

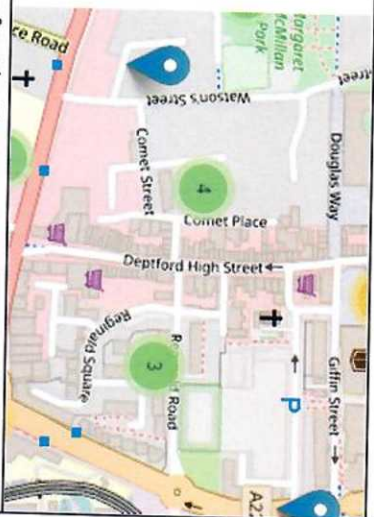
# Merkur Slots, 40 Deptford High Street, SE8 4AF

## Local Area Risk Assessment

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

## Local Area Profile Risk Factors

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



**The Gambling Act 2005 sets out the three licensing objectives (LO), which are:**

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

**Localised Risks to the Licensing Objectives**

This Local Area Risk assessment takes into consideration London Borough of Lewisham local authority Statement of Gambling Principles 2019, reference section 10 for Bingo Centres and Lewisham Council Borough Profile 2011.

**Environmental Factors**

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

Licensing Objectives	Local Risks	Control Measures
<p>Protecting children and other vulnerable people from being harmed or exploited by gambling</p>	<p><b>Unemployment:</b>                      Census 2011 showed 41.4% of working age population in full time employment, 3.4% in part time employment and 3.4% were students. No one industry was substantially larger than others – the largest industries were Accommodation/food and education at – 2.4%, then professional and scientific, retail and health.</p> <p><b>Deprivation:</b>                      In relative terms Lewisham has become less deprived since 2015. It is now ranked 63rd most deprived LA, compared to 48th in 2015, 31st in 2010 and 39th for 2007. However, relative to London, Lewisham has become more deprived moving from 10th most deprived to 7th. Increasing in Income, Employment, Education and Health and disability.</p> <p><b>Schools and Education</b>                      Tidemill Academy, 11 Giffin St, SE8 4RJ                      Kush Academy, 190-196 Deptford High St, SE8 3PR                      Deptford Park Primary School, Evelyn St, SE8 5RJ                      Addey and Stanhope School, 472 New Cross Rd, SE14 6TJ                      Deptford Green School, 61 Edward St, E14 6AN                      St Joseph's Catholic Primary School, Crossfield St, SE8 3PH                      Lewisham College, 1 Deptford Church St, SE8 4RX                      Bellerbys College London, Bounty House, Stowage, Greenwich, SE8 3DE                      Coventry University London, 1st Floor, Bounty House, Stowage, SE8 3DE                      Coventry University Greenwich Campus, Royal Hill, SE10 8RG</p>	<p><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 Praesepe operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots West Bromwich Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

