

MERKUR SLOTS, 40 DEPTFORD HIGH STREET, DEPTFORD, LONDON, SE8 4AF

LICENSING SUB-COMMITTEE HEARING

24TH JUNE 2021

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**Skeleton Argument from Philip Kolvin
QC, Counsel for the applicant**

LEWISHAM COUNCIL

LICENSING COMMITTEE

24TH JUNE 2021

APPLICATION FOR BINGO PREMISES LICENCE

MERKUR SLOTS UK LIMITED

40 DEPTFORD HIGH STREET, DEPTFORD SE8 4AF

SKELETON ARGUMENT ON BEHALF OF APPLICANT

INTRODUCTION

1. This is an application by Merkur Slots UK Limited (“the applicant”) for a new bingo premises licence. The site was formerly a long-standing betting office, so in practical terms this application involves one gambling use replacing another.
2. The purpose of this skeleton argument is to help the 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
 - Andy Tipple
 - Steve Ambrose
 - Stuart Jenkins

- Nicholas Mason
- Legal obligations to promote licensing objectives:
 - Gambling Commission's Licence Conditions and Codes of Practice applicable to non-remote bingo licences
 - Mandatory and default conditions attaching to bingo premises licences
 - Proposed licence conditions for 40 Deptford High Street
- Operational standards (Agenda papers page 53).

BACKGROUND

4. 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.
5. 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.
6. 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).
7. In addition, the applicant has offered a raft of individual licence conditions as mentioned above.

The nature of high street bingo premises

8. 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 11:1 (6,735 v 601¹). As to impact, betting offices can bring with them social issues, including street drinking and disorder and loitering outside. Deptford may be no exception. Hence, when an application is made for a bingo premises licence, it is sometimes thought, perfectly understandably, that it will bring with it the same kind of issues as arise at high street betting offices.
9. In fact, high street bingo premises in general and the applicant's in particular are different from betting offices in terms of local impact. It is therefore important to try to convey why the applicant's premises trade without regulatory concern.
10. *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 empirically 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.

¹ Gambling Commission industry statistics.

- 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.
 - Unlike in betting offices, staff are not behind the counter taking or paying out bets. They are there to greet 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.
11. The effect on the streetscape is important. Those walking past high street bingo premises do not have to run the gauntlet of street drinkers or other groups, whether during the school run, the evening or otherwise. Consistent and authoritative evidence on this topic is given by company witnesses and also Stuart Jenkins and Nick Mason, independent witnesses who have visited several of the applicant's London premises.
12. *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.
13. *Upon entry.* Those entering will be greeted face to face by a uniformed member of staff. This is an opportunity to ascertain whether the customer may appear 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 ascertain 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.

14. *Appearance.* Like the exterior, the interior of premises is 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 similarly prominently displayed, explaining where and how to obtain help with problem gambling.
15. *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.
16. *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, its 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.
17. *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 on their tablets, 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 at least three times a year.

It is fair to report that the outward appearance, interior ambience, supervision, layout and product in bingo premises are not attractive to children, and its systems have proved more than effective to ensure that underage gambling is not an issue in the applicant's 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.

18. *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 will have no pre-planned single staffing after 8 p.m.

- 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 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 on the tablet and reviewed at national level.
- Premises are fitted with maglocks, enabling entry to be controlled when necessary. In this case, the applicant has proposed a condition that the maglock will always be in use after midnight.
- The applicant maintains good liaison with local Police.
- It will also join any available Betwatch scheme.

THE REGULATORY RECORD OF THE APPLICANT

19. 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.

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

- **It has over 180 licences. It has been granted licences in every premises it has applied for.²**
- **None of its trading licence have ever been reviewed.**

21. This is despite the range of areas in which the applicant operates, including some with higher 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.

22. 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

23. As the 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]

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

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

(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))."

24. The following points should be noted:

- a. The 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. 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.
- e. As the Guidance states: “*Any refusal should be for reasons which demonstrate that the licensing objectives will not or are unlikely to be met*” That means demonstrate by evidence.
- f. Conversely, the following considerations are legally irrelevant to the determination of an application for a premises licence:
 - i. A dislike of gambling.
 - ii. A general notion that it is undesirable to allow gambling premises in an area.
 - iii. Moral or ethical objections to gambling.
 - iv. 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.
 - v. Nuisance (see Guidance by Gambling Commission).

SUBMISSIONS

25. The objectors have raised concerns as to harm to the licensing objectives which may occur should the premises be licensed and permitted to open.

26. However:

- the applicant’s record nationally and in London, and in areas of higher and lower deprivation, is that they operate without harm to the licensing objectives;
- there is no evidence that the feared harms will occur;

- none of the expert bodies advising the Licensing Committee, including the police, the licensing authority itself or the child protection authority have submitted representations.
27. There are concerns expressed regarding internal security. However, the quality of the applicant's security measures, including full CCTV inside and out, staffing levels set following security risk assessment, the use of staffguard and the secure handling of cash mean that its premises are not crime generators.
 28. There is a fear that the premises will attract exterior issues – loitering, petty crime, disorder etc. Such fears are usually rooted in an assumption that high street bingo premises attract the same sort of clientele as betting offices and that they will hang around outside. However, this is not so. The Committee has copious evidence on this point, from the applicant's own experienced personnel together with extensive independent evidence.
 29. There is reference to the presence of children in the area. Of course, this is true of all the applicant's premises which, being situated on the high street, are close to schools, takeaways and other facilities attractive to children. This does not present a problem, because children are unattracted to high street bingo premises and would not get in if they tried.
 30. 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.
 31. 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.
 32. Finally, all staff working in these premises will be thoroughly trained before the premises opens, if it is licensed. The applicant would welcome the involvement of the

police and licensing authority in such training so as to reinforce the local characteristics of Deptford, should this be thought helpful.

33. 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 180 licensed gambling premises in a wide variety of locations of higher and lower crime, deprivation and population density, including in London.
- Despite that, it has never experienced a regulatory complaint, review of a trading venue or prosecution.
- There is no evidence before the Committee that it has failed to promote the licensing objectives elsewhere.
- 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.
- 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.

34. 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.
35. Accordingly, the Committee is respectfully invited to grant the application as asked.

PHILIP KOLVIN QC
18th June 2021

11 KBW
Temple EC4

Proposed Licence Conditions

Proposed Operational Condition

All Merkur Slots premises maintain a high standard of operation and implement many of the following measures as standard.

Having Considered the London Borough of Lewisham Council's Statement of Licensing Principles for Gambling Premises, local demographics, crime statistics and local concerns raised by the Interested Parties, Merkur Slots UK Limited would be willing to accept the following premises licence conditions:

1. Premises opening hours:
 - a. 09:00 to midnight Sunday to Thursday; and
 - b. 09:00 to 02:00 the following morning on Friday and Saturday.
2. The venue shall install and maintain a comprehensive CCTV system at the premises which should cover, as a minimum:
 - a. all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions;
 - b. the areas of the premises to which the public have access (excluding toilets); and
 - c. gaming machines and the counter area;

The CCTV system shall continually record whilst the venue is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of thirty one days with date and time visible. Subject to data protection legislative requirements, recordings shall be made available to the Police or an authorised officer of the Licensing Authority upon request.

3. There shall be an external camera at the premises which will provide live images to staff in the service counter area.
4. Notices indicating that CCTV is in use at the premises shall be placed at or near the entrance to the premises.
5. The licence holder shall ensure that the outside areas of the premises are monitored so as to ensure there is no public nuisance or obstruction of the highway.
6. 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 Think 25 Refusals.
7. A Think 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
8. Prominent signage and notices advertising the Think 25 Policy will be displayed at the premises.

