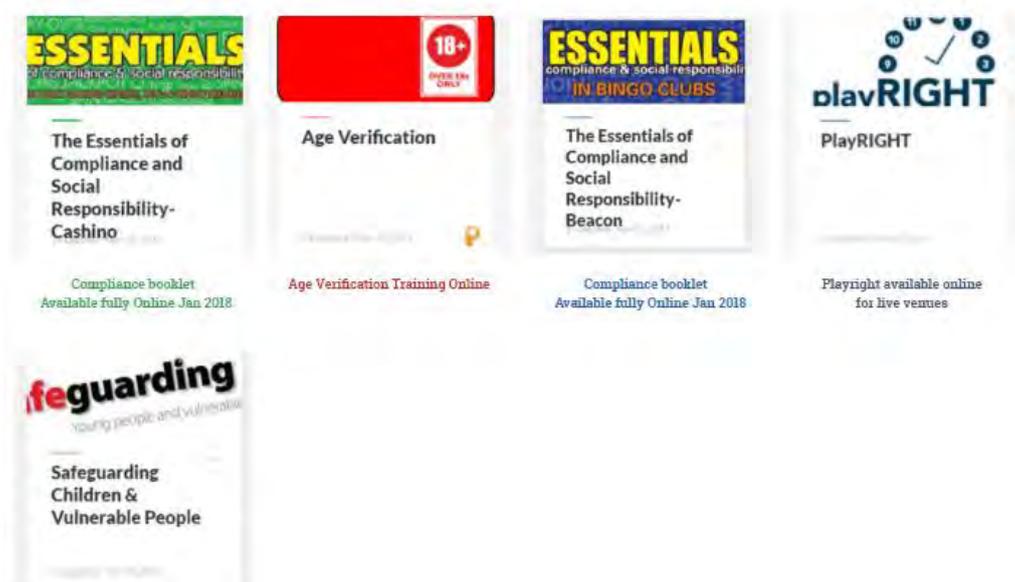
**Ultimately we as a business have a responsibility to take action to safeguard vulnerable people so let's move to the next section and look at this next.**

## Taking Action (Lesson 5 / Observation module 6)

As a business we have several processes and tools in place to ensure we are promoting responsible gambling. These include:

- 1 Think 25 Policy
- 2 PlayRight App
- 3 Gamcare Information and Leaflets
- 4 Complaints Procedure and ADR (Alternative Dispute Resolution)
- 5 Responsible advertising
- 6 Self Exclusion Policy and Process
- 7 and most importantly - **YOU; OUR EMPLOYEES**

These processes and interventions only work if our employees know and understand them and to ensure you do we have the following training modules which refresh every 6 months to keep you up to date and trained to the latest standards



## Dealing with Anger & Aggression (Lesson 7)

It is true that when Customers start to lose control of their gambling they may become agitated or upset and get angry and perhaps become confrontational; remember - this is a sign of a problem and rather than ignore it we have to deal with the situation and help the customers.

### Things to avoid:

- Do not make threats you cannot carry through, such as threatening to remove the person.
- Do not be defensive or take it personally. What is being said may seem insulting and directed at you, but this is not really about you.
- Do not use humour unless you are sure it will help and you have a very good relationship with the customer
- Do not use sarcasm or humiliate the customer
- Do not put yourself at risk; use staffguard if you are alone and feel vulnerable

## Advertising Responsibly (Lesson 8)

Whilst we do all we can to safeguard children and vulnerable people in our premises; we need to be aware of the messages that are reaching them outside of venues and clubs

Earlier we referred to the research on underage gambling undertaken on behalf of the Gambling Commission. In terms of advertising the figures are far reaching

(click to enlarge):



% of 11 - 15 year olds seeing promotional materials/advertising



When we run promotions locally we must adhere to the marketing code of conduct to ensure that we are safeguarding children and vulnerable people when we promote and advertise our business. Please read the code of conduct attached below. This is available as a printable poster in Knowledge base.



Marketing Code of Practice 2018.pdf  
441.8 KB



## Gamcare / Support (Lesson 9)

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Our role is to be **aware** and provide **support** to any customer at risk. The industry has strong links to **organisations** that can help anyone who **thinks** they have a **problem with gambling**. It is our duty to provide this information readily and freely:



### Every Venue and Club has Staying in Control Leaflets

Make sure you know where they are, the information in them and do not hesitate to share this information with customers who feel they need to make a change.

It's our responsibility to provide this information and support customers in their decision making.

## Behaviours Quiz (Lesson 10)

What behaviours should YOU our employees adopt in order to safeguard?

Look at the words on each card. Each word describes either a positive behaviour and is what we should be doing or a negative behaviour and what we should NOT be doing



**You have completed Part 1: Training**  
**You now need to complete Part 2;**  
**Knowledge Check**

**REMEMBER:**

- **Listen, Observe, Interact and Break Play**
- **Follow the Think 25 policy**
- **Provide support and information to Customers at Risk**
- **Be Gamble Aware**

**Let's all do our bit to be Socially Responsible**

**Please now complete Part 2 - Knowledge Check in order to finish your training**

A quiz is then taken to complete the training and double check employee understanding.

## Working in a Merkur Slots



## My Training Plan

This workbook belongs to:

## Merkur Slots Training Plan



### Programme Welcome!

Your role as a member of the Merkur Slots team plays a vital part in our venue. You are here to host our customers, look after them whilst they are visiting, and make their visit memorable so they keep coming back.

You are responsible for building great customer relationships with our new and existing customers and providing them with outstanding service and giving them an exceptional customer experience.

Throughout this workbook, you will find instructions, hints, and tips to support your learning. You will build knowledge of the Gauselmann Group, Praesepe, and what is expected from you in your role.

It's all about learning.....

You will be using a variety of learning methods to explore the role, this will help you retain and gain knowledge of the business and your role and get you ready for taking on the role.

To help you learn as effectively as possible, we will be asking you to complete tasks such as:

- e-Learning
- Observing a colleague
- Spending one to one time with your Training Manager

We wish you a pleasant and successful start in your role.

Yours very truly, Casino MERKUR International

Stefan Bruns  
MSI International MD

Mark Schertle  
Chief Operating Officer

## Merkur Slots Training Plan



Merkur Slots Training Summary	
Topic	Page no. Training Plan Workbook
Induction Day	
Programme Welcome	Page 2
Training Summary	Pages 3-4
Introduction to E-Learning	Pages 5-8
Day One	
Welcome & Icebreaker	Pages 9-10
Uniforms & Appearance	Page 11
Venue Tour	Page 12
Finding Essential Items in Venue	Pages 13-14
Meet the Team	Pages 15-17
Personal/Staff Safety	Pages 18-19
Panic Alarms in my venue	Pages 20-23
Cleaning Standards within the Venue	Pages 24-37
Customer Service Introduction (Mystery Shop)	
Day Two	
Open & Close Venue	Pages 39-40
Venue Safety	Page 41
Compliance Logs	Page 42
Compliance Acronyms	Page 43
Compliance Licensing Objectives	Page 44
IHL Tablet training	Page 113
Float Check and Customer Handover	Pages 45-46
Day Three	
Gaming Machines Introduction	Pages 48, 49
Gaming Machines Product & Brand Knowledge	Pages 50-51
Gaming Machines Cleaning	Page 52
Gaming Machines TITO	Page 53
Operations Manual & Procedures	Page 54
Observe Midweek Collection	Page 55
Day 4	
GeWeTe Introduction	Page 57
Midweek Collection	Page 113
GeWeTe Refill	Page 58
GeWeTe Hand Pay / Refill / Payout	Page 59
Know your High Street	Page 60
Merkur Slots Marketing	Page 61
Day 5	
Collection	Pages 63-65
Cash Banking	Page 113
Venue Systems & Paperwork	Pages 66-67
Targets	Page 68
Shifts & Rotas	Page 69
Feedback and Week One Sign Off	Pages 70-71

## Merkur Slots Training Plan



Topic	Page no. Training Plan Workbook
<b>Week 2- Day 6</b>	
Float Check & Customer Handover - Practice	
Midweek Collection - Practice	
GeWeTe Refill - Practice	
<b>Customer Service &amp; Customer Journey</b>	<b>Pages 74-76</b>
*Moments of Truth	
*Types of Customers	
*Customer Needs	
*Meeting Expectations	
<b>Day 7</b>	
Float Check & Customer Handover - Practice	
Cleaning Standard Exercise - Practice	
Cash & Banking - Practice on MARS	
<b>Communication Skills</b>	<b>Pages 78-84</b>
*Customer Interactions	
*Customer Interventions	
*Effective Listening	
*Question Techniques	
*Listening Skills	
*Empathy	
HEAT & Handling Conflict	
<b>Day 8</b>	
HR/ People Responsibility	Page 86
My Game Changers	Pages 87-90
Receiving Feedback	Page 91
Food & Beverage Offer	
Stock & Deliveries	Pages 92-93
<b>Day 9</b>	
Gaming Machine Maintenance	Pages 95-104
Work in Venue	
<b>Day 10</b>	
Collection (Practice)	
Know your Role checklist	Pages 106-110
Difference between Cashino & Slots	
Merkur Slots Set-Up (Practical office standards)	
Game Changer Goals & 4 Week Action Plan	Page 111
Helpful Guide and References	Pages 112-114
Review & Sign Off	



**BEFORE**

**YOU CAN START TRAINING OR WORKING IN VENUE**

**YOU MUST COMPLETE**

**YOUR COMPLIANCE TRAINING**

**LOG IN TO THE  
INFORM PEOPLE  
SYSTEM**



**SELECT THE  
e-LEARNING TAB**



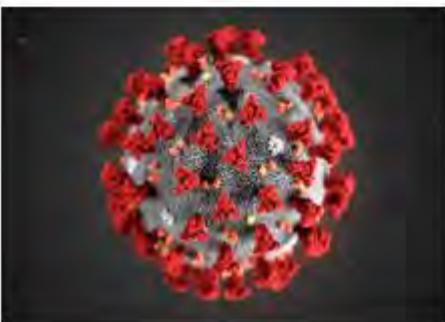
Complete these **four** courses:



Essentials of  
Compliance and  
Social  
Responsibility



Age Verification



COVID-19



Safeguarding Children  
And Vulnerable People

## Merkur Slots Training Plan



### e-Learning

You will have been introduced to Inform People and your e-learning on Inform People by your training manager first thing today. All your e-learning sits in your 'Virtual PA' and you access it through the e-learning tile as below:



EVERYONE who works in one of our venues, (Merkur Slots) must complete various training modules to ensure they understand our industry and area of compliance. You will already have completed the following courses:

Essentials of Compliance & Social Responsibility  
Safeguarding of Children & Vulnerable People  
Age Verification  
Covid-19

You will have an element of e-learning and various modules to complete every day during your first two weeks of your induction.

We know this looks a lot, but you must understand the ethos of the Gaming Industry, that compliance is a legal requirement and how it is used day to day in your role and your venue.

**Merkur Slots  
Training Plan  
e-learning Checklist**



<b>e-learning topic</b>	<b>Tick when complete</b>
Merkur Slots Induction	
Essentials of Compliance & Social Responsibility	
Safeguarding the Vulnerable	
Age Verification	
Health & Safety Essentials (incl. COVID 19 video)	
Lone Working	
Playright	
Customer Service - Introduction Part 1	
Customer Service - Welcome Part 2	
Customer Service - Hosting Part 3	
Customer Service - Monitoring Part 4	
Customer Service - Excellence Part 5	
Equality Essentials	
Complaints Management	
Complaints Mgt. - Duty Manager	
Complaints Mgt. - Venue Manager	
Part 1 - Game Changers & Performance Review	
COVID	



## Uniforms & Appearance – Looking Part of the Team

You are a 'Brand Ambassador' for our Company

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

### Appearance of Employees

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

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

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

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

- Well-groomed hair
- Pleasant body odour
- Perfectly cared hands (including fingernails)
- Minimal make up
- Minimal jewellery "less is more"
- Good oral hygiene
- It is preferred that tattoos are covered up, especially if it is explicit or may cause offence
- Standards of dress will be monitored regularly and should be adhered to at all times



## Venue Tour

The first thing you will do with your Training Manager is a tour of the venue and get used to your surroundings. Below are some important areas you will need to know where they are located. You will complete one box for your training venue and complete the other box when you start in your Merkur Slots Venue.

### Training Venue

What is the signing in and signing out process in the venue?

Where is the fire exit located?

Where should you gather in case of a fire?

Where are the toilets?

Where do I keep my personal belongings?

Where is the smoking area?

Where is the first aid kit kept?

### My Venue

What is the signing in and signing out process in the venue?

Where is the fire exit located?

Where should you gather in case of a fire?

Where are the toilets?

Where do I keep my personal belongings?

Where is the smoking area?

Where is the first aid kit kept?

**Merkur Slots  
Training Plan**



**Finding Essential Items in Venue**

So where is it in your venue? In this exercise, we want you to find out and confirm where the above items, procedures, or contact details are in your venue.

Item	Image	Location
Fire Exit and Procedures		
Fire Extinguishers		
First Aid/ Accident Book		
Compliance & Social Responsibility Folder and Self Exclusion Tablet		
Complaint Procedures/Log Tablet		
Information Board		
Risk Assessment Information		
Operations Manual		
Emergency Contacts		

**Merkur Slots  
Training Plan**



**The Cashino Team – Training Venue**



**Merkur Slots  
Training Plan**



**The Merkur Slots Team – Your Venue**



## Merkur Slots Training Plan



### Operations - Personal/Staff Safety

At Praesepe we take your safety and security very seriously. As a business, we operate to the needs of our customers and this can mean on occasions, you may be the only employee working in the venue or you may need to leave an employee alone on the floor. Thinking about the safety aspect is vitally important.

We do not need heroes – staff safety is the number one priority at all times. Looking at our policies and the lone working training module, answer the ‘best practice’ sections for each of the safety areas below:

AREA	WHY	BEST PRACTICE/RESULT
STAFFGUARD FOBS AND PANIC ALARMS	The security of employees is of the utmost importance; therefore personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.	
FLOOR COVER	We need to know who is working in the Venue and where they are – it is important to consider when we can leave people working alone on the floor and when there should be more than 1 employee.	
MANUAL HANDLING SAFETY	The health and safety of employees is of great importance. Policies and processes need to be in place to protect employees and customers from dangers that may occur in the workplace.	
VISITORS TO VENUE	No one except authorised personnel should be allowed into any non-public areas of the venue. Only employees and authorised personnel are allowed in other private areas of the site. Identification should be requested for all visitors to the venue.	



#### THINK

**NEVER PUT YOURSELF,  
ANOTHER EMPLOYEE  
AT RISK OR IN DANGER**



- ✓ Be aware
- ✓ Be safe
- ✓ Be Sensible
- X Don't be a Hero
- X Don't put yourself at RISK

**Merkur Slots  
Training Plan  
Specimen ID card**



As from 01/01/2020 no other form of ID will/should be accepted.

As the team at HO and field-based roles continue to expand, and more colleagues are visiting the venues, we have issued new company ID cards.

Incorporated into the new design to improve security, along with the photo and name, is the person's job title and specimen signature that can be verified against the visitor's book.





## Operations - Your Safety

Your safety is one of our greatest priorities and we have several procedures in place in venues to keep you safe and our customers safe.

Within the Gauselmann Group, the subject of security, in general, attracts special attention. Security does not only mean protecting machines, buildings, and money, but rather all precautions for maintaining a safe working environment for our employees and a trustworthy place of recreation for all our customers. For us, human beings are the centre of attention!

To prevent serious incidents in our venues, it is important to understand what we can and should do to help prevent them.

Remember the points below to help reduce the risk to yourself and other people in the Venue:

- **Ensure you greet everyone who enters the venue and briefly make eye contact**
- **Only remove money from machines when 2 members of staff are on duty**
- **Do not empty machines if there are strangers in the venue**
- **Empty only one machine at a time. If you have concerns and you have consulted your Area Manager first, then you may lock the door when emptying machines**
- **All monies must be kept in the safe and/or the Change/GeWeTe machine**
- **No unauthorized personnel should be allowed in the office or staff areas**
- **No more than £500 to be available in a non-Time Delay safe.**
- **GeWeTe and safe keys must be kept in the Time Delay safe at all times**
- **During the venue collection, please refer to the company collection procedures and adhere to these**
- **Test the StaffGuard™ system weekly in front of customers**
- **Be particularly attentive at the beginning and the end of opening hours.**

In case of an incident, try to remain calm and remember, we do not expect you to be a hero! To help you stay calm and deal with a serious incident remember the following:

- **Your safety and the safety of our customers is paramount**
- **Don't take any sudden action**
- **Keep calm and don't shout or scream**
- **Do as you are told and keep your hands in sight at all times**
- **Only activate the StaffGuard™/panic alarm if it is safe to do so**
- **Do not make eye contact with the offender(s)**
- **Try to remember things like scars, tattoos and unusual accents and clothing**
- **Write everything down as soon after the event as possible**

**Merkur Slots  
Training Plan**



**Operations - StaffGuard™ & Panic Alarm in my Venue**

To ensure that you know where StaffGuard™ and Panic Alarm units are in your venue and to ensure you know how to use them and to keep safe complete the questions below.

Where are the StaffGuard™/Panic Alarm units in your venue?	
Where is the fob that you can use?	
What should you say if you require immediate assistance?	
What should you say if you want them to stay on the line and listen?	
What should you say if you no longer need StaffGuard™?	
If you just require operational advice who should you call?	
What does a blue light on the StaffGuard™ unit mean?	
What does a steady red light on the StaffGuard™ unit mean?	
Where should you record, that a weekly test is completed?	
Who is responsible for the weekly test call in your venue?	

Remember; StaffGuard™ is a security measure to be used when we are in danger. If you have any operational issues or concerns they should be directed to your Cluster/Area/Night Manager



## Operations - Staffguard™ & Panic Alarms

Have a look inside and outside your venue and ask yourself:

1. What are the risks in your area/location/venue?

2. What should you be aware of?



## Cleaning Standards - within the Venue

Cleaning the venue is important not only for keeping up appearances, but it is also important for your safety, as well as providing a safe environment for our customers.

When opening/closing the Venue, or if you are a 24 hours Venue, we need to ensure the Venue is cleaned and prepared for the next day or shift change over.

Below are the areas that need to be cleaned before opening or before the morning shift changeover.

### Exterior:

- Woodwork (window frames, doors, tiles) washed down with soapy water
- Door handles (push buttons/push bars) washed and disinfected
- Brass polished to acceptable standards (where applicable)
- External back area/Smoking area cleaned and presentable (ashtrays/bins emptied and cleaned, rubbish removed, any tables/chairs wiped down and disinfected)

### Venue Machine floor:

- Walls/poster frames wiped down
- Venue floor vacuumed including behind and between machines
- All gaming machines, GEWETE and ATM wiped down and disinfected, GTAB stand wiped down and disinfected, each tablet wiped down and disinfected
- All machine infills/spacers wiped down and disinfected
- All money pots to be disinfected
- All chairs (seats and bottom plates) wiped down and disinfected
- Service counter (worktops, shelves, cupboards doors, outside drawers and handles, swing doors, dishwasher door) wiped down and disinfected
- Coffee machine cleaned following manufacturers guidelines
- Service trays disinfected
- CCTV monitor wiped and disinfected
- Any flasks/jugs to be washed up
- All doors cleaned top to bottom, disinfected with no sign of dirt or damage
- First Aid Box cleaned, stocked, and easily accessible
- Toilets:
  - Toilet bowl and seat cleaned and disinfected
  - The sink basin cleaned, the area around the sink cleaned, taps and soap dispenser cleaned and disinfected
- Hand dryer cleaned
- Mirrors, light switches, cupboards cleaned and disinfected
- Walls and tiles wiped down
- Doors/handles/keypads cleaned and disinfected
- Floor swept and mopped



## Cleaning Standards - within the Venue

### Office and team areas:

- All doors and handles cleaned and disinfected
- All Working surfaces wiped down and disinfected
- All office equipment dusted and wiped with sanitiser (laptop, coin/note counters, telephones, safes, staff guard fobs, panic alarm fobs, walkie talkies)

### Shared Equipment:

- All shared equipment will be sanitised before, during and after each shift or anytime the equipment is transferred to a new employee. This includes phones, computers and other communication devices, kitchen implements, panic buttons, office equipment, cleaning equipment and all other direct contact items used throughout the venues.
- If we think of the areas and equipment we share as a team, can you think of what areas or items the customers would be sharing?

Activity – In the box below, please write down what areas or items you think customers would share in the venue and how you can ensure they are kept clean;

What items or areas do you think customers share?

How can you ensure they are kept clean?



## **Cleaning Standards - within the Venue**

You are going to spend some time with the team and learn about the cleaning standards within the venue and look at the checklists that need to be completed throughout the day.

All cleaning within the venue is recorded on checklists, some of these are found within the venue. You will learn about the rest of the cleaning procedures and rotas for inside and outside the venue from your Training Manager.

Activity – whilst working in the Venue please complete the following questions within the box;

**Where can you find the cleaning policy?**

**What products do you use to clean the Gaming Machines?**

**How often should you check the toilets?**

**When a customer leaves the venue, what should be cleaned so it is ready for the next customer?**

**Where can you find the venue cleaning checklists?**

**Where can you print the cleaning checklist off?**

## Merkur Slots Training Plan



### Cleaning Standards - within the Venue

It is our commitment to clean the machine and chair after each use. If there is a delay in cleaning the machine, it is recommended a hold card is added to stop any new customer from playing until it can be cleaned.

Our commitment to our colleagues and ourselves is to ensure that anything we use, or is shared needs to be cleaned. If there is a delay, please ensure you tell your colleagues before they or our customers use the equipment.

**Remember we are working together to keep us all safe!**





## Customer Service Introduction - Mystery Shopper

Service standards are the core of our business and is the area where we can differentiate from our competitors.

Compare us to a gaming arcade at a motorway service and the customer experience is much better – but how do we compare to the high street gaming venues?

To help us achieve industry-leading service standards; **mystery shopping visits** provide our business with a range of information on the level of service which is being provided at each of our venues. Currently, we use a company called Store Checkers to have mystery shoppers visit every venue twice per year.

The report which is completed by a mystery shopper provides a non-biased opinion on the service which is provided, and the level of satisfaction they were left with, following the visit to one of our venues. The report itself has specific scoring areas included within, which range from; the welcome received, to the offers which were made, through to the level of rapport which the staff attempted to build with the customer.

**The first experience a customer has in your venue is KEY to whether they will make a return visit, therefore, it is important that we are making the Right approach and offers to these customers.**



## Service Standards – Mystery Shopper

The mystery shopper report is broken down into 8 sections. Find a copy of your venue's mystery shopper report and list what the 8 sections are:

1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	



## Customer Service Introduction – Mystery Shop

To be the best gaming business on the high street our aim is to score 100% in every venue. The only way we can achieve this is through our teams in the venue – it's you that makes all the difference.

While some of the areas within the mystery shopper report may not relate directly to the actions of staff serving the customer, i.e. "Would you describe the brand sign above the venue to be clean and well maintained? everything included within the report relates to the overall experience the customer has and the product and service which we offer. Ultimately if the exterior is dirty, it is our team's responsibility to notify someone to do something about it. It is the team's responsibility to action what they see needs doing (if they can) rather than leave it to someone else.

The areas which staff can have the greatest impact during the visit to a new customer are: The arrival, staff interaction, staff service, and departure. This forms part of the customer's journey and experience in the venue.

To complete the following exercise there is an example of a good and poor mystery shop. Looking at the areas covered in the report; think about how you can personally contribute to a great (100%) score. Focus on the areas that scored less than 100% on your last report, but also think about how you can ensure we maintain any 100% areas. Make notes below and discuss these with your training manager.

