

**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 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**

### **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 Kaspa's 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 Kaspa's 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. Kaspa's 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 Russey 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 Russey 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

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

**Leveche Associates Ltd**  
Nightingale House  
46-48 East Street  
Epsom  
Surrey KT17 1 HQ

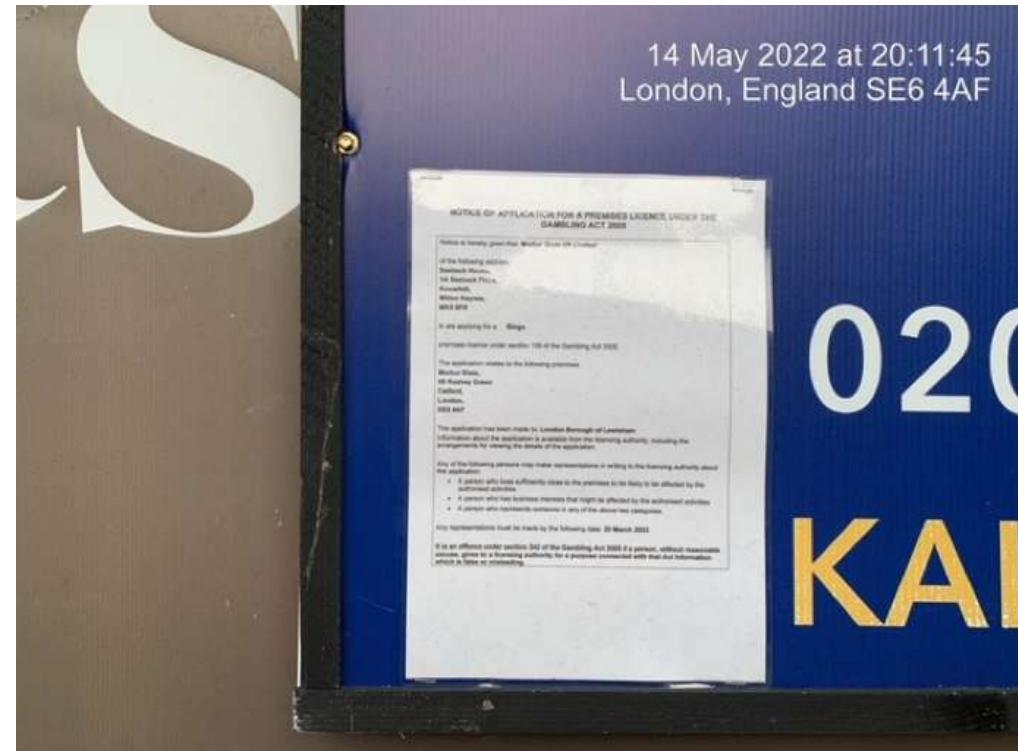
Merkur Slots - 95 Rushey Green, Catford, London. SE6 4AF

14th/15th May 2022



**Image B1**

20:11hrs - Front of 95 Rushey Green Catford



**Image B2**

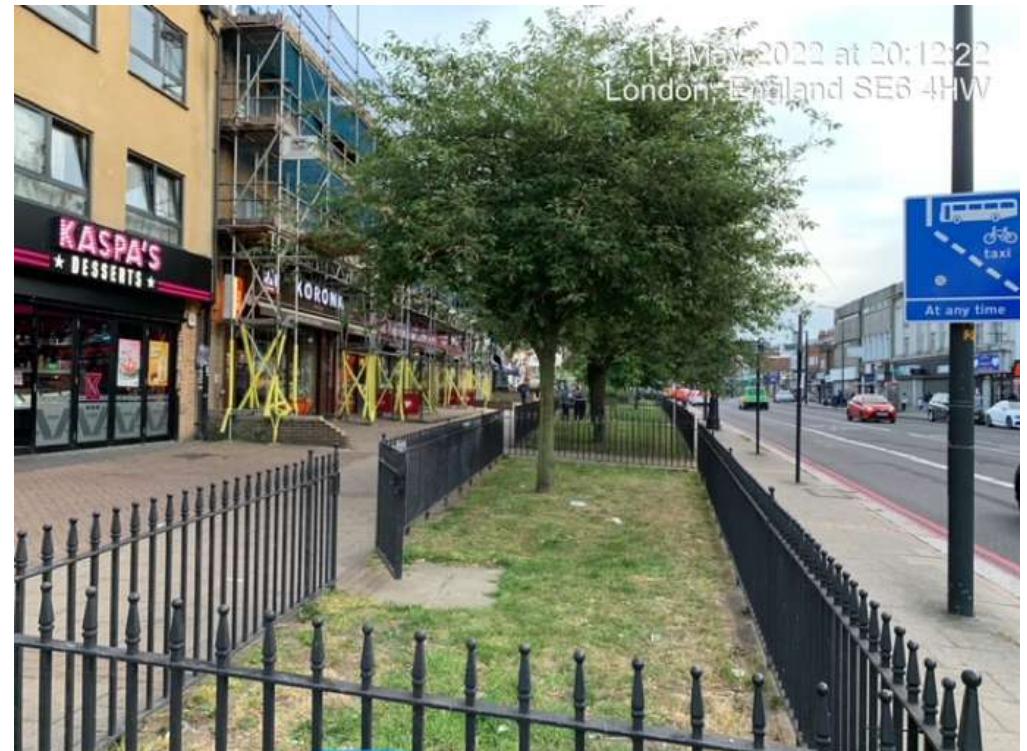
20:11hrs - Notice of Application  
Bingo Premises Licence Gambling Act 2005

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**

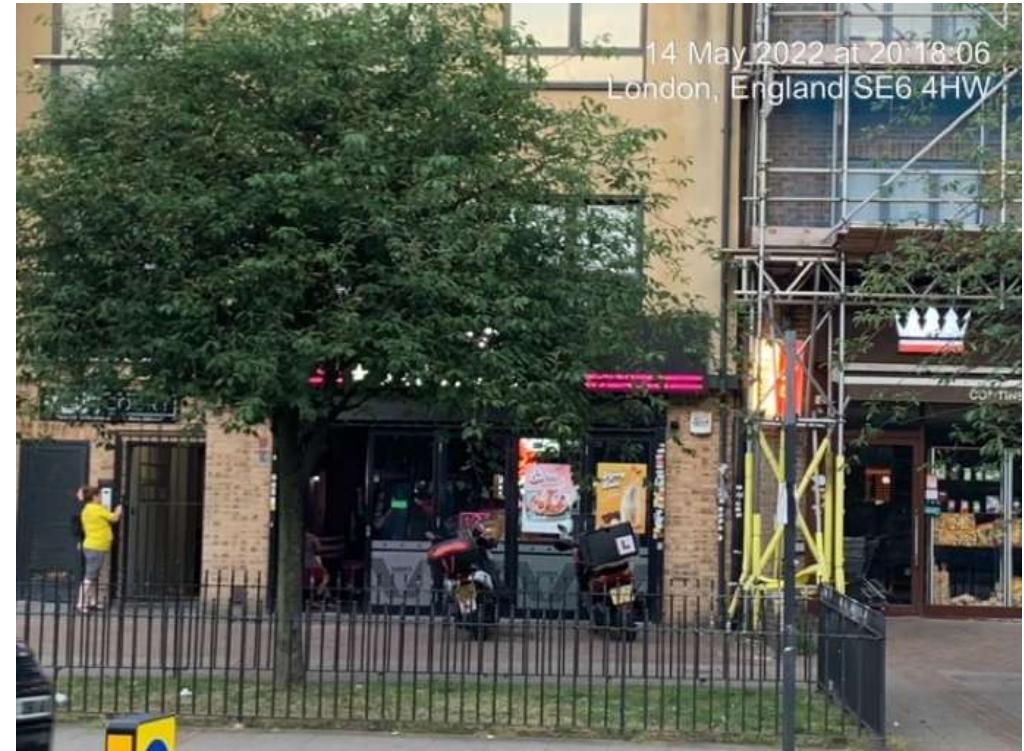
20:12hrs - Opposite 95 Rushey Green looking north

14th/15th May 2022



**Image B7**

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



**Image B8**

20:18hrs - Kaspa's 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

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

14th/15th May 2022



**Image B11**

20:26hrs - Admiral Slots 116 Rushey Green



**Image B12**

20:46hrs - Kaspa's Desserts 97 Rushey Green

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

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

14th/15th May 2022



**Image B17**

22:23hrs - Opposite 95 Rushey Green looking south



**Image B18**

22:26hrs - Rear of 95 Rushey Green

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

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



**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

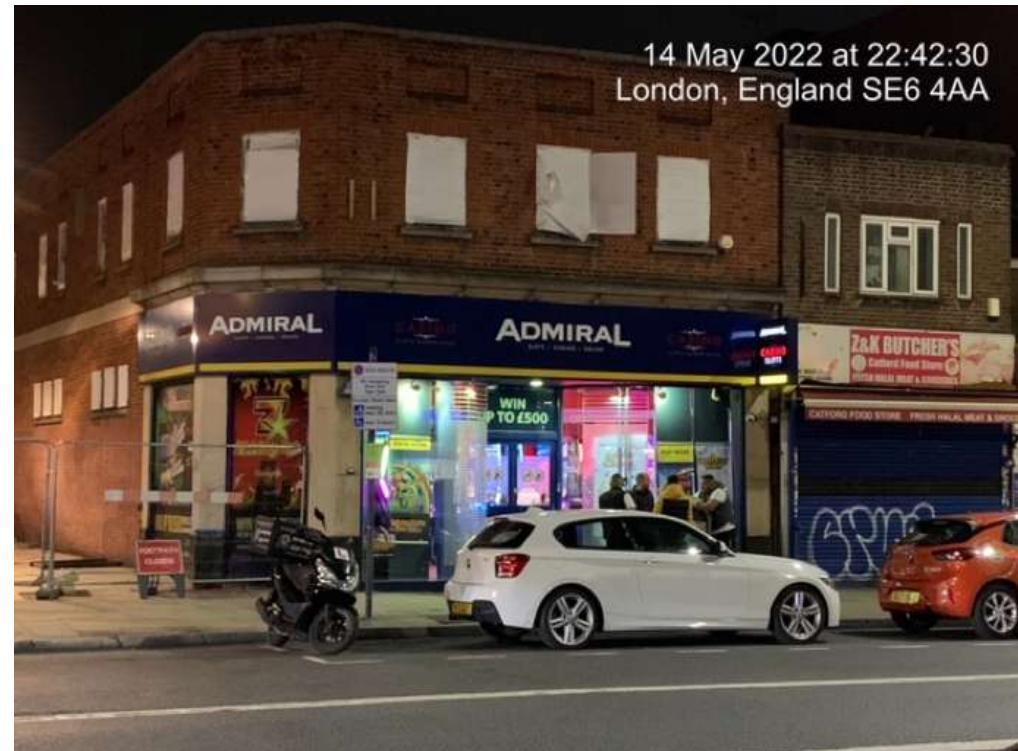
14 May 2022 at 22:34:56  
London, England SE6 4BD