9. **Third party testing on age restricted sales systems shall be carried out on the premises at least 3 times a year and the results shall be provided to the Licensing Authority upon request.**
10. **The licensee will ensure, through regular checks and intervention that customer's children are not left unsupervised outside the premises.**
11. **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 the ground floor staff.**
12. **The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice.**
13. **There shall be no pre-planned single staffing after 20:00.**
14. **If at any time (whether before or after the opening of the premises), the police or licensing authority supply to the premises names and/or photographs of individuals which it wishes to be banned from the premises, the licensee shall use all reasonable endeavours to implement the ban through staff training.**
15. **The Licensee shall implement a policy of banning any customers who engage in crime, disorder or anti-social behaviour within or outside the premises.**
16. **The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.**
17. **The licensee shall install and maintain an intruder alarm on the premises.**
18. **The Company's staff guard system or similar shall be installed and maintained at the premises, which allows direct communication with a central monitoring station permitting audio and CCTV communication.**
19. **The licensee will ensure that customer toilets are checked hourly and access is permitted by interaction with staff members**
20. **Prominent GamCare documentation will be displayed at the premises.**
21. **The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in the training shall be formally recorded and the records produced to the police or licensing authority upon request.**
22. **The licensee will contact Bench Outreach and local charities identified by the Licensee as working with people with mental health issues and gambling addiction issues to work in partnership and identify local concerns.**
23. **The licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.**
24. **The licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.**
25. **Full cash collections will not be completed by lone staff members.**
26. **Upon request, the licensee shall provide the Licensing Authority with their compliance/operating manual which sets out all of the premises policies to meet the regulatory requirements under the Gambling Act 2005 and shall provide a copy of any update or revision as soon as practicable following the implementation of that change.**

- 27. The licensee shall participate in a local Betwatch or similar scheme, where available.**
- 28. The Licensee will provide a contact number for local residents to contact the premises**
- 29. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.**

**Witness statement from
Amanda Kiernan, Head of
Compliance at Merkur Slots UK
Limited**

LICENSING SUB - COMMITTEE HEARING – 24TH JUNE 2021

SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

Merkur

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, 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 190 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 bingo premises licence, which evidences the high standard of operation applied across the licensed estate.
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 Metropolitan Police Licensing Team were approached on the 11th August 2020.
13. The local police licensing team advised they had no concerns with the proposed activities, nor did they raise any concerns regarding an association of local licensed gambling premises with crime, disorder or local nuisance.
14. 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.
15. 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.
16. None of the Responsible Authorities under the Gambling Act 2005, those of most relevance being the Licensing Authority, Police, Gambling Commission, Environmental Health and Child Protection teams, have raised any specific concerns regarding Merkur's bingo premises licence proposals and none have objected to the application.
17. 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.
18. 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 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.

19. We have identified local providers of vulnerability support services within the local area risk assessment and we will contact those organisations to discuss gambling addiction support services 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

20. 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.
21. 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'.
22. 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 Gamcare and Bingo Association accredited Social Responsibility and Interaction training for its premises management teams. This training is accredited by Gamcare. Excerpts from the Company's training platform are provided in the supporting documents.
23. 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.
24. 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.

25. 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.
26. 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.
27. Examples of some of Merkur's responsible gambling information have been provided in the supporting documents.
28. As part of Merkur's continuing commitment to high standards of staff training and compliance, the Company has engaged the services of YGAM (Young Gamers & Gamblers Education Trust). The charity will work in partnership with another charity, Betknowmore, to develop and provide additional Safer Gambling training and resources for venue and area managers. Training will be designed to complement our existing face to face training and will be City and Guilds accredited.
29. 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.
30. 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.
31. 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.

Lewisham existing operation

32. Merkur has held a bingo premises licence for 97-99 Lewisham High Street since 2012 and the premises continues to operate responsibly. The premises licence does not contain any additional licence conditions imposed by the Licensing Authority, nor does it operate with any limitation to its hours of operation.

Site location

33. The premises is a former William Hill bookmakers.
34. A detailed local area risk assessment has been submitted designed in consideration of Lewisham Council'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.

35. 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.
36. Merkur operates in many large cities and towns that have higher levels of deprivation and are subject to potentially higher levels of footfall from Children and Young Persons due to location in busy town centre locations with nearby fast food outlets. We have provided data within the hearing documentation, extracted from the English indices of deprivation 2019, which identifies that Merkur is an experienced operator with premises licences in 22 local authority areas, which are more deprived than Lewisham. A table of operational venues, which have recently undergone independent covert inspection has also been provided
37. As a result of the Company's commitment to responsible operation and the resources directed to responsible play, none of Merkur's 190 operational premises licences have been subject to review proceedings or revocation.

Underage Gambling

38. 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.
39. 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.
40. 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.
41. Merkur Slots customer demographics are up to 50% female with an average age over 30.
42. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
43. 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.
44. In our experience venues are not more susceptible to access by underage individuals due to the nature of our gaming services and customer demographics. 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

45. Merkur has considered local police crime statistics, the premises location, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
46. 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.

47. Merkur operates premises within other areas of the country with high crime statistics and manages its premises effectively and incidents relating to crime and disorder are rare. Merkur is an experienced operator with a proven history of operating premises in challenging areas.
48. 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.
49. Merkur's training scheme and control systems are proven to be effective across the Company's licensed estate but local premises management will always work with any local authorities, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.
50. 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.
51. 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.

Local Concerns

52. The representations received from Interested Parties identify the potential for increased anti-social behavior, crime and disorder and the risk to local individuals that may be at risk of gambling harm should the Licensing Sub-Committee be minded to grant the current premises licence application.
53. Merkur has completed a 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.
54. 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.
55. 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.

56. 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.
57. Having considered the concerns raised, we believe that the proposed licence conditions and restricted operational hours will mitigate any perceived risk.
58. 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. Deptford High Street will be no exception.
59. 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.

Premises Operation

60. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the Licensing Objectives and a copy of our Policies and Procedures has been provided as part of our hearing bundle.
61. 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.
62. 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.
63. 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.
64. 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.
65. It is very rare for our premises to employ dedicated SIA registered door staff as, in our experience, this is almost never necessary. We do not have SIA conditions on any of our 90 bingo premises licences. However, staff numbers and rotas are continuously reviewed to adapt to customer numbers and cognisance is taken of police advice. We do have premises where door staff are employed following liaison with local police licensing teams, which have identified concerns in the immediate area of our premises, even where concerns do not directly relate to our customers.

Conclusion

66. 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.
67. 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.
68. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
69. Also in my experience 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.
70. 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: 16th June 2021

**Witness statement from Steve
Ambrose, Operations Director
at Merkur Slots UK Limited**

LICENSING SUB - COMMITTEE HEARING – 24TH JUNE 2021

SUPPLEMENTAL STATEMENT – STEVE AMBROSE

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. We have considered the local concerns raised by the Interested Parties and whilst our other premises in Lewisham High Street has traded responsibly since 2012, with no conditions on its licence or limitation to its operational hours, we have proposed a number of additional licence conditions for this premises, which we hope will address any perceived risk and allay any fears.
20. In our local area risk assessment we have identified a number of organisations, such as Bench Outreach 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.
21. 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: 16th June 2021

**Witness statement from Andy
Tipple, Head of Product at Merkur
Slots UK Limited**

LICENSING SUB-COMMITTEE HEARING – 24 JUNE 2021

SUPPLEMENTAL STATEMENT - ANDY TIPPLE

Merkur Slots UK Limited, formerly Cashino Gaming Limited

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 90 'High Street Bingo' premises, 5 bingo clubs, 5 Family Entertainment Centres and 87 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 machines 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. 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.
9. Following successful grant of the new bingo premises licence, we have proposed that there will be 20 bingo tablets and 32 gaming machines.
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: 16th June 2021

**Independent Observation
Reports: Leveche Associates
Limited**



Independent Observations Report

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

Merkur Slots

40 Deptford High Street, London SE8 4AF

Introduction

1. I have been instructed to conduct independent observations on the venue at 40 Deptford High Street, London SE8 4AF and the area around these premises.
2. Merkur Slots UK Limited have applied for a Bingo Premises Licence for the premises under Section 159 of the Gambling Act 2005.
3. The premises was a former William Hill Bookmakers. It is currently closed and not trading.
4. As part of my review of the observations I have considered the Licensing Objectives under the Gambling Act 2005:

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

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. Three observations were conducted on Saturday 12th June into Sunday 13th June 2021, Monday 14th June 2021 and Wednesday 16th June 2021 at various times throughout the day and night.
11. On all three days the weather was bright, hot and dry. During the period of the nighttime observations, the area is illuminated by street lighting and shop front lights though I would describe this lighting as poor. I had clear and unobstructed views throughout the observations.