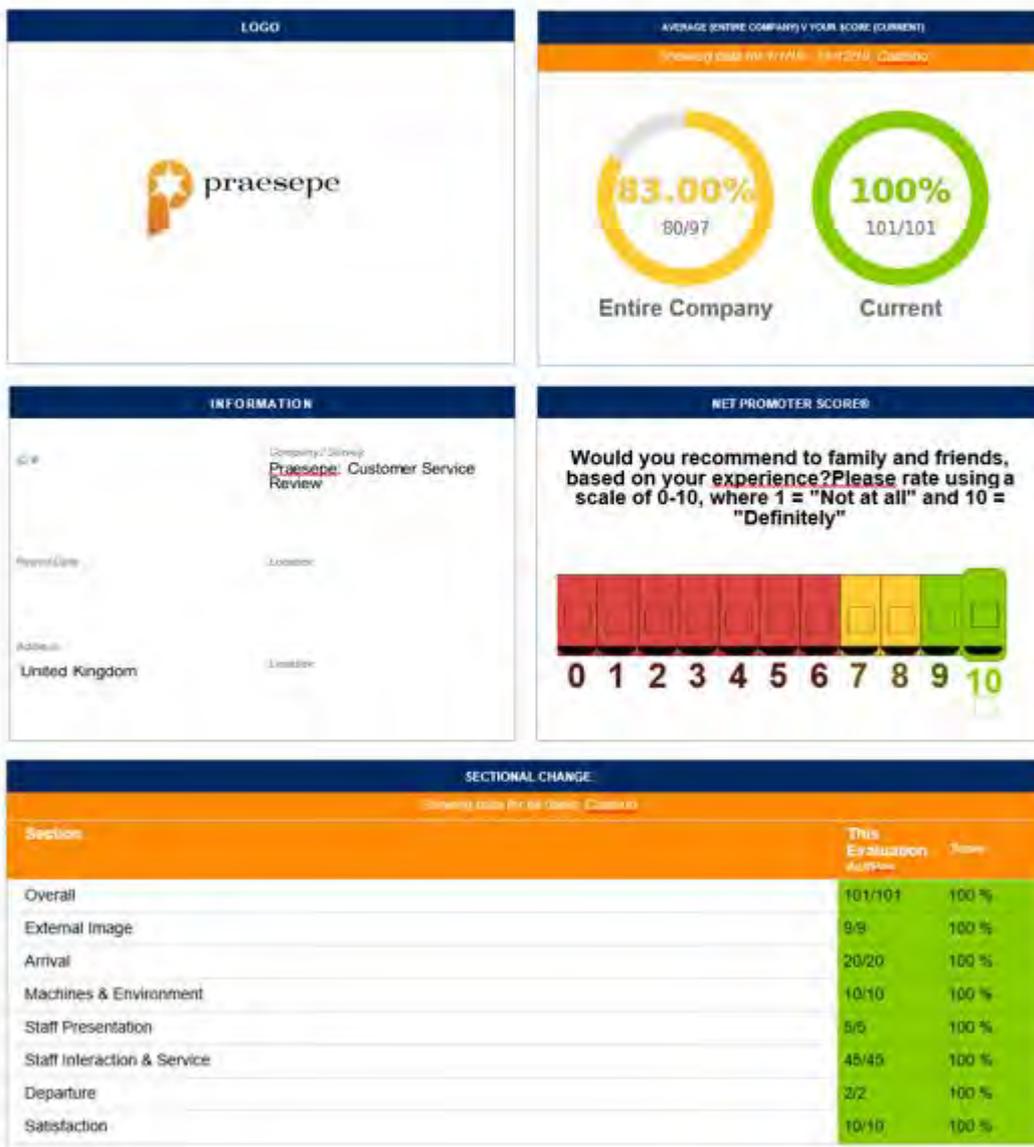


**Merkur Slots  
Training Plan**



Area of Report	Our Score	What I can do to maintain/improve this

# Merkur Slots Training Plan Mystery Shopper – Good Report



# Merkur Slots Training Plan



## Mystery Shopper – Good Report

YOUR SCORE- MAJOR SECTIONS

(Showing score for Current Checklist)

Overall	External Image	Arrival	Machines & Environm...
Staff Presentation	Staff Interaction & Ser...	Departure	Satisfaction

MYSTERY SHOPPING (REPORT)

QUESTION	SCORE	ANSWER
Location:		
Date of visit:		23/06/2020
Time of visit:		10:00
Photo of the <del>ceppo</del> (exterior) relating to this report:		
Day of visit:		<input type="checkbox"/> Monday <input type="checkbox"/> Tuesday <input type="checkbox"/> Wednesday <input type="checkbox"/> Thursday <input type="checkbox"/> Friday <input checked="" type="checkbox"/> Saturday <input type="checkbox"/> Sunday

# Merkur Slots Training Plan



## Mystery Shopper – Good Report

Questions	Answers	Comments
Number of staff present during your initial sweep:	2	
Number of customers present during your initial sweep:	17	
Give names/descriptions of all staff you came into contact with (in order of dealings):		
Detail the products/offers/services offered to you during the discussion with staff (i.e. membership/text scheme/promotions, drinks/snacks, etc)		
Offered assistance with changing my money into coins, Tea, coffee, cold soft drinks and water, Chocolate snacks, crisps and biscuits, Membership application form and the <b>Cashing</b> text match play offer.		
What did you spend in total?:	£10	
Detail the games you played:		
Pots of Gold, Slots of Gold, Wines, Wish Upon a Jackpot, Kingdom of Wealth, Golden Pharaohs and Thai Princess		
Your age:	54	
Location/Target	Performance	Comments
Was the front of the venue clean and well maintained?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not met	Achieved <input type="checkbox"/> Partially met <input type="checkbox"/> Not met
Would you describe the window display as clean and tidy, and the brasswork/aluminium polished?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not met	Achieved <input type="checkbox"/> Partially met <input type="checkbox"/> Not met
Was there an over 10s notice clearly displayed on one of the entrance doors or in the front window area?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not met	Achieved <input type="checkbox"/> Not met
Describe what was memorable about the window displays:		
The windows, although slightly misted up due to the inclement weather outside, were full of promotional material detailing slot machines and the venue's twenty-four hour opening times. The signs appeared interesting as I approached the venue due to the bright colours and bold text used.		
External Image - please provide comments supporting your scoring for this section (both positive and negative)		
The promotional material promoting the slot machines on the left hand side of the double bay windows appealed to me as they appeared to display modern and new machines which I had previously played. This excited me and made me want to enter.		
Arrival	100% (On/On)	Comments
Based on the level of activity when you arrived, were you acknowledged quickly enough?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
When you entered the site, how were you acknowledged by the staff?	<input checked="" type="checkbox"/> Offer of help <input type="checkbox"/> Verbal welcome <input type="checkbox"/> Smile only <input type="checkbox"/> Eye contact only <input type="checkbox"/> No acknowledgement <input type="checkbox"/> N/A or All staff busy with customers	Offer of help <input type="checkbox"/> Verbal welcome <input type="checkbox"/> Smile only <input type="checkbox"/> Eye contact only <input type="checkbox"/> No acknowledgement <input type="checkbox"/> N/A or All staff busy with customers
When you entered the site and were first spoken to by a member of staff, were you asked for age-verification (where applicable)? N/A - If you took under 25, you should be asked to prove your age by means of identification	<input checked="" type="checkbox"/> Achieved <input type="checkbox"/> Not Met <input type="checkbox"/> Not Met - I was approached but not asked for ID and I am/look 25 or under <input type="checkbox"/> N/A - I am and took over 25	Achieved - I was approached and asked for age-verification <input type="checkbox"/> Not Met - I was approached but not asked for ID and I am/look 25 or under <input type="checkbox"/> N/A - I am and took over 25
Minor Narrative		
Please provide a detailed narrative of everything that happened on the day - both positive and negative points - including playing, browsing and staff interactions.		
I was immediately welcomed by a smartly dressed member of staff as I browsed the numerous brightly lit slot machines with an offer of assistance together with a smile and a genuine kind attitude. I asked for help changing a ten pound note into ten one pound coins and received a detailed explanation of how the change machine worked while the staff member inserted my note into the machine. I was again asked if I required anything else before the staff member entered into a brief conversation with me by asking if I was new around this area as he had not seen me before. I replied I was on holiday and a brief conversation ensued about the town and surrounding countryside. He then proceeded to circulate around the venue asking other customers if they required assistance. He was being kept very busy as the venue had a lot of customers. Later the same staff member approached me and politely offered hot and cold drinks including tea, coffee, soft drinks and water. I thanked him and asked for a black coffee. He returned shortly afterwards with a coffee and a selection of crisps neatly arranged on an oval wicker tray. He spoke to me about completing a membership application form and entering my mobile telephone number into a match play text promotion. He was very knowledgeable and spoke in detail about the current offers and promotions. I was handed an application form to complete. During the visit I continued to browse and noticed one slot machine not working with an out of order sign attached. Later a different staff member approached me while I was playing the slot machines and asked if I required any hot drinks. She returned again with a tray of assorted chocolate offering them to myself and other customers. Both staff members appeared very attentive and were constantly interacting with the customers and myself, offering a brief and light hearted conversation, assistance and food and drinks. There was a buzz in the air, with		

# Merkur Slots Training Plan



## Mystery Shopper – Good Report

Question	Score	Response
<p>The staff members creating a pleasant and joyful atmosphere. As I left a nearby staff member noticed me leaving and offered a genuine farewell and a polite thank you.</p>		
<b>Machines &amp; Environment</b> 100% (14/14)		
Were all machines (all types of gaming) you saw during your visit clean?	100.00% 14/14	Yes <input checked="" type="checkbox"/> No
Was the price of play and jackpot amounts you could win clear on the machine?		Yes <input checked="" type="checkbox"/> No
Were all the machines (all types of gaming) switched on and working? (Score "Out of order card displayed" if any of the machines that are off have an "out of order" card displayed)	70.00% 10/14	Yes <input checked="" type="checkbox"/> "Out of order" card displayed <input type="checkbox"/> No
Was the centre generally clean and tidy?	100.00% 14/14	Yes <input checked="" type="checkbox"/> No
Was the centre generally in good repair? Information only - no score value		Yes <input checked="" type="checkbox"/> No
Was the carpet not worn in any places? Information only - no score value		Achieved <input checked="" type="checkbox"/> Not met
Was there no sign of anything that could cause health and safety issues? Information only - no score value		Achieved <input checked="" type="checkbox"/> Not met
Did you hear background music playing?	50.00% 7/14	Yes <input type="checkbox"/> No
Was the temperature of the centre acceptable, or too hot/too cold?	40.00% 5/14	Acceptable <input checked="" type="checkbox"/> Extreme
If there was a smoking area, was this well presented? Information only - no score value		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p>Machines &amp; Environment - please provide brief supporting comments: The atmosphere inside this venue was busy with customers and had a pleasant and enjoyable ambience. All the slot machines appeared clean, tidy and working apart from one slot machine which was not working but had an out of order card displayed on it. The interior was warm, brightly lit and had a clean and smart looking carpet. Overall the whole venue was clean and tidy and offered an exciting establishment with friendly and polite staff. There were no no-smoking areas inside this venue.</p>		
<b>Staff Presentation</b> 100% (5/5)		
Were all members of staff wearing uniforms?	100.00% 5/5	Yes <input checked="" type="checkbox"/> No
Were all of the staff that you came into contact with wearing name badges and Think 25 Badges (must wear both)?	100.00% 5/5	Yes, wearing both <input checked="" type="checkbox"/> Not wearing both
<p>Please list the names of staff you came into contact with who were wearing name badges/Think 25 badges, and provide a brief description of those who were not. Both Staff 1 and Staff 2 were both clearly wearing a name badge and an over 25 badge. They were noticeable as staff members due to their smart uniforms and prominently displayed name badges. Staff Presentation - please provide brief supporting comments: Both staff members came across as smart, professional and tidy. They were each wearing company uniforms which appeared new, ironed and freshly laundered.</p>		
<b>Staff Interaction &amp; Service</b> 100% (4/4)		
When you requested change, did the member of staff give you the change you requested (where applicable)?	100.00% 4/4	Achieved <input checked="" type="checkbox"/> Not met N/A
Did a member of staff mention the Membership and/or Text scheme to you during your visit?	100.00% 4/4	Achieved <input checked="" type="checkbox"/> Not met
Were you offered a free drink of tea/coffee or a cold drink within the first 10 minutes of your arrival?	100.00% 4/4	Achieved <input checked="" type="checkbox"/> Not met
Were you offered a complimentary snack?		Offered <input type="checkbox"/> Not offered <input checked="" type="checkbox"/>
If yes, at what time? Please describe what you were offered:		16:36 I was offered crisps more drinks and chocolates.

# Merkur Slots Training Plan



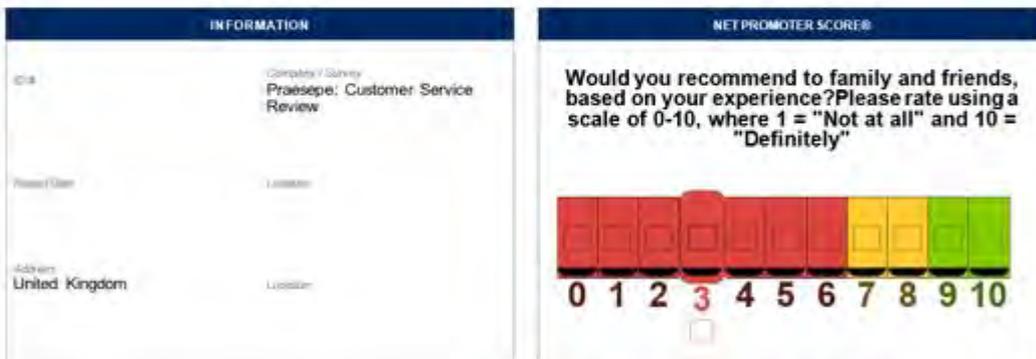
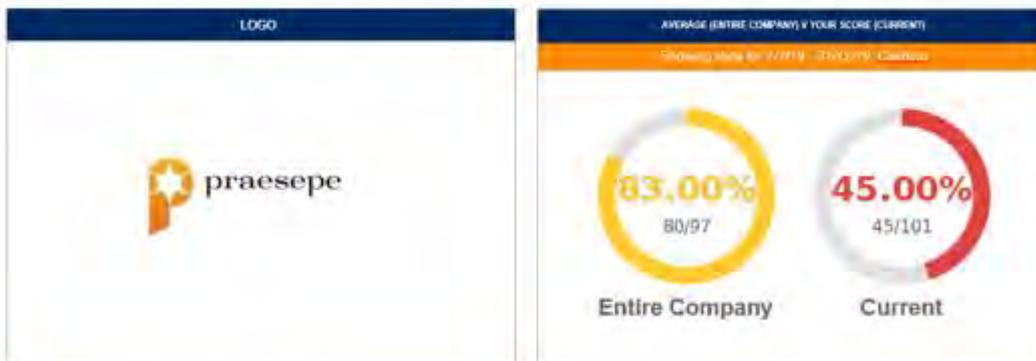
## Mystery Shopper- Good Report

Question	Score	Answer
Were you aware of staff circulating (e.g. talking to customers/keeping the place tidy/etc, but not just standing around)?	100000	Achieved <input type="checkbox"/> Not met
Were there any staff members who exceeded your expectations? Information only - no score value		Yes <input type="checkbox"/> No
Whilst serving you, did the staff member seem genuinely interested and give you their full attention?	100000	Outstanding service <input type="checkbox"/> Very good service Sufficient service Could do better Weak/lack of interest
Was the staff member friendly and helpful whilst interacting with you?	100000	Extremely <input type="checkbox"/> Very Obliging Relatively Not at all
Was any unprompted "general" conversation attempted or any rapport built? E.g. "Have you played at <b>Cashino</b> before?", "How has your day been?", etc	100000	Met <input type="checkbox"/> Partially met Not met
Did you feel valued and appreciated as a customer?	100000	Extremely <input type="checkbox"/> Very On the whole Not really Definitely not
<b>Departure</b> 100% (1/1)		
Did the staff thank you for visiting <b>Cashino</b> and offer a genuine goodbye?	100000	Yes <input type="checkbox"/> No
What was said/what happened on your departure? A nearby staff member noticed me leaving and offered a warm farewell and a thank you		
<b>Satisfaction</b> 100% (10/10)		
Would you recommend to family and friends, based on your experience? Please rate using a scale of 0-10, where 1 = "Not at all" and 10 = "Definitely"	100000	0 1 2 3 4 5 6 7 8 9 10 <input type="checkbox"/>
Please support your "recommend" rating: I would want my friends and work colleagues to experience the same high standards of customer care as I was given during my visit. My friends would enjoy the hospitality which was offered to me and the delight of playing modern and up to date slot machines		
<b>Feedback of Visit</b>		
Was there anyone in the <b>queue</b> or in the doorway that appeared to be under the age of 18? Information only - no score		Yes No <input type="checkbox"/>
If yes, give details of what staff did (or did not do) to overcome this: There was no one loitering in the doorway during my visit.		
Is there anything that we could have done better/improved upon today? I noticed there were two deep steps in the middle of the venue which would limit a person with mobility issues from experiencing all the areas within this venue, however I understand this would be outside the control of the staff members.		
What did we do really well today? I enjoyed the attentive staff members who offered a friendly, attentive and helpful service to me during my visit. They were very generous with their offers of drinks and assorted snacks and I stayed longer in this venue playing the slot machines due to the attentiveness and friendliness of the staff members		

# Merkur Slots Training Plan



## Mystery Shopper- Good Report



**SECTIONAL CHANGE**  
Showing data for 2/2019 - 2/2019 - Casino

Section	This Evaluation Count/Total	Score
Overall	45/101	45 %
External Image	9/9	100 %
Arrival	15/20	75 %
Machines & Environment	10/10	100 %
Staff Presentation	5/5	100 %
Staff Interaction & Service	3/45	7 %
Departure	0/2	0 %
Satisfaction	3/10	30 %

**Merkur Slots  
Training Plan**



**Mystery Shopper – Poor Report**



MYSTERY SHOPPING REPORT

Question	Score	Answer
Location:		
Date of visit:		23/06/2020
Time of visit:		10:00
Photo of the <b>outside</b> (exterior) relating to this report:		
Day of visit:		Monday Tuesday Wednesday Thursday Friday Saturday

# Merkur Slots Training Plan



## Mystery Shopper – Poor Report

Task Area	Score	Comments
<p>Number of Staff present during your initial sweep: 2</p> <p>Number of Customers present during your initial sweep: 1</p> <p>(Give names/Descriptions of all staff you came into contact with (in order of dealings))</p> <p>Detail the product(s)/other services offered to you during the discussion with staff (i.e. membership card (scheme)/redemption, drinks/snacks, etc.)</p> <p>I was not offered any services during this visit.</p> <p>What did you spend on/lose? £100</p> <p>Detail the games you played</p> <p>Worms Hot Scatter Super Star Turns Toad Fowl Ultra Hit Multi Wild King Kong Cash Your age: 25</p>		
<p><b>External Image</b> 100% (2/2)</p> <p>Was the front of the venue clean and well maintained? <input checked="" type="checkbox"/> Achieved <input type="checkbox"/> Partially met <input type="checkbox"/> Not met</p> <p>Would you describe the window display as clean and tidy, and the brasswork/aluminium polished? <input checked="" type="checkbox"/> Achieved <input type="checkbox"/> Partially met <input type="checkbox"/> Not met</p> <p>Was there an over 18s notice clearly displayed on one of the entrance doors or in the front window area? <input checked="" type="checkbox"/> Achieved <input type="checkbox"/> Not met</p> <p>Describe what was memorable about the window displays</p> <p>There was nothing particularly memorable about the window display as nothing stood out from it when walking past.</p> <p>External image - please provide comments supporting your scoring for this section (both positive and negative)</p> <p>The exterior of the venue was clean, tidy and well maintained. There was some dust visible on the woodwork but this was acceptable given that this venue is currently being converted. The windows were free of any dirt and blemishes. There is an over 18s sign visible at the entrance to the venue.</p>		
<p><b>Arrival</b> 75% (1/2)</p> <p>Based on the level of activity when you arrived, were you acknowledged quickly enough? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>When you entered the site, how were you acknowledged by the staff? <input checked="" type="checkbox"/> Offer of help <input type="checkbox"/> Verbal welcome <input type="checkbox"/> Smile only <input type="checkbox"/> Eye contact only <input type="checkbox"/> No acknowledgement <input type="checkbox"/> N/A or All staff busy with customers</p> <p>When you entered the site and were first spoken to by a member of staff, were you asked for age verification (where applicable)? <input checked="" type="checkbox"/> Achieved <input type="checkbox"/> Not Met - I was approached but not asked for ID and I am/look 25 or under <input type="checkbox"/> N/A - I am and look over 25</p> <p>N.B - If you look under 25 you should be asked to prove your age by means of identification</p>		
<p><b>Main Narrative</b></p> <p>Please provide a detailed narrative of everything that happened on the day - both positive and negative points - including playing, browsing and staff interactions.</p> <p>I proceeded to enter the venue. I immediately noticed that the venue was undergoing refurbishment to a future venue and that only half of the venue was being used. Staff 1 acknowledged me on entry non-verbally. As I walked towards the machines, she approached me and asked me for ID, which I provided. This was accepted and Staff 1 thanked me for providing this. For the majority of the visit, both Staff 1 and Staff 2 were stood at the counter talking to each other or to the engineer who also works for the company. I observed them speaking in a different language to each other over the course of my visit. I played on some machines for a few minutes. When I had finished playing, I approached the counter and spoke to Staff 2. I asked her for some change from a £5 note to which she pointed me at the GetTe and told me to use this. I proceeded to use the machine and obtain some change. I then continued to play on some machines for a few minutes. When I had finished playing on the machines, I approached Staff 1 at the counter and asked her if there was anywhere I could smoke in the venue to which she advised me there was not and that I had to go outside. I proceeded to exit the venue in front of both staff members and did not receive a farewell on exit.</p>		
<p><b>Recovery &amp; Environment</b> 100% (1/1)</p>		

# Merkur Slots Training Plan



## Mystery Shopper-Poor Report

Question	Score (%)	Comments
Were all machines (all types of gaming) you saw during your visit clean?	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was the price of play and jackpot amounts you could win clear on the machine?	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Were all the machines (all types of gaming) switched on and working? (Score "Out of order card displayed" if any of the machines that are off have an "out of order" card displayed)	100%	Yes <input type="checkbox"/> "Out of order" card displayed <input type="checkbox"/> No <input type="checkbox"/>
Was the centre generally clean and tidy?	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was the centre generally in good repair? Information only - no score value	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was the carpet not worn in any places? Information only - no score value	100%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Was there no sign of anything that could cause health and safety issues? Information only - no score value	100%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Did you hear background music playing?	0%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was the temperature of the centre acceptable, or too hot/too cold?	100%	Acceptable <input type="checkbox"/> Extreme <input type="checkbox"/>
If there was a smoking area, was this well presented? Information only - no score value	100%	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Machines & Environment - please provide brief supporting comments:		
The venue did not have any background music playing, but as this may have been because of the refurbishment I have marked this positively. Due to it being refurbished, it did not have any carpet and had a solid stone floor. Given this fact, the machines were clean and tidy and also in good condition. All machines were in working order. The temperature was comfortable in the venue. The venue does not have a smoking area.		
Staff Presentation	100% (5/5)	
Were all members of staff wearing uniforms?	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Were all of the staff that you came into contact with wearing name badges and Think 25 Badges (must wear both)?	100%	Yes, wearing both <input type="checkbox"/> Not wearing both <input type="checkbox"/>
Please list the names of staff you came into contact with who were wearing name badges/Think 25 badges, and provide a brief description of those who were not:		
Staff Presentation - please provide brief supporting comments:		
Both Staff 1 and Staff 2 were wearing the correct uniform with the relevant badges on and were well presented.		
Staff Interaction & Service	75% (3/4)	
When you requested change, did the member of staff give you the change you requested (where applicable)?	0%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/> N/A <input type="checkbox"/>
Did a member of staff mention the Membership and/or Text scheme to you during your visit?	0%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Were you offered a free drink of tea/coffee or a cold drink within the first 10 minutes of your arrival?	0%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Were you offered a complimentary snack?		Offered <input type="checkbox"/> Not offered <input type="checkbox"/>
If yes, at what time?		
Please describe what you were offered:		I was not offered any snacks during this visit.
Were you aware of staff circulating (e.g. talking to customers/keeping the place tidy/etc, but not just standing around)?	0%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Were there any staff members who exceeded your expectations?		Yes <input type="checkbox"/>

# Merkur Slots Training Plan



## Mystery Shopper-Poor Report

Questions	Answers	Options
Information only - no score value		No <input type="checkbox"/>
Whilst serving you, did the staff member seem genuinely interested and give you their full attention?	0/10 3.00%	Outstanding service Very good service Sufficient service Could do better Weak/lack of interest <input type="checkbox"/>
Was the staff member friendly and helpful whilst interacting with you?	0/10 0.00%	Extremely Very Obliging Relatively <input type="checkbox"/> Not at all
Was any unprompted "general" conversation attempted or any rapport built? E.g. "Have you played at <b>Cashio</b> before?"; "How has your day been?"; etc.	0/10 0.00%	Met Partially met Not met <input type="checkbox"/>
Did you feel valued and appreciated as a customer?	0/10 0.00%	Extremely Very On the whole Not really Definitely not <input type="checkbox"/>
Comments:	0/2 (0%)	
Did the staff thank you for visiting <b>Cashio</b> and offer genuine goodbye?	0/2 0.00%	Yes No <input type="checkbox"/>
What was said/what happened on your departure? I did not receive a farewell despite leaving the venue at the entrance opposite the counter where both Staff 1 and Staff 2 were situated.		
Satisfaction:	0/10 (0%)	
Would you recommend to family and friends, based on your experience? Please rate using a scale of 0-10, where 1 = "Not at all" and 10 = "Definitely"	3/10 30.00%	0 1 2 3 4 5 6 7 8 9 10
Please support your "recommend" rating: I would not recommend this venue. Both Staff 1 and Staff 2 showed no interest in wanting to proactively provide any services to me or establish a rapport during the visit and were observed talking to each other and the engineer for the majority of the visit. I did not feel valued as a customer and was left to it in that regards. Even when interacting with the staff members, they did not show much interest in wanting to help.		
Feedback of Visit		Yes No <input type="checkbox"/>
Was there anyone in the centre or in the doorway that appeared to be under the age of 18? Information only - no score		
If yes, give details of what staff did (or did not do) to overcome this: N/A		
Is there anything that we could have done better/improved upon today? A more proactive and positive approach to customer service is required to improve.		
What did we do really well today? Despite the venue's ongoing refurbishment, the venue was clean, tidy and generally well maintained.		



## Venue Operations & Compliance





## Operations Open & Close Venue

As part of your role, you may have the responsibility of opening and closing the venue as you will most likely hold keys. It is vitally important that you consider safety as the number one element. If you are a 24-hour site, it is still important that you understand and can refer back to this policy, as during the Christmas period we have to close the venue (it is the Law)

This was covered in your **Lone Working e-Learning** if for any reason you need to re-take this course; you can get the course reset by contacting: [LearningandDevelopment@praesepeplc.com](mailto:LearningandDevelopment@praesepeplc.com)

We have clear procedures for opening and closing the venue. These can be found in the Operations Manual. Find the opening and closing procedures and answer the following questions:

Opening and Closing Procedures	
Question:	Answer:
Why do we have to follow the procedure?	
What should happen 10 minutes before we close?	
Why do we call a designated venue?	
Who is your designated venue?	
What happens with the alarm at open/close?	
What is the alarm contact number and code?	
What is the alarm fob? Where is it kept? How do you use it?	