**Image B25**

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

14 May 2022 at 22:42:30  
London, England SE6 4AA



**Image B26**

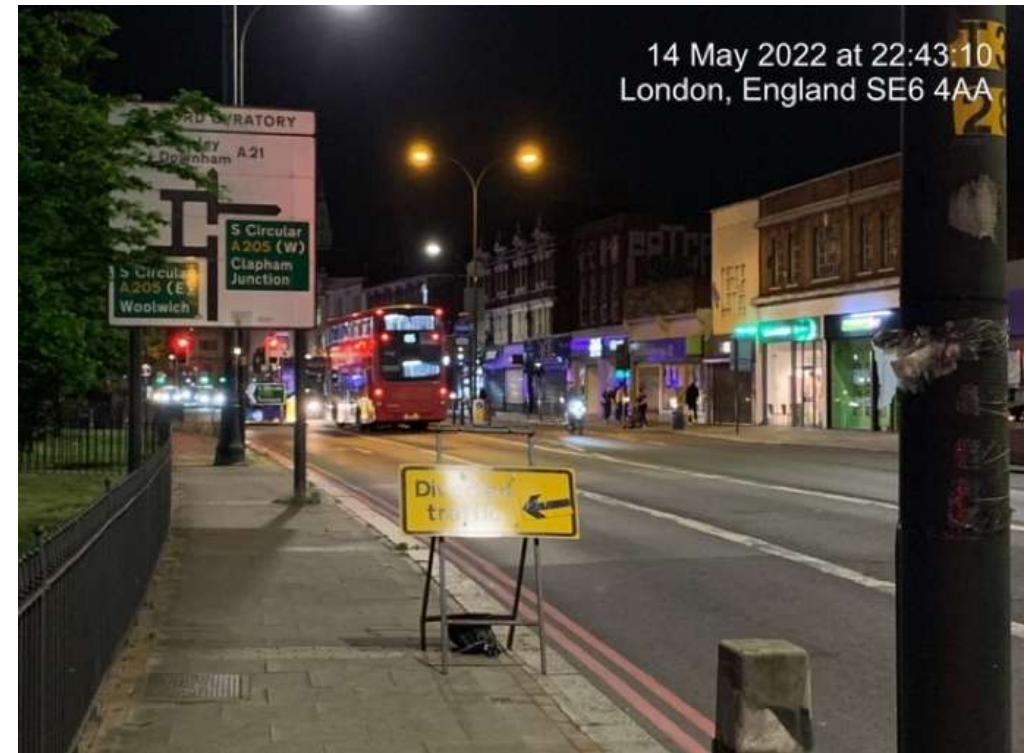
22:42hrs - Admiral Slots 116 Rushey Green

14th/15th May 2022



**Image B27**

22:43hrs - Rushey Green looking north towards premises



**Image B28**

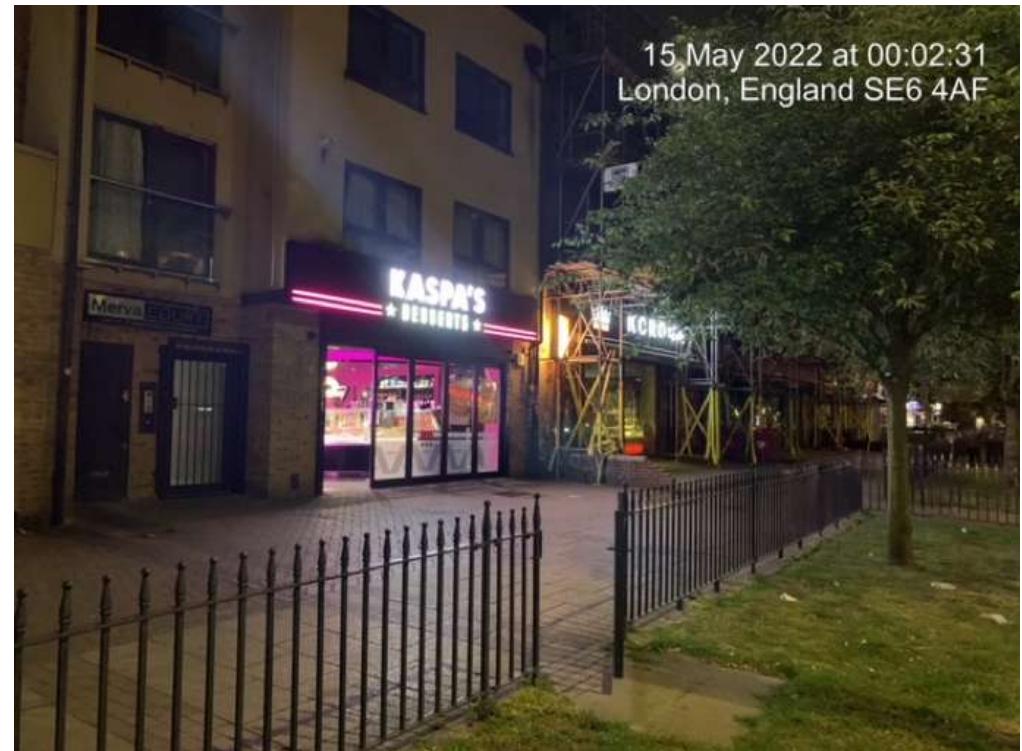
22:43hrs - Rushey Green looking towards Catford Centre.

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

14th/15th May 2022



15 May 2022 at 00:02:18  
London, England SE6 4AF



15 May 2022 at 00:02:31  
London, England SE6 4AF

**Image B29**

00:02hrs - Front of 95 Rushey Green

**Image B30**

00:02hrs - Kaspa's Desserts 97 Rushey Green

14th/15th May 2022



**Image B31**

00:03hrs - Opposite 95 Rushey Green looking south



**Image B32**

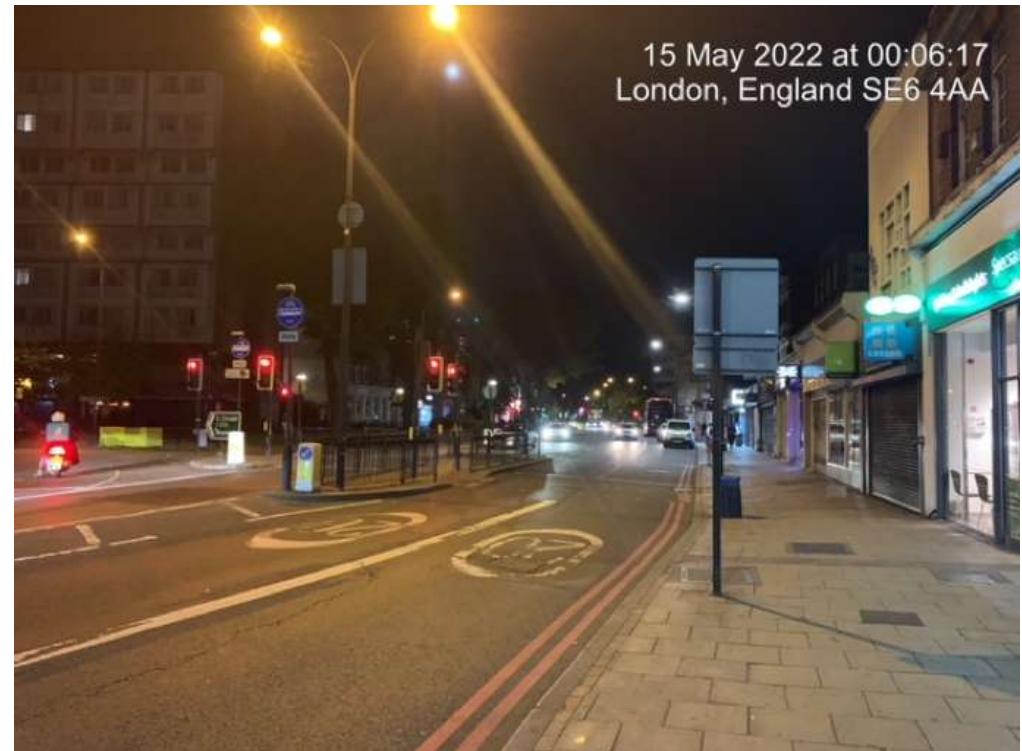
00:03hrs - Coral Bookmakers 78 Rushey Green

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

14th/15th May 2022



**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**

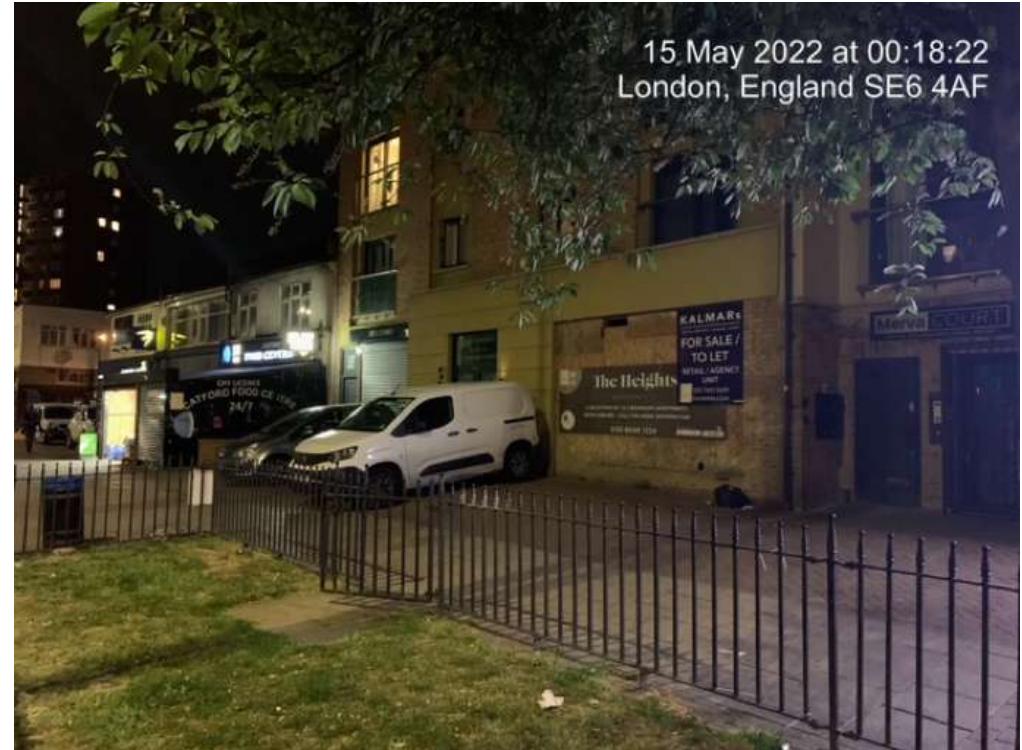
00:16hrs - The London & Rye Wetherspoons PH