12. For the observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
13. Deptford High Street, London SE8 runs north to south and is 733 metres (0.455 miles) in length. Deptford Rail Station is located at the junction with Deptford Yard opposite Resolution Way.
14. There clearly is regeneration taking place in the area, which has a cosmopolitan and bohemian feel to the shops, bars, cafes and barber shops around the Deptford Yard, Resolution Way and Deptford High Street.
15. The area of my observations is densely populated with a large number of retail premises that include supermarkets, mini supermarkets, betting shops, fishmongers, butchers, barber shops, restaurants, hairdressers, tattoo shops, funeral directors, traditional hardware stores, bars, cafes, late licensed bars, pubs, charity shops, estate agents, pawn brokers and fast-food restaurants.
16. The area has a diverse community living together in a mixture of privately owned, local authority and rental accommodation.
17. Immediately south and next to the premises is the Fu Quing Chao Shi Chinese Supermarket and immediately north and next to the premises was the Star Pizza take-away shop. Both of these premises were open. Opposite was a furnishings shop called Bluir.
18. There are three traditional betting shops in Deptford High Street, north of the premises towards Evelyn Road and Creek Road, Paddy Power at 52 Deptford High Street and Paddy Power at 175 Deptford High Street and to the south of the premises towards New Cross Road, Jennings Bet at 175 Deptford High Street. There are no other betting shops in the immediate vicinity of the premises.
19. The Paddy Power premises had an obscured glass shop front so it was hard to see into the premises. At Jennings Bet however, the gaming machines to the right, cashier counter to the left and television screens at the back of the premises could all clearly be seen from the street.
20. To the north of the premises is H and T Pawnbrokers at 72 Deptford High Street and at 161 is the ASC After-School Cub.
21. In the area there are three schools and two churches:
 - i) Tidemill Academy 11 Giffin Street SE8.
 - ii) St Joseph's Roman Catholic Primary School Crossfield Street SE8.

- iii) Addey and Stanhope Comprehensive School 472 New Cross Road SE14.
 - iv) St Paul's Church St Pauls Courtyard.
 - v) Deptford Catholic Church by Deptford Rail Bridge.
22. There appeared to be no bus routes servicing Deptford High Street itself, however buses were in service on New Cross Road and Evelyn Road / Creek Road.
23. There was graffiti adorned on many of the premises in Deptford High Street giving the area the appearance that some parts of the high street were run down which was in complete contrast to areas such as Deptford Yard and when the street market was in full swing with the shops were open.
24. Deptford High Street is two vehicular traffic from the junction of Evelyn Road to Giffin Street, when it becomes one way for motor vehicles from Giffin Street to the junction with New Cross Road. One way motorised traffic runs past the premises. Pedestrian and vehicular traffic varied during the times of the observations. There was zoned parking all the way along Deptford High Street and surrounding streets with double yellow lines on some sections.
25. The lifting of some COVID-19 pandemic restrictions clearly had a positive impact on the public visiting the bars, shops, cafes and the area in general.
26. Photographic images of what was seen during the observations at 40 Deptford High Street and the surrounding area were obtained to support my findings and recommendations. These images are documented in Appendices A, B, and C.

Observations

27. On Saturday 12th June 2021 from 22:00 hours to 01:30 hours on Sunday 13th June 2021 I observed 40 Deptford High Street SE8 4AF and the surrounding area.
28. During the observations vehicular and pedestrian traffic was varied throughout the night. There was steady pedestrian and vehicular traffic at the start of my observations, which eased off completely to virtually none, in the early hours of the morning.
29. The area felt safe with members of the public who were going about their business, working, shopping and socialising.

30. The three betting shops were closed at the time of my first visit. I saw no evidence of groups of youths hanging around the streets or outside betting shops or licensed premises.
31. During the course of my observations I did not see any children unaccompanied without their parents or a responsible adult.
32. In the evening SIA door staff wearing SIA badges were deployed on the front entrance to the Badger & Badger Pub/Kitchen. They remained on the premises entrance until it closed.
33. Bars and Cafes were busy but not overcrowded and customers remained good natured until the premises closed.
34. The takeaway premises were busy throughout the night with customers and delivery drivers waiting for and collecting takeaway orders. In the early hours of the morning numbers of people using the area fell dramatically.
35. 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 any of the premises.
36. The images taken on this day in support of my observations are shown in Appendix A.
37. On Monday 14th June 2021 from 15:30 hours to 20:00 hours I observed 40 Deptford High Street SE8 4AF and the surrounding area.
38. During the observations vehicular and pedestrian traffic was varied throughout the day and evening. There was steady pedestrian and vehicular traffic at the start of my observations, which reduced as it got later in the evening.
39. When the school children started to leave their respective schools at Tidesmill Academy, St Josephs RC School and Addey and Stanhope Comprehensive, the pedestrian numbers increased and the high street felt busy. None of the children or young adults I saw in school uniform were hanging in groups or causing problems. The younger children were accompanied by their parents or a responsible adult. They showed no interest in the betting shops that were open or any desire to look through the windows. As they transited the high street they walked with purpose and clearly were on their way home or on their way to meet another commitment.
40. The area felt safe with members of the public who were going about their business, working, shopping and socialising.
41. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing or groups of youths hanging around

any of the premises. However, during my observations, I was approached by a lone thin, white and heavily tattooed female who asked me for money. I refused whereupon she ran off towards New Cross Road.

42. The images taken on this day in support of my observations are shown in Appendix B.
43. On Wednesday 16th June 2021 from 14:40 hours to 19:00 hours I observed 40 Deptford High Street SE8 4AF and the surrounding area.
44. On my arrival I saw that the Wednesday Street Market was in full swing. Deptford High Street was closed to all traffic from Giffin Street to New Cross Road. Stalls and stall holders lined the road with a wide variety of goods, fruit and veg and other foods on sale.
45. Pedestrian traffic was heavy from Deptford Rail Bridge to New Cross Road especially in the street market itself. These numbers were even more swollen when the children started to leave their respective schools at Tidesmill Academy, St Josephs RC School and Addey and Stanhope Comprehensive. The younger children were accompanied by their parents or a responsible adult. None of the children or young adults I saw in school uniform were hanging around in groups or causing problems. They showed no interest in the betting shops that were open or any desire to look through the windows. As they transited the high street they walked with purpose and were clearly on their way home or on their way to meet another commitment.
46. During the observations vehicular and pedestrian traffic was varied throughout the day and evening.
47. The area felt safe with members of the public who were going about their business, working, shopping and socialising.
48. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, drug dealing or groups of youths hanging around any of the premises.
49. However, during my observations, I was approach by a lone thin black female who asked me for money. I refused whereupon she walked off north along the high street. Throughout the afternoon I saw the same female three times approach members of the public asking for money. On another occasion I saw a white male playing the electric violin opposite Giffin Street busking for money and I was aware of a lone white female drinking from cans of beer whilst seated in the open courtyard area in Giffin Street, for most of the afternoon.