**Merkur Slots  
Training Plan**



**Operations - Open & Close Venue**

Looking at the Opening and Closing Policy – please list the steps for opening and closing as listed in the policy.

This can be referred to in the Merkur Slots Operations Manual.

STEPS TO OPEN THE VENUE	
1	
2	
3	
4	
5	
6	
7	

STEPS TO CLOSE THE VENUE	
1	
2	
3	
4	
5	
6	
7	
8	
9	

## Merkur Slots Training Plan



### Operations - Venue Safety

As well as our safety and security, the venue's security becomes our responsibility, especially if we are opening or closing the venue. Other areas to consider include those listed below. Each area has an explanation as to why it is important. Find out best practices and what is in the policy so you can deliver this in your role.

AREA	WHY	BEST PRACTICE/BEST RESULT:
<b>CCTV</b>	CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue are covered by CCTV at all times.	
<b>MACHINE FRAUD</b>	Machine fraud is a threat, which is present. Employees should be aware of how fraud can take place and what to do in the event of spotting a "customer" defrauding a machine.	
<b>FIRE SAFETY</b>	The health and safety of employees and customers is of great importance. Being aware of the dangers which a fire can bring is important, as is being prepared to deal with one. Most fires are preventable by taking responsibility for and adopting the right behaviours and procedures.	
<b>OPEN/CLOSE THE VENUE</b>	Several safety requirements must be adhered to when opening and closing the venue. Ensuring that policy and processes are followed reduces the chance of mistakes being made, which may negatively impact the security of the premises.	

**Merkur Slots  
Training Plan**



**Compliance – Understanding the Different Logs**

Work through the Compliance folder and the IHL Smart Tablet in the venue. For each log listed, please explain where it's found, what it is, what it is used for, and when the last entry was made in your venue.

Log Name	Where Found	Used For	Last Entry
Log A			
Log B (1)			
Log B (2)			
Log C			
Log D			
Log E			
Log F			
Log G			

## Merkur Slots Training Plan



### Compliance - Acronyms & Abbreviations

Understanding the language and terminology we speak is important in our business. You may be asked what things mean by customers, your Line Manager, or even a Gambling Commission Officer, should they visit your venue. You will find the full list of Acronyms/Abbreviation displayed within your venue.

This quick exercise below will help you learn and understand the terminology used. Match up the Abbreviation with the Meaning .... It's not a test by the way!

Acronym/ Abbreviation:	Match here:	Meaning
ADR		Independent Betting Adjudication Services
BCAP		Ticket in Ticket out
IBAS		Proceeds of Crime Act
TITO		Alternative Dispute Resolution
FEC		Broadcast Committee of Advertising Practice
AML		Committee of Advertising Practice
MOSES		Machines Administration Reporting System
AGC		Video Bingo Terminal
CAP		British Amusement Catering Trade Association
VBT		Anti-Money Laundering
MARS		License Conditions & Codes of Practice
BACTA		Adult Gaming Centre
LCCP		Multi-Operator Self Exclusion Scheme
POCA		Family Entertainment Centre

## Merkur Slots Training Plan



### Compliance – What we do to meet the licensing objectives

You need to understand what we do as a company to meet the three Licensing objectives and comply with the law.

Compliance	
Question:	Answer:
What policy do we have in place to protect the young?	
What information would you record for a customer interaction and where would you record this information?	
Where would you record a self-exclusion?	
What is Proceeds of Crime?	
What are the signs money laundering is happening in your Venue?	
Where would you record a money laundering incident?	
What are the three Licensing objectives?	

## Merkur Slots Training Plan



### Operations – Float Check & Customer Handover

When starting a shift or when there is a shift change over, this must be done with minimal disruption to the customer. Uniforms must remain worn whilst in view of the customers. You can refer to the Merkur Slots Operations Manual for customer service change over policy.

You are now going to carry out a float check with your training manager; you will be encouraged throughout the rest of your training to be involved carrying out floats checks daily.

DAILY FLOAT CHECK RECORD				
Merkur Casino				
DATE	TIME	LOCATION	CHECKED BY	REMARKS

Please make notes below, on the relating documents you need to complete a float check:

---

---

---

---

---

---

---

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---

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## Operations – Float Check & Customer Handover

Please note the **five** steps in the table below that you must be aware of when starting a shift/ changing of shift. You can refer to the Merkur Slots Operations Manual.

STEPS TO BE AWARE OF AT THE START/CHANGE OF SHIFT	
1	
2	
3	
4	
5	

Remember to be aware of your surroundings and do not count cash on your own. You need to ensure you adopt the four-eye approach for your safety, as well as keeping the money secure.



Gaming Machines knowledge and Procedures



## Merkur Slots Training Plan



### Gaming Machines – Introduction

There are several different machines at each venue.

You should familiarise yourself with the different types of machines so you can advise customers, explain the workings and start to become an expert on machines – after all, they are our 'product'!

#### Did you know?

All Gaming establishments require a premises licence to run gambling activities. This will be located on the Information Board, near to the front entrance.

An AGC/High street Bingo can comprise a mixture of the entire machine categories; however, the ratio of B3 cabinets to all the other categories cannot exceed TWENTY PERCENT. For example, an AGC/High street Bingo operating with 10 B3 cabinets must have 40 Cat C/and Ds to operate legally

The following notices are a requirement by law to be displayed on all Gaming Machines in the venue. This can be on the screen of the machine or displayed on a sticker affixed to the cabinet;

- **No under 18's to Play**
- **Gamble Responsibly (Gamcare UK Helpline 0800 8020 133)**
- **Minimum Percentage payout**
- **Machine Category – (either Legacy or Non-Legacy)**

MACHINE CATEGORY	MAX STAKE	MAX PRIZE	EXAMPLE MACHINE	MARS CATEGORY	CATEGORY STICKER
B3	£2	£500	AURORA CARBON PREMIUM	B3	B3
C	£1	£100	ALPHA STAR CCV	CAT C	C
CAT C LITE	20P	£10	CHASE THE ACE - NO LIMITS	CAT C LITE	C/D
D COMPLEX	10P	£5	TIMELESS SUPER LUCKY PAIRS	CAT D	D



## Merkur Slots Training Plan



### Gaming Machines – Product and Brand Knowledge

As a member of the Merkur Slot team, having knowledge on Machine Manufacturers, Games offered and their features means you can use this information to;

- interact with customers effectively
- understand if we are ahead of the game with our competitors
- suggest if the machine is positioned correctly within the layout of the venue

#### Who Makes our Machines?

The manufacturer **Blueprint** is a sister company of Gauselmann, so encouraging customers to play these is a good thing.

**Blueprint** machines are identified by the Sun logo on the top of the machine cabinets. Other manufactures we use are Novomatic, Astra, SG/Barcrest, Project coin, Amatic and Electrocoin.

#### Activity 1

Have a look at each machine in your venue and complete the activity below. Different manufacturers put their company name in different places!

If you need help, ask your manager.

Machine Manufacturers	Number of machines in my venue

## Merkur Slots Training Plan



### Gaming Machines – Product & Knowledge

Some of the machines in venue have multiple games and they are referred to as game packs. It is good practice to understand which manufacturer produces what machines, what games are available, what the most popular games are, and what the main features of that game are. This will mean that you can, help new customers, promote new games that may be introduced and be confident if there are any issues during game play.

#### Activity: Half Hour Play

We are now going to ask you to spend 30 minutes in the venue, to either play a machine on demo mode and/or look at the help menu on the machines. This is going to allow you to get a feel for the different games and machines so that you can build your knowledge of what we offer and be able to promote games and features to our customers. The training manager will be available to guide you.

Make notes below about the games you like, the machine name and category, the manufacturer and the main feature of that game:

Machine & Category	Manufacturer	Game & Feature of Game

## Merkur Slots Training Plan



### Gaming Machines - Cleaning Gaming Machines

It is important that our gaming machines are always ready to play and presentable to our customers. Below are some key hints and tips to make sure your machines are always ready for play.

Machine Exterior	
<b>Appearance</b>	Throughout your shift, make a habit of having a good look at every machine. If you see anything that looks dirty make sure you clean it as soon as you can. If anything is broken either report to your Line Manager or record the fault in the Engineers Log on MARS.
<b>POP (Price of Play)</b>	Do ensure that EVERY machine has the correct Price of Play. Price of Play is either displayed on a flag, on the exterior of the machine or can be displayed electronically on the digital screen, so familiarise yourself with each machine's location. When any new machines arrive this is equally important to check. Please also make sure that any new POP flags, where applicable, are attached at the same height level of all other POP flags displayed.
<b>Buttons</b>	If you see any broken buttons, record it in the Engineer's log on MARS.
<b>Stools</b>	To encourage customers to enjoy a comfortable stay in your venue, ensure that stools are placed appropriately in front of the gaming machines. If a customer leaves, then make a point of putting the stool "straight" so it is not left in an untidy position.
<b>Volume</b>	It is important that our gaming machines can be heard by those playing them. If you notice that a machine has a very low volume to it, then report this to your Line Manager or record in the Engineers log on MARS.
Cleanliness	
<b>Cabinet/Glass /LCD Screens</b>	Are they clean and free of smears dirt and foreign articles?
<b>Overall</b>	Does the general level of machine cleanliness meet the required cleanliness standards?
<b>Surrounding Area</b>	The area around is all clean including the floor and stools.

Your Training Manager will now go through the Machines Presentation Policy in the Merkur Slots Operational Manual. You will be able to use this as a guide when you start at your Merkur Slots Venue.

## Merkur Slots Training Plan

### Gaming Machines



#### **Ticket in Ticket out Machine (TiTo)**

**Ticket in Ticket Out** is a very simple concept and has been introduced throughout the Praesépe estate. This has now given us a system that provides full data retrieval and a cashless solution, which assists all departments in the day to day running of the business.

All manufacturers conform to the GBG (Gambling Business Group) ticketing protocol, which allows the player to transfer winnings from machine to machine easily and conveniently. In essence, TITO offers a simpler, efficient and impartial playing experience.

The real advantage from an operational perspective is the reduction of cash handling by automating the manual processes, such as hand pays and floating hoppers with cash. This in turn means more time freed up for customer service.

Whilst a lot of our estate uses Ticket in Ticket out (TiTo), we do still have machines that follow the manual processes. This means that the Gaming Machines will have an agreed float within them. The float will need to be topped up; this is called the refill process. During the collection process, this machine will need to be emptied of all cash, and then the agreed float put back into the machine. If these machines are within the venue you are training in, the training manager will go through this process with you.

## Merkur Slots Training Plan



### Operations - Manual/Procedures

You will already be familiar with some of the policies and procedures, however, there is a policy to cover all parts of the operation. They are there to help you carry out your role, so you remain compliant and understand the expectations when working as part of the Merkur Slots team.

This means reading and understanding the Merkur Slots Operations Manual (this can be found in venue and in the shared documents folder on the PC – ask your Line Manager if you are unsure.)

Make sure you read, understand and can implement the following policies;

Policy No.	Policy Name	Read ✓	My notes/tasks (how I will implement the policy)
CS3	Customer Service Changeover		
CS4	Holding Machines for Customers		
CS6	Customer Complaints		
CS7	Drink & Food Offering		
GP5	Venue Office Folder		
CC09	Key Management		
S03	Venue Visitors		
CC06	Cash Banking		
CS2	Mobile Phone		
CC7	Banking Collection		
CC11	Manual Ticket Redeem		
CC5	Collection		
CC4	Float Checks		

NB: You should also be familiar with the contents of all our Health & Safety Policies; however these are the Venue Management Teams' responsibility to manage/enforce but equally important that you are aware of them.

## Merkur Slots Training Plan



### Operations – Midweek Collection

The midweek empty process is integral to the successful operation of a venue. Midweeks are carried out in the main to ensure there is enough money in the GeWeTe. We collect the money from the gaming machines so we can minimise risk to the venue and ensure all monies are secure. This means there will be less cash deliveries to the venue, note acceptor cash boxes will not be full of notes and causing note jams and will ensure the GeWeTe is constantly full with money for customers to collect their winnings.

You are responsible for ensuring all policies and processes are followed, this will help to ensure all information is accurate and recorded in MARS correctly. This will reduce time correcting errors at a later date.

You will now spend time with your training manager observing a midweek collection. Please answer the questions within the box, using the information you have observed. You can also refer to the Merkur Slots Operations Manual as guidance.

<b>In the venue what do you need to do to prepare for the midweek collection?</b>	
<b>How do you select the machines you need to empty for the collection?</b>	
<b>When should the midweek collection figures be entered on MARS?</b>	
<b>What document should you use to record the amount of notes you have collected?</b>	
<b>If a customer is playing a machine you need to collect what would you do?</b>	
<b>How do you avoid the midweek collection having a negative impact on the customers?</b>	
<b>Where would you find out the amounts of expected cash?</b>	
<b>If you made a mistake entering the wrong amount, what would you do?</b>	
<b>How many people must carry out the Midweek Collection?</b>	



Day 4

Operating the GeWeTe, Know your High Street and Marketing



## Merkur Slots Training Plan



### Operations – GeWeTe Introduction

The GeWeTe's main purpose within the Venue, is to ensure the safety of the employees and company money. It will be part of your responsibility within your role to provide constant operation of the GeWeTe, so our customers can collect winnings/change as needed.

As the GeWeTe is where most of the Venue's Monies are stored, this in turn adds risk to the GeWeTe. The GeWeTe needs to be covered by CCTV. To add extra security measures to protect our teams, we have a GeWeTe SOS policy. Your training manager will show you how to carry out a GeWeTe SOS.

How often do you need to carry out a GeWeTe SOS?

Where do you record that you have done a GeWeTe SOS?

As it will be your responsibility to ensure the GeWeTe is constantly in operation and available to our customers, you will need to be able to refill the GeWeTe. This should be carried out with minimal disruption to the customers as possible; the GeWeTe refill is performed after you have carried out a midweek collection.

This process is hard to learn in a day and throughout the rest of your training, you will need to be involved in this process, so you can practice. Remember, if you do not understand anything ask your training manager and/or refer to the Merkur Slots Operations Manual.

**You will now carry out a full midweek and GeWeTe Collection with your training manager.**



**Remember, we do have different models of GeWeTe and Change machines.**

**The Policies and procedures remain the same, and you will be trained in your Merkur Slots Venue if the Model is slightly different to your training venue.**

## Merkur Slots Training Plan



### Operations – GeWeTe Refill

Now that you have completed a full Midweek and GeWeTe Collection, please answer the questions below within the box;

	QUESTION	WHAT I NEED TO DO:
GeWeTe	What card do you need to use to fill/refill GeWeTe?	
	What option should you select after you have entered your password?	
	Starting from the top menu, what are the next two options you need to select and why?	
	On the refill screen, what do you need to input and press to ensure the GeWeTe has accounted for the stock?	
	If this refill is done on a non – audit day, do you print the receipt with or without delete?	
	What information does the receipt from the GeWeTe give you?	
GeWeTe	What paperwork do you record the information that you have refilled the GeWeTe on?	
	What information do you record on the paperwork?	
	What Menu and options on MARS do you need to select, to enter the information of the GeWeTe Refill?	
	When do you need to record and update information on MARS, when do you complete a GeWeTe refill?	



## Merkur Slots Training Plan



### Know Your High Street

We aim to be the best in the high street gaming industry, but do you know who our competitors are and how well they treat their customers?

The next activity is designed to help you understand better what is happening in your area.

#### Activity

Working with the support of your Line Manager, answer the questions below. Where possible, go and visit your competitors and understand how they treat their customers. After spending your first week in venue, ask yourself – ‘do we do this better’?

Questions	Write your answers here
Who are your local competitors?	
What similarities are there to your venue?	
What did you see that your competitor(s) do well? (Think about the service they offered and their approach to customer service).	
From your observations, what do we do better already?	



**Day 5**  
**Collection, Venue Systems & Paperwork, Targets and**  
**Shifts and Rotas**



## Merkur Slots Training Plan



### Collection – Operations

The collection process is the penultimate action before being able to bank income. It can become a lengthy process if mistakes are made and there is a large amount of cash handling throughout the process. Therefore, everyone must follow the collection policy using the correct guidance tools.

Please Refer to MARS Manual, Cash & Banking Guide, and the collection policy in the Merkur Slots manual.

To enable the collection to run smoothly, you need to ensure that you are prepared for auditing and collecting the machines. Referring to the Operations Manual and your notes, please complete the following table;

Pre – Collection Procedures	
1	
2	
3	
4	
5	
6	
7	
8	
9	

## Merkur Slots Training Plan



### Collection - Operations

As you will be handling and collecting a large amount of money, you will need to ensure you are aware of your surroundings and what security measures will need to be followed. This is to prevent risk to you and your colleagues, as well as protecting our assets.

As you assist and observe a collection, please make notes on what you need to be aware of for security. Please refer to the Merkur Slots Operations Manual.

Collection Security	
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	

## Merkur Slots Training Plan



### Collection – Operations

The collection cannot be trained within a day and when problems occur, you will be quicker at solving them as you become experienced.

The collection policy is in place to help you complete a full collection. Most errors within the collection are caused by human error due to incorrect information being inputted into the MARS system.

Please answer the questions below:

1. What form do you use to record staff tasks/transactions on the GeWeTe?
2. From the Print out of the GeWeTe on collection day, what information do you use to check figures?
3. On MARS if you have an exception, how do find the actual denominations of cash you may be looking for?
4. What supporting documents do you need to have to complete a collection?
5. What deductions do you need to check have been entered onto MARS before collection?
6. What needs to be connected to MARS correctly before you can start a collection?

**Merkur Slots  
Training Plan**



**Venue Systems & Paperwork**

Complete the following table. Think about what the task is, the frequency of the task, which menu and what paperwork do you use.

	WHAT IT DOES	HOW/WHEN WILL I USE IT
<b>MARS</b>		
<b>SHOPWORKS</b>		
<b>INFORM PEOPLE/ E-LEARNING</b>		

## Merkur Slots Training Plan



### Venue Systems & Paperwork

MARS tracks all cash through the machines and provides financial reports. To help ensure finance is accurate, we need to know what tasks we should undertake to help keep the information accurate and up to date. This relates to cash handling tasks in your role. Using the table below think about your task and make notes about what you need to do. (We have given the core tasks – but ask what else is required in your venue).

	TASKS/HOW I WILL USE IT:	WHAT I NEED TO DO:
<b>GeWeTe</b>	Filling	
	£5 Recycling	
	Emptying	
	Counting Run	
<b>ATM</b>	Fill	
	End of Day	
<b>MACHINE EMPTY</b>	Security	
	Recording	
	Balancing	
	Entering on to MARS	
<b>FLOAT CHECKS</b>	Frequency	
	Information to include	
	Checking when there are errors	
	Shortages	

## Merkur Slots Training Plan Shifts & Rotas



Rotas/Shifts are prepared by the Lead Supervisor/Cluster Manager. They are prepared on the in-house system **Shopworks**. You will be given your shift Pattern in your first week in venue, from the Lead Supervisor/Cluster Manager.

**Shopworks** is found on the Company's portal.

It is very rare that you will be asked to prepare rotas for your venue, however, there may be a time that you might be asked to amend one. Your Lead Supervisor/ Training Manager will show you how **Shopworks** is used during your induction.



Thinking about your rota, take some time to answer the questions below;

1. What is my shift pattern?
2. How will I find this information out, where do I find my rota?
3. How far in advance are rotas prepared?
4. What should I bear in mind in respect of rotas?

**Merkur Slots  
Training Plan**



**Review, feedback, and One Week Sign Off**

**Review**

Today you will review the week's learning, exercises, the information in your workbook and discuss progress with your Training Manager. Take the time to check you have completed everything and are happy with your learning. Have questions or areas you would like more information on ready to discuss;

**My Questions/Thoughts:**



### Week 1 Feedback & Sign Off

WEEK ONE MANAGER'S FEEDBACK:		
LIKES	CONCERNS	SUGGESTIONS

By signing below, I confirm that during my training, I have completed all that is listed above with my Training Manager:

Signature  
Trainee

Signature  
Training Manager

**Congratulations - you have completed Week 1**



Day 6

Customer Journey





## Welcome Back to Week Two

During this week we will be looking at the customer journey, we do, however, need to ensure that all our technical learning of the operation has not been forgotten.

At the start of each shift or during your shift, you need to ensure that you complete a shift change over float check and a midweek collection.

This will give you an opportunity to ensure that you keep the knowledge you have already gained and allow you to put it into practice in a live situation. This means that you will be responsible for ensuring that the paperwork is correct and that you can accurately input the required information onto our systems in the main MARS.

Be prepared to learn and to learn from your mistakes, in order to understand the impact everything has within the operation and how it is all linked.



## Customer Service

*Customer service is the act of taking care of the customer's needs by providing and delivering professional, helpful, high-quality service and assistance, before, during and after the customer's requirements are met.* So what does that actually mean?

Our customers choose to visit our venues, but they could choose to go to any of our competitors or indeed play online. The reason they come to us is based on their overall experience – not just the environment, the machines and respective games, but also our teams and the service we offer.

Great customer service in addition to great customer experiences is going to create customer satisfaction.

### Customer Journey

In Merkur Slots, the customer journey doesn't just start at the front door of the venue. A customer decides to visit us by one of several methods...

- > Word of mouth – a recommendation from a friend
- > passing by – a spur of the moment decision
- > visiting the website – looking for the nearest venue or getting directions
- > telephoning the venue – checking opening times

At any of these points in time, the customer is coming into contact with our brand – Merkur Slots. These interactions could be positive or negative and are called Moments of Truth. They can be with the building, the surroundings and the team members.

For example, when 'visiting the website' a positive moment of truth could be, a user-friendly webpage that is easy to navigate. A negative moment of truth could be visiting the website and out of date information has been provided, i.e no update on the change in opening times.

Take a few minutes to think about the 4 different methods below and list one positive and one negative for each.

### Moments of Truth

		Positive	Negative
Word of Mouth	+		
	-		
Passing By	+		
	-		
Visiting the Website	+		
	-		
Telephoning the venue	+		
	-		

## Merkur Slots Training Plan



What is important to remember is that throughout the customer journey – from making that initial contact to entering the venue, visiting the toilets, playing at the machines, etc. there could be a series of positive and negative moments of truth.

We cannot ever totally get rid of the negatives, as things can go wrong in life, but we can certainly try to minimise them. Preparation is key. The key is to ensure the scales are weighted in the favour of the positives, so that is the lasting impression created in the mind of the customer.

POSITIVE



NEGATIVE

## Merkur Slots Training Plan



### Customer Needs

It can be easy to just group all our customers into one, but if you think about it, there are very many different types of customers – casual players, social players, regulars, higher stake players, etc. Each type has its own needs. Discuss with your trainer how you might recognise the behaviors and words used and then think about what their individual needs might be:

Type of Customer	Behavior's	Words you might hear	Individual Needs
Casual			
Social			
Regulars			
High Stakes			

### Meeting needs & exceeding expectation

Having identified the customer needs, we can do our best to meet them by following not only our company procedures but also by thinking of how we can bring something of ourselves – our personality – into the interaction with the customer. These WOW moments can be very memorable for our customers. Can you think of a customer experience where someone made a real difference to your meal out, visit to the cinema, holiday, or shopping visit? It might only be small, but it meant a lot to you because of what they said or did.

The likelihood is that they showed empathy. **Empathy** is putting yourself into someone else's shoes and trying to see the situation from their point of view. By doing that, you can imagine what they might like and what will prove meaningful to them... give it a go!

There is no magic wand when it comes to delivering great Customer Service. It is all about making the customer experience fun and enjoyable. Many customers visit our venues because of you – the team member. So just be you – smile, be helpful, and make the difference to that customer!



**DAY 7**

**Communication Skills**





## Communication Skills

In the information age, we have to send, receive and process huge numbers of messages every day. Effective communication as a team leader is about more than just exchanging information; it's also about understanding the emotion behind the information. Effective communication can improve relationships at work and in social situations by building strong connections to others and improving teamwork, decision making and problem-solving.

It enables you to communicate even negative or difficult messages without creating conflict or destroying trust. Effective communication combines a set of skills including non-verbal communication, attentive listening, the ability to manage stress in the moment, and the capacity to recognise and understand your own emotions and those of the person you are communicating with.

### Listening

Listening is one of the most important aspects of effective communication. Successful listening means not just understanding the words or the information being communicated, but also understanding how the speaker feels about what they're communicating. Effective listening can:

- Make the speaker feel heard and understood which can help build a stronger, deeper connection between you both.
- Create an environment where everyone feels safe to express ideas, opinions and feelings or plan and problem solve in creative ways.
- Save time by helping clarify information and avoid conflicts and misunderstandings.
- Relieve negative emotions. When emotions are running high, if the speaker feels that he or she has been truly heard, it can help to calm them down, relieve negative feelings and allow for real understanding or problem solving to begin.