14th/15th May 2022



**Image B41**

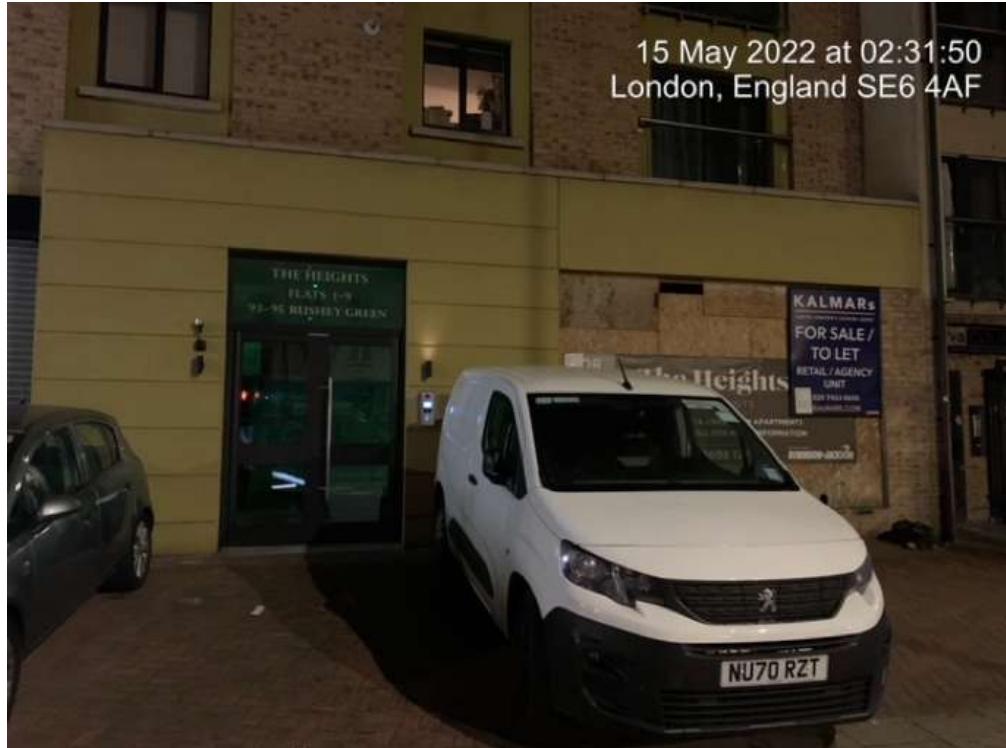
00:17hrs - Kaspa's Desserts 97 Rushey Green



**Image B42**

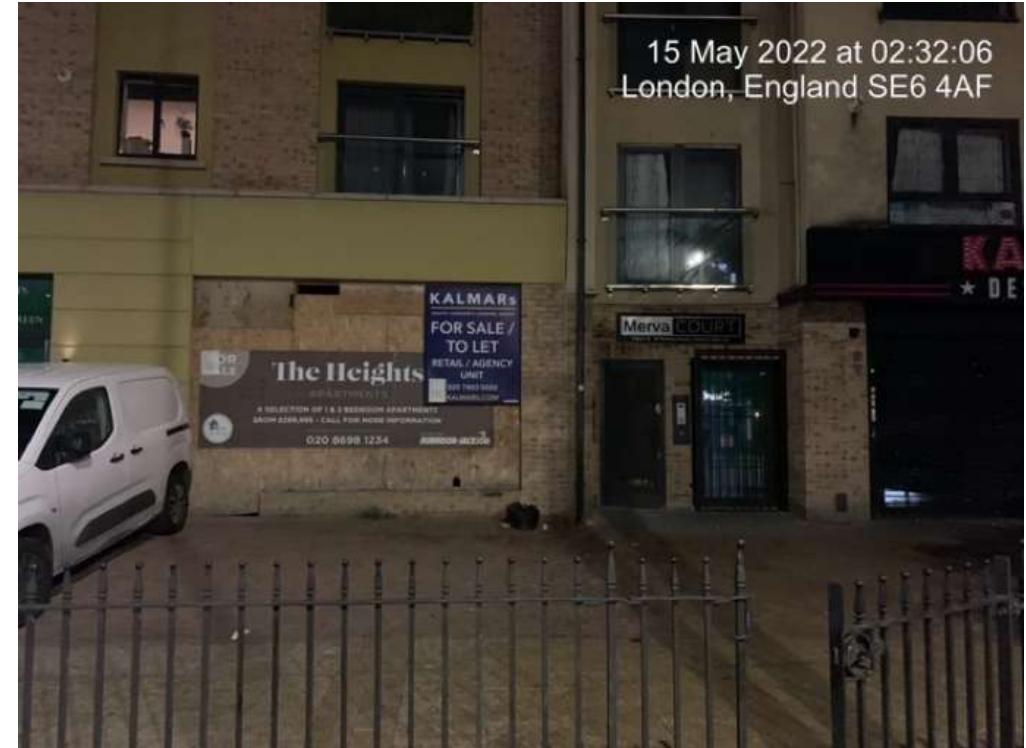
00:18hrs - Front of 95 Rushey Green

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 Kaspa's Desserts Rushey Green



**Image B46**

02:32hrs - Opposite 95 Rushey Green looking north

14th/15th May 2022

15 May 2022 at 02:32:36  
London, England SE6 4AF



**Image B47**

02:32hrs - Opposite 95 Rushey Green looking south

15 May 2022 at 02:32:44  
London, England SE6 4AF



**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

15 May 2022 at 02:35:38  
London, England SE6 4AA



**Image B51**

02:35hrs - Admiral Slots 116 Rushey Green

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



**Image B52**

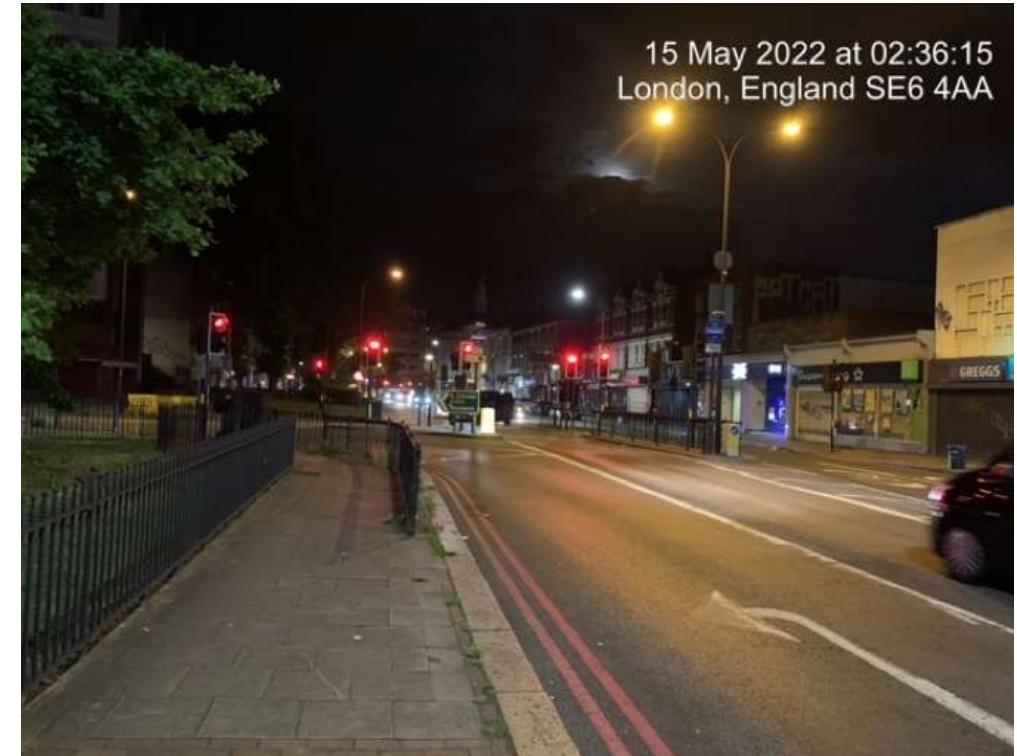
02:36hrs - Jennings Bet Bookmakers 130 Rushey Green