50. The images taken on this day in support of my observations are shown in Appendix C.

Research

51. As part of my research into Merkur Slots UK Premises and its operation I previously carried out a number of covert visits to their premises. Two of these premises were Tooting High Street, SW17 and Neasden Lane, NW10 and details of those visits are provided below. More recently, Leveche Associates Limited has completed further covert inspections of other Merkur operational premises and inspection reports have been provided within the hearing documentation.
52. On Saturday 24th October 2020 between 21:25 hours and 21:40 hours I covertly visited the Merkur Slots Premises at 65 Tooting High Street, London SW17 OSP. The premises had a smart well-lit and professional looking frontage which was clean and well maintained. On the main entrance door was displayed the premises temporary opening hours – Monday to Sunday 0500 – 2200 hours.
53. On entry I saw the premises licences and rules of the house displayed on the walls. There was clear signage in relation to CCTV in operation, COVID-19 Guidelines and for face coverings to be worn. There were hand sanitizer dispensers which I was able to use. 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 was a staff counter and beyond that change machines. I saw there were two smartly dressed members of staff, one female and one male, wearing dark trousers, white shirts and a waist coat type garment. The female member of staff approached me, welcomed me to the premises and asked if I needed any help.
54. Whilst I walked around the premises deciding on which machine to use, I saw there were two other smart but casually dressed customers using the machines. They were clearly not being pressurised and encouraged to spend money and they were not vulnerable or drunk. I then used one of the gaming machines until I left the premises. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money and I found the premises clean and tidy. The premises closed at about 21:45 hours and I saw the staff securing and then leaving the premises at about 22:00 hours.
55. On Thursday 29th October 2020 between 15:40 hours and 16:00 hours I covertly visited the Merkur Slots Premises at 304 Neasden Lane, London NW10 0AD. The premises had a smart well-lit and professional looking

frontage which was clean and well maintained. On the changing screens either side of entrance doors was displayed the premises temporary opening hours – Monday to Sunday 0500 – 2200 hours.

56. On entry there was clear signage in relation to CCTV in operation, COVID-19 Guidelines and for face coverings to be worn. There were hand sanitizer dispensers which I was able to use. 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. On the left-hand side were further machines and at the back a toilet for customers use. The toilet was clean and tidy with ample handwashing facilities and hand sanitizer. I saw there were two smartly dressed members of staff, one female and one male, wearing dark trousers, white shirts and a waist coat type garment. Both members of staff approached me and welcomed me to the premises, the male asked if I needed any help and if I wanted a free drink of tea, coffee or water. I stated I wanted to play a traditional style fruit machine and he directed me to one of the machines. He explained some of the promotional literature and then left me alone to play the machine.
57. When I walked into the premises, I saw there were two other casually dressed customers using the machines. They were clearly not being pressurised and encouraged to spend money and they were not vulnerable or drunk.
58. Whilst I played the machine two further customers came into the premises to use the machines. Once again, they were not pressurised or encouraged to spend money and they were not vulnerable or drunk.
59. 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.
60. Once I had finished using the fruit machine, I left the premises.

Summary

61. During the visits to 40 Deptford High Street and the surrounding area I saw no evidence of crime and disorder, anti-social behaviour, street urinating, littering or drug dealing. However, I did witness three occasions where I saw three individuals engaged in begging in Deptford High Street and one street drinker in the seated open courtyard area in Giffin Street opposite the Library.
62. I have also visited Merkur Slots Premises in Wembley, North Finchley, Edmonton, Tottenham Court Road, Kilburn High Road, Morden, Holloway and Wembley. I found them to have smart well-lit and professional looking

frontages. At the times of my visits, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing, begging or groups of youths hanging around any of the premises.

63. From my visits to Merkur Slot Premises I have found professional and attentive staff managing them. The premises appeared 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 unlike some other gaming and betting premises.
64. 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.
65. In conclusion, from my observations and 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.
66. From my observations I cannot see any evidence to support the concerns raised in the objections at this time.

Recommendations

Conditions

67. To ensure the safety of customers and the general public and provide reassurance to the Police and the Licensing Authority I would recommend the following conditions be added to the licence namely:
 - Premises opening hours:
 - a. 09:00 hours to midnight Sunday to Thursday; and
 - b. 09:00 hours to 02:00 hours the following morning on Friday and Saturday.
 - The venue shall install and maintain a comprehensive CCTV system at the premises which should cover, as a minimum:

- a. all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions.
 - b. the areas of the premises to which the public have access (excluding toilets).
 - c. gaming machines and the counter area.
- The CCTV system shall continually record whilst the venue is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of thirty one days with date and time visible. Subject to data protection legislative requirements, recordings shall be made available to the Police or an authorised officer of the Licensing Authority upon request.
- There shall be an external camera at the premises which will provide live images to staff in the service counter area.
- Notices indicating that CCTV is in use at the premises shall be placed at or near the entrance to the premises.
- The licence holder shall ensure that the outside areas of the premises are monitored so as to ensure there is no public nuisance or obstruction of the highway.
- 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 Think 25 Refusals.
- A Think 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
- Prominent signage and notices advertising the Think 25 Policy will be displayed at the premises.

- Third party testing on age restricted sales systems shall be carried out on the premises at least 3 times a year and the results shall be provided to the Licensing Authority upon request.
- The licensee will ensure, through regular checks and intervention that customer's children are not left unsupervised outside the premises.
- 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 the ground floor staff.
- The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice.
- There shall be no pre-planned single staffing after 20:00 hours.
- If at any time (whether before or after the opening of the premises), the police or licensing authority supply to the premises names and/or photographs of individuals which it wishes to be banned from the premises, the licensee shall use all reasonable endeavours to implement the ban through staff training.
- The Licensee shall implement a policy of banning any customers who engage in crime, disorder or anti-social behaviour within or outside the premises.
- The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.
- The licensee shall install and maintain an intruder alarm on the premises.
- The Company's staff guard system or similar shall be installed and maintained at the premises, which allows direct communication with a central monitoring station permitting audio and CCTV communication.
- The licensee will ensure that customer toilets are checked hourly and access is permitted by interaction with staff members
- Prominent GamCare documentation will be displayed at the premises.
- The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in the training shall be formally recorded and the records produced to the police or licensing authority upon request.

- The licensee will contact Bench Outreach and local charities identified by the Licensee as working with people with mental health issues and gambling addiction issues to work in partnership and identify local concerns.
- The licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
- The licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.
- Full cash collections will not be completed by lone staff members.
- Upon request, the licensee shall provide the Licensing Authority with their compliance/operating manual which sets out all of the premises policies to meet the regulatory requirements under the Gambling Act 2005 and shall provide a copy of any update or revision as soon as practicable following the implementation of that change.
- The licensee shall participate in a local Betwatch or similar scheme, where available.
- The Licensee will provide a contact number for local residents to contact the premises
- Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.

68. I believe 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.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
17/06/2021

Appendix 'A'

