



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

Local Area Risk Assessment

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| 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 Kiernon – Head of Compliance |
| Date of Assessment: | 03.09.2021 |
| Review Date: | On opening in conjunction with local staff |

Local Area Profile Risk Factors

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| 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 |
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| <p>Protecting children and other vulnerable people from being harmed or exploited by gambling</p> | <p>Unemployment: 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>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%.</p> <p>Schools and Education 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>Age Verification <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots 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> |

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| <p>Catford County School, Engleheart Road, SE6 2HR</p> <p>Little Elms Daycare Nursery Catford Green, Adenmore Road, SE6 4BS</p> <p>Holy Cross Primary School, Culverley Road, SE6 2LD</p> <p>Prendergast Ladywell School, Manwood Road, SE4 1SA</p> <p>First Fruits Saturday School, 265 Brownhill Road, SE6 1AE</p> <p>Monkey Puzzle Day Nursery Catford, 25 Bromley Road, SE6 2TS</p> <p>Little Elms Daycare Nursery Catford Green, Adenmore Road, SE6 4BS</p> <p>Catford College, 3 Rosenthal Road, SE6 2BY</p> <p>Pavilion Nursery Catford Ltd, 1st floor, Catford Cricket & Sports Club, Penerley Road, SE6 2LQ</p> <p>St George's Preschool, Catford, 6 Elm Lane, SE6 4LB</p> <p>Rathfern Primary School, Rathfern Road, SE6 4NL</p> <p>The Family Learning School, 47 Rushey Green, SE6 4AS</p> <p>Sandhurst Primary School, Minard Road, SE6 1NW</p> <p>Community Centres and Youth Centres</p> <p>The Point Catford, 401 Lewisham High Street, SE13 6NZ</p> <p>Lewisham Irish Centre, 2A Davenport Road, SE6 2AZ</p> <p>Lewisham Local, Unit C, Place/Ladywell, 261 Lewisham High St, SE13 6NJ</p> <p>Hartley Hall, Catford, London SE6 2JS</p> <p>St Mary's Centre Lewisham, 37 Ladywell Road, SE13 7UT</p> <p>Abbotshall Healthy Lifestyle Centre, Abbotshall Road, SE6 1SQ</p> <p>Lewisham Seventh-Day Adventist Church & Community Hall, 434 Lewisham High St, SE13 6LJ</p> <p>Rural Urban Synthesis Society (RUSS), 12 Church Grove, SE13 7UU</p> <p>Parks, play grounds and sports/leisure facilities</p> <p>Mountsfield Park, The Lodge, Stainton Road, SE6 1AN</p> <p>Mountsfield Park Playground, Mountsfield Park, Stainton Road, SE6 1AN</p> <p>Lewisham Park, 18 Lewisham Park, SE13 6QZ</p> <p>Ladywell Fields, 126 Ewhurst Road, SE4 1SD</p> <p>Ladywell Fields Adventure Playground, End of road, Malyons Rd, SE13 7XE</p> <p>Blythe Hill Fields, 42 Blythe Hill Lane, SE6 4XJ</p> <p>Riverview Walk & River Pool Linear Park, London SE6 4PQ</p> <p>Vulnerable and addiction support services</p> <p>Lewisham Community Team For Adults With Learning Disabilities, 19-21 Brownhill Rd, SE6 2HG</p> <p>Quo Vadis Trust, 92 Brownhill Rd, SE6 2EW</p> <p>Foundation 66, 92 Bromley Rd, SE6 2UR</p> <p>Africa Advocacy Foundation, 76 Elmer Rd, SE6 2ER</p> <p>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>https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</p> <p>Vulnerability</p> <p>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>Homeless shelters and food banks 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 Apex 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>Medical Centres, Care Homes and Mental Health facilities 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 & 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>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as 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>Player Protection <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>Gambling premises</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>Pawnbrokers and Loan Shops</p> <p>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</p> <p>Bus stops and other Transport links</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>Locally Identified Premises</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>Public Houses and Alcohol Licensed Premise</p> <p>A2 Lounge Restaurant & Wine Bar, 77A Rushey Green, SE6 4AF The London & Rye, 109 Rushey Green, SE6 4AF The Jolly Farmers, 354 Lewisham High St, SE13 6LE Fox & 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 & 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>Deprivation</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 & Star, Randlesdown Road, Bellingham, SE6 3BT Riva Lounge & Restaurant, 3-7 Bromley Road, Catford, SE6 2TS</p> | <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging. 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>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i> Merkur Slots Catford is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed. 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. 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. General Crime and Disorder <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i> 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>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p> | <p>Crime statistics: 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>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.</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"> Reducing serious violence amongst those under 25 year old with particular focus on knife enabled crime, child sexual exploitation and domestic abuse. |

- Tackling all strands of violence against women and girls with particular focus on domestic abuse and sexual abuse.
- Preventing hate crime occurring in Lewisham whilst increasing reporting of hate crime and public confidence.
- Preventing vulnerable people from becoming radicalised.
- Delivery of the National Extremism Strategy at a local level.
- 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.