14th/15th May 2022



**Image B53**

02:36hrs - Jennings Bet Bookmakers  
130 Rushey Green



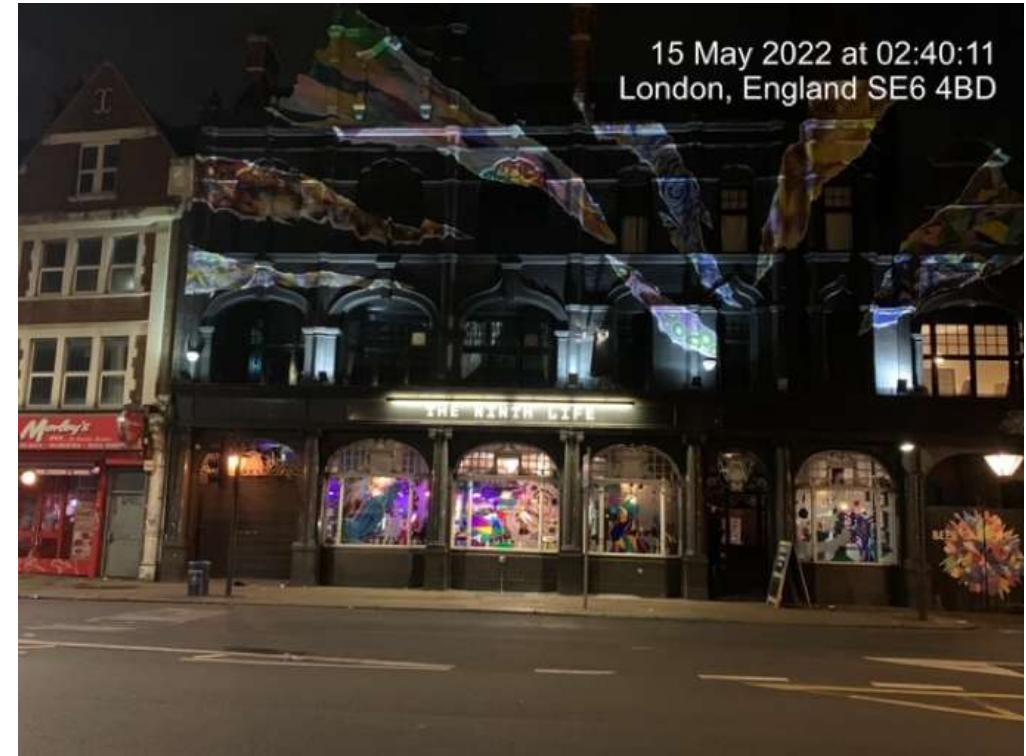
**Image B54**

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

14th/15th May 2022



15 May 2022 at 02:40:00  
London, England SE6



15 May 2022 at 02:40:11  
London, England SE6 4BD

**Image B55**

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

**Image B56**

02:40hrs - The Ninth Life PH Catford Centre

14th/15th May 2022



**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**

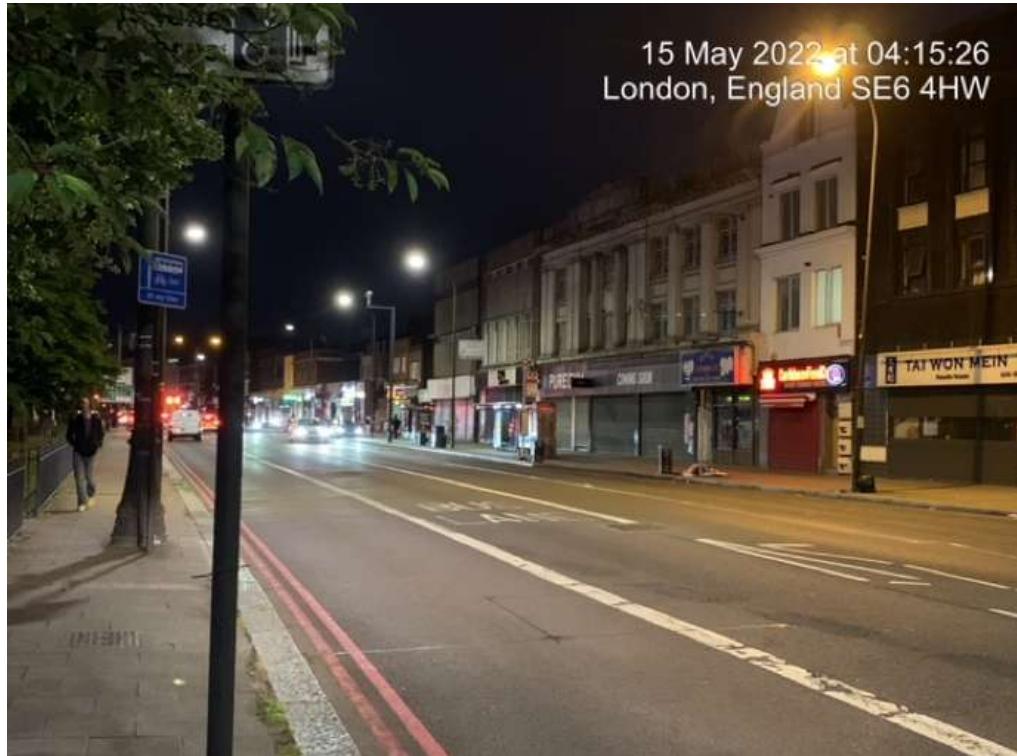
04:15hrs - Poundland 80 Rushey Green



**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**

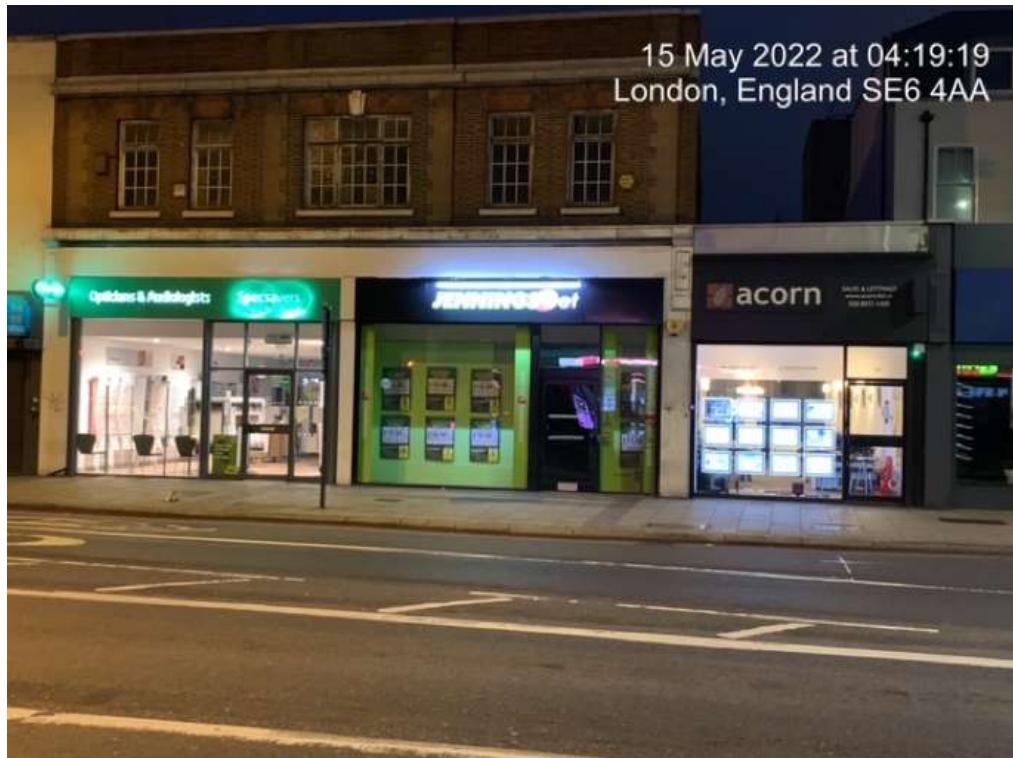
04:16hrs - Rushey Green looking south towards Catford Centre



**Image B64**

04:18hrs - Admiral Slots 116 Rushey Green

14th/15th May 2022



15 May 2022 at 04:19:19  
London, England SE6 4AA



15 May 2022 at 04:22:06  
London, England SE6 4RY

**Image B65**

04:19hrs - Jennings Bet Bookmakers  
130 Rushey Green

**Image B66**

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

14th/15th May 2022

15 May 2022 at 04:28:06  
London, England SE6 4AF



**Image B67**

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

15 May 2022 at 05:15:25  
London, England SE6 4AF



**Image B68**

05:15hrs - Front of 95 Rushey Green

14th/15th May 2022



**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



**Image B73**

05:45hrs - Front of 95 and Kaspa's Desserts  
97 Rushey Green.



**Image B74**

05:45hrs - Looking north opposite 95 Rushey Green

14th May 2022



**Image B75**

05:45hrs - Looking south opposite 95 Rushey Green



**Image B76**

05:45hrs - Poundland, 80 Rushey Green

14th May 2022



### 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 Kaspa's 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 Kaspa's 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 Kaspa's 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, Kaspa's 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 Kaspa's 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**