## Communication Skills

### Tips for effective listening

- ✓ **Focus fully on the speaker;** his or her body language and other non-verbal cues. If you are daydreaming, checking text messages, or doodling, you're almost certain to miss non-verbal cues in the conversation. If you find it hard to concentrate on some speakers, try repeating their words over in your head- it'll reinforce their message and help you stay focused.
- ✓ **Avoid interrupting** or trying to redirect the conversation to your concerns by saying something like, 'if you think that's bad, let me tell you what happened to me' This is NOT listening.
- ✓ **Listening** is not the same as waiting for your turn to talk. You don't concentrate on what someone's saying if you're thinking about what you're going to say next. Often, the speaker can read your facial expressions and know that your mind's elsewhere.
- ✓ **Avoid seeming judgmental.** To communicate effectively with someone, you don't have to like them or agree with their ideas, values, or opinions. However, you do need to set aside your judgement and withhold blame and criticism to fully understand a person. The most difficult communication, when successfully executed, can lead to the most unlikely and beneficial link to someone.
- ✓ **Show your interest in what's being said.** Nod occasionally, smile at the person and make sure your posture is open and inviting. Encourage the speaker to continue with small verbal comments like 'yes' or 'okay' or 'go on' etc...



## Communication Skills

### Non-Verbal Communication

When we communicate things that we care about, we do so mainly using non-verbal signals. Wordless communication or body language, includes facial expressions, body movement and gestures, eye contact, posture, the tone of your voice and even your muscle tension and breathing. The way you look, listen, move and react to another person tells them more about how you're feeling than words alone ever can.

- ❖ You can enhance effective communication by using open body language – arms uncrossed, standing with an open stance or sitting on the edge of your seat and maintaining eye contact with the person you're talking to.
- ❖ You can also use body language to emphasise or enhance your verbal message – patting a friend on the back while complimenting him on his success for example, or standing up when you want to gain attention.

Put it into practice. Watch people at work in different situations (when it's really busy, when it's quiet, in a meeting, with a customer and so on). See what they do and make some notes:

Situation	What I heard	What I saw

Remember, be aware of individual differences. People from different countries and cultures tend to use different non-verbal communication gestures, so it's important to take age, culture, religion, gender and emotional state into account when reading body language signals



## Communication Skills

### Stress Impacts Communication

In small doses, stress can help you perform under pressure. However, when stress becomes constant and overwhelming it can hamper effective communication by compromising your capacity to think clearly and/or act appropriately. When you're stressed you are more likely to misread other people, send confusing or off-putting non-verbal signals and lapse into unhealthy knee-jerk patterns of behaviour.

How many times have you felt stressed during a disagreement with your spouse, kids, boss, friends, or co-workers and then said or done something you later regretted? If you can quickly relieve stress and return to a calm state, you'll not only avoid such regrets but in many cases, you will also help to calm the other person as well. It's only when you are in a calm and relaxed state that you will be able to know whether the situation requires a response, or whether the other person signals indicate it would be better to remain silent.

#### To deal with stress during communication:

- Recognise when you are becoming stressed. Are your muscles or your stomach tight and/or sore? Are your hands clenched? Is your breath shallow? Are you "forgetting" to breathe?
- Take a moment to calm down before deciding to continue a conversation or postpone it.
- Take a few deep breaths, clenching and relaxing muscles. The best way to rapidly and reliably relieve stress is through the senses, sight, sound, touch, taste and smell. But each person responds differently to sensory input, so you need to find things that work for you.
- Be willing to compromise. Sometimes, if you can both bend a little you will be able to find a happy middle ground that reduces the stress levels for everyone concerned.
- Agree to disagree if necessary and take time away from the situation so everyone can calm down. Take a quick break and move away from the situation.

**Think about** what makes you stressed at work. Is it certain times of the day, certain people, or external pressures from outside of work? Identifying what stresses you have is the first step to not getting stressed.



## Communication Skills

If you know what stresses you, think about ways you can remain calm under that pressure. Note below your thoughts when something stresses you and see if there is a pattern.

The situation when I was stressed	Why I was stressed

### Emotions Impact Communication

Emotions play an important role in the way we communicate. It is the way you feel, more than the way you think, that motivates you to communicate or to make decisions. The way you react to emotionally driven and non-verbal cues affects both how you understand other people and how they understand you.

When you don't address what's really bothering you, you often become embroiled in petty squabbles; this leads to conflict and disagreement and most often happens when a new team leader reverts to a 'tell' style rather than listening and loses sight of how to do things right.

You not only have to understand where you are coming from and find a way to explain it but as a team leader, you have to consider the other person too. It is your responsibility to help, then explain and to listen and understand.

Emotional awareness provides you with the tools needed for understanding both yourself and other people and the real messages they are communicating to you. If you are afraid of strong emotions or if you insist on communicating only in a rational or 'strictly business' way, it will impair your ability to fully understand others, creatively problem solve, resolve conflicts, or build a strong business connection with someone. Manage your emotions without fighting them.



## H.E.A.T

At some stage, you may encounter a conflict situation. There are many reasons why this conflict might occur. They could be provoked by events outside the venue, for example, a domestic issue, or some are provoked inside the venue, for example, an alleged machine fault. Some conflicts could also be with colleagues.

As a professional in your venue, you need to be able to take control of these situations and be able to resolve them in the best possible way.

You will know through reading your Operations Manual and completing Module 4 of your Customer Service training, one good way is to take the HEAT out of the situation. Let's remind ourselves what HEAT stands for.

### **H is for Hearing**

We need to do more than hear. Hearing is a passive activity. We need to listen and we need to demonstrate that we are listening. One way is by using encouraging phrases such as "ah-hah", "I see", "yes". Another is to ask if you can take notes because you take their complaint very seriously. Try not to listen to just the complaint but go deeper and try to find the source of the complaint. Maybe the source of the complaint is linked to something else and the complaint is an expression of frustration.

### **E is for Empathy**

As well as listening actively to the complainant, we need to demonstrate that we understand their grievance. That does not necessarily mean that we accept that they are right, but we do accept that they are upset. Showing compassion and kindness is one very good way of reducing tension. Lower your voice, speak in calm tones and keep speaking even if they do not respond. Use simple language and avoid direct eye contact. Don't give orders but make suggestions.

### **A is for Acknowledgement**

Acknowledging that there is a problem using phrases like "I can understand that you are upset" or "I believe you when you say something is wrong" will help reduce the tension. Do not get into an argument, take the complaint personally, or promise instant fixes. However, do spend the time agreeing that there is a problem and that you will get to the bottom of it.

### **T is for Taking Action**

Whatever the complaint, we need to be seen to be taking action. We also need to communicate that fact to the person making the complaint. If we can show we are listening, showing empathy and acknowledging the person's grievance (without necessarily accepting it) and we communicate the actions we are going to take, then not only can we reduce the tension, but we can also create a stronger bond with the customer as he or she knows that they are being taken seriously. Try to outline your actions in groups of three as three is a number people remember, for example, "first, I intend to do this\_\_\_, then I will do this\_\_\_, and thirdly I will do this.... to properly deal with your concern."

Always inform the Line Manager of the complaint and the action taken.



## Handling Conflict

Conflict is a natural part of human group interactions. Expect it, understand it and know how to **HANDLE IT!** We looked at H.E.A.T and the skills you need are the same at this working level. It's vitally important you understand our complaints procedure and can give Customers the right information and advice.

**Where in your venue are the Complaints Procedure Leaflets?**

**Answer:** \_\_\_\_\_

*The Service with a Smile training covers handling difficult situations. Please ensure you have completed and understood this training fully. If you have done this and would like to revisit it, please contact the L&D Department to have the course reset.*

### Top tips for dealing with conflict

#### **Accept conflict**

Remember that conflict is natural and happens everywhere and for all different reasons. Accepting it makes your life easier!

#### **Adjust your thinking/mindset**

This means that you set aside any feelings/reactions you have that the situation is not your fault, or that the other person is wrong or misinformed, or that they are giving you personal/unfair criticism – accept it is how they feel and listen.

#### **Listen**

Allow angry customers/employees to talk and express their feelings until they release their frustration and calm down.

#### **Don't react**

Never respond to angry comments. Allow the other person to voice their opinion and only interject with helpful redirection when appropriate.

#### **Be neutral**

Do not offer your opinion or agree/disagree with the other person. Show empathy through courtesy, professionalism, respect and patience, work to solve their problems effectively. If you cannot resolve it – escalate to a Manager.

#### **Use the correct tone**

Don't smile, laugh or mock people who are angry/upset. Convey empathy with a soft tone and listening body language – focus on them as they speak.



**HR/People Responsibility, My Game Changers, Food & Beverage Offer and Stock & Deliveries**



## Merkur Slots Training Plan



### HR / People Responsibility

As you step up to a new working level there comes an element of people responsibility. This means setting a good example and working as a mentor or buddy with Team Members. You should be an 'expert' in all elements of the Team Member role and be able to support new starters who are starting their Merkur Slot learning and development journey.

Whilst the Lead Supervisor or Cluster manager will complete most of the people/HR tasks and paperwork, you may need to support them and Team Members may come to you directly.

Use the table below to understand who does which tasks in your venue and make sure you get trained on any you may need to complete;

PEOPLE TASKS	
TASK	HOW
Be up to date and aware of all online training	
Note-taking (disciplinary/interview)	
Holiday Requests	
Rota Planning	
Absence Records	
Return to work interviews	
4,8 & 12 Week Reviews	
Performance Reviews	
Support Team member with L&D	
Role model/Buddy	



## Game Changers

At Merkur slots, our core competencies are called the 'Game Changers' also known as 'the way we do things around here'. They define the standards, behaviours and attitudes we adopt when at work.

### So what are competencies?

If you consider someone doing their job, there are 2 elements to this – **WHAT** they do and **HOW** they go about doing it. Everyone is trained on the technical parts of their job, but how they do it is what can make a BIG difference.



Examples of competencies include communication, customer service, managing your time, planning, prioritizing and delegation, etc. They are often referred to as soft skills and are with you always. They go with you to another job or in your personal life when you are dealing with your children or communicating with a shop assistant.

Competencies are often grouped together – they include a title and a general definition and under that, there are several measurable or observable performance statements.

In Praesepe, we call this competency framework our "**Game Changers.**" There are 6 of them which apply to all job roles – if we achieve/deliver them to a good standard/level, it impacts our business positively.

When delivered they will impact; people, profit, performance and productivity- a real **Game Changer** for the business as a whole.

## Merkur Slots Training Plan



In our business, we have six key areas of competence across all job roles.....These are our 'Game Changers' for everyone in the business;



There are different expectations of a Team member versus a Manager and in its simplest terms, that's what our Game Changers are; the standards and expectations of personal performance at each job level in our business.

Each role is measured against a different level within the Game Changers.

Team Member – Game Changer Level 1

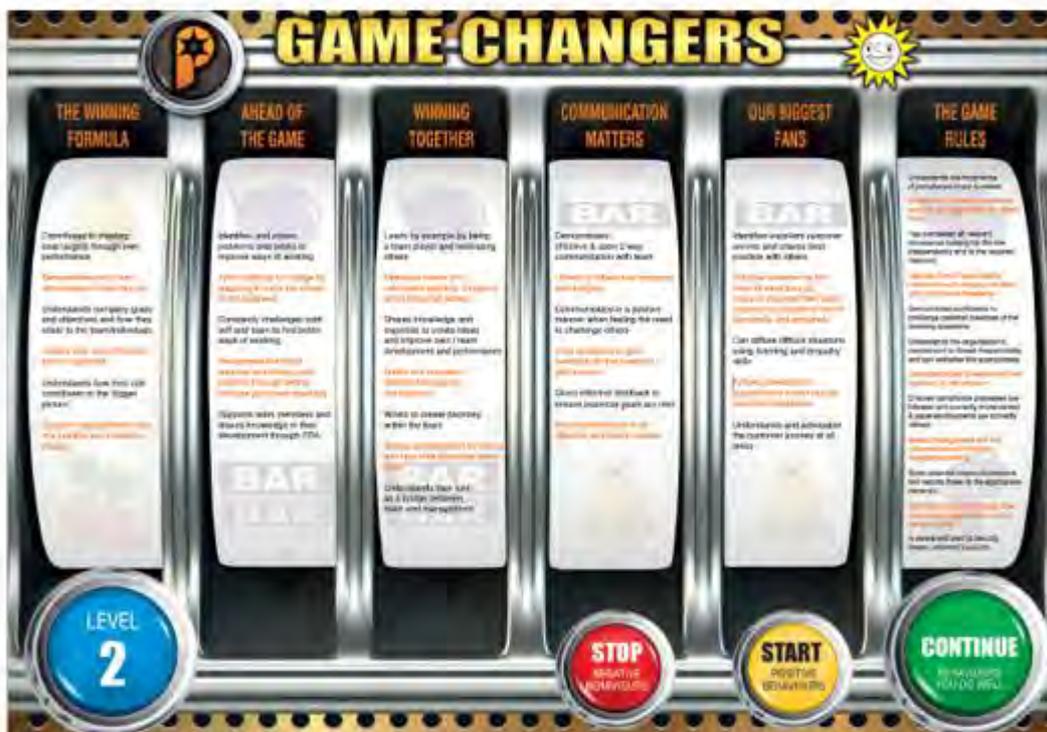
Supervisor – Game Changer Level 2

Lead Supervisor – Game Changer Level 3

## Merkur Slots Training Plan



The performance statements listed below give examples of how an individual operating at a level 2, could demonstrate these competencies. The below highlights, what EFFECTIVE performance would look like.



### How are Game Changers used?

As a business, we recruit new employees using the 6 Game Changers – we also train against them and measure performance against them during the reviews. They are an integral part of the business and so, everyone must understand what they are and how they are used. Feedback is much more effective if someone is told how they could have approached a task or situation to achieve a better result.

Game Changers make us think about **HOW** we do things and we should all reflect and consider what we do well, what we need to improve on, and what bad habits we may have.

By using the Game Changers as ‘measures’ of how to do things; we know we are doing it the right way. As a business, we have goals, targets, and KPI’s to achieve, but what makes the difference between an OK performance and a great performance is **HOW** we deliver the goals.

**Merkur Slots  
Training Plan**



**Game Changers – Understanding what do they mean?**

Look at the game changer level for your role and your Job description, and give an example of what you need to do to achieve in each game-changer:

GAME CHANGER	Example What do you need to do?
The Winning Formula	
Ahead of the Game	
Winning Together	
Communication Matters	
Our Biggest Fans	
The Game Rules	



## Feedback

### Feedback Tips:

<b>Critique the work done, but don't criticise the person e.g. "the colleague left feeling annoyed" NOT "You're so insensitive you always manage to rub people up the wrong way"</b>
Personalise feedback, but don't make it personal: e.g. "I know you are capable of more, the paperwork had at least 5 mistakes" NOT "When will you ever learn to get the basics right?"
Give feedback in the right spirit – or not at all: e.g. "there's some valuable learning you can take in the way you handled that colleague/customer. Reflect on it and let's review it in 30 minutes or so as I'd value your thoughts" NOT (said with sarcasm) "You certainly know how to handle colleagues/Customers Fred!"

### REMEMBER:

**Do no harm. Poorly handled feedback is worse than no feedback at all.  
Seek feedback from your team and encourage others to do the same.  
Build feedback into everything you do – phone calls, meetings, presentations, negotiations etc.  
Reinforce the right behaviours – reward them, celebrate them, champion them, let colleagues know when you spot them showing the right behavior.  
Remember to think about the IMPACT of their behaviour, only give feedback if it impacts the workplace and performance and NOT just because it niggles YOU!**

**I like the fact that you are chatting to customers and making them comfortable and welcome, my concern is that you are spending a long time with the regulars and missing new customers coming in. How can you ensure that your customer service skills get spread across the whole venue?**

The underlined section is the impact of what they were doing. This is your area of CONCERN. This is good feedback because we have recognised what they were trying to achieve and acknowledged it, but also pointed out the impact and asked how we can change the behaviour in the future.

Think of an example in your team/venue where feedback would help. See if you can construct some feedback for this person and write it on the next page.



**Knowledge Check Sheet & 4 Week Action Point**





## Know My Job Role Checklist



Learn about your new role using ***The Know My Job Role Checklist*** on the following pages, ensuring you can explain each point to your Line Manager so that they can sign off that you have the required knowledge levels for your role.

The Checklist is in no particular order, so please don't panic if the information you learn does not follow the checklist, all will be covered within your 12 week induction period.

As you spend time in the venue and with your team, you are going to learn about additional tasks that may not be listed.

You can make note of these in the notes section provided.



## Know My Job Role Checklist

KNOWLEDGE		COMPLETED	SIGNED OFF BY:
<b>Signing in and out of the venue</b>			
<b>Licenses? What they are and where they are displayed?</b>			
<b>Location of the visitor's book and how to use it (Visitors policy). Who is allowed access to the premises?</b>			
<b>Dealing with deliveries</b>			
<b>Answering the telephone in the venue</b>			
<b>Who are the key contacts – Area Manager/Head Office?</b>			
<b>Compliance – know this training inside out!</b>			
ID Checking	The age limit for entering the venue and how to challenge (think 25). Which ID verification is accepted		
Self-Exclusion	Understand and Demonstrate the process		
IHL Tablet	Check for new Self Exclusions Record Self Exclusion breaches Incident Reporting		
Compliance Logs Paper Based	The Compliance folder – what's in it and how and when to use it		
PlayRight App	Understand the process		
<b>Understand how to be vigilant and why this is so important.</b>			
<b>Customer Service Training – e-learning</b>			
<b>Welcoming Customers to the venue:</b>			
Sign in a new customer	Promoting membership benefit to include the text service and membership app		
Promotions	Know and understand current promotions Know and understand current tournaments		
<b>Venue</b>			
Machines	What machines and types are in your venue?		
	Machine operation		
	Refill a machine from the front		
	Basic Machine repairs		
	Machine fault reporting on MARS		

## Merkur Slots Training Plan



KNOWLEDGE		COMPLETED	SIGNED OFF BY:
<b>G-Tab Bingo</b>			
	G-Tab Collection and Accounting		
	G-Tab Game Knowledge		
	G-Tab connection to Machine Ratio		
	Explain how to Play the G-tab to Customer		
	G-Tab basic fault fixing		
<b>Payouts</b>	How are these managed?		
<b>TITO Payments</b>	How are these paid?		
<b>Credit Notes</b>	Why are they issued?		
<b>Cleaning:</b>			
Cleaning Rota	Where is this kept?		
External area of the Venue	What is cleaned and when, how often? What products are used to clean?		
Shop Entrance	What is cleaned and when, how often? What products are used to clean?		
Smoking Area	What is cleaned and when, how often? What products are used to clean?		
Bathrooms	What is cleaned and when, how often? What products are used to clean?		
Machines	What is cleaned and when, how often? What products are used to clean?		
Brass	What is cleaned and when, how often? What products are used to clean?		
Emptying Bins	How often are they emptied, where are they Emptied and how often are they collected?		
Cleaning Products COSHH/Data Sheets	Manage/Monitor stock levels Where are these stored? Where are the products stored and who has access to these?		
<b>HR Processes:</b>			
Personal Details	How to enter these onto InformPeople		
E-Learning	How to access the E-Learning, where courses appear, and what courses to complete and when?		
Knowledge Base	What is knowledge base, what can be found here?		

## Merkur Slots Training Plan



Knowledge		COMPLETED	SIGNED OFF BY:
<b>Shopworks:</b>			
<b>Rota's</b>	Where do you find them?		
	How do you build?		
<b>Leave Requests</b>	Where to find and how to complete		
<b>Contacts:</b>	Know who is who in MK for:		
	Repairs		
	Air Conditioning		
	Payroll		
	Rubbish Collection order bags		
<b>ATM:</b>	Fill		
	End of day		
<b>Property Issues:</b>	Basic Security checks – check cameras, toilets		
	Switches/trips etc.		
	CCTV – know how to get a certain day and time		
<b>Machine Empty:</b>	Security		
	Recording		
	Balancing		
	Entering on to MARS		
<b>Collection:</b>	Attend and complete a mid-week collection		
	Attend and complete a full-week collection		
	Complete collection on MARS		
	Check for any exceptions and complete re-audit		
<b>Float Checks:</b>	Frequency		
	Information to include		
	What to check if there's an error		
	Responsibility for shortages		



**Merkur Slots  
Training Plan**



**Game Changer – Goals; Next 4 Weeks**

Think about some goals you can set yourself in your new role against your game-changers shown on page 87. Think about ways of working and things you can do to be the best in your role:

GAME CHANGER	GOAL	HOW I CAN ACHIEVE THIS
The Winning Formula		
Ahead of the Game		
Winning Together		
Communication Matters		
Our Biggest Fans		
The Game Rules		

## Merkur Slots Training Plan



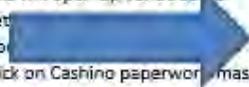
### Helpful Reference Guides and Contacts



There are many processes that you will learn about through this workbook and whilst most are covered within your training, you may need to refer back to processes in the first few weeks of your new role in your own Merkur Slots Venue. Please see below where you will find these useful guides and manuals to help you in your role.

**cash bank** *(on your main venue PC/laptop desktop)*

1. Double click on Cash Bank
2. This will open up venue server details
3. Open up the Cash Bank icon
4. Click on Cashino paperwork master copies



This is where you will find the master copies of all the mc forms

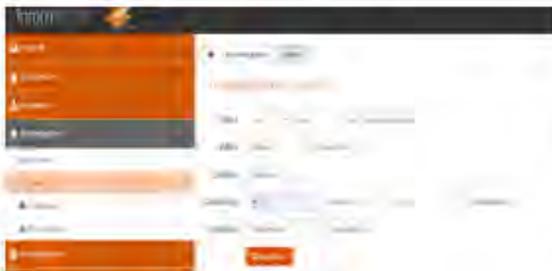
The Following Manuals will also appear there:

- G-Tab and Bingo Manuals
- Cash & Banking
- MARS Manual
- Fire Register & Risk Assessment

NB: If Cash bank does not appear on your desktop, please log a call with IT, and they will add this to your desktop.

## Merkur Slots Training Plan

### Inform People - Knowledge Base



1. Log into inform people
2. Double click on Knowledge Base
3. Double click on Search
4. Type in box 'containing' title of manual
5. Double click Run search

You can use knowledge Base to search for;

- IHL Tablet user guides
- Playright user guides

The following manuals will be delivered to your venue:

- Merkur Slots Operational Manual
- Compliance Manual

## Merkur Slots Training Plan



### Useful contact emails (Spaces to add additional)

Email	Department
<a href="mailto:marketing@praesepeplc.com">marketing@praesepeplc.com</a>	Marketing and promotional queries
<a href="mailto:HR@praesepeplc.com">HR@praesepeplc.com</a>	HR-related queries/and or advice
<a href="mailto:LearningandDevelopment@praesepeplc.com">LearningandDevelopment@praesepeplc.com</a>	Training and development queries
<a href="mailto:ITsupport@praesepeplc.com">ITsupport@praesepeplc.com</a>	Technical issues non-gaming machine related
<a href="mailto:Cashier@praesepeplc.com">Cashier@praesepeplc.com</a>	To order your bank books and cash bags and for any float or cash related queries (check who the supplier for your venue is)
<a href="mailto:IncomeProtection@praesepeplc.com">IncomeProtection@praesepeplc.com</a>	MARs passwords and any MARS problems
<a href="mailto:Payroll@praesepeplc.com">Payroll@praesepeplc.com</a>	Shopworks password and any Payroll related queries



Please see below a list of acronyms and definitions used in the UK Gaming Industry. Some of these are questions on the Compliance Audit for both MERKUR Slots and MERKUR Bingo Clubs and will be asked when we visit your venue.

The Gambling Commission & Local Authority Compliance Officers may also ask these questions when they visit your venue. Please ensure your knowledge is up to date with our Compliance & Social Responsibility policies and procedures.

It is a condition of our Licence Conditions & Codes of Practice to be “Socially Responsible”.