Public Houses and Alcohol Licensed Premise

- A2 Lounge Restaurant & Wine Bar, 77A Rushey Green, SE6 4AF
- The London & Rye, 109 Rushey Green, SE6 4AF
- The Jolly Farmers, 354 Lewisham High St, SE13 6LE
- Fox & 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 & 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

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.

All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.

Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.

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

Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.

Merkur Slots 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.

Anti-social behaviour outside the premise

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

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

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

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

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.

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| | <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p> |
| <p>Ensuring that gambling is conducted in a fair and open way</p> | <p>Bingo/Gaming Machine and Supervision The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</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>Customer Complaints <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> |

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| | | <p>Marketing</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>Places of worship and Religious Buildings</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>Ethnicity and Local Area Demographic</p> <p>Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility</p> <p>Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>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

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| <p>Premise level:</p> | <p>Merkur Slots is a ground floor premises.</p> |
| <p>Premise frontage:</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>Counter Position:</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"> - TITO machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times. |
| <p>Floor layout:</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>Machine Positions:</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>Hidden Areas:</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).

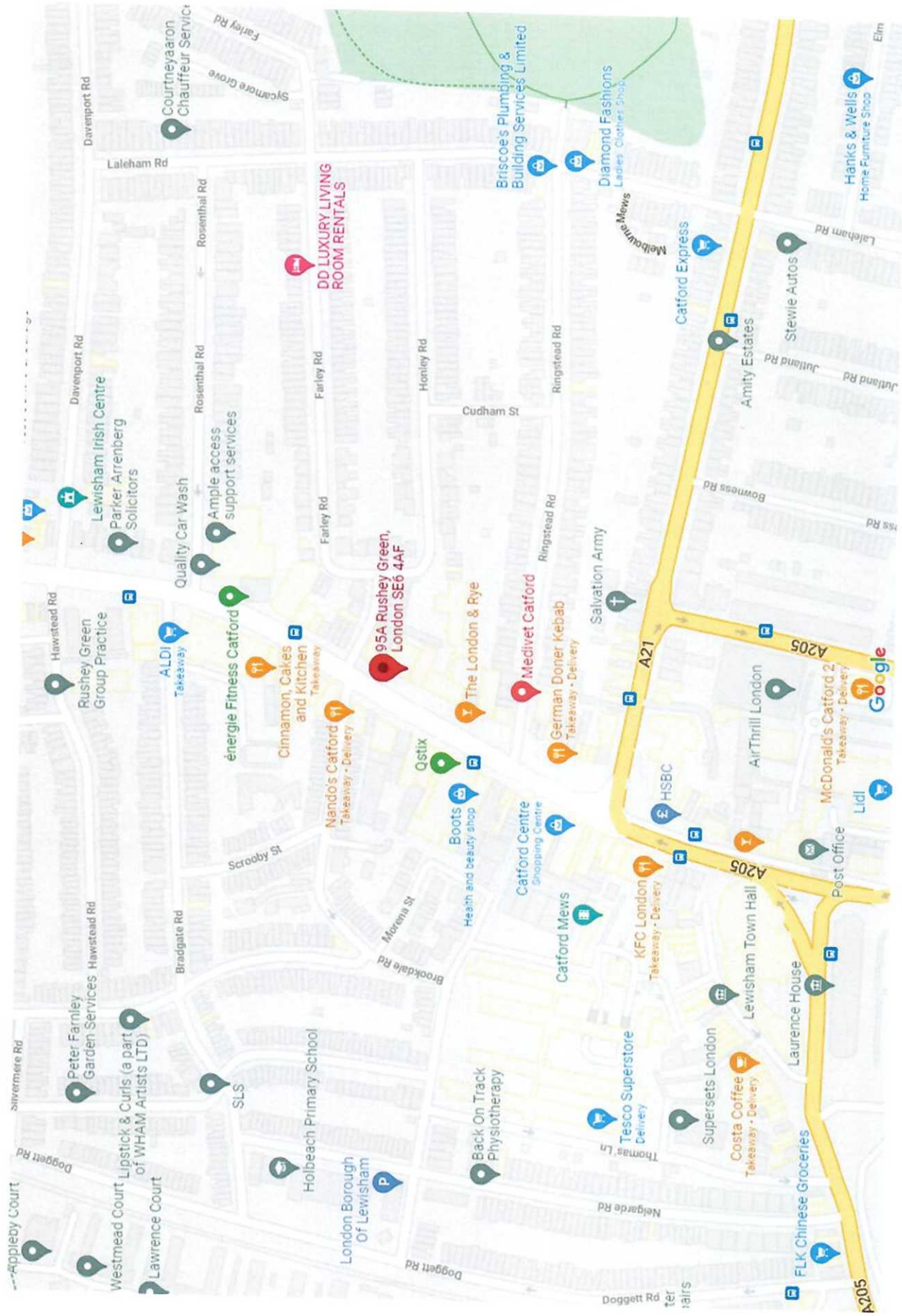
I am an IIA Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries. The last 9 years I have been working solely in the Gambling Industry (Amanda Kiernan, Head of Compliance).

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 being at greater risk of gambling related harm.

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| Assessors Name: | Gill Clulow |
| Signature: |  |
| Date: | 03.09.2021 |

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



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