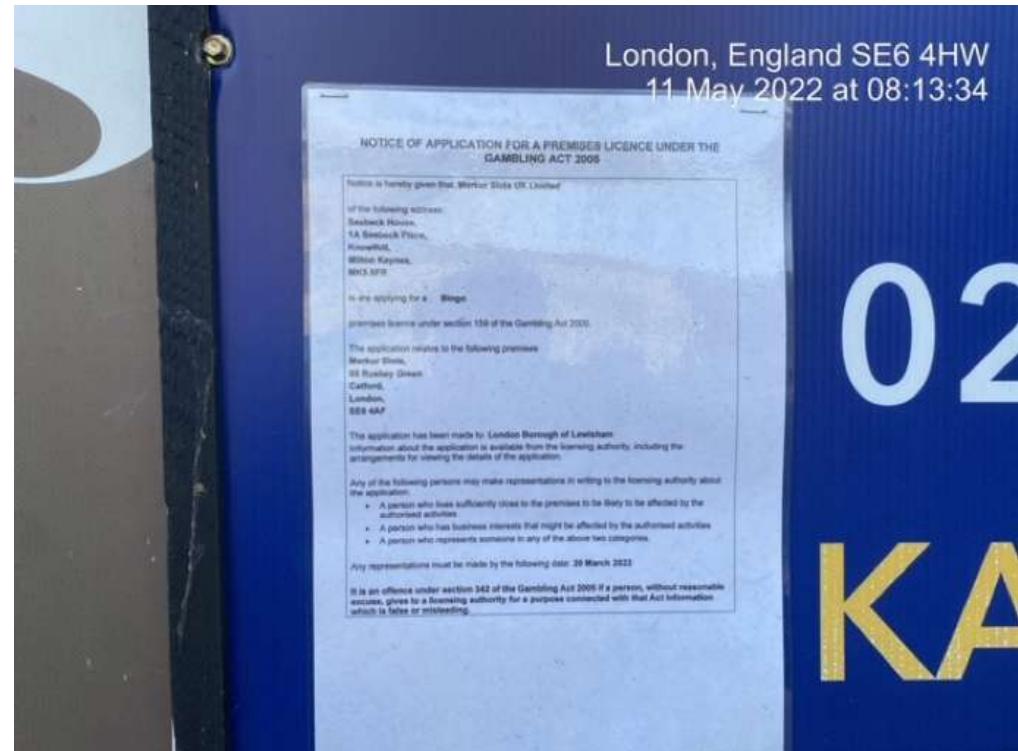


**Appendix A**  
Observation Images  
11th May 2022

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

**Leveche Associates Ltd**  
Nightingale House  
46-48 East Street  
Epsom  
Surrey KT17 1 HQ

11th May 2022



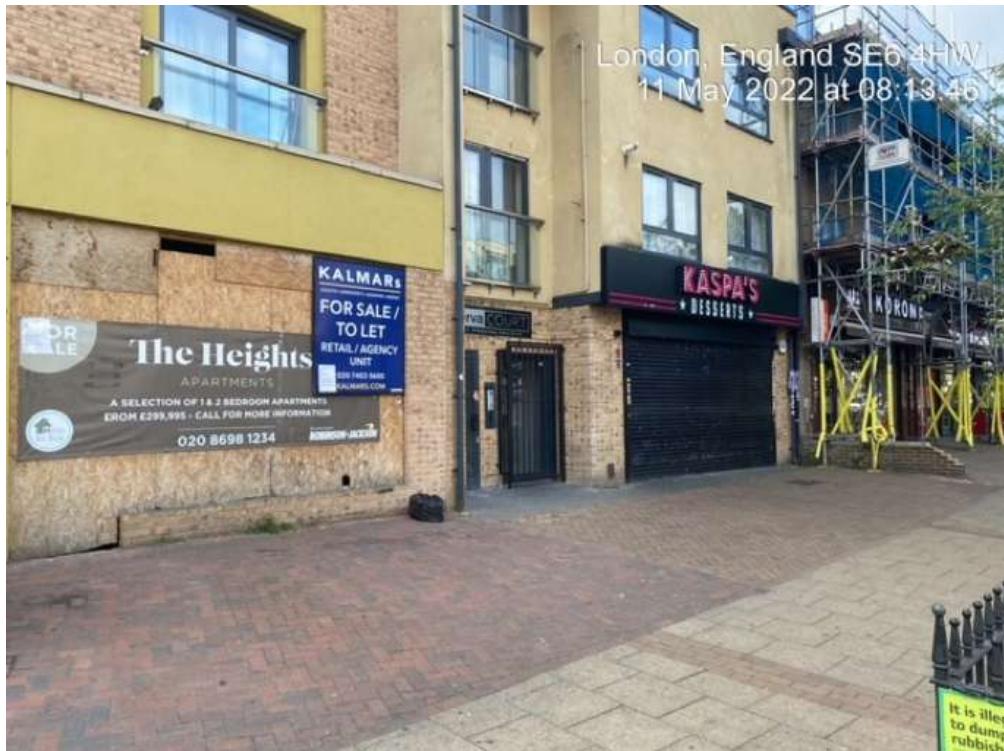
**Image A1**

08:13hrs - Front of 95 Rushey Green Catford

**Image A2**

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

11th May 2022



**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**

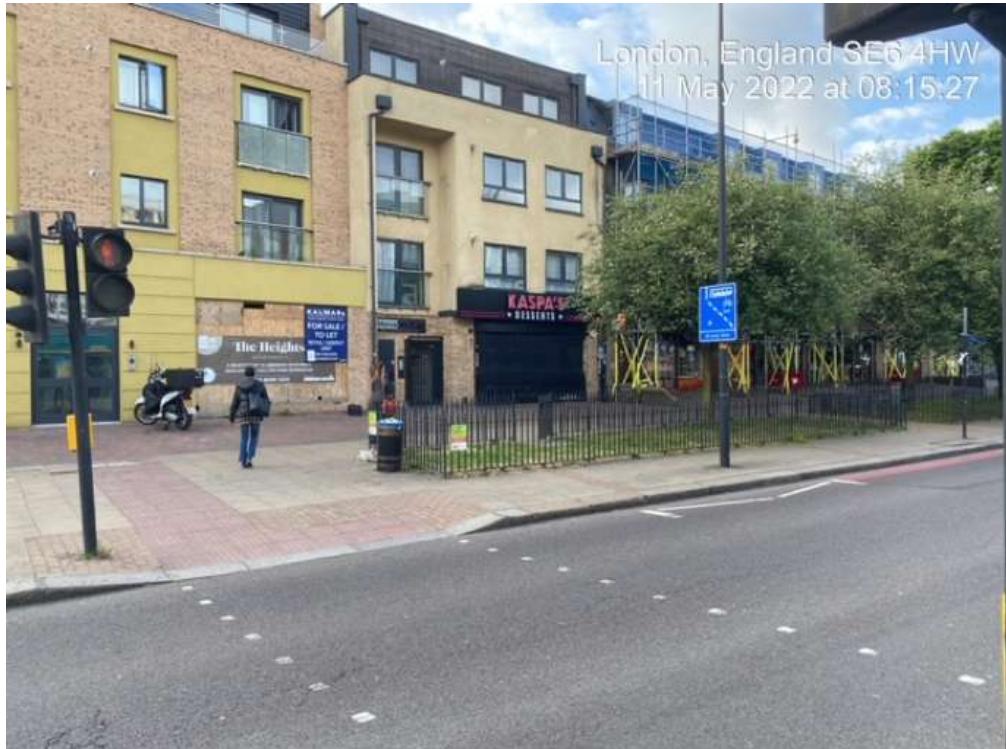
08:14hrs - Front of 95 and Kaspa's Desserts,  
97 Rushey Green looking north



**Image A6**

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

11th May 2022



**Image A7**

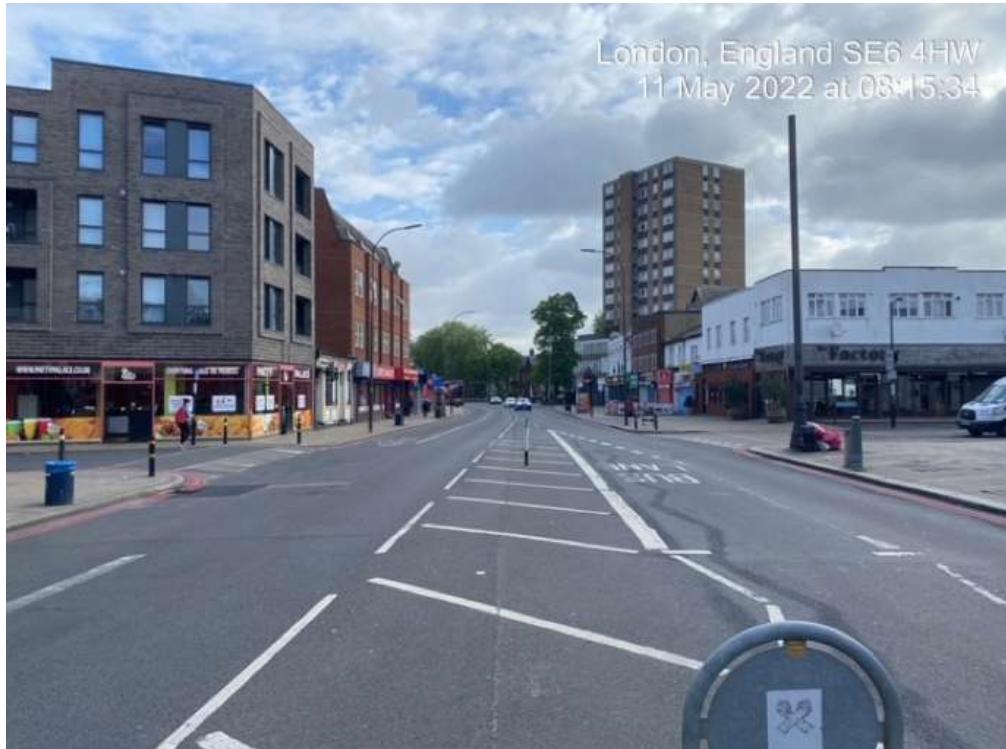
08:15hrs - Front of 95 and Kaspa's Desserts  
97 Rushey Green



**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



**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**

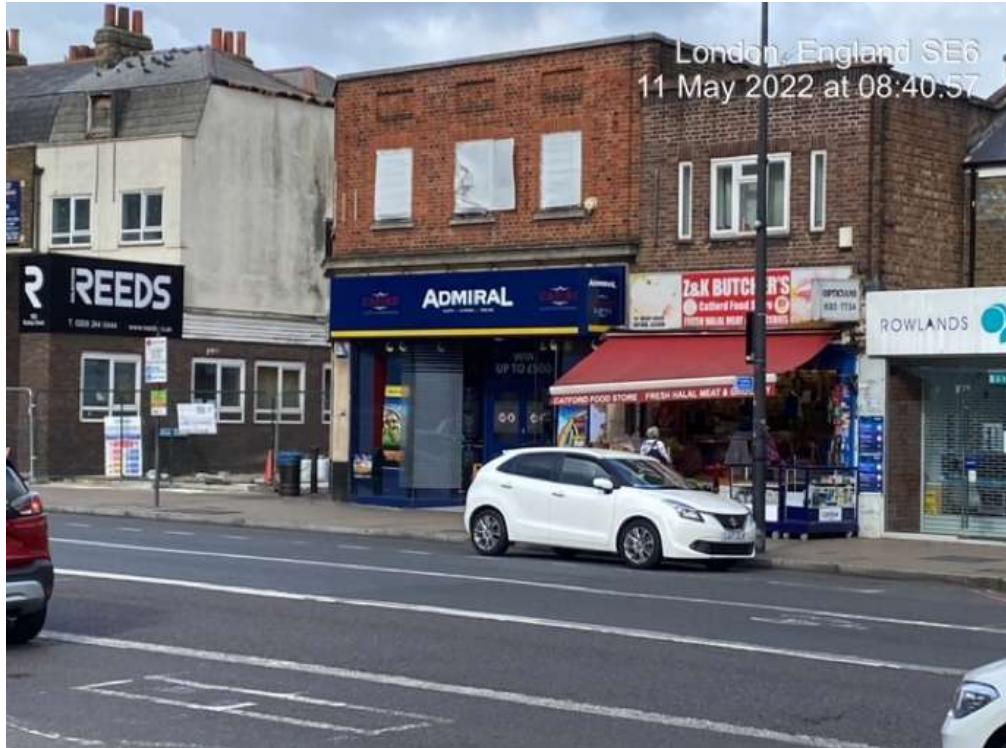
08:39hrs - The London & Rye Wetherspoons PH