<b>COMPLIANCE</b>		
<b>ACRONYM/ABBREVIATION</b>	<b>MEANING</b>	<b>COMPLIANCE &amp; SOCIAL RESPONSIBILITY DEFINITION</b>
<b>ADR</b>	<b>ALTERNATIVE DISPUTE RESOLUTION</b>	If we are unable to resolve a customer complaint internally within our organisation, we would use the services of a “Alternative Dispute Resolution” provider. (See details below regarding our ADR provider IBAS).
<b>AML</b>	<b>ANTI MONEY LAUNDERING</b>	As a company we have to have procedures and policies in place to prevent anti money laundering and terrorist financing within our business. A new electronic AML button is now available on the IHL Tablet for reporting incidents of £50 or more of stained

		notes/dyed notes/foreign coins.
<b>AML OFFICER</b>	<b>ANTI MONEY LAUNDERING OFFICER</b>	<p>Our Licence conditions and codes of practice state that we have an appointed Anti Money Laundering Officer.</p> <p>The appointed officer is:  <b>AMANDA KIERNAN</b>  Email:  <b>amandakiernan@praesepeplc.com</b></p>
<b>BCAP</b>	<b>BROADCAST COMMITTEE OF ADVERTISING PRACTICE</b>	<p>As a company we have to comply with the advertising codes of practice issued by the Broadcast Committee of Advertising Practice. The code applies to the way in which we advertise gambling facilities and services. We are not allowed to use images of a child or young person and no-one who is, or appears to be under the age of 25 years of age. This includes being compliant with broadcasting information electronic TV screens which are installed in some Cashino venues and Beacon Clubs.</p>

<p><b>CAP</b></p>	<p><b>COMMITTEE OF ADVERTISING PRACTICE</b></p>	<p>As a company we have to comply with the advertising codes of practice issued by the Committee of Advertising Practice. The code applies to the way in which we advertise gambling facilities and services. We are not allowed to use images of a child or young person and no-one who is, or appears to be under the age of 25 years of age.</p>
<p><b>IBAS</b></p>	<p><b>INDEPENDENT BETTING ADJUDICATION SERVICES</b></p>	<p>IBAS are the external company who provide "<a href="#"><u>Alternative Dispute Resolution</u></a>" (ADR) services, whereby we are unable to resolve a customer complaint. Details are available on the Complaints &amp; Disputes Policy leaflet available in your Compliance folder/staff area. Address details: Independent Betting Adjudication Services, P.O. Box 62639, London, EC3P 3AS</p>

<p><b>LCCP</b></p>	<p><b>LICENCE CONDITIONS &amp; CODES OF PRACTICE</b></p>	<p>All UK licensees have to abide by the rules and regulations of the Licence Conditions &amp; Codes of Practice. The document is issued by the Gambling Commission who regulate the UK Gaming industry. New regulations have to be sanctioned by Central Government and the “Department of Culture Media &amp; Sport” (DCMS) and agreed with the Gambling Commission.</p>
<p><b>MOSES</b></p>	<p><b>MULTI OPERATOR SELF EXCLUSION SCHEME</b></p>	<p>Multi Operator Self Exclusion Scheme came into effect on 6th April 2016. UK gaming operators have to use the scheme to allow customers to self-exclude from gaming premises. The scheme is sector specific i.e. AGC, Bingo, Licensed Betting Office and Casinos.</p>
<p><b>POCA</b></p>	<p><b>PROCEEDS OF CRIME ACT (2002)</b></p>	<p>Proceeds of Crime Act 2002 allows the authorities to enforce the law and prosecute criminals whereby criminal activity such as money laundering is taking place in gaming establishments. The authorities have the power to prosecute criminals which could lead to heavy fines and imprisonment!</p>

<b>TITO</b>	<b>TICKET IN TICKET OUT</b>	TITO technology allows a player to insert cash into a machine to commence play. They then have the option to collect the credited amount, which is printed via a ticket. The ticket can be inserted into another machine with TITO, or redeemed for cash at a cash redemption machine or cash counter.
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## OTHER USEFUL ACRONYMS

ACRONYM/ABBREVIATION	MEANING	DEFINITION
<b>ABB</b>	<b>ASSOCIATION OF BRITISH BOOKMAKERS</b>	The Association of British Bookmakers (ABB) is the leading trade association representing bookmakers in Great Britain. They work closely with the Gambling Commission and Central Government on Social Responsibility and Codes of Practise.
<b>AGC</b>	<b>ADULT GAMING CENTRE</b>	Adult Gaming Centre is prohibited to strictly Over 18's only. Offering a range of gaming machines, such as Category D, C and B3 £500 jackpot machines. High Street venues operating on a Bingo licence provide gaming machines and proprietary electronic bingo equipment.

<p><b>AWP</b></p>	<p><b>AMUSEMENT WITH PRIZE</b></p>	<p>Amusement with Prize is a fruit machine which requires player interaction and pays out a percentage. There are a variety of category types i.e. category B3, category C/D with different jackpots and price of play. They are regulated by the Gambling Act 2005. (Further details are available in the Machines Standards document available at your venue).</p>
<p><b>BA</b></p>	<p><b>BINGO ASSOCIATION</b></p>	<p>The Bingo Association represents Bingo Clubs in the UK. They were formed in 1998. They work closely with UK Operators and Bingo Club owners, the Gambling Commission, Central Government and organisations who deal with the research/treatment of problem gambling to keep them informed of industry changes and regulations. They offer advice and support for Social Responsibility &amp; Code of Practise, Compliance, Machine Standards and problem gambling.</p>

<p><b>BACTA</b></p>	<p><b>British Amusement Catering Trade Association</b></p>	<p>BACTA are the trade association in the UK. They represent Adult Gaming Centres (AGC's), Family Entertainment Centres (FEC's) and Machine Suppliers. They were formed in 1974. They work closely with the Gambling Commission, Central Government and organisations who deal with the research/treatment of problem gambling to keep them informed of industry changes and regulations. They offer advice and support for Social Responsibility &amp; Code of Practise, Compliance, Machine Standards and problem gambling.</p>
<p><b>EBT</b></p>	<p><b>ELECTRONIC BINGO TERMINAL</b></p>	<p>Customers are able to play Bingo Variant Games and Cat D and Cat C type games. These machines will be operated in Bingo Licensed venues.</p>
<p><b>FEC</b></p>	<p><b>FAMILY ENTERTAINME NT CENTRE</b></p>	<p>A Family Entertainment Centre allows children under the age of 18 to enter. An FEC would offer ancillary machines, such as video games, cranes, pushers, air hockey, Prize SWP and category D machines . FEC's are very popular in the UK coastal areas and some may be found inland too.</p>

<p><b>FOBT</b></p>	<p><b>FIXED ODDS BETTING TERMINAL</b></p>	<p>These machines are operated in Licensed Betting Offices/Shops. They are classed as a category B2/B3 machine. They have a maximum prize of £500. Touch screen roulette, casino style games and virtual racing are available to play. They are regulated by the Gambling Act 2005.</p>
<p><b>LBO</b></p>	<p><b>LICENSED BETTING OFFICE</b></p>	<p>Licensed Betting Offices/shops can be found on our High Street and local areas in the UK. There are currently 9,000 LBO's in the UK. They are regulated by the Gambling Act 2005.</p>
<p><b>MARS</b></p>	<p><b>MACHINES ADMINISTRATI ON REPORTING SYSTEM</b></p>	<p>MARS is our new machine reporting system. MARS has a whole host of benefits and offers real time machine data/income, improved cash handling to name a few. A suite of reports are available for performance and machine management.</p>
<p><b>VBT</b></p>	<p><b>VIDEO BINGO TERMINAL</b></p>	<p>Video Bingo Terminal offer bingo type games and is a video bingo product. These machines will be operated in Bingo Licensed venues. They are regulated by the Gambling Act 2005.</p>

The image shows a large, semi-transparent sign for 'Merkur Slots' mounted on a wall. At the top center is a large, smiling sun logo with a face and rays. To the right of the sun is a vertical green logo with the letters 'LFC' and a small arrow pointing upwards. Below the sun, the text 'MERKUR' is written in a bold, sans-serif font, followed by 'SLOTS' in a larger, bold, sans-serif font. Below the text are four circular icons: a cigarette with a slash through it (No Smoking), the number '18+' (Over 18s Only), a glass with a slash through it (No Alcohol), and a triangle with a camera icon (CCTV). The sign is set against a background of a wall with some posters and a window.



# INFORMATION



## CODE OF PRACTICE

Persons under the age of 18 years are prohibited from entering the premises.

The management reserves the right to refuse admission. The company cannot be held responsible for personal items left on these premises. No dogs are permitted for entry on any premises, restricted to one dog per machine. Dogs are not allowed on these premises (except guide dogs). Alcohol beverages or take-away food cannot be consumed on these premises. The management reserves the right to refuse bank payments. Failure to do so can result in delay or refusal of payment. Managers' Please note, clothing items must be adhered to, so please ensure that all clothing is pinned off as refunds are not permitted. An attendant will be called to witness bank payments. Failure to do so can result in delay or refusal of payment. Managers' Please check your change before leaving the Cash Desk as refunds cannot be recalled later. In the interests of security, all cash payments are recorded. All Prize Draws conducted on these premises are free to enter. No purchase is necessary to participate. The acceptance of a free draw prize does not obligate you to participate in any other company activities. Managers will conduct business in a manner which complies with all relevant Gambling Commission codes of practice. Complaints and Disputes Policy Manager to (01) 181 10000. Failure to resolve the customer complaint or dispute will result in the Duty Manager consulting an official form relating the issue to the Area Manager for action within 7 days. The form will also be lodged at our Head Office. Make an official complaint in writing to: The Duty Manager, Casino Gaming, Midland House, 21 Market Place, Norwich, NR1 1JN. A formal response will follow. Please ask a member of staff for a copy of our Complaints and Disputes Policy.

## BINGO RULES

1. Prior to the commencement of each game, the following information will be announced:
  - (a) Which machine or full house (or any other combination) has to be completed to win.
  - (b) Which machine or full house (or any other combination) has to be completed to win.
2. When play begins each number will be indicated at random by means of the Random Number Generator in the full view of the majority of players. Members must mark their card/books in such a way that the numbers are sufficiently legible to be easily checked by the staff.
3. Random Number Generator numbers are announced by the Caller and that illuminated on the indicator board, the actual number produced by the Random Number Generator.
4. The point at which the next number is demanded to have been called will be the moment the Caller has commenced the number in any column. Once a number has been so started it will be completed and that number will become the last number called. The winning card/book must contain the last number called.
5. No further claims will be accepted for a line, or two lines for other combinations once the next number has been called. No further claims will be accepted after the reestablishment of a new player to stop the game before the next number is called, no member of staff will be allowed to accept this responsibility on behalf of a Member.
6. **Checking the Prize**
  - (a) If the book/boards are being used then these must be intact upon checking a claim.
  - (b) When a claim is being checked the following items will be announced/displayed:
    - (i) the colour and type of card.
    - (ii) the last number called.
    - (iii) the other numbers on the card.
    - (iv) the other numbers on the board.
  - (c) That decision. The reason why the claim has not been achieved will be announced.
7. If the book/boards are being used then these must be intact upon checking a claim. If they do not allow the claim they will endeavour to obtain the player's agreement to have the claim checked on the board and announce their decision. If they do not allow the claim they will endeavour to obtain the player's agreement to have the claim checked on the board and announce their decision. If they do not allow the claim they will endeavour to obtain the player's agreement to have the claim checked on the board and announce their decision.
8. Multiple Wins
  - (a) In the case of a special game for a prize (one card) provided by the Proprietor, the Caller will announce before the game the proceeds to be shared in the event of more than one winner sharing the prize. In the event of more than one winner in a card game, all prizes will be equally shared between the winners.
  - (b) The Venue Manager's decision will be final in all matters.

## SOCIAL MEDIA

The group will often take photographs of the group and/or individual members. However, we understand that our members may have concerns about privacy and the group will seek consent in any social media campaigns.

## GAMBLING ACT 2005

1. Preventing gambling from being associated with crime or disorder or being used to support crime - we ensure our premises are not used for any such activities and have systems in place such as cash handling to minimise the risk of crime.
2. Ensuring that gambling is conducted in a fair and open way. Gambling machines comply with the relevant technical standards and software and are subject to regular testing and the results of testing are made available to our customers.
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling - policies prevent under age gambling and we contribute to the Responsibility in Gambling Trust for the treatment of problem gambling.

## STAYING IN CONTROL

### The Golden Rules

- Playing machines is buying fun NOT investing money
- Only play with money you can AFFORD to lose
- Set LIMITS on how much you will spend
- Playing within your means can be FUN and exciting
- Spending outside your means can create PROBLEMS for yourself and others

A simple, yet effective, and easy to use system to help you control your gambling. It's the way to stay in control.

GamCare: 0800 8020 133



GamCare.org.uk It's a service... Gamble Aware

FOOD HYGIENE RATING AWAITING INSPECTION

FOOD ALLERGENS AND INTOLERANCES If you require further information regarding food served on these premises please speak to a member of staff who will advise you accordingly.

NO ALCOHOL It is against the law to consume alcohol on these premises

STRICTLY OVER 18s ONLY

NO SMOKING It is against the law to smoke on these premises

## CUSTOMER CARE

Please either call 0800 808 5335 or email [casinocustomers@praesepepc.com](mailto:casinocustomers@praesepepc.com)

BeGambleAware.org

18+



THINK 25 If you are lucky enough to look under 25 years old we need to check your ID



# STAYING IN CONTROL

## The Golden Rules of playing Fruit Machines

- **Playing machines is buying fun, NOT investing money**
- **Only play with money you can AFFORD to lose**
- **Set LIMITS on how much you will spend**
- **Playing within your means can be FUN and exciting**
- **Spending outside your means can create PROBLEMS for yourself and others**

A leaflet with more guidance is available here. If you feel you are in difficulty with your gambling or know someone who is and would like help, call the free GamCare helpline.

**GamCare:**  
**0808 8020 133**

GAMCARE is the national centre for information, advice and practical help regarding the social impact of gambling. Their helpline is run by trained staff, who can offer counselling, information and advice to problem gamblers, family members and to friends of gamblers.



**G** GamCare.org.uk  
f t @GamCare

Funded by

**GambleAware**

GamCare - A Charitable Company Registered in England No.3297914  
Charity No. 1060005



BeGambleAware.org

# **Merkur Slots**

## **Working Together**

# WORKING TOGETHER



Accredited by the Global Gambling Guidance Group

## THE MERKUR FAMILY



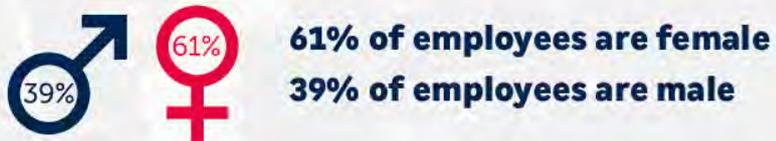
## PART OF THE GAUSELMANN GROUP

### A Strong Partner For More Than 60 Years



Merkur Casino UK, formerly 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.

Merkur Casino UK employs over 1,600 people (61% Female) over 3 Bingo Clubs, over 180 High Street gaming centres and 3 Family Entertainment Centres under two main brands.



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



Merkur Bingo clubs, formerly Beacon Bingo, 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 customers can attend and play bingo at any time with the numbers auto-called.

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



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



Bingo is available for play from 9am until midnight.

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



### 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, Merkur Casino is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

### GAMBLING COMMISSION

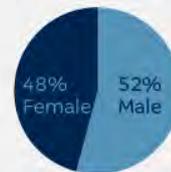
Merkur Casino is regulated by the Gambling Commission and Licensing Authorities



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



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 persons who look under 25 have to produce a form of photo ID.



Our venues appeal to all ages with our membership gender database split of 52% Male / 48% Female



Our venues have 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared to other leisure and gambling sectors 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 Merkur Casino also has a number of socially responsible gambling tools, and management and training initiatives that include:



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



Dedicated Learning & Development Team and National training centres.

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.

### Compliance



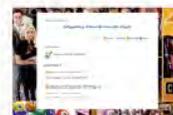
### Training Centre



### PlayRight App



### Online Training





## SOCIAL RESPONSIBILITY MEASURES IN PLACE

### Machine Messaging



### Customer Interaction Training



## All Levels

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



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



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



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

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



- Senior Manager representation Divisional meetings.
- Operations Director is the 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:



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



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



Linked trips with other shops helping to support other businesses.



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



Increased footfall to the High Street.



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

# COMMUNITY & CHARITY

## Merkur Initiative

Supporting Local Charities and Good Causes



Amongst other charities, some of your donations have helped:



Merkur Casino UK has raised in excess of  
£1.2 million for good causes since 2005

### Please contact us

For press enquiries:  
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phone +44 (0) 7796 614137

Merkur Casino UK  
Seebeck House  
1A Seebeck Place  
Knowlhill  
Milton Keynes  
MK5 8FR

phone 01908 351200  
email [info@merkur-casino.com](mailto:info@merkur-casino.com)



# **Extract of Licence Conditions and Codes of Practice (LCCP) for Bingo**

**Version effective from 31 October 2020**

## 1.1.1 - Qualified persons – qualifying position

### Applies to:

All operating licences, except ancillary remote licences, issued to small-scale operators

1. In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
2. Schedule X<sup>1</sup> lists those individuals notified to the Commission as qualified persons.
3. If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X<sup>1</sup>.
4. An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
5. In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005(Definition of Small-scale Operator) Regulations 2006.

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<sup>1</sup> The schedules mentioned here will be attached to individual licences.

## 1.2.1 - Specified management offices – personal management licences

### Applies to:

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

1. Subject to 6 and 7 below, licensees must ensure:
  - a. that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter ‘a personal management licence’); and
  - b. that at least one person occupies at least one of those offices
2. The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
  - a. the overall management and direction of the licensee’s business or affairs
  - b. the licensee’s finance function as head of that function
  - c. the licensee’s gambling regulatory compliance function as head of that function
  - d. the licensee’s marketing function as head of that function
  - e. the licensee’s information technology function as head of that function in so far as it relates to gambling-related information technology and software
  - f. oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
  - g. in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
3. The person responsible for the licensee’s gambling regulatory compliance function as head of that function shall not, except with the Commission’s express approval, occupy any other specified management office.
4. Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder’s personal management licence.
5. Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual’s work and any requirements of the Commission in respect of such matters applicable during the period of the review.
6. Paragraphs 1 to 5 above shall not apply to a licensee for so long as the licensee is a ‘small-scale operator’ as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 (‘the Regulations’).
7. During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs 1 to 6 above shall apply subject to the proviso that the phrase ‘each individual’ in paragraph 1a shall not include any individual who was a ‘qualified person’ (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

### 2.1.1 - Access to (and provision of data from) key equipment

**Applies to:**

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1. Licensees must, on request, permit an enforcement officer to inspect any of their remote gambling equipment and/or provide to the Commission copies of data held on such equipment in such format and manner as the Commission may request.

### 2.2.1 - Gambling software

**Applies to:**

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1 All gambling software<sup>1</sup> used by the licensee must have been manufactured by the holder of a gambling software operating licence. All such gambling software must also be supplied to the licensee by a holder of a gambling software operating licence. Such software must only be installed or adapted by the holder of such a licence.

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<sup>1</sup> As defined in section 41(2)&(3) of the Act

### 2.3.1 - Technical standards

**Applies to:**

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

1. Licensees must comply with the Commission's technical standards and with requirements set by the Commission relating to the timing and procedures for testing.

## 2.3.2 - Bingo equipment specifications

**Applies to:**

Non-remote bingo operating licences and bingo ancillary remote licences

1. Licensees must comply with the Commission's specification for bingo equipment.

### 3.1.2 - Other networks

**Applies to:**

All remote casino, bingo, and betting licences (except ancillary remote and host licences)

1. Subject to 2 below, all licensees who provide facilities for gambling, other than peer to peer gaming, in circumstances in which they do not contract directly with all of the participants using those facilities ('network operators') must have, put into effect and monitor the effectiveness of policies and procedures designed to ensure that:
  - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the network operator, or that player and another holder of a Gambling Commission remote operating licence of the same kind as that held by the network operator ('a relevant licence');
  - b. the arrangements between the network operator and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
  - c. the network operator's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
    - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
    - ii. investigation of suspected cheating,
    - iii. combating of problem gambling, and
    - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

### 3.1.3 - Hosting

**Applies to:**

All casino (game host), bingo (game host), general betting (host) (real events) and general betting (host) (virtual events) licences

1. Subject to 2 below, all licensees who provide facilities for gambling in circumstances in which they do not contract directly with any of the participants using those facilities ('hosts') must ensure that:
  - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the holder of a Gambling Commission remote casino, bingo, general betting (real events) or general betting (virtual events) operating licence ('a relevant licence');
  - b. the arrangements between the host and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
  - c. the host's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
    - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
    - ii. investigation of suspected cheating,
    - iii. combating of problem gambling, and
    - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

## 4.1.1 - Segregation of funds

### Applies to:

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

1. Licensees who hold customer funds must ensure that these are held in a separate client bank account or accounts.
2. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
  - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling,
  - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer, and
  - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

## 4.2.1 - Disclosure to customers

### Applies to:

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

1. Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
2. Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
3. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
  - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
  - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
  - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

### 5.1.1 - Cash and cash equivalents

**Applies to:**

All operating licences except gaming machine technical, gambling software and host licences

1. Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
2. Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

### 6.1.2 - Use of credit cards

**Applies to:**

All non-remote general betting, pool betting and betting intermediary licences, and all remote licences (including ancillary remote betting and ancillary remote lottery licences) except gaming machine technical, gambling software and host licences

1. Licensees must not accept payment for gambling by credit card. This includes payments to the licensee made by credit card through a money service business.

## 7.1.1 - Fair and transparent terms and practices

### Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
2. The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
3. Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
4. Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

### 8.1.1 - Display of licensed status

**Applies to:**

All remote casino, bingo and betting licences other than ancillary, host, remote betting intermediary (trading room only), remote general betting (limited) and remote general betting (standard) (remote platform) licences

1. Licensees providing facilities for remote gambling must display on every screen from which customers are able to access gambling facilities provided in reliance on this licence:
  - a. a statement that they are licensed and regulated by the Gambling Commission;
  - b. their account number; and
  - c. a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission's website.
2. Such statement, account number and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission in its technical standards applicable to the kind of facilities for gambling provided in accordance with this licence or otherwise notified to licensees for the purposes of this condition.
3. Licensees may also display on screens accessible from Great Britain information about licences or other permissions they hold from regulators in, or by virtue of the laws of, jurisdictions outside Great Britain provided it is made plain on those screens that the licensee provides facilities for gambling to persons in Great Britain in reliance on their Gambling Commission licence(s).

### 9.1.2 - Prohibited bingo prize games

**Applies to:**

All non-remote bingo operating licences

1. Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

## 12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

### Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
2. Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
3. Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

## 14.1.1 - Access to premises

### Applies to:

All operating licences

1. Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

### 15.1.1 - Reporting suspicion of offences etc – non-betting licences

**Applies to:**

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

1. Licensees must as soon as reasonably practicable, in such a form or manner as the Commission may from time to time specify, provide the Commission with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.<sup>1</sup>

Read additional guidance on the information requirements contained within this section.

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<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website

### 15.1.3 - Reporting of systematic or organised money lending

**Applies to:**

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

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.<sup>1</sup>

Read additional guidance on the information requirements contained within this section.

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<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website

## 15.2.1 - Reporting key events

### Applies to:

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence<sup>1</sup>.

### Operator status

1. Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 3% or more of the issued share capital of the licensee or its holding company): • presenting of a petition for winding up • making of a winding up order • entering into administration or receivership • bankruptcy (applying to individuals only) • sequestration (applicable in Scotland), or • an individual voluntary arrangement.

### Relevant persons and positions

2. In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
3. The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
4. The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). A 'key position' in relation to a licensee is:
  - a. in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
  - b. in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
  - c. a position where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
  - d. any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

### Financial events

5. Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
6. Any breach of a covenant given to a bank or other lender.
7. Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
8. Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

#### Legal or regulatory proceedings or reports

9. The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
10. Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
11. Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
12. The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional, statutory or other regulatory or government body (in whatever jurisdiction)) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
13. The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
14. The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
15. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in

respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

#### Gambling facilities

16. Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
17. Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
18. In the case of remote gambling, the commencement or cessation of trading on website domains (including mobile sites or mobile device applications) or broadcast media through which the licensee provides gambling facilities (including domains covered by 'white label' arrangements). In this condition: 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof
  - a. in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
  - b. a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Read additional guidance on the information requirements contained within this section.

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<sup>1</sup>Key events are to be reported to us online via the 'eServices' digital service on our website.

## 15.2.2 - Other reportable events

### Applies to:

All operating licences

1. Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events<sup>1</sup>:
  - a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable)
  - b. any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
  - c. their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
  - d. any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002, or Part III of the Terrorism Act 2000, or any UK law by which those statutes are amended or superseded.

In this condition:

- a. 'group company' has the same meaning as in condition 15.2.1; and
- b. without prejudice to section 327 of the Gambling Act 2005, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

Read additional guidance on the information requirements contained within this section.

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<sup>1</sup> Other reportable events are to be reported to us online via the 'eServices' digital service on our website.

## 15.3.1 - General and regulatory returns

### Applies to:

All operating licences

1. On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.
2. In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.<sup>1</sup>

Read additional guidance on the information requirements contained within this section.

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<sup>1</sup> Regulatory returns are to be submitted to us online via the 'eServices' digital service on our website.

## 16.1.1 - Responsible placement of digital adverts

### Applies to:

All licences

1 Licences must:

- a. Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b. take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c. ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

## 17.1.1 - Customer identity verification

### Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except any lottery licence the holder of which only provides facilities for participation in low frequency<sup>1</sup> or subscription lotteries, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo.

1. Licensees must obtain and verify information in order to establish the identity of a customer before that customer is permitted to gamble. Information must include, but is not restricted to, the customer's name, address and date of birth.
2. A request made by a customer to withdraw funds from their account must not result in a requirement for additional information to be supplied as a condition of withdrawal if the licensee could have reasonably requested that information earlier. This requirement does not prevent a licensee from seeking information on the customer which they must obtain at that time due to any other legal obligation.
3. Before permitting a customer to deposit funds, licensees should inform customers what types of identity documents or other information the licensee may need the customer to provide, the circumstances in which such information might be required, and the form and manner in which such information should be provided.
4. Licensees must take reasonable steps to ensure that the information they hold on a customer's identity remains accurate.

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<sup>1</sup> A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw.

### Ordinary code

These do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner.

Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

## Social responsibility code

Compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution.

### 1.1.1 - Cooperation with the Commission

#### Ordinary code

#### Applies to:

All licences

1. As made plain in its Statement of principles for licensing and regulation, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

## 1.1.2 - Responsibility for third parties – all licences

### Social responsibility code

#### Applies to:

All licences

1. Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
2. Licensees must ensure that the terms on which they contract with such third parties:
  - a. require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
  - b. oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
  - c. enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

## 1.1.3 - Responsibility for third parties – remote

### Social responsibility code

#### Applies to:

All remote licences

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

## 2.1.2 - Anti-money laundering – other than casino

### Ordinary code

#### Applies to:

All licences except casino licences

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

## 3.1.1 - Combating problem gambling

### Social responsibility code

#### Applies to:

All licences

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

## 3.2.5 - Bingo and FEC SR code

### Social responsibility code

#### Applies to:

All non-remote bingo and family entertainment centre licences

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

Read additional guidance on the information requirements contained within this section.