	<p>Goldsmiths, University of London, 8 Lewisham Way, SE14 6NW</p> <p><b>Community Centres and Youth Centres</b></p> <p>Community Hall, Evelyn St, SE8 5QW</p> <p>Lewisham Indo Chinese Community, 33 Clyde St, SE8 5LW</p> <p>Deptford Lounge, 9 Giffin St, SE8 4RJ</p> <p>Riverside Youth Club, 185 Grove St, SE8 3QQ</p> <p>Deptford Church Hall, 131 Deptford High St, SE8 4NS</p> <p>Second Wave Youth Arts, 1 Creek Rd, SE8 3BT</p> <p><b>Parks, play grounds and sports/leisure facilities</b></p> <p>Ferranti Park, Creekside, Deptford, SE8 3DW</p> <p>Fordham Park, New Cross, SE14 6LU</p> <p>Margaret McMillan Park, 54 Glenville Grove, SE8 4BP</p> <p>Mary Ann Gardens, 43 Mary Ann Gardens, SE8 3DP</p> <p>Deptford Park, 23 Scawen Rd, SE8 5AE</p> <p>Richard MacVicar Deptford Adventure Playground, New King St, Deptford, London SE8 3JB</p> <p><b>Vulnerable and addiction support services</b></p> <p>Deptford Action Group For The Elderly, 71 Deptford High St, SE8 4AA</p> <p>Deptford Methodist Church and Mission, Mary Ann Gardens, SE8 3DP</p> <p>Deptford Reach, 64 Speedwell St, SE8 4AT</p> <p>The Samaritans of Lewisham Greenwich and Southwark, 1-5 Angus St, SE14 6LU</p> <p>Centrepoint, 204 Evelyn St, SE8 5BZ</p> <p><b>Homeless shelters and food banks</b></p> <p>Lewisham Refugee &amp; Migrant Network, 341 Evelyn St, SE8 5QX</p> <p>Bench Outreach, 14 New King St, SE8 3HS</p> <p>Deptford Reach, 64 Speedwell St, SE8 4AT</p> <p>999 Club, 21 Deptford Broadway, SE8 4PA</p> <p>The Bear Church, Shaftesbury Christian Centre, Frankham St, SE8 4RN</p> <p>Deptford Salvation Army Centre, Mary Ann Gardens, SE8 3DP</p> <p><b>Pawnbrokers and Loan Shops</b></p> <p>H&amp;T Pawnbrokers, 72 Deptford High St, SE8 4RT</p> <p>Cash Xchange, 184 Deptford High St, SE8 3PR</p> <p>H&amp;T Pawnbrokers, 121 Lewisham High St, SE13 6AT</p> <p>Cash Converters, 292-294 Lewisham High St, SE13 6JZ</p> <p>Everyday Loans, 39 Lewis Grove, SE13 6BG</p>	<p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue. 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 participate by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified'</p> <p><a href="https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019">https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</a></p> <p><b>Vulnerability</b></p> <p>Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p>
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	<p><b>Medical Centres, Care Homes and Mental Health facilities</b></p> <p>Deptford Surgery, 502-504 New Cross Rd, SE14 6TJ  Deptford Medical Centre, 2 Pearson's Ave, SE14 6TG  Kingfisher Medical Centre, 3 Kingfisher Square, SE8 5DA  Speedwell Mental Health Centre, 62 Speedwell St, New Cross, SE8 4AT  Grove Medical Centre, Windlass Pl, SE8 3QH  Waldron Health Centre, Waldron Health Centre, SE14 6LD</p> <p><b>Gambling premises</b></p> <p>Merkur Cashino, 97 High St, Lewisham, SE13 6AT  Admiral Casino, 96 Lewisham High St, Lewisham, SE13 5JH  Paddy Power, 52 Deptford High St, SE8 4RT  Paddy Power, 175 Deptford High St, SE8 3NU  Ladbroke's, 48/50 Deptford High St, SE8 4NS  Coral, 321 Evelyn St, SE8 5QX  William Hill, 403 New Cross Rd, SE14 6LA  Jennings Bet, 242A Evelyn St, SE8 5BZ  Ladbroke's, 54-56 Lewisham High St, SE13 5JH  Jennings Bet, New SE8 4AF  William Hill, 174 New Cross Rd, SE14 5AA  Betfred, 33-35 Lewis Grove, SE13 6BW</p> <p><b>Residential Areas</b></p> <p>Housing types are typically flats/apartments and terraced which make up 82% of the housing stock which are mainly rented with 50% occupied by single persons.</p> <p><b>Bus stops and other Transport links</b></p> <p>Deptford High Street, New Cross, SE14 6TQ  Deptford Bridge Station, Greenwich, SE8 4HH  Deptford Bridge, Saint John's, London  Deptford Train Station, Deptford, SE8 4BZ  Deptford Bridge, DLR, Greenwich, London</p> <p><b>Public Houses and Alcohol Licensed Premise</b></p> <p>Job Centre, 120-122 Deptford High St, SE8 4NP  White Swan, 217 Deptford High St, SE8 3NT  Red Lion &amp; Wheatshaf, 45 Deptford High St, SE8 4AD  Winemakers Deptford, 209 Deptford High St, SE8 3NT  Little Crown, 495 New Cross Rd, SE14 6TQ  STOCKTON, 2 Deptford High St, SE8 4AF  Badger Badger, 139 Deptford High St, SE8 3NU  Royal Standard, 86 Tanner's Hill, SE8 4PN</p>	<p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p><b>Customer Interaction</b></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>
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Plume Feathers, 5-9 Deptford High St, SE8 4AD  
 Taproom, Unit 2, St Paul's House, 3 Market Yard, SE8 4BX  
 The Dog & Bell, 116 Prince St, SE8 3JD  
 Star and Garter, 490 New Cross Rd, SE14 6TJ  
 The Duke, 125 Creek Rd, SE8 3BU  
 Dirty Apron, 4 Deptford Market Yard, 133 Deptford High Street, SE8 4BX  
 Royal Albert, 460 New Cross Rd, SE14 6TJ  
 The Black Horse, 195 Evelyn St, SE8 5RE  
 The Brookmill, 65 Cranbrook Rd, SE8 4EJ  
 Bluetroat Bar, Arch 2 Deptford Station, Deptford High St SE8 4NS  
 The Bunker, 46 Deptford Broadway, SE8 4PH  
 The Venue, 2a Clifton Rise, SE14 6JP  
 Shades Snooker & Pool Club, 197-199 Deptford High St, SE8 3NT  
 Marcella, 165A Deptford High St, SE8 3NU  
 M and D Japanese, 117 Deptford High St, SE8 4NS  
 The Tapas Room, Deptford Market Yard, 133 Deptford High St, SE8 4BX