**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

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



**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 - Kaspa's Desserts



**Image A36**

11:56hrs - Merva Court entrance next to  
Kaspa's Desserts

11th May 2022



**Image A37**

11:59hrs - Front of 95 and Kaspa's Desserts  
97 Rushey Green



**Image A38**

12:27hrs - Front of 95 and Kaspa's Desserts  
looking south

11th May 2022



**Image A39**

12:28hrs - Opposite front of 95 Rushey Green



**Image A40**

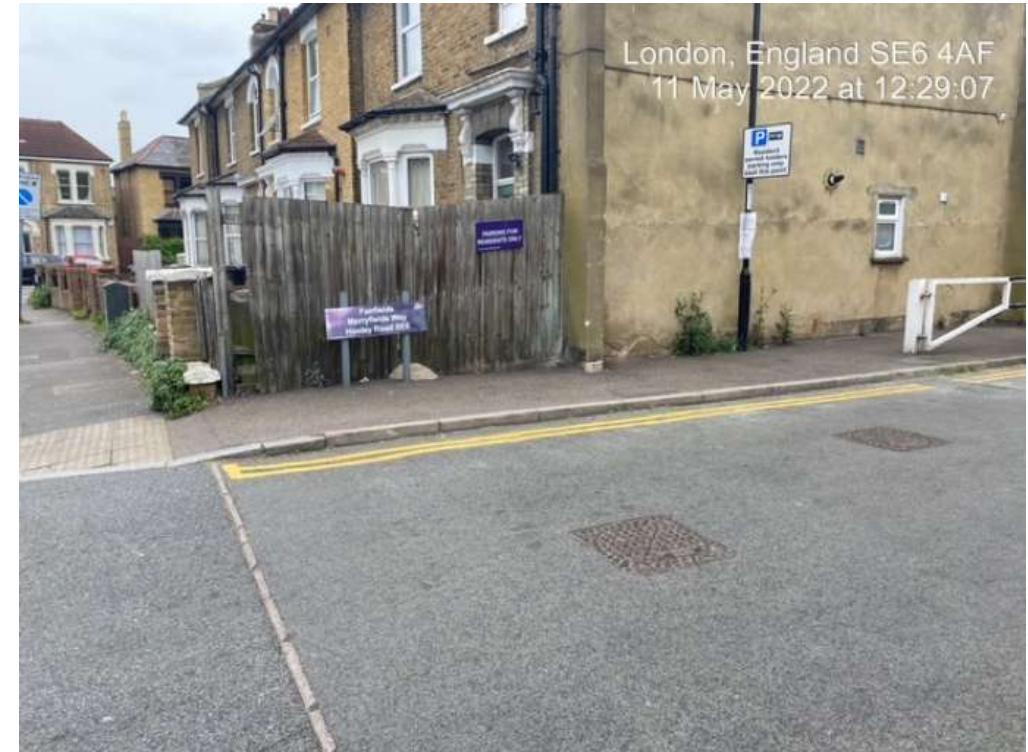
12:28hrs - Front of 95 and Kaspa's Desserts  
97 Rushey Green

11th May 2022



**Image A41**

12:28hrs - Looking south opposite 95 Rushey Green



**Image A42**

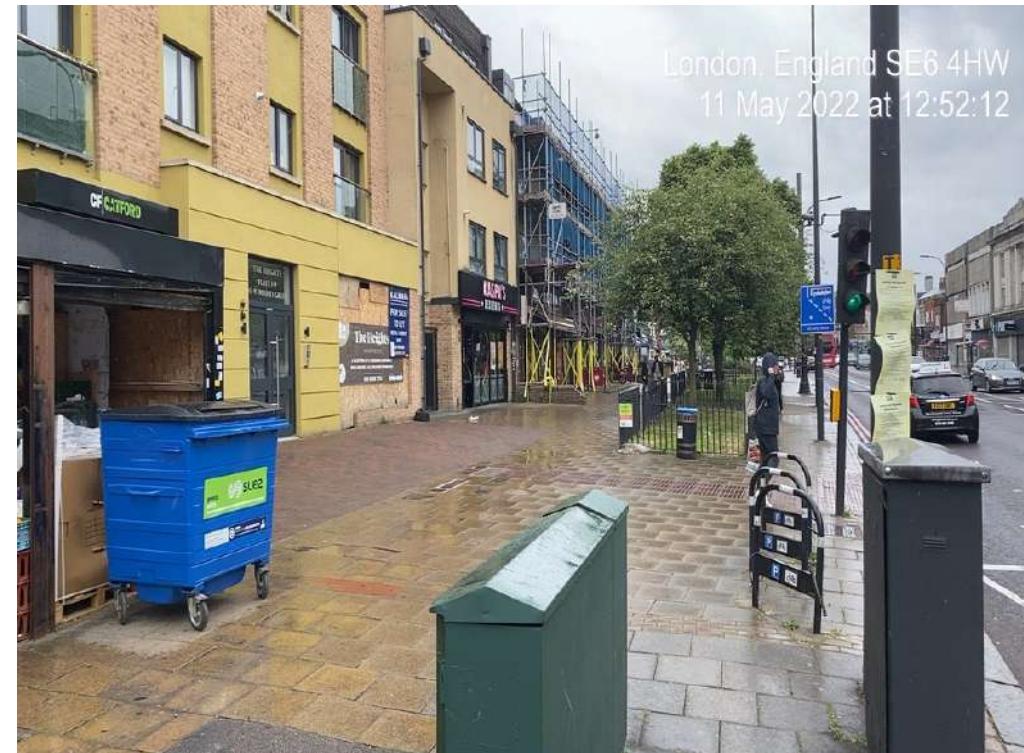
12:29hrs - Merryfields Way rear of premises

11th May 2022



**Image A43**

12:29hrs - Rear of 95 Rushey Green



**Image A44**

12:52hrs - Front of 95 and Kaspa's Desserts  
97 Rushey Green

11th May 2022



**Image A45**

12:52hrs - Looking south front of Kaspa's 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



**Image A49**

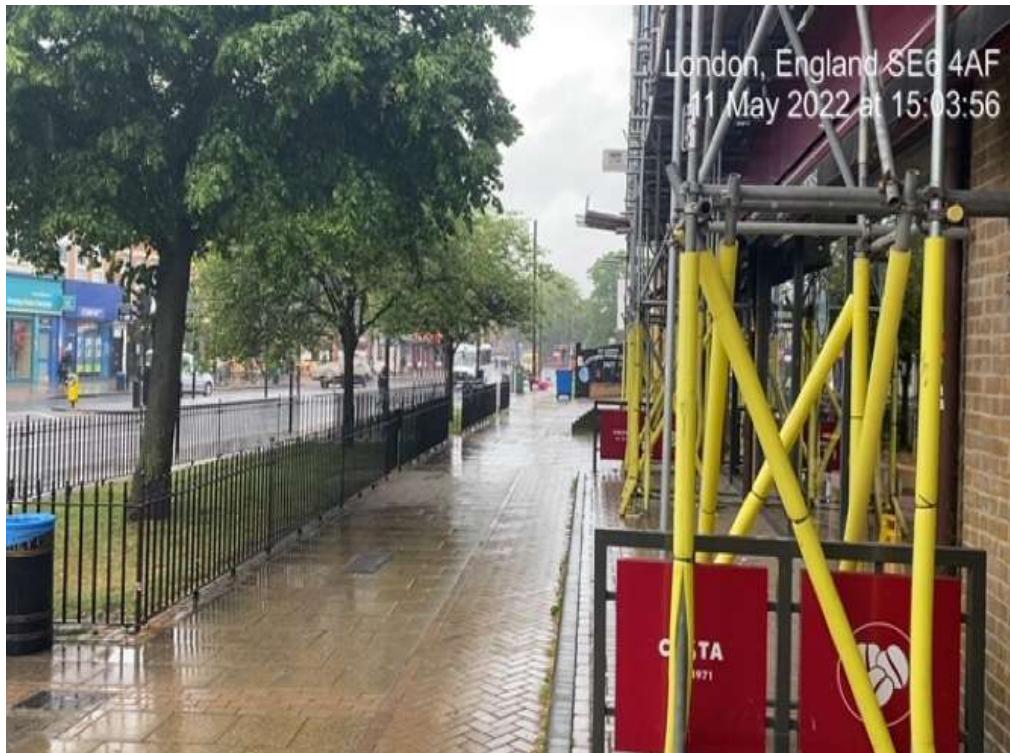
14:38hrs - Looking south opposite front of  
95 Rushey Green



**Image A50**

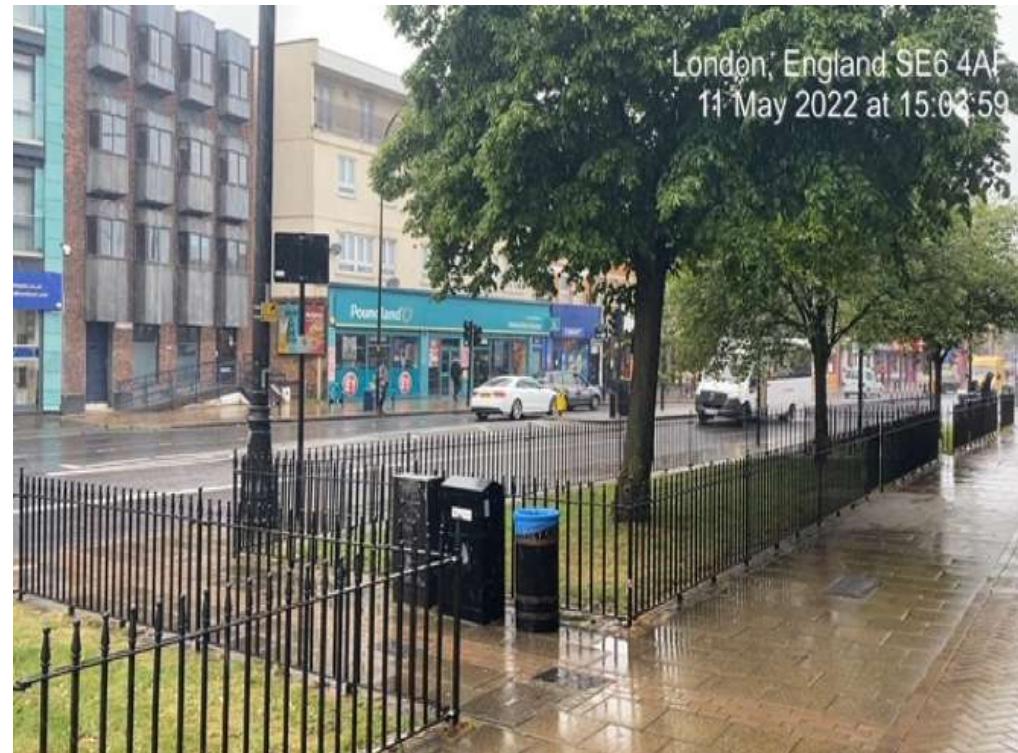
14:59hrs - Front of 95 and Kaspa's Desserts  
97 Rushey Green