### 3.2.6 - Bingo and FEC ordinary code

#### Ordinary code

#### Applies to:

All non-remote bingo and family entertainment centre licences

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission<sup>1</sup> and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
7. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional guidance on the information requirements contained within this section.

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<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website.

## 3.2.11 - Remote SR code

### Social responsibility code

#### Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
2. Such procedures must include:
  - a. Verifying the age of a customer before the customer is able to:
    - i. deposit any funds into their account;
    - ii. access any free-to-play versions of gambling games that the licensee may make available; or
    - iii. gamble with the licensee using either their own money or any free bet or bonus.
  - b. warning potential customers that underage gambling is an offence;
  - c. regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
  - d. ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
  - e. enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

### 3.2.12 - Remote ordinary code

#### Ordinary code

#### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

### 3.3.1 - Responsible gambling information

#### Social responsibility code

#### Applies to:

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

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

### 3.3.2 - Foreign languages

#### Ordinary code

##### Applies to:

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

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

### 3.3.4 - Remote time-out facility

#### Social responsibility code

##### Applies to:

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

- 1 Licensees must offer a 'time out' facility for customers for the following durations:
  - a. 24 hours
  - b. one week
  - c. one month or
  - d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

### 3.4.1 - Customer interaction

#### Social responsibility code

#### Applies to:

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

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

### 3.5.1 - Non-remote and trading rooms SR code

#### Social responsibility code

##### Applies to:

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

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

## 3.5.2 - Self-exclusion – non-remote ordinary code

### Ordinary code

#### Applies to:

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

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.
7. Licensees should take steps to ensure that:
  - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
  - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
  - c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
  - d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
  - e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
  - f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

### 3.5.3 - Self-exclusion – remote SR code

#### Social responsibility code

##### Applies to:

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences. Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
  - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
  - b. a record of the card numbers to be excluded;
  - c. staff training to ensure that staff are able to administer effectively the systems; and
  - d. the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
7. Licensees must when administering the self-exclusion signpost the individual to counselling and support services.
8. Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid

inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

### 3.5.4 - Remote ordinary code

#### Ordinary code

#### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
  - a. over the internet; this can be a box that must be ticked in order to indicate that they understand the system
  - b. by telephone; this can be a direct question asking whether they understand the system.
2. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
3. Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
4. Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
5. Licensees should take all reasonable steps to ensure that:
  - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
  - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
  - c. the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
  - d. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
  - e. at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
  - f. where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
  - g. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

6. The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
7. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
8. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

### 3.5.5 - Remote multi-operator SR code

#### Social responsibility code

##### Applies to:

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

1. Licensees must participate in the national multi-operator self-exclusion scheme.

### 3.5.6 - Multi-operator non-remote SR code

#### Social responsibility code

##### Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

1. Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

### 3.5.7 - Multi-operator non-remote ordinary code

#### Ordinary code

##### Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

1. Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

## 3.6.2 - Bingo

### Ordinary code

#### Applies to:

All non-remote bingo licences

1. Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
  - a. to employ them to provide facilities for playing bingo;
  - b. for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
  - c. to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
  - a. children and young persons are never asked to perform tasks within 1a or 1b, above
  - b. all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:
  - a. children are not employed to work on bingo licensed premises at any time when the premises are open for business
  - b. neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

### 3.6.7 - Remote

#### Ordinary code

#### Applies to:

All remote licences, except remote lottery, remote pool betting, remote gaming machine technical, remote gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence to employ them to provide facilities for gambling.

### 3.8.2 - Money-lending – other than casinos

#### Ordinary code

#### Applies to:

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

1. Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

### 3.9.1 - Identification of individual customers - remote

#### Social responsibility code

##### Applies to:

All remote licences (including ancillary remote betting licences) except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
2. Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
  - a. if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
  - b. all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
  - c. where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
  - d. individual financial limits can be implemented across all of a customer's accounts.
3. Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
4. A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof.

### 4.1.1 - Fair terms

#### Social responsibility code

#### Applies to:

All licences, except gaming machine technical and gambling software licences

1. Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

### 4.2.2 - Display of rules - bingo

#### Social responsibility code

#### Applies to:

All non-remote bingo licences

1. In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
  - a. rules about each variant of bingo made available; and
  - b. rules about any prize gaming made available.

### 4.2.3 - Display of rules – remote SR code

#### Social responsibility code

##### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must make the following available to customers:
  - a. a player's guide to each gambling opportunity (bet, game or lottery) made available by the operator; and
  - b. such additional information relating to the available gambling as the Commission shall from time to time publish to licensees: the current requirements are set out in the Commission's Remote gambling and software technical standards.

### 4.2.4 - Remote ordinary code

#### Ordinary code

##### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Where practicable, the player's guide and additional information referred to in the social responsibility code 4.2.3 should be made available through the medium in which the remote gambling is to be conducted. Where that is not practicable, licensees should either:
  - a. send a copy of the guide and required additional information by post, fax or email; or
  - b. make these available to the customer in another medium to which he has access.

## 5.1.1 - Rewards and bonuses – SR code

### Social responsibility code

#### Applies to:

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

1. If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
  - a. the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
  - b. neither the receipt nor the value or amount of the benefit is:
    - i. dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
    - ii. altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
  - c. if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
  - d. if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
2. If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value, 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.

Licensees must take into account the Commission's guidance on high value customer incentives.

## 5.1.2 - Proportionate rewards

### Ordinary code

#### Applies to:

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

1. Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

## 5.1.3 - Alcoholic drinks

### Social responsibility code

#### Applies to:

All non-remote bingo and casino licences

1. If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
2. Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

## 5.1.6 - Compliance with advertising codes

### Social responsibility code

#### Applies to:

All licences, except lottery licences

1. All marketing of gambling products and services must be undertaken in a socially responsible manner.
2. In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
3. The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

## 5.1.8 - Compliance with industry advertising codes

### Ordinary code

#### Applies to:

All licences

1. Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

## 5.1.9 - Other marketing requirements

### Social responsibility code

#### Applies to:

All licences

1. Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
2. Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
3. The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

## 5.1.10 - Online marketing in proximity to information on responsible gambling

### Ordinary code

#### Applies to:

All licences

1. Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

## 5.1.11 - Direct electronic marketing consent

### Social responsibility code

#### Applies to:

All licences

1. Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

## 6.1.1 - Complaints and disputes

### Social responsibility code

#### Applies to:

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

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

In this Code, 'ADR entity' means

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

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

Read additional guidance on the information requirements contained within this section.

## 7.1.2 - Responsible gambling information for staff

### Social responsibility code

#### Applies to:

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

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

## 8.1.1 - Ordinary code

### Ordinary code

#### Applies to:

All licences

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

Read additional guidance on the information requirements contained within this section.

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<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website.

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

## 9.1.2 - Bingo

### Social responsibility code

#### Applies to:

All non-remote bingo operating licences

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

## 10.1.1 - Assessing local risk

### Social responsibility code

#### Applies to:

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

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

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<sup>1</sup>This is the statement of licensing policy under the Gambling Act 2005.

## 10.1.2 - Sharing local risk assessments

### Ordinary code

#### Applies to:

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

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



# **Highlighted Extracts of the Gambling Commission's Guidance to Licensing Authorities**

**4.5** Licensing authorities in England and Wales have responsibilities under the Licensing Act 2003 (opens in new tab). There are some inter-dependencies between the Licensing Act 2003 (opens in new tab) and the Act, in terms of the framework for decision making and the procedures that must be followed. However, licensing authorities must take care to ensure that they follow the procedures and only take into account issues that are relevant to the Act, when dealing with applications under the Act. Particular care should be taken to distinguish considerations made under the Act from those relevant to alcohol licensing, public entertainment or late night refreshments.

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## Licensing (Scotland) Act 20052

**4.6** The position in Scotland is similar, with procedures and decision making requirements under both the Licensing (Scotland) Act 2005 (opens in new tab) and the Act. The same care must be taken by licensing authorities in Scotland to consider only those issues which are relevant to matters under the Act in their decision making, and to ensure that they follow the prescribed procedures under the Act.

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## Other provisions and legislation

**4.7** Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's Licence conditions and codes of practice (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.

**4.8** Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the Environmental Protection Act 1990 (opens in new tab).

## Licensing authority decisions

**4.9** S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:

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

**4.10** Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the guidance contained in this document, any relevant Commission code of practice, the licensing objectives or the licensing authority's own policy statement.

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## Delegations

**4.11** The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.

**4.12** It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise to a risk of judicial review challenge, particularly on the basis of appearance of bias.

**4.13** The tables at Appendix H set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

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# Part 5: Principles to be applied by licensing authorities

## Licensing objectives

**5.1** In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:

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

**5.2** It is expected that the licensing authority will have set out their approach to regulation in their policy statement, having taken into account local circumstances. This is dealt with in more detail at Part 6.

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

**5.3** Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6. A non-exhaustive list of licence conditions is provided at Appendix F.

**5.4** A licensing authority will need to consider questions raised by the location of gambling premises when:

- formulating its statement of licensing policy
- receiving relevant representations to an application
- dealing with applications as a responsible authority in its own right considering applications before it.

**5.5** In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.

**5.6** Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.

**5.7** Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 (opens in new tab) /Licensing (Scotland) Act 2005 (opens in new tab), in which context they have wider powers to also take into account measures to prevent nuisance.

**5.8** In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (opens in new tab) (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this guidance.

**5.9** There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers. Further information can often be found on the websites of industry trade associations.

**5.10** Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

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

**5.11** Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.

**5.12** In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this guidance.

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

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

**5.14** Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.

**5.15** If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.

**5.16** In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the Licence conditions and codes of practice (LCCP) or as Gambling codes of practice. In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this guidance.

**5.17** The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who

gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.

**5.18** Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's policy statement. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

## Section 153 principles

**5.19** S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:

- a. in accordance with any relevant code of practice under s.24 (the LCCP)
- b. in accordance with any relevant guidance issued by the Commission under s.25 (this guidance)
- c. reasonably consistent with the licensing objectives (subject to a and b above)
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

**5.20** Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this guidance, any relevant Commission code of practice, its own statement of licensing policy, and the licensing objectives.

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

**5.22** In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:

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

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

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

## Codes of practice

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

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

## Good practice in regulation

**5.27** Under the Legislative and Regulatory Reform Act 2006 (opens in new tab), any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation in the exercise of the function (Legislative and Regulatory Reform Act 2006 (opens in new tab), section 21). These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills<sup>5</sup>, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006 (opens in new tab). The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.

**5.28** The statutory principles of good regulation and the Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act. The Legislative and Regulatory Reform (Regulatory Functions) Order 2007 (opens in new tab), was amended by the Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2009 (opens in new tab), which, amongst other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the Gambling Act 2005 (opens in new tab) - see Parts 3 and 7.

**5.29** Guidance produced by Regulatory Delivery now replaced by the Office of Product Safety and Standards seeks to assist local authorities in interpreting the requirements of the Regulator's Code for example in delivering risk-based regulation in relation to age restrictions.

Age-restricted products and services framework (opens in new tab)<sup>6</sup> sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the Age-restricted products and services: a code of practice for regulatory delivery (opens in new tab)<sup>7</sup>.

## Human Rights Act 1998

**5.30** The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing

authorities should bear in mind that they are subject to the Human Rights Act 1998 (opens in new tab) and in particular:

- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
- Article 6 – right to a fair hearing
- Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
- Article 10 – right to freedom of expression.

## Other considerations

**5.31** Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions. In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.

**5.32** Licensing authorities must ensure that the application is in accordance with the relevant codes of practice, this guidance, the licensing objectives and the licensing authority's own policy statement. There is, therefore, significant scope for licensing authorities to request additional information from the applicant where they have concerns about both new applications and variations.

**5.33** Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9 and a non-exhaustive list of licence conditions is included at Appendix F of this guidance.

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

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

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## Representations

**7.52** In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as 'responsible authorities' and 'interested parties'. Representations from other parties are inadmissible. Further information on these categories can be found in Part 8 of this guidance.

**7.53** Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority's policy statement, or the Commission's guidance or codes of practice, are likely to be relevant.

**7.54** The licensing authority will also need to consider if representations are 'frivolous' or 'vexatious'. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:

- who is making the representation, and whether there is a history of making representations that are not relevant
- whether it raises a 'relevant' issue
- whether it raises issues specifically to do with the premises that are the subject of the application.

**7.55** The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission's approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

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## Making a decision

**7.56** As explained earlier, the licensing authority's primary obligation under s.153(1) is to permit the use of premises in so far as it thinks that to do so is:

- a. in accordance with any relevant code of practice issued by the Commission
- b. in accordance with any relevant guidance issued by the Commission

- c. reasonably consistent with the licensing objectives (subject to a and b above)
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

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

## Consideration of planning permission and building regulations

**7.58** In determining applications, the licensing authority should not take into consideration matters that are not related to gambling and the licensing objectives. One example would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal. Licensing authorities should bear in mind that a premises licence, once it comes into effect, authorises premises to be used for gambling. Accordingly, a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use. Equally, licences should only be issued where they are expected to be used for the gambling activity named on the licence. This is why the Act allows a potential operator to apply for a provisional statement if construction of the premises is not yet complete, or they need alteration, or he does not yet have a right to occupy them. Part 11 of this guidance gives more information about provisional statements.

**7.59** As the Court has held in a 2008 case (*The Queen (on the application of) Betting Shop Services Limited –v- Southend-on-Sea Borough Council* [2008] EWHC 105 (Admin)), operators can apply for a premises licence in respect of premises which have still to be constructed or altered, and licensing authorities are required to determine any such applications on their merits. Such cases should be considered in a two stage process; first, licensing authorities must decide whether, as a matter of substance after applying the principles in s.153 of the Act, the premises ought to be permitted to be used for gambling; second, in deciding whether or not to grant the application a licensing authority will need to consider if appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

**7.60** For example, where the operator has still to undertake final fitting out of the premises but can give a reasonably accurate statement as to when the necessary works will be completed, it may be sufficient to simply issue the licence with a future effective date, as is possible under the Regulations (SI 2007/459: *The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007* and SSI No 196: for Scotland). The application form allows the applicant to suggest a commencement date and the notice of grant allows the licensing authority to insert a date indicating when the premises licence comes into effect. In other cases, it may be appropriate to issue the licence subject to a condition that trading in reliance on it shall not commence until the premises have been completed in all respects in accordance with the scale plans that accompanied the licence application. If changes to the pre-grant plans are made, then parties who have made representations should be able to comment on the changes made. Part 9 of this guidance gives more information about licence conditions.

**7.61** If the plans submitted at the time of the application for a premises licence are changed in any material respect during the fitting out of the premises after the grant of the licence, then the applicant will be in breach of the licence. If the applicant wishes to change the proposed plans after grant then, in order to avoid breaching the licence, it will be necessary for the applicant to either make a fresh application under s.159 or seek an amendment to a detail of the licence under s.187 of the Act. If there are substantive

**9.25** The following mandatory conditions apply to all premises licences:

- the summary of the premises licence issued by the licensing authority must be displayed in a prominent place on the premises. In England and Wales this must include a summary of the terms and conditions of the premises licence.
- the layout of the premises must be maintained in accordance with the plan that forms part of the premises licence.
- neither National Lottery products nor tickets in a private or customer lottery may be sold on the premises in England and Wales. Sale of National Lottery and private lottery tickets are prohibited in Scotland.

**9.26** There are also mandatory conditions attaching to each type of premises licence controlling access between premises. There can be no direct access between one premises licensed under the Act and another premises licensed under the Act, with the following exceptions:

- between licensed betting premises
- between bingo premises and alcohol-licensed premises/clubs with a club gaming or club machine permit/family entertainment centres (FECs) and tracks
- between tracks and alcohol-licensed premises/clubs with a club gaming or club machine permit/FECs/betting premises and bingo premises
- between FECs and alcohol-licensed premises/bingo halls/clubs with club gaming or club machine permit and tracks.

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## Default conditions

**9.27** S.169 of the Act gives licensing authorities:

- the ability to exclude from premises licences any default conditions that have been imposed under s.168
- the power to impose conditions on premises licences that they issue.

**9.28** Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

**9.29** Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.

**9.30** Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.

**9.31** Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:

- relevant to the need to make the proposed building suitable as a gambling facility
- directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
- fairly and reasonably related to the scale and type of premises
- reasonable in all other respects.

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

**9.32** The Act sets out certain matters that may not be the subject of conditions:

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

**Extracts from Hansard Parliamentary  
Debate discussing the inclusion of the  
prevention of public nuisance as a  
Licensing Objective**

## Hansard Extract

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

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

**Column Number: 012**

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

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

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

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

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

**Column Number: 037**

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

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

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

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

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

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

**Column Number: 038**

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

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

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

**Extracts of Paterson's Licensing Acts  
2020 Part 8:  
Para 5.158 – Premises  
Licences**

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

## Determination of application

### [5.158]

In determining an application the licensing authority must hold a hearing<sup>1</sup> if:

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

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course<sup>3</sup>, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application<sup>4</sup>. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations<sup>5</sup>, presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence<sup>6</sup> the authority cannot determine the application until the relevant operating licence has been issued<sup>7</sup>.

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

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

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

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

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

*Section 1 Commentary*  
*PART 8: PREMISES LICENCES*

Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities<sup>11</sup> as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)-(d).

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

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

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide<sup>12</sup>, nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval<sup>13</sup>. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected<sup>14</sup>.

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC<sup>15</sup> and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition<sup>16</sup> they must give their reasons<sup>17</sup>. If representations were made by an interested party or a responsible authority they must give their response to the representations<sup>18</sup>.

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant<sup>18</sup>. The notice must give the authority's reasons for rejecting the application<sup>19</sup>.

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

<sup>2</sup> GA 2005, s 162. See further para 5.159 below.

<sup>3</sup> GA 2005, s 162.

<sup>4</sup> GA 2005, s 162(3).

<sup>5</sup> GA 2005, s 162(4).

<sup>6</sup> Ie under GA 2005, s 159(3)(b).

<sup>7</sup> GA 2005, s 163(2).

<sup>8</sup> GA 2005, s 163(1).

<sup>9</sup> *The Oxford English Dictionary* (2nd edn, 1989).

<sup>10</sup> (5th Edn, OUP).

**The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007: Schedule 2  
Part 1 – Conditions attaching to bingo premises licences**

SCHEDULE 2

Regulations 10 and 11

Conditions attaching to bingo premises licences

PART 1

Mandatory conditions attaching to bingo premises licences

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## PART 2

### Default conditions attaching to bingo premises licences

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

# Agenda Item 4



## Licensing Committee

**Report title:** The Firkin Brewery, 15 Whitburn Road, London, SE13 7UQ

**Date:** 21 June 2022

**Key decision:** No.

**Class:** Part 1.

**Ward(s) affected:** Ladywell

**Contributors:** Community Services – Safer Communities Service

### Outline and recommendations

Determination of New Premises Licence Application submitted by The Firkin Brewery Ltd for the premises at 15 Whitburn Road, London, SE13.

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 25 of the Licensing Act 2003.

The last day for representations was 25th May 2022.

## 1. Summary

1.1. The following activities were applied for by the applicant:

1.2. **Particulars of Application**

The premises will be the tap room for Firkin Brewery Limited. It will consist of an outdoor area located on the East side of the Firkin Brewery accessible via the roller shutter located to the East of the Firkin Brewery.

The outdoor Space will consist of serving bar and a large marquee with table and chairs where light entertainment will be provided.

### **Recorded and Live Music – Outside**

12:00 – 21:00 Sunday – Saturday

### **Recorded & Live Music – Inside**

23:00 – 00:00 Friday & Saturday

### **Alcohol for consumption ON the premises**

12:00 – 23:00 Sunday – Thursday

12:00 – 00:00 Friday & Saturday

### **Seasonal Variation**

New Year's Eve Until 01:00 New Year's Day

Alcohol for consumption ON the premises

Recorded &/or Live music

- 1.3. Three representations were received from interested persons on various grounds including the prevention of public nuisance, prevention of crime and disorder and public safety. 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.
- 1.4. One representation, received from a resident living close to the premises was particularly concerned over the potential disturbance from music as well as customers.
- 1.5. A representation was also received from the Metropolitan Police concerning all three of the above licensing objections.
- 1.6. In addition to this, a representation was received from the Council's Planning department concerned that the consent for the premises does not cover it being a drinking establishment or having any outdoor seating area.
- 1.7. Conditions were offered on the application form by the applicant. These have been reworded to meet the councils model conditions and have all been agreed by the applicant.
- 1.8. The Police have sent additional conditions that they would like added to the licence, however these have not been agreed by the applicant

## **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. The steps available to the Licensing Authority:
  - 1.) Grant the new premises licence as applied for,
  - 2.) Grant the licence subject to conditions modified to such extent as the authority considers appropriate for the promotion of the licensing objectives
  - 3.) Exclude from the scope of the licence any of the licensable activities to which the application relates;
  - 4.) Refuse to specify a person in the licence as the designated premises supervisor;
  - 5.) Refuse to grant the application.

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- 2.2 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 Licensing Act 2003 and the promotion of the four Licensing Objectives at all times, which includes the following:
- Protection of Children from Harm
  - Prevention of Crime and Disorder
  - Prevention of Public Nuisance
  - Public Safety
- 3.2. Members should also have regard to the Licensing Authority's Statement of Licensing Policy 2015-19.
- 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.

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- 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](#)
- 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 Licensing Act 2003, to that end there are no climate change or environmental considerations.

## 8. Crime and disorder implications

- 8.1. Under the Licensing Act 2003, one of the 4 licensing objectives is the Prevention of Crime and Disorder.
- 8.2. It is the requirement of the Licensing Act 2003 that any decision made by the Licensing Committee must not negatively impact on the Licensing objectives.

## 9. Background papers

- 9.1. Application received 26<sup>th</sup> April 2022.
- 9.2. Application plan.
- 9.3. Three Representations as served.
- 9.4. Conditions offered by the applicant.
- 9.5. Proposed conditions from Police, not agreed with applicant.

## 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.
Licence	an authority to do something.
Licensee	the holder of a licence to do something.
Licensing Authority	The Council (London Borough of Lewisham) Under section 3 of the 2003 Act, the licensing authority's area is the area for which the authority acts.
Licence Objectives	Under section 4 of the 2003 Act the Licensing Authority must promote the following 4 objectives <ul style="list-style-type: none"><li>• Prevention of crime and disorder</li><li>• Public safety</li><li>• Prevention of public nuisance</li><li>• Protection of children from harm</li></ul>
Interested Person	A person who lives in the vicinity of the premises A body who represents the persons who live in that vicinity A person involved in a business in that vicinity A body representing businesses in that vicinity An elected member of the council

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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"> <li>• Licensing Authority</li> <li>• Chief Officer of Police</li> <li>• London Fire Brigade</li> <li>• Trading Standards</li> <li>• Planning Authority</li> <li>• Public Health</li> <li>• Environmental Enforcement (with respect to Noise)</li> <li>• Children’s Services</li> <li>• Home Office Immigration</li> </ul>

## 11. Report author and contact

- 11.1. Richard Lockett, Senior Safer Communities Service Officer for Licensing  
richard.lockett@lewisham.gov.uk.

**Application for a premises licence to be granted under the Licensing Act 2003****PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

Before completing this form please read the guidance notes at the end of the form. Your right to work in the UK will be checked as part of your licensing application and this could involve us checking your immigration status with the Home Office. We may otherwise share information with the Home Office. Your licence application will not be determined until you have complied with the below guidance. (See page 14)

If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You may wish to keep a copy of the completed form for your records.

I Didier Autard

*(Insert name(s) of applicant)*

**apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in Part 1 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003**

**Part 1 – Premises details**

<b>Name and Postal address of premises</b> or, if none, Ordnance survey map reference or description <b>15 Withburn road London</b>			
<b>Post town</b>	LONDON	<b>Postcode</b>	<b>SE13 7UQ</b>
Telephone number at premises (if any)		<b>02086900969</b>	
Non-domestic rateable value of premises		<b>£6900</b>	

**Part 2 - Applicant details**

Please state whether you are applying for a premises licence as:

**Please tick as appropriate**

- a) an individual or individuals \*  please complete section (A)
- b) a person other than an individual \*
- i) as a limited company/limited liability partnership  please complete section (B)
- ii) as a partnership (other than limited liability)  please complete section (B)
- iii) as an unincorporated association or  please complete section (B)
- iv) other (for example a statutory corporation)  please complete section (B)
- c) a recognised club  please complete section (B)
- d) a charity  please complete section (B)
- e) the proprietor of an educational establishment  please complete section (B)

- f) a health service body  please complete section (B)
- g) a person who is registered under Part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales  please complete section (B)
- g.1 a person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 (within the meaning of that Part) in an independent hospital in England  please complete section (B)
- the chief officer of police of a police force in England and Wales  please complete section (B)

\* If you are applying as a person described in (a) or (b) please confirm (by ticking yes to one box below):

- I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities; or
- I am making the application pursuant to a statutory function or
- a function discharged by virtue of Her Majesty's prerogative

**(A) INDIVIDUAL APPLICANTS** (fill in as applicable)

Mr	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
<b>Surname</b>			<b>First names</b>		
<b>Date of birth</b> <input type="text"/>		I am 18 years old or over		Please tick yes <input type="checkbox"/>	
<b>Nationality</b>					
Current <b>residential address</b> if different from premises address					
Post town				Postcode	
<b>Daytime contact telephone number</b>					
<b>E-mail address (Required)</b>					

**SECOND INDIVIDUAL APPLICANT (if applicable)**

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
<b>Surname</b>			<b>First names</b>		
<b>Date of birth</b>			I am 18 years old or over <input type="checkbox"/> Please tick yes		
<b>Nationality</b>					
Current postal address if different from premises address					
Post town				Postcode	
<b>Daytime contact telephone number</b>					
<b>E-mail address (Required)</b>					

**(B) OTHER APPLICANTS**

**Please provide name and registered address of applicant in full. Where appropriate please give any registered number. In the case of a partnership or other joint venture (other than a body corporate), please give the name and address of each party concerned.**

Name The Firkin Brewery Limited
Address 316 Lewisham High Street SE13 6JZ
Registered number (where applicable) 13855714
Description of applicant (for example, partnership, company, unincorporated association etc.) Limited Company
Telephone number (if any) 07707072324
E-mail address <b>(Required)</b> didier@firkinbrewery.com

**PART 3 – OPERATING SCHEDULE**

When do you want the premises licence to start?