Saturday 12th June 2021 19:57hrs – 01:20hrs

Image A1

40 Deptford High Street, London SE8 4AF - 19:57hrs

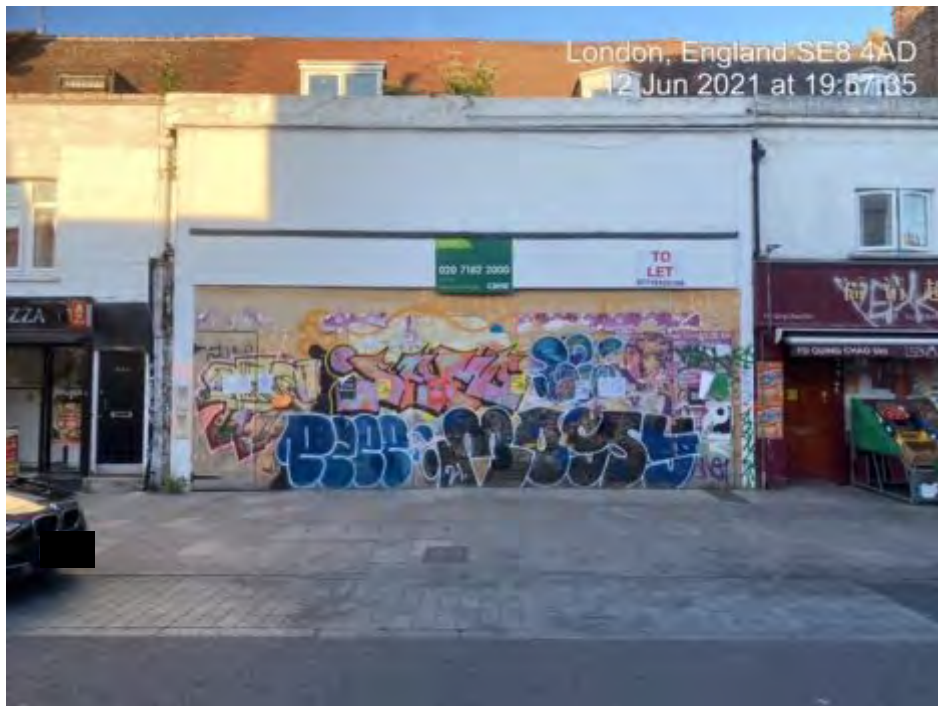


Image A2

Notice of Application - Bingo Premises Licence under Section 159 of the Gambling Act 2005 and Lewisham Council Planning Application displayed on front of premises- 19:58hrs.



Image A3

Fu Qing Chao Shi Chinese Supermarket - next door south of premises - 19:57hrs



Image A4

Bluria Soft furnishing store opposite premises - 19:58hrs



Image A5

Looking south from front of premises - 19:58hrs



Image A6
Looking south from front of premises - 19:58hrs



Image A7
Looking north from front of premises - 19:58hrs



Image A8
Looking north from front of premises - 19:58hrs



Image A9
Street view south of the premises - 19:59hrs



Image A10
Tesco Express Supermarket south of the premises - 19:59hrs



Image A11

Deptford High Street looking north from New Cross Road - 20:01hrs



Image A12

Jennings Bet Bookmakers 14, Deptford High Street - 20:03hrs



Image A13

Looking north from front of premises towards Paddy Power Bookmakers - 20:03hrs



Image A14

Graffiti on walls and front of shops north of venue at junction Hales Street - 20:11hrs



Image A15

H and T Pawnbrokers 72, Deptford High Street north of premises - 20:12hrs



Image A16

Nightingale Pharmacy junction with Giffin Street, male in blue T-shirt playing violin and begging - 20:14hrs

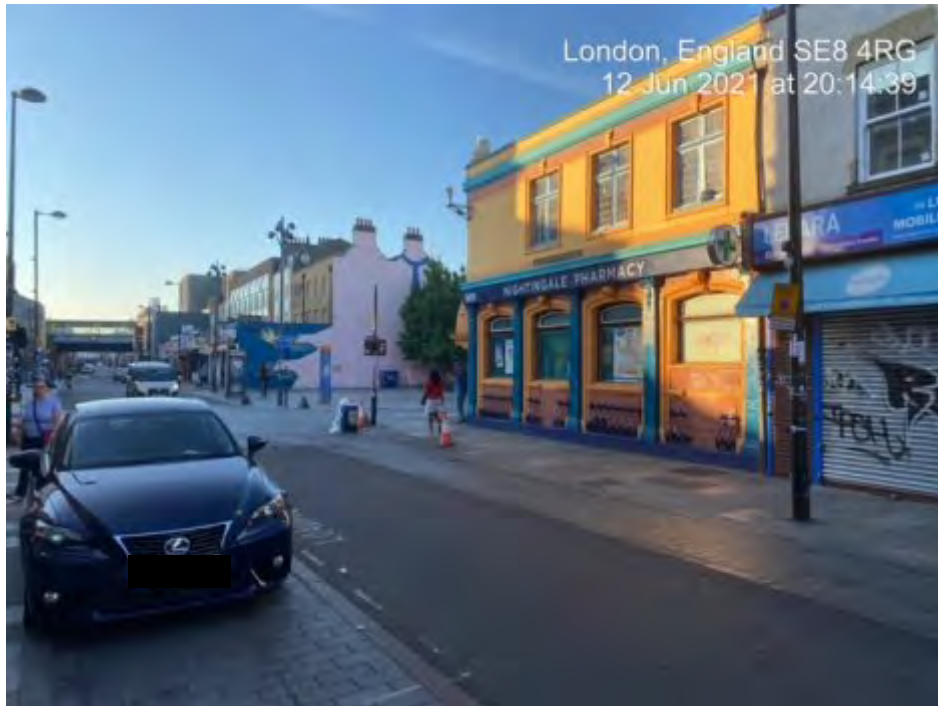


Image A17

Nightingale Pharmacy junction with Giffin Street, male in blue T-shirt playing violin and begging - 20:16hrs