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

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

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

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

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

All machines display Gamble Responsibly stickers with helpline contact details.

Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.

**Deprivation**

Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm

Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.

**Homelessness**

Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.

Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.

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

<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p><b>Crime statistics:</b> High Street, Lewisham, London, SE8 4AF is within the New Cross policing neighbourhood, under the Metropolitan Police Service force area. In February 2021 there were 251 crimes reported within a half mile radius of the venue – Anti-social behaviour (93), Violence and sexual offences (63), Criminal Damage and Arson (20). (streetcheck.uk). In the year ending September 2020 crime rates in Lewisham were 90.2/1000 about the same as similar areas such as Croydon, Hounslow, Newham – all areas in which Merkur Slots operate currently. When compared to other areas in the Metropolitan Police force area crime rates were lower than the average. (police.uk)</p> <p><b>Local Police:</b> Lewisham Police Station, 43 Lewisham High St, SE13 5JZ</p> <p><b>Public Houses and Alcohol Licensed Premise</b> Job Centre, 120-122 Deptford High St, SE8 4NP White Swan, 217 Deptford High St, SE8 3NT Red Lion &amp; Wheatstheaf, 45 Deptford High St, SE8 4AD Winemakers Deptford, 209 Deptford High St, SE8 3NT Little Crown, 495 New Cross Rd, SE14 6TQ STOCKTON, 2 Deptford High St, SE8 4AF Badger Badger, 139 Deptford High St, SE8 3NU Royal Standard, 86 Tanner's Hill, SE8 4PN Plume Feathers, 5-9 Deptford High St, SE8 4AD Taproom, Unit 2, St Paul's House, 3 Market Yard, SE8 4BX The Dog &amp; Bell, 116 Prince St, SE8 3JD Star and Garter, 490 New Cross Rd, SE14 6TJ The Duke, 125 Creek Rd, SE8 3BU Dirty Apron, 4 Deptford Market Yard, 133 Deptford High Street, SE8 4BX Royal Albert, 460 New Cross Rd, SE14 6TJ The Black Horse, 195 Evelyn St, SE8 5RE The Brookmill, 65 Cranbrook Rd, SE8 4EJ Bluethroat Bar, Arch 2 Deptford Station, Deptford High St SE8 4NS The Bunker, 46 Deptford Broadway, SE8 4PH The Venue, 2a Clifton Rise, SE14 6JP Shades Snooker &amp; Pool Club, 197-199 Deptford High St, SE8 3NT Marcella, 165A Deptford High St, SE8 3NU M and D Japanese, 117 Deptford High St, SE8 4NS The Tapas Room, Deptford Market Yard, 133 Deptford High St, SE8 4BX</p>	<p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p><b>Premise Security and violence in the workplace</b> <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots High street, Deptford is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots High Street, Deptford will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p><b>General Crime and Disorder</b> <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police UK hot-spot mapping for Swale - Chalkwell policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with Kent Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p>
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**Pawnbrokers and Loan Shops**  
 H&T Pawnbrokers, 72 Deptford High St, SE8 4RT  
 Cash Xchange, 184 Deptford High St, SE8 3PR  
 H&T Pawnbrokers, 121 Lewisham High St, SE13 6AT  
 Cash Converters, 292-294 Lewisham High St, SE13 6JZ  
 Everyday Loans, 39 Lewis Grove, SE13 6BG

**Gambling premises**

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

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

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

The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).  
 Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.