DD	MM	YYYY
2	7	04
2	0	22

If you wish the licence to be valid only for a limited period, when do you want it to end?

DD	MM	YYYY

- Describe the premises, for example the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place for consumption of these off-supplies, you must include a description of where the place will be and its proximity to the premises.

The premises will be the tap room for firkin brewery limited. It will consist of an outdoor area located on the East side of the Firkin Brewery accessible via the roller shutter located to the East of the Firkin Brewery.  
 The outdoor Space will consist of serving bar and a large marquee with table and chairs where light entertainment will be provided.

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend.

What licensable activities do you intend to carry on from the premises?

(Please see sections 1 and 14 and Schedules 1 and 2 to the Licensing Act 2003)

- |   |                            |
|---|----------------------------|
| Provision of regulated entertainment (please read guidance note 2)  | Please tick all that apply |
| a) plays (if ticking yes, fill in box A)  | <input type="checkbox"/>   |
| b) films (if ticking yes, fill in box B)  | <input type="checkbox"/>   |
| c) indoor sporting events (if ticking yes, fill in box C)   | <input type="checkbox"/>   |
| d) boxing or wrestling entertainment (if ticking yes, fill in box D)  | <input type="checkbox"/>   |
| e) live music (if ticking yes, fill in box E)   | x                          |
| f) recorded music (if ticking yes, fill in box F)   | x                          |
| g) performances of dance (if ticking yes, fill in box G)  | <input type="checkbox"/>   |
| h) anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H) | <input type="checkbox"/>   |
| <b><u>Provision of late night refreshment</u></b> (if ticking yes, fill in box I)                           | <input type="checkbox"/>   |
| <b><u>Supply of alcohol</u></b> (if ticking yes, fill in box J)   | x                          |

**In all cases complete boxes K, L and M**

**A**

<b>Plays</b> Standard days and timings (please read guidance note 7)			<b>Will the performance of a play take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	<input type="checkbox"/>			
				Outdoors	<input type="checkbox"/>			
				Both	<input type="checkbox"/>			
Day	Start	Finish	<b>Please give further details here</b> (please read guidance note 4)					
Mon								
Tue								
Wed						<b>State any seasonal variations for performing plays</b> (please read guidance note 5)		
Thur								
Fri						<b>Non-standard timings. Where you intend to use the premises for the performance of plays at different times to those listed in the column on the left, please list</b> (please read guidance note 6)		
Sat								
Sun								

**B**

<b>Films</b> Standard days and timings (please read guidance note 7)			<b>Will the exhibition of films take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	<input type="checkbox"/>			
				Outdoors	<input type="checkbox"/>			
				Both	<input type="checkbox"/>			
Day	Start	Finish	<b>Please give further details here</b> (please read guidance note 4)					
Mon								
Tue								
Wed						<b>State any seasonal variations for the exhibition of films</b> (please read guidance note 5)		
Thur								
Fri						<b>Non-standard timings. Where you intend to use the premises for the exhibition of films at different times to those listed in the column on the left, please list</b> (please read guidance note 6)		
Sat								

Sun			

**C**

<b>Indoor sporting events</b> Standard days and timings (please read guidance note 7)			<b><u>Please give further details</u></b> (please read guidance note 4)
Day	Start	Finish	
Mon			<b><u>State any seasonal variations for indoor sporting events</u></b> (please read guidance note 5)
Tue			
Wed			<b><u>Non- standard timings. Where you intend to use the premises for indoor sporting events at different times to those listed in the column on the left, please list</u></b> (please read guidance note 6)
Thur			
Fri			
Sat			
Sun			

**D**

<b>Boxing or wrestling entertainments</b> Standard days and timings (please read guidance note 7)			<b><u>Will the boxing or wrestling entertainment take place indoors or outdoors or both – please tick</u></b> (please read guidance note 3)	
Day	Start	Finish	Indoors	<input type="checkbox"/>
Mon			Outdoors	<input type="checkbox"/>
Tue			Both	<input type="checkbox"/>
Wed			<b><u>Please give further details here</u></b> (please read guidance note 4)	
Thur			<b><u>State any seasonal variations for boxing or wrestling entertainment</u></b> (please read guidance note 5)	
Fri			<b><u>Non- standard timings. Where you intend to use the premises for boxing or wrestling entertainment at different times to those listed in the column on the left, please list</u></b> (please read guidance note 6)	
Sat				

Sun			
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**E**

<b>Live music</b> Standard days and timings (please read guidance note 7)			<b>Will the performance of live music take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	X
				Outdoors	
				Both	
Day	Start	Finish	<b>Please give further details here</b> (please read guidance note 4) Performance of unamplified live music between 08.00 and 21.00 on any day. Performance of amplified live music between 08.00 and 21.00 on any day  <b>State any seasonal variations for the performance of live music</b> (please read guidance note 5) N/A  <b>Non-standard timings. Where you intend to use the premises for the performance of live music at different times to those listed in the column on the left, please list</b> (please read guidance note 6) New years EVE extention till 01:00 finish on new year day		
Mon	12.00	21.00			
Tue	12.00	21.00			
Wed	12.00	21.00			
Thur	12.00	21.00			
Fri	12.00	21.00			
Sat	12.00	21.00			
Sun	12.00	21.00			

**F**

<b>Recorded music</b> Standard days and timings (please read guidance note 7)			<b>Will the playing of recorded music take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	X
				Outdoors	
				Both	
Day	Start	Finish	<b>Please give further details here</b> (please read guidance note 4) Playing of recorded background music between 12.00 and 23.00  <b>State any seasonal variations for the playing of recorded music</b> (please read guidance note 5) N/A  <b>Non-standard timings. Where you intend to use the premises for the playing of recorded music at different times to those listed in the column on the left, please list</b> (please read guidance note 6) New years EVE extention till 01:00 finish on new year day		
Mon	12.00	23.00			
Tue	12.00	23.00			
Wed	12.00	23.00			
Thur	12.00	23.00			
Fri	12.00	00.00			
Sat	12.00	00.00			

Sun	12.00	23.00	
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**G**

<b>Performances of dance</b> Standard days and timings (please read guidance note 7)			<b>Will the performance of dance take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<b>Please give further details here</b> (please read guidance note 4)		
Mon					
Tue					
Wed			<b>State any seasonal variations for the performance of dance</b> (please read guidance note 5)		
Thur					
Fri					
Sat			<b>Non- standard timings. Where you intend to use the premises for the performance of dance at different times to those listed in the column on the left, please list</b> (please read guidance note 6)		
Sun					

**H**

<b>Anything of a similar description to that falling within (e), (f) or (g)</b> Standard days and timings (please read guidance note 7)			Please give a description of the type of entertainment you will be providing		
Day	Start	Finish	<b>Will this entertainment take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
Mon				Outdoors	<input type="checkbox"/>
Tue				Both	<input type="checkbox"/>
				<b>Please give further details here</b> (please read guidance note 4)	
Wed					
Thur					
			<b>State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g)</b> (please read guidance note 5)		
Fri					
Sat					
			<b>Non-standard timings. Where you intend to use the premises for the entertainment of a similar description to that falling</b>		

Sun			<b>within (e), (f) or (g) at different times to those listed in the column on the left, please list</b> (please read guidance note 6)

I

<b>Late night refreshment</b> Standard days and timings (please read guidance note 7)			<b>Will the provision of late night refreshment take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<b>Please give further details here</b> (please read guidance note 4)		
Mon					
Tue					
Wed					
			<b>State any seasonal variations for the provision of late night refreshment</b> (please read guidance note 5)		
Thur			<b>Non- standard timings. Where you intend to use the premises for the provision of late night refreshment at different times, to those listed in the column on the left, please list</b> (please read guidance note 6)		
Fri					
Sat					
Sun					

J

<b>Supply of alcohol</b> Standard days and timings (please read guidance note 7)			<b>Will the supply of alcohol be for consumption – please tick</b> (please read guidance note 8)	On the premises	x
				Off the premises	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<b>State any seasonal variations for the supply of alcohol</b> (please read guidance note 5)		
Mon	12:00	23:00			
Tue	12:00	23:00			
Wed	12:00	23:00			
			<b>Non- standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list</b> (please read guidance note 6)		
Thur	12:00	23:00			
Fri	12:00	00:00			
Sat	12:00	00:00			

Sun	12:00	23:00	

**State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor (Please see declaration about the entitlement to work in the checklist at the end of the form):**

Name Daniel Sidders	
Date of birth 22/08/1992	
Address 127b Catford hill	
Postcode	SE6 4PR
Personal licence number (if known) HO31116	
Issuing licensing authority (if known) Hastings Borough Council	

**K**

<p><b>Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children (please read guidance note 9).</b> No adult entertainment or any other entertainment will be provided in concern of children.</p>
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**L**

<b>Hours premises are open to the public</b> Standard days and timings (please read guidance note 7)			<b>State any seasonal variations</b> (please read guidance note 5)
Day	Start	Finish	
Mon	12:00	23:00	<b>Non- standard timings. Where you intend the premises to be open to the public at different times from those listed in the column on the left, please list</b> (please read guidance note 6) New Year day 02:00  <div style="text-align: center; font-size: 24px;">Page 519</div>
Tue	12:00	23:00	
Wed	12:00	23:00	
Thur	12:00	23:00	
Fri	12:00	01:00	
Sat	12:00	01:00	

Sun	12:00	23:00	

**M** Describe the steps you intend to take to promote the four licensing objectives:

**a) General – all four licensing objectives (b, c, d and e) (please read guidance note 10)**

The Licensee shall ensure that there are sufficient and competent staff on duty at the premises, when being used for licensable activities, for fulfilling the terms and conditions of the licence and for preventing crime and disorder. The Licensee shall ensure that all staff will undertake training in their responsibilities in relation to the sale of alcohol, particularly with regard to drunkenness and underage persons. Records will be kept of all relevant records such as risk assessments, appliance checks etc.

**b) The prevention of crime and disorder**

- Effective and responsible management of the premises
- Training and supervision of staff to ensure the highest standard of responsibility
- Patrons carrying opened or sealed containers will not be admitted on the premises
- Bottle bins for collection and empty bottles not accessible to the public
- Provision of outside lighting
- CCTV
- Ensure a capacity limit of 200
- Only responsible drink promotions to take place and the dps or a personal license holder to be present for such promotions.
- A zero tolerance on drugs policy
- To maintain a refusal register outlining any refused sales or admissions

**c) Public safety**

- Suitable risk assessments
- Provision of a sufficient amount of people employed to ensure the safety of the premises and all patrons
- The implementation of crowd management measures
- Regular testing (and certification) of procedures and appliances
- Adequate and appropriate first aid equipment and materials to be available
- In the absence of adequate daylight suitable and sufficient artificial lighting is provided to all areas accessible to the public
- Free drinking water available at all times
- A continuous and accurate record of all patrons in the venue to be kept where appropriate

**d) The prevention of public nuisance**

- Appropriate training and supervision to prevent incidents of public nuisance
- Installation of sound proofing
- Positioning of external lighting to not affect the public
- Regular collection and disposal of litter
- Noise management plan
- Prominent, clear and legible notices are displayed at all exits requesting patrons to respect the needs of local residents and to leave the premises and the area quietly
- For the final hours of opening the music is reduced in volume and is discernibly quieter.
- The playing of live or recorded music in garden or outside seating areas of the premises is not permitted after 23:00

**e) The protection of children from harm**

- Sufficient number of staff to secure the protection of children from harm
- Appropriate instruction, training and supervision to all staff in respect to determining the age of a customer
- THINK 25 Policy in place
- Only acceptance of accredited proof of age cards, driver's license or passport
- Limitations on the hours when U18's may be on the premises
- Imposition of requirements for children to be accompanied by an adult

**Checklist:**

**Please tick to indicate agreement**

- I have provided a daytime telephone number in order to make payment over the phone by debit or credit card. X
- I have enclosed the plan of the premises. x
- I have sent copies of this application and the plan to responsible authorities and others where applicable. x
- I have enclosed the consent form completed by the individual I wish to be designated premises supervisor, if applicable. x
- I understand that I must now advertise my application. x
- I understand that if I do not comply with the above requirements my application will be rejected. x
- X

[Applicable to all individual applicants, including those in a partnership which is not a limited liability partnership, but not companies or limited liability partnerships] I have included documents demonstrating my entitlement to work in the United Kingdom (please read note 15).

**IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.**

**IT IS AN OFFENCE UNDER SECTION 24B OF THE IMMIGRATION ACT 1971 FOR A PERSON TO WORK WHEN THEY KNOW, OR HAVE REASONABLE CAUSE TO BELIEVE, THAT THEY ARE DISQUALIFIED FROM DOING SO BY REASON OF THEIR IMMIGRATION STATUS. THOSE WHO EMPLOY AN ADULT WITHOUT LEAVE OR WHO IS SUBJECT TO CONDITIONS AS TO EMPLOYMENT WILL BE LIABLE TO A CIVIL PENALTY UNDER SECTION 15 OF THE IMMIGRATION, ASYLUM AND NATIONALITY ACT 2006 AND PURSUANT TO SECTION 21 OF THE SAME ACT, WILL BE COMMITTING AN OFFENCE WHERE THEY DO SO IN THE KNOWLEDGE, OR WITH REASONABLE CAUSE TO BELIEVE, THAT THE EMPLOYEE IS DISQUALIFIED.**

**Part 4 – Signatures** (please read guidance note 11)

**Signature of applicant or applicant’s solicitor or other duly authorised agent** (see guidance note 12). **If signing on behalf of the applicant, please state in what capacity.**

<b>Declaration</b>	<ul style="list-style-type: none"> <li>[Applicable to individual applicants only, including those in a partnership which is not a limited liability partnership] I understand I am not entitled to be issued with a licence if I do not have the entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15).</li> <li>The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, if appropriate (please see note 15)</li> </ul>
Signature & Print Name	
Date	`26/04/2022
Capacity	Director

**For joint applications, signature of 2<sup>nd</sup> applicant or 2<sup>nd</sup> applicant’s solicitor or other authorised agent** (please read guidance note 13). **If signing on behalf of the applicant, please state in what capacity.**

Signature & Print Name	
Date	
Capacity	

Signature & Print Name	
Date	
Capacity	

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 14) Didier Autard			
Post town	<b>Lewisham</b>	Postcode	<b>se136jz</b>
Telephone number (if any)	07707072324		
Your e-mail address (Required) didier@firkinbrewery.com			

## Notes for Guidance – New Premises Licence Applications

2. Describe the premises, for example the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place for consumption of these off-supplies, you must include a description of where the place will be and its proximity to the premises.
  
2. In terms of specific regulated entertainments please note that:
  - Plays: no licence is required for performances between 08:00 and 23:00 on any day, provided that the audience does not exceed 500.
  - Films: no licence is required for 'not-for-profit' film exhibition held in community premises between 08.00 and 23.00 on any day provided that the audience does not exceed 500 and the organiser (a) gets consent to the screening from a person who is responsible for the premises; and (b) ensures that each such screening abides by age classification ratings.
  - Indoor sporting events: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000.
  - Boxing or Wrestling Entertainment: no licence is required for a contest, exhibition or display of Greco-Roman wrestling, or freestyle wrestling between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000. Combined fighting sports – defined as a contest, exhibition or display which combines boxing or wrestling with one or more martial arts – are licensable as a boxing or wrestling entertainment rather than an indoor sporting event.
  - Live music: no licence permission is required for:
    - a performance of unamplified live music between 08.00 and 23.00 on any day, on any premises.
    - a performance of amplified live music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
    - a performance of amplified live music between 08.00 and 23.00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.
    - a performance of amplified live music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
    - a performance of amplified live music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital.
  - Recorded Music: no licence permission is required for:
    - any playing of recorded music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
    - any playing of recorded music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
    - any playing of recorded music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school proprietor or (iii) the health care provider for the hospital.
  - Dance: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000. However, a performance which amounts to adult entertainment remains licensable.

- Cross activity exemptions: no licence is required between 08.00 and 23.00 on any day, with no limit on audience size for:
    - any entertainment taking place on the premises of the local authority where the entertainment is provided by or on behalf of the local authority;
    - any entertainment taking place on the hospital premises of the health care provider where the entertainment is provided by or on behalf of the health care provider;
    - any entertainment taking place on the premises of the school where the entertainment is provided by or on behalf of the school proprietor; and
    - any entertainment (excluding films and a boxing or wrestling entertainment) taking place at a travelling circus, provided that (a) it takes place within a moveable structure that accommodates the audience, and (b) that the travelling circus has not been located on the same site for more than 28 consecutive days.
3. Where taking place in a building or other structure please tick as appropriate (indoors may include a tent).
  4. For example the type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.
  5. For example (but not exclusively), where the activity will occur on additional days during the summer months.
  6. For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.
  7. Please give timings in 24 hour clock (e.g. 16.00) and only give details for the days of the week when you intend the premises to be used for the activity.
  8. If you wish people to be able to consume alcohol on the premises, please tick 'on the premises'. If you wish people to be able to purchase alcohol to consume away from the premises, please tick 'off the premises'. If you wish people to be able to do both, please tick 'both'.
  9. Please give information about anything intended to occur at the premises or ancillary to the use of the premises which may give rise to concern in respect of children, regardless of whether you intend children to have access to the premises, for example (but not exclusively) nudity or semi-nudity, films for restricted age groups or the presence of gaming machines.
  10. Please list here steps you will take to promote all four licensing objectives together.
  11. The application form must be signed.
  12. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
  13. Where there is more than one applicant, each of the applicants or their respective agent must sign the application form.
  14. This is the address which we shall use to correspond with you about this application.

• **Entitlement to work/immigration status for individual applicants and applications from partnerships which are not limited liability partnerships:**

A licence may not be held by an individual or an individual in a partnership who is resident in the UK who:

- does not have the right to live and work in the UK; or
- is subject to a condition preventing him or her from doing work relating to the carrying on of a licensable activity.

Any premises licence issued in respect of an application made on or after 6 April 2017 will become invalid if the holder ceases to be entitled to work in the UK.

Applicants must demonstrate that they have an entitlement to work in the UK and are not subject to a condition preventing them from doing work relating to the carrying on of a licensable activity. They do this by providing with this application copies or scanned copies of the following documents (which do not need to be certified).

### **Documents which demonstrate entitlement to work in the UK**

- An expired or current passport showing the holder, or a person named in the passport as the child of the holder, is a British citizen or a citizen of the UK and Colonies having the right of abode in the UK [please see note below about which sections of the passport to copy].
- An expired or current passport or national identity card showing the holder, or a person named in the passport as the child of the holder, is a national of a European Economic Area country or Switzerland.
- A Registration Certificate or document certifying permanent residence issued by the Home Office to a national of a European Economic Area country or Switzerland.
- A Permanent Residence Card issued by the Home Office to the family member of a national of a European Economic Area country or Switzerland.
- A **current** Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder indicating that the person named is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK.
- A **current** passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.
- A **current** Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A **full** birth or adoption certificate issued in the UK which includes the name(s) of at least one of the holder's parents or adoptive parents, **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A birth or adoption certificate issued in the Channel Islands, the Isle of Man or Ireland **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A certificate of registration or naturalisation as a British citizen, **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A **current** passport endorsed to show that the holder is allowed to stay in the UK and is currently allowed to work and is not subject to a condition preventing the holder from doing work relating to the carrying on of a licensable activity.
- A **current** Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder which indicates that the named person can currently stay in the UK and is allowed to work relation to the carrying on of a licensable activity.

- A **current** Residence Card issued by the Home Office to a person who is not a national of a European Economic Area state or Switzerland but who is a family member of such a national or who has derivative rights or residence.
- A **current** Immigration Status Document containing a photograph issued by the Home Office to the holder with an endorsement indicating that the named person may stay in the UK, and is allowed to work and is not subject to a condition preventing the holder from doing work relating to the carrying on of a licensable activity **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A Certificate of Application, **less than 6 months old**, issued by the Home Office under regulation 17(3) or 18A (2) of the Immigration (European Economic Area) Regulations 2006, to a person who is not a national of a European Economic Area state or Switzerland but who is a family member of such a national or who has derivative rights of residence.
- Reasonable evidence that the person has an outstanding application to vary their permission to be in the UK with the Home Office such as the Home Office acknowledgement letter or proof of postage evidence, or reasonable evidence that the person has an appeal or administrative review pending on an immigration decision, such as an appeal or administrative review reference number.
- Reasonable evidence that a person who is not a national of a European Economic Area state or Switzerland but who is a family member of such a national or who has derivative rights of residence in exercising treaty rights in the UK including:-
  - evidence of the applicant's own identity – such as a passport,
  - evidence of their relationship with the European Economic Area family member – e.g. a marriage certificate, civil partnership certificate or birth certificate, and
  - evidence that the European Economic Area national has a right of permanent residence in the UK or is one of the following if they have been in the UK for more than 3 months:
    - (i) working e.g. employment contract, wage slips, letter from the employer,
    - (ii) self-employed e.g. contracts, invoices, or audited accounts with a bank,
    - (iii) studying e.g. letter from the school, college or university and evidence of sufficient funds; or
    - (iv) self-sufficient e.g. bank statements.

Family members of European Economic Area nationals who are studying or financially independent must also provide evidence that the European Economic Area national and any family members hold comprehensive sickness insurance in the UK. This can include a private medical insurance policy, an EHIC card or an S1, S2 or S3 form.

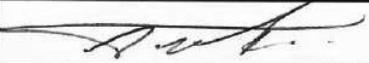
**Original documents must not be sent to licensing authorities.** If the document copied is a passport, a copy of the following pages should be provided:-

- (i) any page containing the holder's personal details including nationality;
- (ii) any page containing the holder's photograph;
- (iii) any page containing the holder's signature;
- (iv) any page containing the date of expiry; and
- (v) any page containing information indicating the holder has permission to enter or remain in the UK and is permitted to work.

**If the document is not a passport, a copy of the whole document should be provided.**

**Part 4 – Signatures** (please read guidance note 11)

**Signature of applicant or applicant's solicitor or other duly authorised agent** (see guidance note 12). **If signing on behalf of the applicant, please state in what capacity.**

<b>Declaration</b>	<ul style="list-style-type: none"><li>• [Applicable to individual applicants only, including those in a partnership which is not a limited liability partnership] I understand I am not entitled to be issued with a licence if I do not have the entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15).</li><li>• The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, if appropriate (please see note 15)</li></ul>
Signature & Print Name	 <b>Didier AUTARD</b>
Date	26/04/2022
Capacity	Director

**For joint applications, signature of 2<sup>nd</sup> applicant or 2<sup>nd</sup> applicant's solicitor or other authorised agent** (please read guidance note 13). **If signing on behalf of the applicant, please state in what capacity.**

Signature & Print Name	
Date	
Capacity	

Signature & Print Name	
Date	
Capacity	

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 14) Didier Autard			
Post town	<b>Lewisham</b>	Postcode	<b>se136jz</b>
Telephone number (if any)	07707072324		
Your e-mail address (Required) didier@firkinbrewery.com			

Below in Black are the conditions offered by the applicant in Part M of the application.

The conditions in Red are our Model conditions taken from our licensing policy that match what was offered by the applicant.

These conditions have all been agreed by the applicant.

- 1 The Licensee shall ensure that there are sufficient and competent staff on duty at the premises, when being used for licensable activities, for fulfilling the terms and conditions of the licence and for preventing crime and disorder. The Licensee shall ensure that all staff will undertake training in their responsibilities in relation to the sale of alcohol, particularly with regard to drunkenness and underage persons. Records will be kept of all relevant records such as risk assessments, appliance checks etc.

Training and supervision of staff to ensure the highest standard of responsibility

Appropriate training and supervision to prevent incidents of public nuisance

All documents of members of staff will be retained for a period of 12 months post termination of employment and will be made available to the police, immigration and/or Licensing officers upon reasonable request

The premises Licence Holder and/or Designated Premises Supervisor shall keep up to date policies and staff training records in relation to the following: Requirements of the challenge 25 scheme, drugs, identification & recognition of drunks, identification recognition and responsibilities of dealing with vulnerable persons and the correct procedures to be followed when refusing service regular training must be provided to all staff at least every six months, a record of the training will be maintained for at least twelve months

- Effective and responsible management of the premises
- Patrons carrying opened or sealed containers will not be admitted on the premises
- Bottle bins for collection and empty bottles not accessible to the public
- Provision of outside lighting

- 2 CCTV – - A continuous and accurate record of all patrons in the venue to be kept where appropriate

The premises shall install and maintain a comprehensive CCTV system. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police or authorized officer throughout the preceding 31 day period. The CCTV system should be updated and maintained according to police recommendations.

A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open to the public. This staff member must be able to show a Police or authorized council officer recent data or footage with the absolute minimum of delay when requested.

The CCTV must cover all areas of the venue that the public have access to. There should be no obstructions to any internal camera that creates areas that are not wholly covered by CCTV, apart from within toilet cubicles and directly covering men's urinals.