11th May 2022



**Image A51**

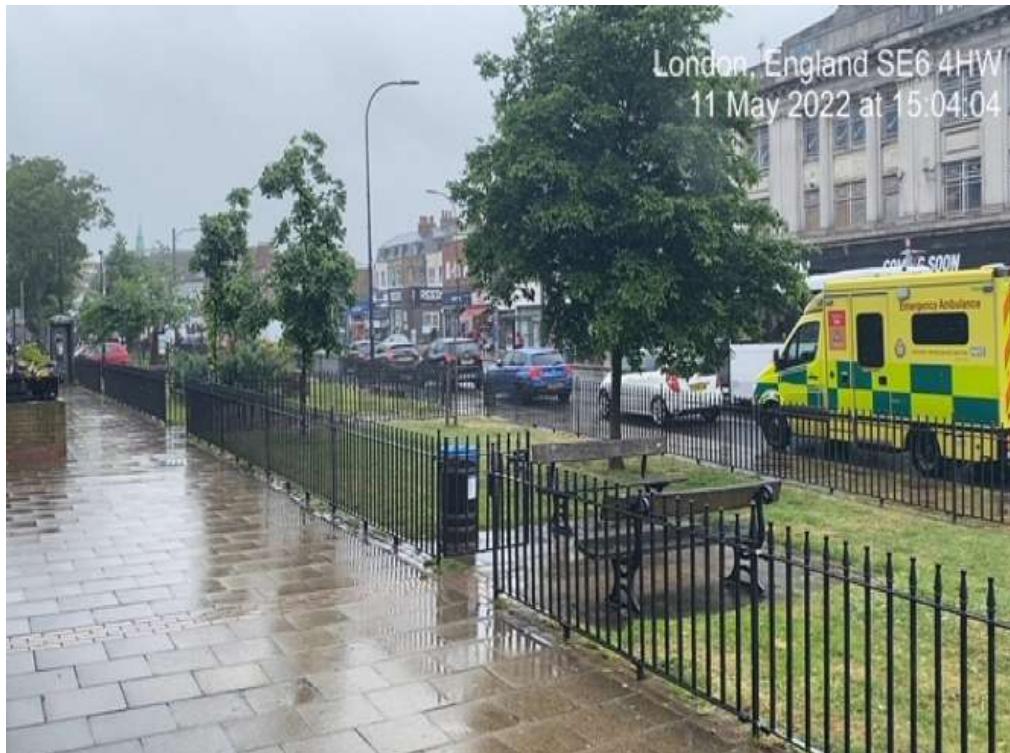
15:03hrs - Looking north from Costa Coffee  
Rushey Green



**Image A52**

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

11th May 2022



**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



**Image A63**

16:10hrs - Looking north opposite 95 Rushey Green



**Image A64**

16:10hrs - Front of 95 and Kaspa'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



London, England SE6 4HW  
11 May 2022 at 16:35:55



London, England SE6 4HW  
11 May 2022 at 16:37:57

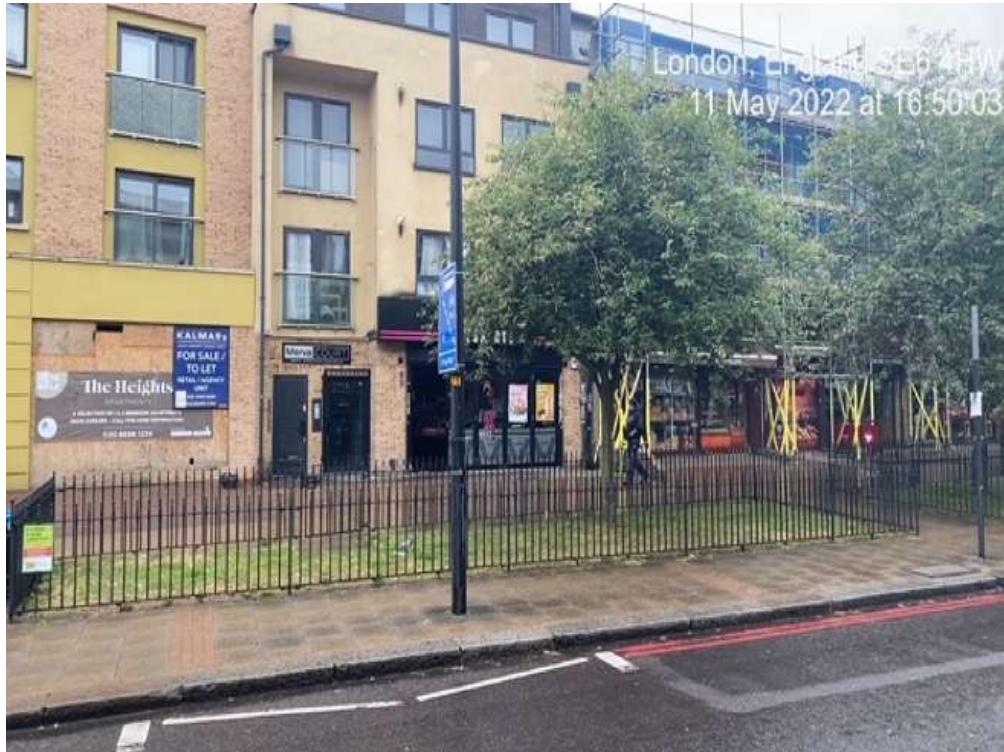
**Image A67**

16:35hrs - Admiral Slots 116 Rushey Green

**Image A68**

16:37hrs - Front of 95 and Kaspa's Desserts  
97 Rushey Green

11th May 2022



**Image A69**

16:50hrs - Front of 95 and Kaspa's Desserts  
97 Rushey Green



**Image A70**

16:50hrs - Looking south opposite 95 Rushey Green

11th May 2022



**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 the 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 been 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 and 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 though 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**

**Leveche Associates Limited**

**06/06/2021**



## **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 Solomon. 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 been 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 been 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 been 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 been 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

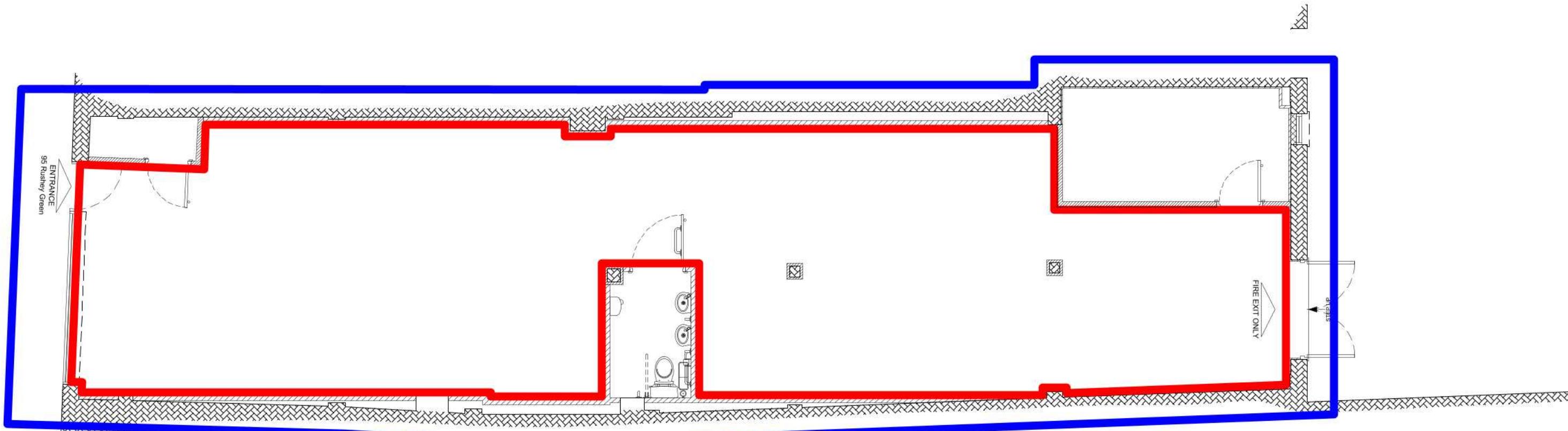
identifying her as Sally. She said hello and I then continued to look at gaming machines on the right-hand side of the premises.