Merkur Slots High Street, Deptford will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.

**Anti-social behaviour outside the premise**

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

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

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

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

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

**Money Laundering**

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

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



	<p>There are 2 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.</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> <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 High street, Deptford will operate TITO machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</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>
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Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.

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

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

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

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

#### **Alcohol and Drugs**

Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.

'No Alcohol Allowed' signage on the door.

Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.

Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.

Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.

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

#### **Money Lending**

Money lending is not tolerated within our premises.

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

Ensuring that gambling is conducted in a fair and open way

**Bingo/Gaming Machine and Supervision**  
The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).

Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.

**Customer Complaints**

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

Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.

The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.

Complaints portal used to collate and manage responses.

4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.

**Marketing**

Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

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

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

Other	Ethnicity and Local Area Demographic
<p><b>Places of worship and Religious Buildings</b></p> <p>Catholic Church of Our Lady of The Assumption, 131 Deptford High St, SE8 4NS</p> <p>The Shaftesbury Christian Centre, 72 Deptford High St, SE8 4RT</p> <p>Deptford Methodist Church and Mission, 1 Creek Rd, Greenwich, SE8 3BT</p> <p>St Paul's Church, Mary Ann Gardens, SE8 3DP</p> <p>Deptford Potter's House Church, 21 McMillan St, Greenwich, SE8 3EZ</p> <p>Deptford Salvation Army Centre, Mary Ann Gardens, SE8 3DP</p> <p>Trinity Vineyard Church, Greenwich, SE8 9BF</p> <p>St Nicholas Church, Deptford Green, Greenwich, SE8 3DQ</p> <p>New Cross Road Baptist Church, 466 New Cross Rd, New Cross, SE14 6TI</p> <p>St Luke's Church, 190 Evelyn St, SE8 5DB</p> <p>Saint Mark's Centre, 2 Harton St, SE8 4DQ</p> <p>Olivet Deptford Baptist Church, 146-160 Edward St, New Cross, SE14 6DX</p> <p>Mountain of Fire and Miracles Ministries, Church, 465 New Cross Rd, New Cross, SE14 6TA</p> <p>New Testament Church of God, Bawtree Rd, SE14 6ET</p> <p>New Cross Congregational Church, 2 Bawtree Rd, SE14 6ET</p> <p>Deptford Islamic Centre, 226 Childers St, SE14 6ED</p> <p>Baraka Mosque, 1UY, 199 Lewisham Way, Saint John's, SE4 1UY</p> <p>Lewisham Bengali Mosque, 10 Clifton Rise, New Cross, SE14 6JP</p> <p>Madina Jammeh Masjid, 248-250 Westerry Rd, Isle of Dogs, E14 3AG</p> <p>Muslim Cultural Centre, 10 Clifton Rise, New Cross, SE14 6JP</p> <p>Lewisham Islamic Centre, 363-365 Lewisham High St, SE13 6NZ</p> <p>The Akwaaba Centre, Grinling Pl, SE8 5HG</p>	<p><b>Ethnicity and Local Area Demographic</b></p> <p>Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p><b>Training &amp; Social Responsibility</b></p> <p>Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Praesepe have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Praesepe work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bimonthly and Compliance Auditors twice yearly.</p>

		<p><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 High Street, Deptford Premise Layout**

<b>Premise level:</b>	Merkur Slots High street, Deptford is a ground floor premises with residential accommodation above.
<b>Premise frontage:</b>	Merkur Slots High Street, Deptford will be a property will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
<b>Counter Position:</b>	<p>Merkur Slots High Street, Deptford floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> <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>
<b>Floor layout:</b>	Merkur Slots High Street, Deptford floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
<b>Machine Positions:</b>	Merkur Slots High Street, Deptford will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).
<b>Hidden Areas:</b>	<p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p> <p>Merkur Slots Hight Street, Deptford will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.</p>