Image A18

Looking north towards Deptford Rail Station - 20:16hrs

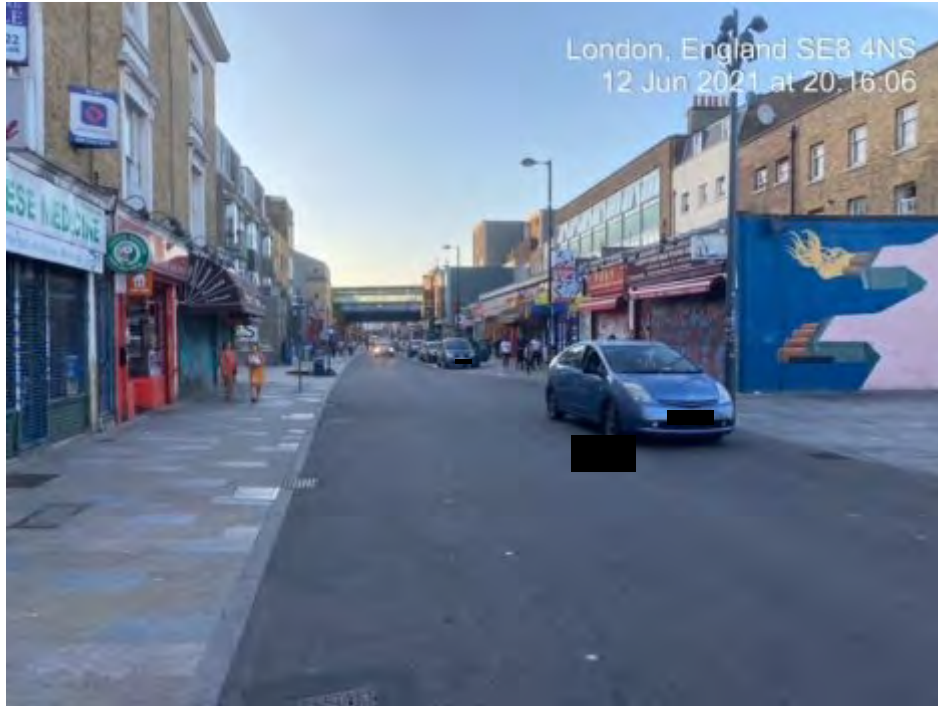


Image A19
Rubbish in street opposite Nightingale Pharmacy - 20:16hrs

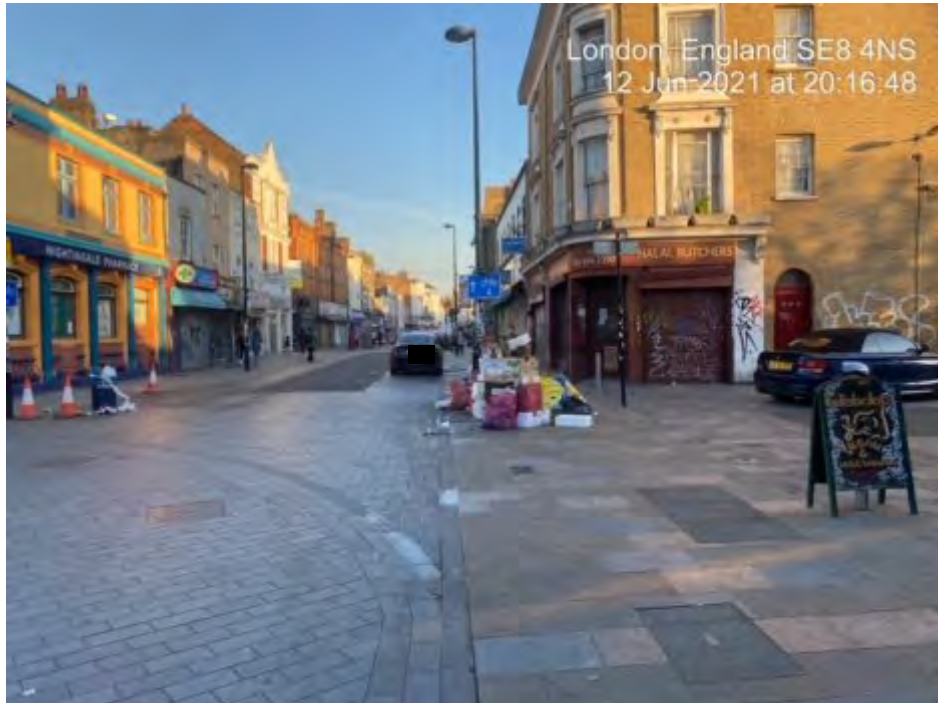


Image A20
Deptford Catholic Church near Deptford Rail Station - 20:18hrs

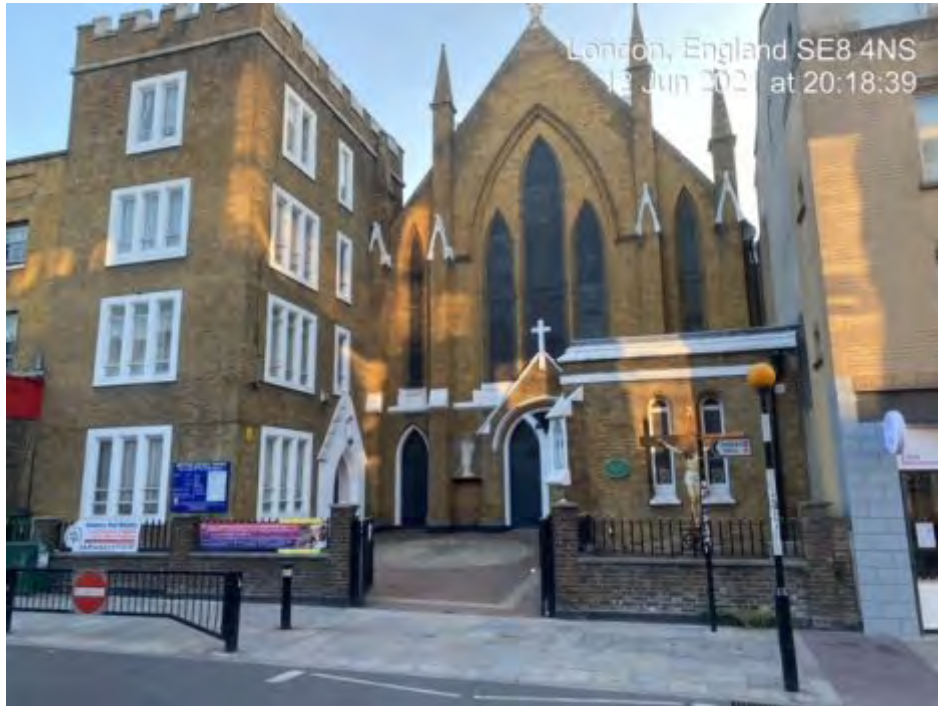


Image A21
Market Yard at Deptford Rail Station - 20:20hrs



Image A22
Looking north at Deptford Rail Station - 20:20hrs



Image A23
Resolution Way under rail arches at Deptford Rail station - 20:20hrs



Image A24

North of Deptford Rail Station towards Evelyn Road - 20:21hrs



Image A25

Looking south towards Deptford Rail Station and the premises - 20:21hrs



Image A26

Deptford High Street looking south from Evelyn Road - 20:27hrs



Image A27

White Swan Public House 217, Deptford High Street - 20:27hrs



Image A28
St Pauls Church at St Pauls Courtyard - 20:30hrs



Image A29