- Ensure a capacity limit of 200

- Only responsible drink promotions to take place and the dps or a personal license holder to be present for such promotions.

3 A zero tolerance on drugs policy

To maintain a refusal register outlining any refused sales or admissions

An incident log shall be kept at the premises, and made available on request to an authorized Local Authority or Police Officer, which will record the following:

- a) All crimes reported to the venue.
- b) All ejections of patrons.
- c) Any complaints received.
- d) Any incidents of disorder.
- e) All seizure of drugs or offensive weapons.
- f) Any faults in the CCTV system.
- g) Any refusal of the sale of alcohol.
- h) Any visit by a relevant authority or emergency service.

Suitable risk assessments

- Provision of a sufficient amount of people employed to ensure the safety of the premises and all patrons

- The implementation of crowd management measures

- Regular testing (and certification) of procedures and appliances

- Adequate and appropriate first aid equipment and materials to be available

- In the absence of adequate daylight suitable and sufficient artificial lighting is provided to all areas accessible to the public

- Free drinking water available at all times

- Installation of sound proofing

- Positioning of external lighting to not affect the public

- Regular collection and disposal of litter

- Noise management plan – do you have one you can send over

- Prominent, clear and legible notices are displayed at all exits requesting patrons to respect the needs of local residents and to leave the premises and the area quietly

- For the final hours of opening the music is reduced in volume and is discernibly quieter.

- The playing of live or recorded music in garden or outside seating areas of the premises is not permitted after 23:00

- Sufficient number of staff to secure the protection of children from harm

- Appropriate instruction, training and supervision to all staff in respect to determining the age of a customer

- THINK 25 Policy in place - **A proof of age scheme, such as Challenge 25, must be operated at the premises where the only acceptable forms of identification are (recognized photographic identification cards, such as a driving license or passport / Holographical marked PASS scheme identification cards) appropriate signage must be displayed.**

- Only acceptance of accredited proof of age cards, driver's license or passport

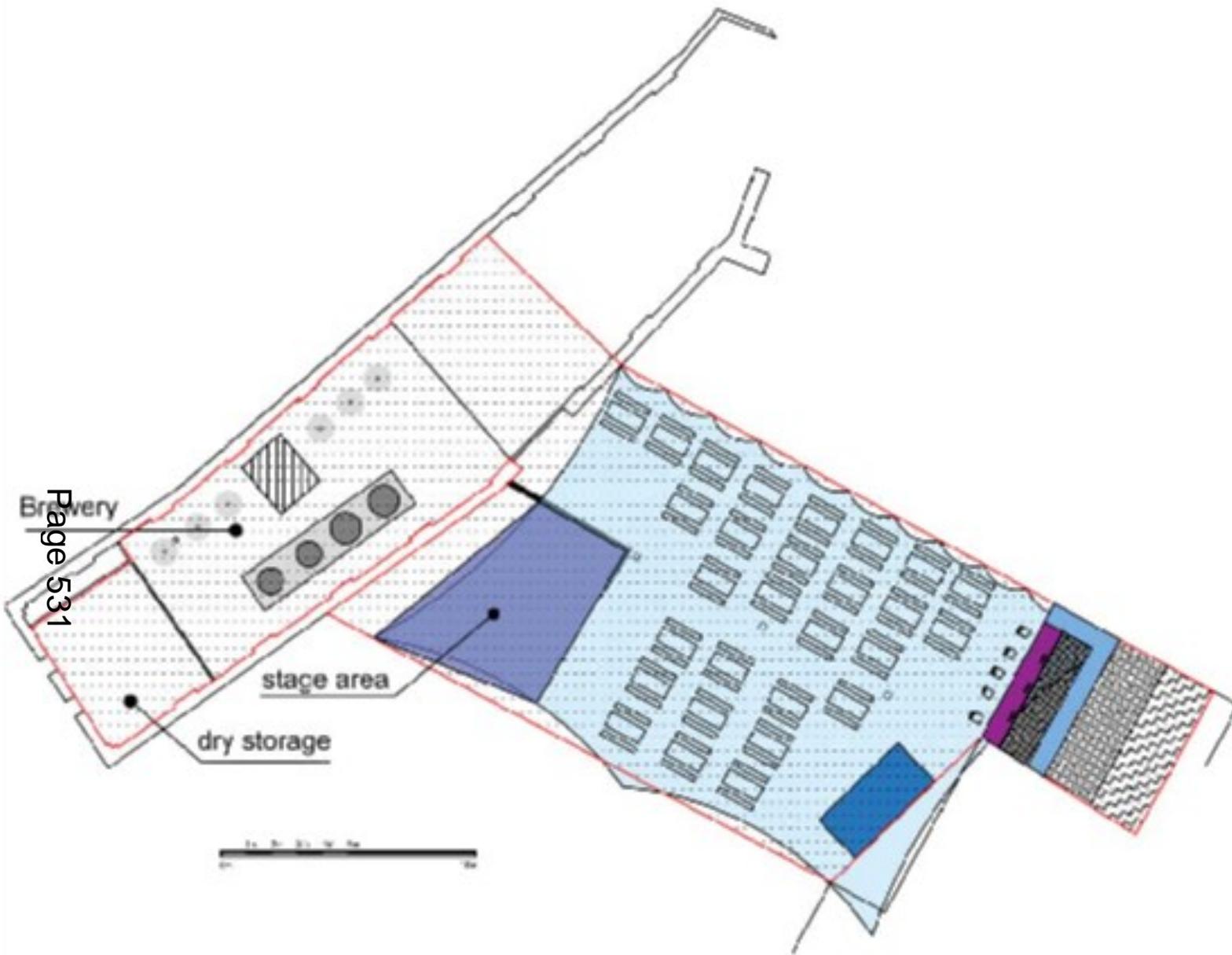
- Limitations on the hours when U18's may be on the premises –

- Imposition of requirements for children to be accompanied by an adult

**Unaccompanied children are not permitted on the premises.**

**No children permitted on the premises whilst adult entertainment is in progress.**

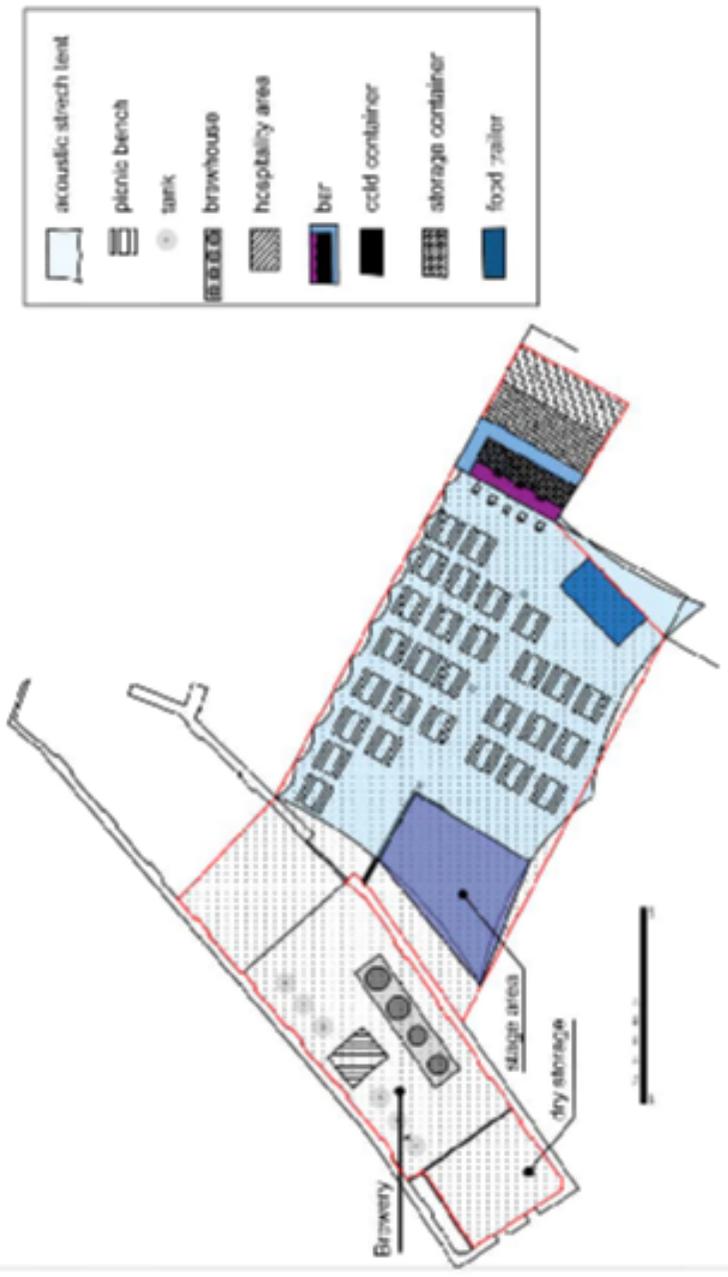
**No children on the premises after 21:00hrs**



	acoustic stretch tent
	picnic bench
	tank
	brewhouse
	hospitality area
	bar
	cold container
	storage container
	food trailer

EXISTING FLOOR AREA	sq.m
Brewery area	79.23
Brewery hospitality drinking area	4.8
Tert area	
Bar area	17.11
Cold container area	12.39
Storage container area	12.39
Food trailer	

WHITBURN ROAD





**PL - Lewisham Borough**

9 Holbeach Road,  
Catford. SE6 4TW

Telephone: 07795 801039  
Email: Simon.Butler@met.police.uk  
www.met.police.uk

Your ref:

Our ref:

25<sup>th</sup> May 2022

Dear Licensing Team,

Police have received an Application for a New Application at The Firkin Brewery, 15 Whitburn Road, SE13 7UQ.

Police wish to object to this New Application on ground of Prevention of Public Nuisance, Prevention of Crime and Disorder and Protection of Public Safety. The New Application was submitted to me on 27/04/2022, and I have been informed that Representations need to be in by 25<sup>th</sup> May 2022.

I sent a proposed draft of Licensing Conditions to the applicant to read through and on not hearing any reply I sent a follow up e-mail and both have now been ignored, so no agreement has been put in place between the Applicant and Police.

The applicant Mr Didier Autard has never been back in touch since our conversation face to face during a visit. He was e-mailed, twice and has never been back in touch. I have proposed conditions to Mr Autard and no conditions have been agreed.

Therefore, Police wish to Object to the Application in order to uphold licensing Objectives.

Police not having heard any reply back formally in writing in an agreement with the new Proposals means that there is NO agreement in place and therefore Consider that the applicant has NOT agreeing to proposals offered.

It is the Consideration of the Metropolitan Police that every effort has been made to contact, discuss and agree operating conditions for the Licence in line with upholding Licensing Objectives for the borough.

Police now wish to Object to this premises opening and without proper controls around operating procedures in place and it is believed that would leave sales of Alcohol being delivered to the Public without any controls in place and that would be unacceptable.

In order to protect Licensing Objective Police will not support any application that cannot put some kind of assurances in place in considering the public and community in which it's based and working from.

The Applicant has failed to agree terms at a time when the applicant is expected to engage with all authorities in relations to its operating procedures.

Police Objection is on the grounds of No Agreement being in place between the Applicant and the Police, due to a lack of a reply from the applicant.

The Failing of the applicant to engage and even reply to basic communications of Telephone calls and e-mails, show that they cannot be serious in opening up a line of communication with any authorities in order to sort out any possible future running problems it may come across.

I have concerns that a premises will open up and therefore have No restrictions on its operating conditions and therefore would give Police serious concerns over upholding any Licensing Objectives for the Borough.

Any premises to be open and serving Alcohol to the public requires control and agreed terms in which to supply Alcohol to the public in a responsible way. This is what the Public would expect and deserve and measures are put in place in order to protect the public and staff alike when a business is operating.

In the possibility that any Crime being committed in the premises it would also prevent any detection or evidence for any form of Prosecution in the light of any criminal activity.

There would also be protection of staff and members of the public to consider with this too.

I object on grounds of Crime and Disorder, Prevention of Public Nuisance and Protection of Public Safety.

For your consideration

Regards

Simon Butler

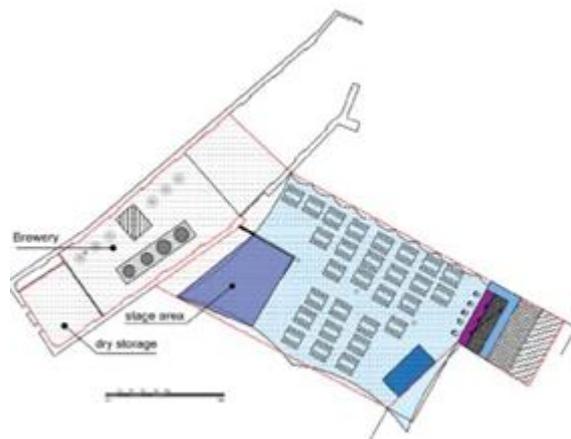
Police Licensing Officer for Lewisham Borough

9 Holbeach Road, Catford SE6 4TW

I have now had an opportunity to review the history in a little more detail (see attached),



With regards to the brewery, this was granted planning permission (DC/21/121516) in October 2021, however the brewery is only the red outlined area above and not the area they have indicated on their licencing application (see below). The B2 use class for micro-brewery includes no provision for a drinking establishment or outdoor seated area, they do not have planning permission for this. We would be concerned if this did become a drinking establishment as we have no planning controls over it.

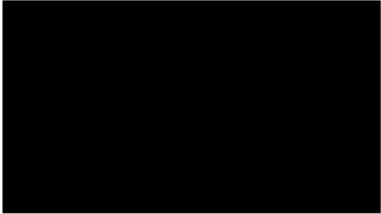


To conclude, we (planning) have an objection to the proposals for a drinking establishment and associated outdoor area. It would need planning permission prior to any licencing being granted.

Thomas Simnett (he/him)

Planning Officer  
Development Management  
Housing, Regeneration and Public Realm Directorate  
Lewisham Council

Direct line: 020 8314 6284 (ext. 46284)



Date: 23/05/22

Crime Enforcement and Regulation Service (Licensing Authority)  
9 Holbeach Road  
London  
SE6 4TW

**Objection to Firkin Brewery licence application for new premises at  
15 Whitburn Road, London SE13 7UQ**

To whom it may concern

The Firkin Brewery has applied for a licence to play recorded and live music outside and inside the premises at 15 Whitburn Road, SE13 7UQ.

My husband and I live on Whitburn Road and object to the granting of this licence on the grounds that it is contrary to at least one of the objectives of your licensing policy section 1.7.

- Protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licensed premises.

The Firkin Brewery has already proved itself to be a disrespectful and irresponsible neighbour and the granting of this licence would make matters worse.

- We understand that the new space is an extension of the existing garden of the Fox & Firkin bar on Lewisham High Street, is around 10 metres behind my garden.
- We already have to suffer persistent loud music and customer rabble most weekends from the existing premises which is a good deal further away than 10 metres. Music being played outside – and inside – at the end of our garden all weekend would be unbearable.
- The music sometimes starts around lunchtime and continues until midnight or even later.
- This situation substantially interferes with the enjoyment of our home and garden, which we believe makes the noise count as a statutory nuisance. We are rarely able to enjoy peace and quiet in our garden in the afternoons and evenings at the weekends.
- Since 2017 we have submitted several complaints to Lewisham Council about this.
- To aid your understanding of the scale of the issue, we have included our diary of noise nuisance from the Fox & Firkin from the summer of 2021. This was shared with the Noise Nuisance team at the time.

We also lodged an objection to the Firkin Brewery planning application (ref: DC/21/121516) citing the company's disrespect for neighbours, but that was ignored. We want to point out that in this application, no mention was made of the intention to use the space for entertainment purposes, outside or inside.

We believe this to be a serious omission as it gives no indication of the intent to use these premises an entertainment venue in addition to a micro-brewery. This intention is now clear from the licensing application which states: The premises will be the tap room for firkin brewery limited. it will consist of an outdoor area located on the east side of the firkin brewery accessible via the roller shutter located to the east of the firkin brewery. The outdoor Space will consist of serving bar and a large marquee with table and chairs where light entertainment will be provided.

The building is situated at the end of our garden, therefore loud music being played at any time at these new premises, regardless of whether it is inside or outside, and the noise from people gathering at the serving bar, will have an increased negative effect on us and our welfare.

Another of your licensing policy objectives is:

- Encouraging greater community involvement in licensing decisions and giving local residents the opportunity to have their say regarding licensing decision that may affect them.

We are members of the community and believe it would be totally unacceptable for Lewisham Council to allow residents' lives to be further disrupted by the granting of a licence for the Firkin Brewery to play music outside and inside, during the day and in the evening.

In summary, the Firkin Brewery is an irresponsible neighbour and has shown contempt for people living nearby. Persistent loud music from the existing venue has, for the past five years or so, been detrimental to our enjoyment of our home and garden, and to our general wellbeing. To grant a licence to permit what, in our opinion, amounts to a doubling of the level of noise nuisance in the area would be unreasonable and demonstrate a general disregard for residents.

I trust the Licensing Committee will consider the issues set out above when deciding whether to grant this licence application.

Yours sincerely



### Log of noise from the Fox & Firkin, summer 2021

June 11	music until at least 10:45pm
June 12	music until at least 10:45pm
June 13	football. Music starts around 4.30pm, heard beat indoors. Around 11pm, can't hear music. People in garden are loud.
June 18	Football. (loud, but willing to put up with this as it's a special occasion)
June 19	Music. Lots of noise from customers until around midnight. Being in my garden feels like being in a pub garden
June 20	Music from around 6pm. Quiet by 10pm.
June 22	football. Rowdy crowd until around 11pm
June 23	music starts around 6pm. Not terribly loud or intrusive, but after a day's work I'd like to be able to sit in my garden to get some peace and quiet. I can't. I'm forced to hear music I don't want to listen to.
June 25	Music from about 6.30pm. Still going at 10:30 and sounds/feels like sitting in a pub garden not a private garden. Still rabble at 11:20.
June 26	Music starts about 6pm – not overly loud, still intrusive. Around 10pm hear rowdy rabble which is still going on at around 12:15am
June 29	Football. A lot of noise from the crowd. (willing to accept as it's a special tournament)
July 02	10:30pm really heavy beat, thumping, heard indoors and rabble of crowd.
July 09	music going on at midnight. Not overly loud. Noise , chanting and singing from customers.
July 16	6pm – music, not loud. 9pm music is louder - at an unacceptable level. I do not want to hear it.
July 17	11pm noisy crowd and music
July 18	around 4pm, big band sound. Don't know how long that went on.
July 23	Early evening OK. 10.30pm, loud music and raucous crowd. 12:30am can still hear music and a very noisy crowd
July 24	music throughout the afternoon. 6.30pm very loud music started. 10pm really noisy crowd, shouting, sounds like a live show.
July 25	evening – loud music, can hear the bass beat indoors
July 31	Music not overly loud but really heavy beat. Noisy crowd.
August 01	Brass band! Length of playing unknown.
August 06	7.30pm music, but not overly loud

August 07	2.30pm loud music with heavy beat/bass heard indoors. Noticeably louder at 3.15pm and it went on.
August 14	Loud music all afternoon and into the evening. Particularly annoying as I was trying to enjoy time in my garden with a friend.
August 15	about 5pm loud music. Can hear indoors.
August 16	evening – music, not overly loud
August 21	3.30pm loud music. &.30pm much louder and very heavy beat.
August 27	5pm (ish) – loud music while I’m still working, only for 30 mins or so. 7.30pm – music much louder, heard indoors, thumping all evening. Around 10pm still very loud music. Not known how long that went on.
August 28	around 4.30pm, started hearing the beat of music indoors. 7.30pm still loud music. 8.30pm really fed up with hearing the beat while watching TV.
Aug 29	2pm really loud beat, heard indoors, and music. 4.45pm beat and music noticeably louder. Thumping music – I can feel the noise! - until 9pm when it was turned down a little. Still going at 10.30pm.

## Proposed Conditions for The Firkin Brewery, 15 Whitburn Road, SE13 7UQ

Sent by Simon Butler MPS – the ones in Green are not agreed by the applicant.  
Everything in Black is the same as the offered conditions.

1/ The premises shall install and maintain a comprehensive CCTV system. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police or authorized officer throughout the preceding 31 day period. The CCTV system should be updated and maintained according to police recommendations.

2/ A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open to the public. This staff member must be able to show a Police or authorized council officer recent data or footage with the absolute minimum of delay when requested.

3/ Cctv must cover all licensable area submitted on the plan during application, must be the same quality inside and it is outside the premises, so must be able to operate in lower light levels.

4/ The CCTV must cover all areas of the venue that the public have access to. There should be no obstructions to any internal camera that creates areas that are not wholly covered by CCTV, apart from within toilet cubicles and directly covering men's urinals.

5/ Any outside area and smoking area must be covered by CCTV that is to the same standards as the internal CCTV system.

6/ The premises shall prominently display signage at all entrances informing customers:

-

- Challenge 25 is in this Premises.
- All persons entering the premise may be requested to produce identification,
- Police may be called if drugs or weapons are found
- CCTV is in operation throughout this premises and is made available to the police.
- Please leave quietly and respect our neighbours and our Community on display in the premises, garden and any marque.

7/ A minimum of 2 SIA registered door staff, of which one (1) **must be female** and are all employed by an Accredited Contractor Scheme (ACS) registered company. They must be on duty when the Premises is open beyond 2330hrs, and on New Year and at seasonal times. Starting time from 21:00hrs until 15 minutes after conducting licensable activities, private events and after the last customer leaving.

**This is not always easy but certainly part of our plan**

8/ A register of security personnel employed on the premises shall be maintained in a legible format and made available to police upon reasonable request. The register should be completed by the DPS/ duty manager/ nominated staff member at the commencement of work by each member of security staff and details recorded should include; full name, SIA badge number, time of commencement and completion of duties. The security operative should then sign their name.

9/ All staff engaged outside the entrance to the premises, or supervising or controlling queues, shall wear obvious Identification and accreditation and be clearly identifiable as SIA when seen on Cctv camera recordings.

10/ All door staff / security must report all criminality to the management and record this in the incident book that is kept on site at all times. The license holder/DPS shall ensure that capacity is kept to under 200 limit.

11/ A refusals log is to be kept on site at the premises and must be signed off by the DPS/PLH on a monthly basis to show refusals are being kept up to date.

12/ In the final hour of opening time the music levels should be reduced to assist a wind down period and aid dispersal and encourage drinking up times.

13/ The PLH / DPS shall ensure that the capacity is kept to under 200 persons limit as stated on the application submitted.

14/ Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.

15/ All outside areas should use Polycarbon/ Plastic drinking vessels and no glasses or glass bottles should be used in the outside area. All must be decanted at the point of sale.

I think this is quite unreasonable. We already use polycarbs for the busier events but when it's quieter and the bar is operating as a 'cocktail bar' I think we should have the right to use glass.

16/ Unaccompanied children are only permitted with a parent or guardian.

17/ An incident log shall be kept at the premises, and made available on request to an authorized officer of the Council or the Police, which will record the following:

- (a) All crimes reported to the venue
- (b) All ejections of patrons
- (c) Any complaints received
- (d) Any incidents of disorder
- (e) All seizures of drugs or offensive weapons
- (f) Any faults in the CCTV equipment.
- (g) Any refusal of the sale of alcohol (this will be recorded electronically)
- (h) Any visit by a relevant authority or emergency service.
- (i) advertise a number for complaints from the public and all complaints to be recorded in the incident book.

18/ A record book of banned individuals shall be held by the SIA registered door supervisors at the front door and will be made available to Police and Council upon request.

We can certainly endeavour to do this but it is not always going to be easy. We can pull images from cctv as best we can but will not always be doable.

19/ The premises shall have a written dispersal policy in order to limit the noise disturbances to residents and neighbours. All door staff shall be knowledgeable of this policy and able to enforce it.

20/ The license holder shall provide information on request for customers with a hackney carriage and/or private carriage contact numbers to assist with egress and getting home safely.

21/ A minimum of two staff should be on site who are trained in schemes such as Ask Angela, WAVE, and around victim vulnerability and people safety and be on site as welfare officers for customers.

22/ A noise limiter must be fitted and maintained within the premises. The level of this meter must be set in accordance with required legislation and standards by a qualified sound engineer, as so not to cause a noise nuisance. The limiter must be sealed in such a way that no unauthorised person can tamper with it. All amplified music played at the premises must be passed through the noise limiter. An annual calibration of the noise limiter must take place by a qualified sound engineer and recorded in the incident book.

23/ An appropriately qualified acoustic engineer\* must be engaged to carry out an acoustic report for both sound insulation, egress and dispersal with appropriate recommendations as to how statutory nuisance can be mitigated appropriately, within 1 month of the licence being granted. A copy of the report must be sent to the licencing authority within 2 months of the licence grant date. Any recommendations to improve noise management to ensure a nuisance does not occur to neighbouring properties must be implemented with 3 months of the licence grant date.

\*defined as a member of the Association of Noise Consultants

24/ Any outside area/ garden must close at 2200hrs to reduce noise to the residential properties nearby.

25/ All smokers must only use garden area for smoking after 2200hrs to remove noise issues for residents.

26/ A Maximum of 10 persons at any one time will be permitted to be using the smoking area at any one time.

All of these clauses don't seem reasonable given that we have applied to serve alcohol at the outside bar until 1am (on weekends)

27/ All areas outside that smokers use are to be provided with waste bins suitable for Cigarette debris to collect any ash and cigarette butts, this will include staff monitoring these and ensuring they are regularly emptied and disposed of.

28/ All deliveries and restocking in Withburn Road must take place between 0700hrs – 2300hrs to limit local residents disturbances.