**Additional Comments**


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

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

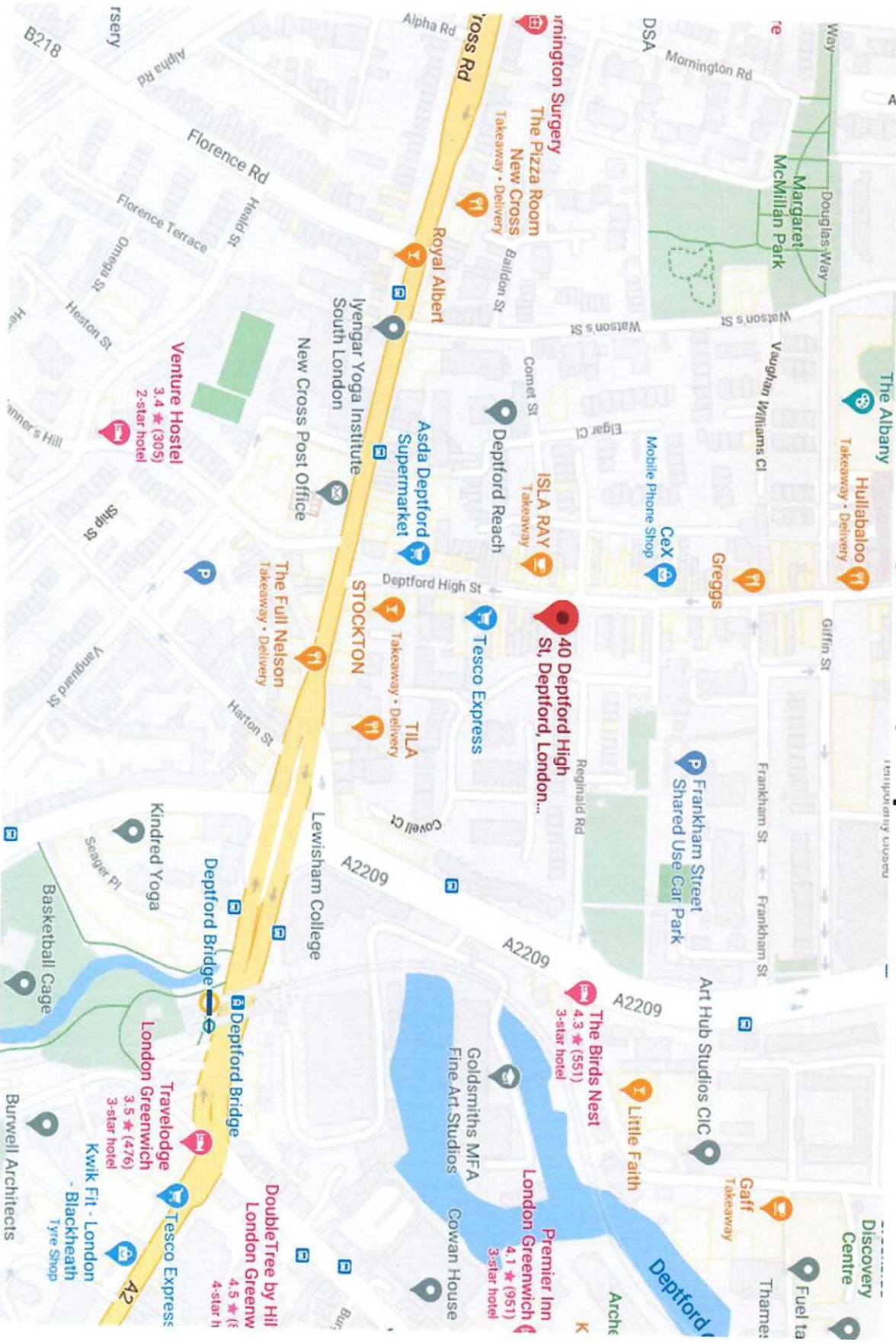
Once lockdown restrictions are eased and retail and hospitality in the area reopen and the town returns to more normal levels of trading a physical visit will be made and any appropriate adjustments made to the Risk Assessment. A review will additionally be carried out once the venue is open and local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

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

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

Assessors Name:	Gill Clulow
Signature:	
Date:	1.04.2021

# Merkur Slots, 40 Deptford High Street, Deptford





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