After School Club 161, Deptford High Street - 20:32hrs



Image A30
40 Deptford High Street, London SE8 4AF - 22:49hrs



Image A31

Looking north from front of premises - 22:49hrs



Image A32

Looking south towards premises - 22:50hrs



Image A33

Deptford High Street looking north from New Cross Road - 22:51hrs



Image A34

Deptford High Street looking south from Evelyn Road - 22:58hrs

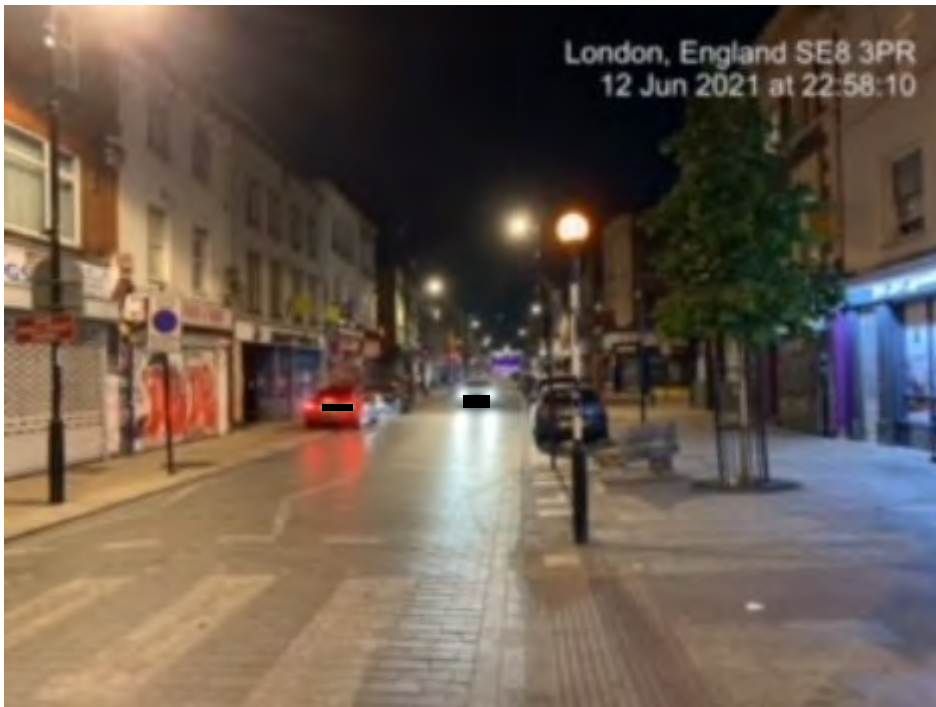


Image A35

Looking south towards Deptford Rail Station - 22:59hrs



Image A36

Market Yard at Deptford Rail Station - 23:00hrs

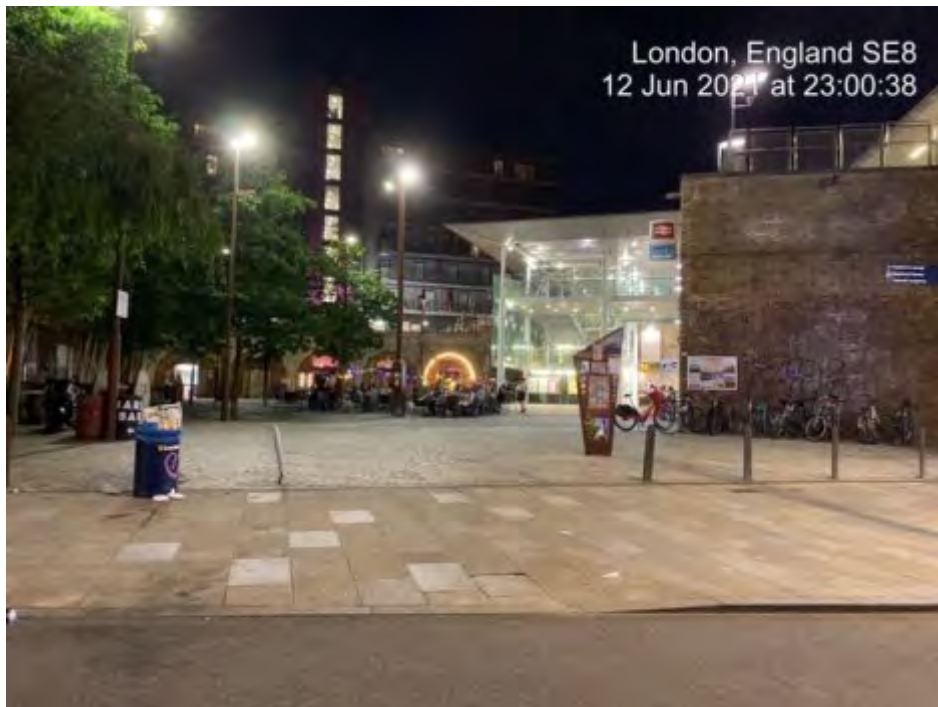


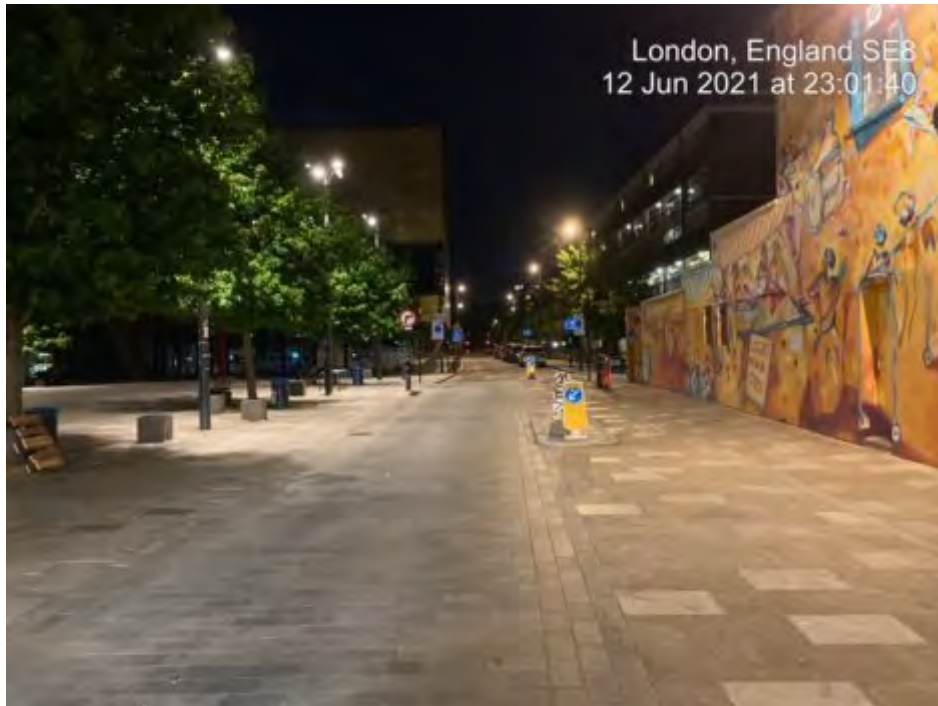
Image A37

Nightingale Pharmacy junction with Giffin Street - 23:01hrs



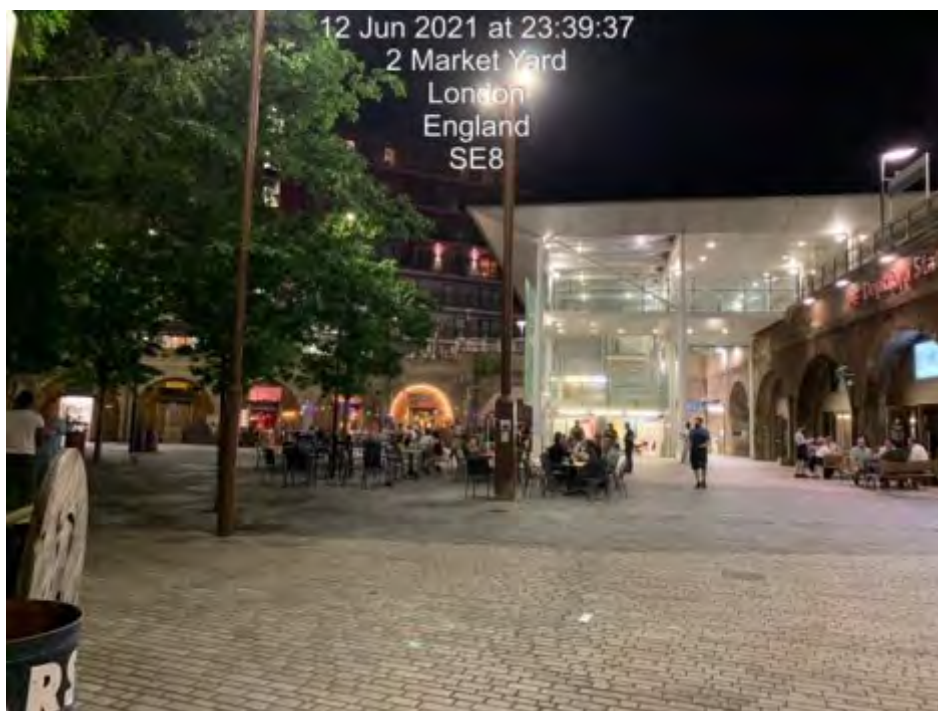
Image A38

Giffin Street next to Nightingale Pharmacy - 23:01hrs



London, England SE8
12 Jun 2021 at 23:01:40

Image A39
Market Yard at Deptford Rail Station - 23:39hrs