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 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**

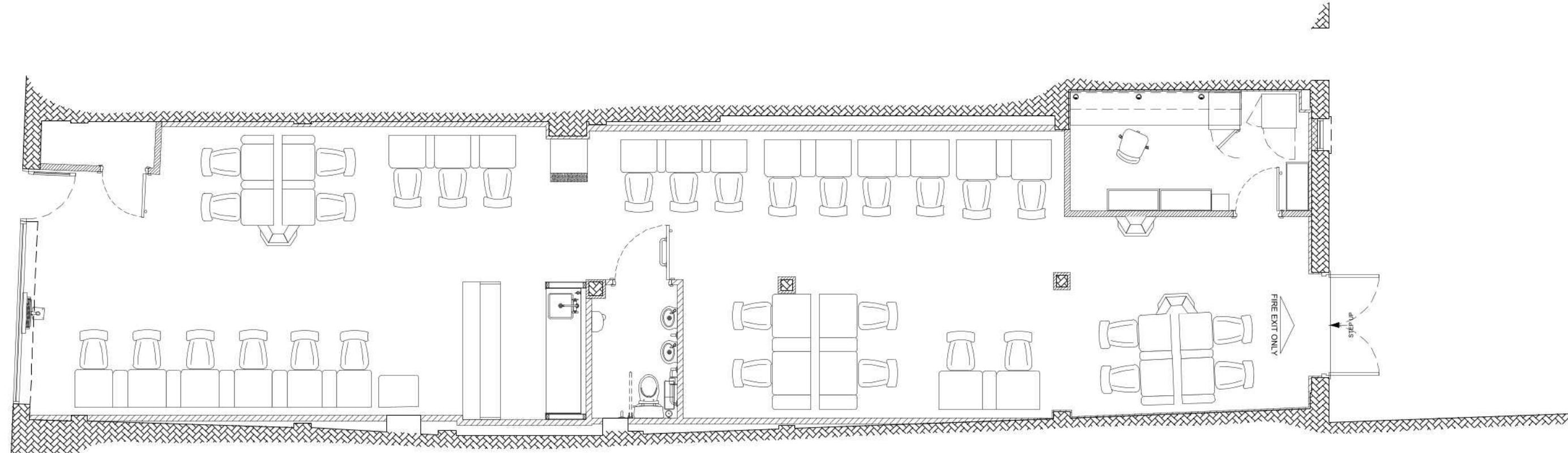
30. I have visited numerous gaming premises including those operated by Merkur Slots, or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a 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 been 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
<span style="color:red">—</span>	AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.
<span style="color:blue">—</span>	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	REFERENCE DRAWINGS	
	PROJECT <b>MERKUR SLOTS</b> 95 RUSHEY GREEN CATFORD SE6 4AF	SCALE 1:75	
	DESCRIPTION PROPOSED LICENCE PLAN	DRAWN BY S.R.B.	
		DATE 19/08/21	
		DRAWING No. 999-PR-04	REVISION 01
			COPYRIGHT IS RESERVED BY MERKUR CASINO UK AND IS ISSUED ON THE CONDITION THAT IT IS NOT COPIED OR DISCLOSED BY OR TO ANY UNAUTHORISED PERSONS WITHOUT PRIOR CONSENT FROM MERKUR CASINO UK.
			THIS DRAWING SHOULD NOT BE SCALED. THE CONTRACTOR SHOULD CHECK ALL DIMENSIONS ON SITE, ANY ERROR OR OMISSION SHOULD BE REPORTED TO MERKUR CASINO UK.



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

153

## REFERENCE DRAWINGS

SCALE  
1:75

DRAWN BY  
S.R.B.

DATE  
19/08/21

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 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:	Kaspas 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 by 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. (<a href="http://streetcheck.uk">streetcheck.uk</a>)</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>

	<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><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</p> <p>Lewisham Housing Options, Laurence House, 1 Catford Road, SE6 4RU</p> <p>UCKG HelpCentre Catford, 1 Bromley Road, SE6 2TS</p> <p>Salvation Army, 23-25 Brownhill Road, SE6 2HE</p> <p>Apax Support, 36-38 Bromley Road, SE6 2TP</p> <p>St Mungo's Hostel, 1 Arlington Cl, Ennersdale Rd, Hither Green, SE13 6JQ</p> <p>Salvation Army Older People Service, 12-14 Lewisham Park, SE13 7PN</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b></p> <p>University Hospital Lewisham, Lewisham High St, SE13 6LH</p> <p>Kaleidoscope, 32 Rushey Green, SE6 4JD</p> <p>Isis-Family Health, 183-185 Rushey Green, SE6 4BD</p> <p>Novum Health Partnership, The Primary Care Centre, Hawstead Road, SE6 4JH</p> <p>Hawstead Road Contraception &amp; Sexual Health Clinic, 1st Floor, The Primary Care Centre, Hawstead Rd, SE6 4JH</p> <p>The Rushey Green Group Practice, The Primary Care Centre, SE6 4JH</p> <p>Parkview Surgery Health Care Centre, 186 Brownhill Road, SE6 1AT</p> <p>Woolstone Medical Centre, Woolstone Rd, Forest Hill, SE23 2SG</p> <p>Woodlands Health Centre, 4 Edwin Hall Pl, Hither Green Lane, SE13 6RN</p> <p>Hilly Fields Medical Centre, 172 Adelaide Ave, SE4 1JN</p> <p>Natures Green Medical Centre, 298 Lewisham High Street, SE13 6JZ</p> <p>Fieldside Care Home, 9 Canadian Avenue, SE6 3AU</p> <p>Ringstead House, 62 Ringstead Road, SE6 2BS</p> <p>M Power Care Home, 22 Bromley Road, SE6 2TP</p> <p>Welcome Care Home, The Welcome Home, 28 Fordel Road, SE6 1XP</p> <p>Oakcroft, 41-43 Culverley Road, SE6 2LD</p> <p>Alexander Care Home, 21 Rushey Mead, Ladywell, SE4 1JJ</p> <p>Lewisham Park Care Home, 40 Lewisham Park, SE13 6QZ</p> <p>Brownhill Care Ltd, 307 Brownhill Road, SE6 1AL</p> <p>Penerley Lodge, 34-40 Penerley Road, SE6 2LQ</p> <p>St Jude's House, 14 Canadian Avenue, SE6 3AS</p> <p>Beechcroft Care Home - Akari Care, 329 Brownhill Road, SE6 1AL</p> <p>Ashleigh House, 133 Bromley Road, SE6 2NZ</p> <p>Penberth House, 29 Penberth Road, SE6 1ET</p> <p>Nomase Home Care Agency - Home Care in London, IVY House, Bradgate Road, SE6 4TT</p> <p>Bargery Road Care Home, 104 Bargery Road, SE6 2LW</p> <p><b>Gambling premises</b></p> <p>Admiral Casino, Catford, 116-118 Rushey Green, SE6 4HW</p> <p>Betfred, 197 Rushey Green, SE6 4BD</p> <p>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></p> <p>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></p> <p><i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i></p> <p><i>Failure to provide information to customers on responsible gambling</i></p> <p><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.</p> <p>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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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      Failure to protect employee and customers from harm during the hours of late-night opening</i></p>

disorder or being used to support crime	<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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	<p>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><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      Crown savers Credit Union, 20 Catford Broadway, SE6 4SN</p> <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      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</p> <p><b>Residential Areas (impacted by Anti Social Behaviour)</b></p> <p>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.</p>	<p>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> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p><b>Money Laundering</b></p> <p><i>Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.</i></p> <p>Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.</p> <p>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.</p> <p>IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.</p> <p>Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.</p> <p>Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.</p> <p>Adequate staff will always be maintained and subject to regular review and risk assessment.</p>
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	<p>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.</p> <p>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.</p> <p>Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p><b>Alcohol and Drugs</b>            Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.            'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p>
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Ensuring that gambling is conducted in a fair and open way		<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). 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>
Other	<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>Holebeam 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> 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 Managers 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 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.

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).

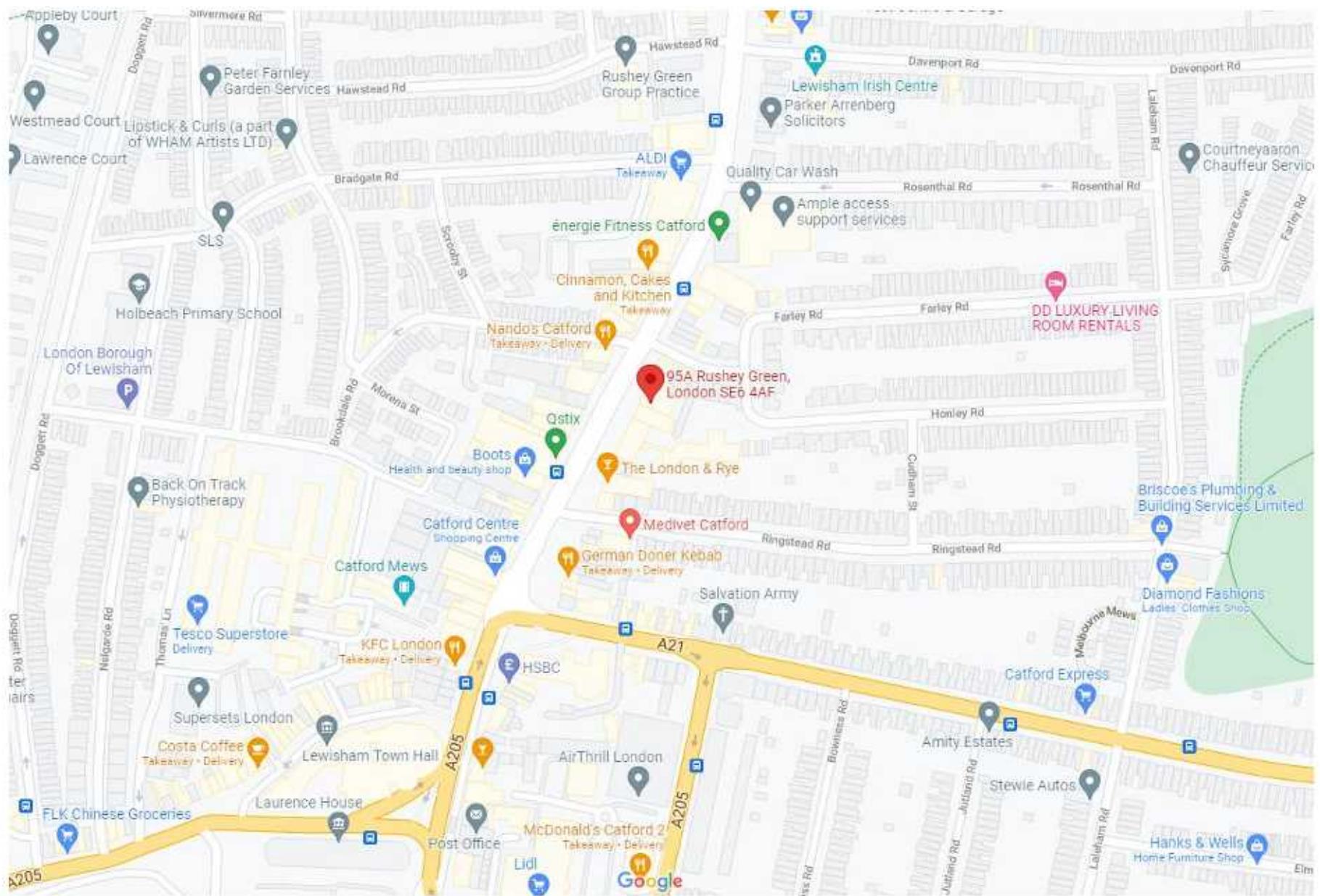
I am an IIA Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries. The last 9 years I have been working solely in the Gambling Industry (Amanda Kiernan, Head of Compliance).

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

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



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