12 Jun 2021 at 23:39:37
2 Market Yard
London
England
SE8

Image A40
Deptford Rail Station - 23:39hrs



Image A41
Looking north towards Deptford Rail Station - 23:41hrs



Image A42
Giffin Street near entrance to Tidemill Academy- 23:45hrs

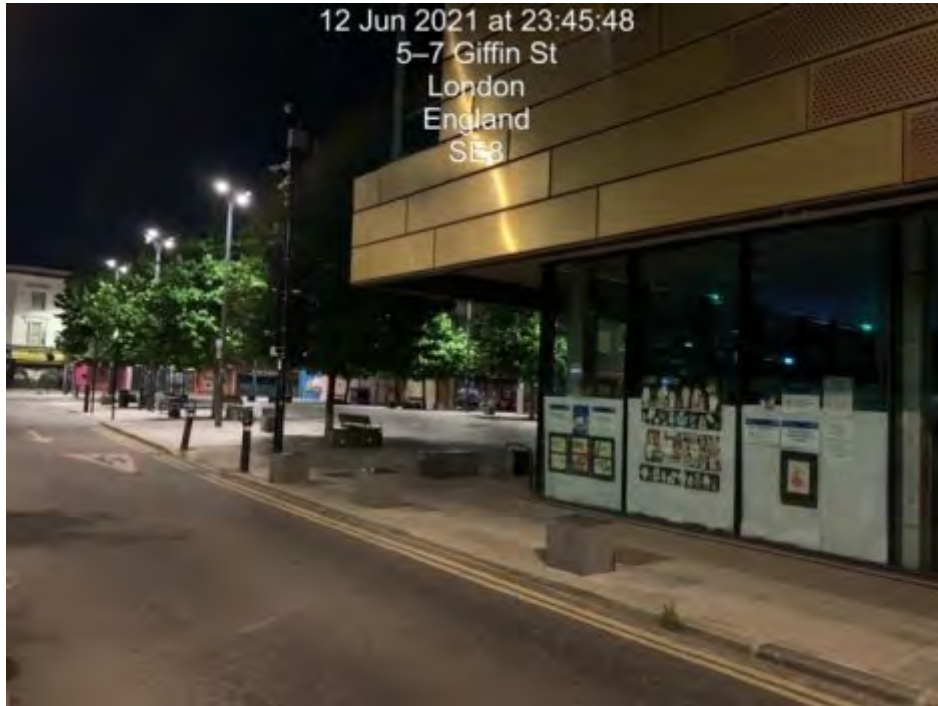


Image A43

Paddy Power Bookmakers north of premises, 52 Deptford High Street - 23:49hrs

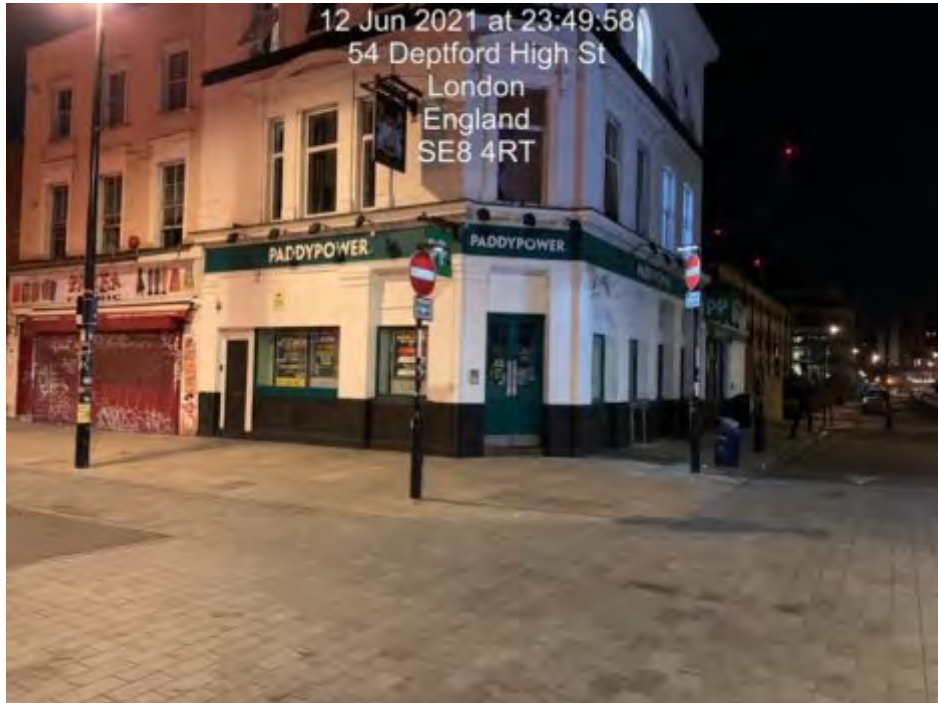


Image A44

40 Deptford High Street, London SE8 4AF - 23:50hrs



Image A45

Corner of Deptford High Street and New Cross Road - 23:53hrs



Image A46

Looking north along Deptford High Street from New Cross Road - 23:53hrs

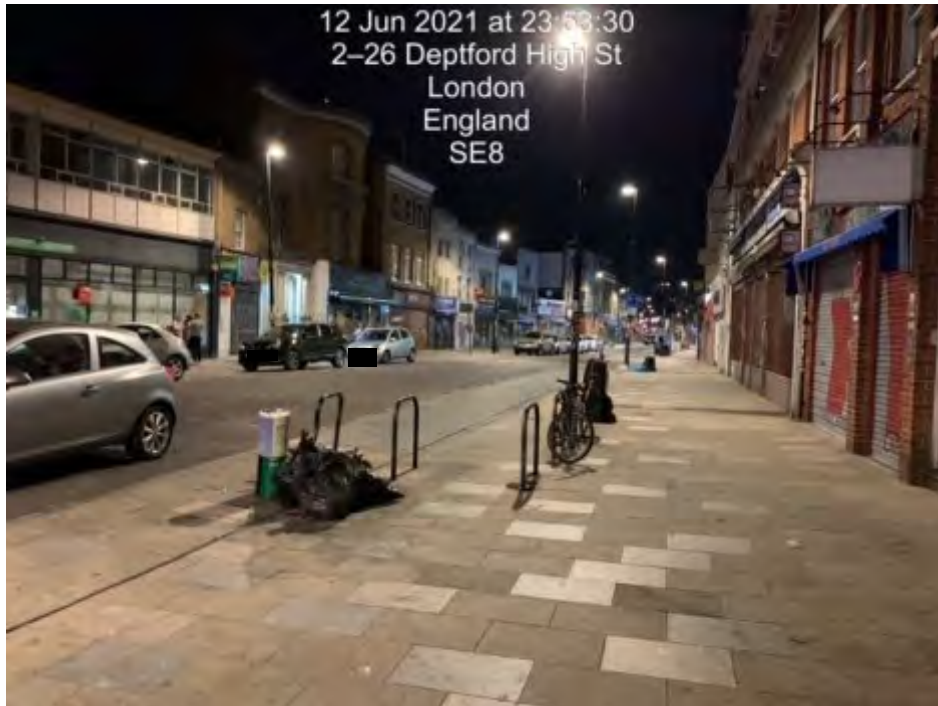


Image A47

Asda Supermarket, Deptford High Street - 23:53hrs

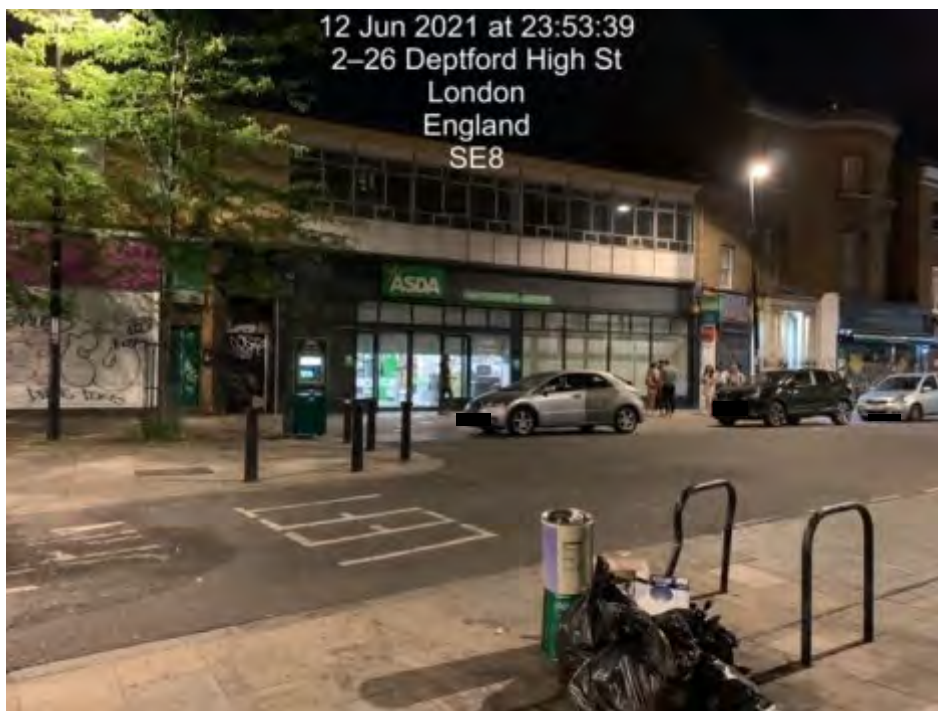


Image A48

Deptford High Street at junction with New Cross Road - 23:53hrs



Image A49

Jennings Bet Bookmakers 14, Deptford High Street - 23:54hrs

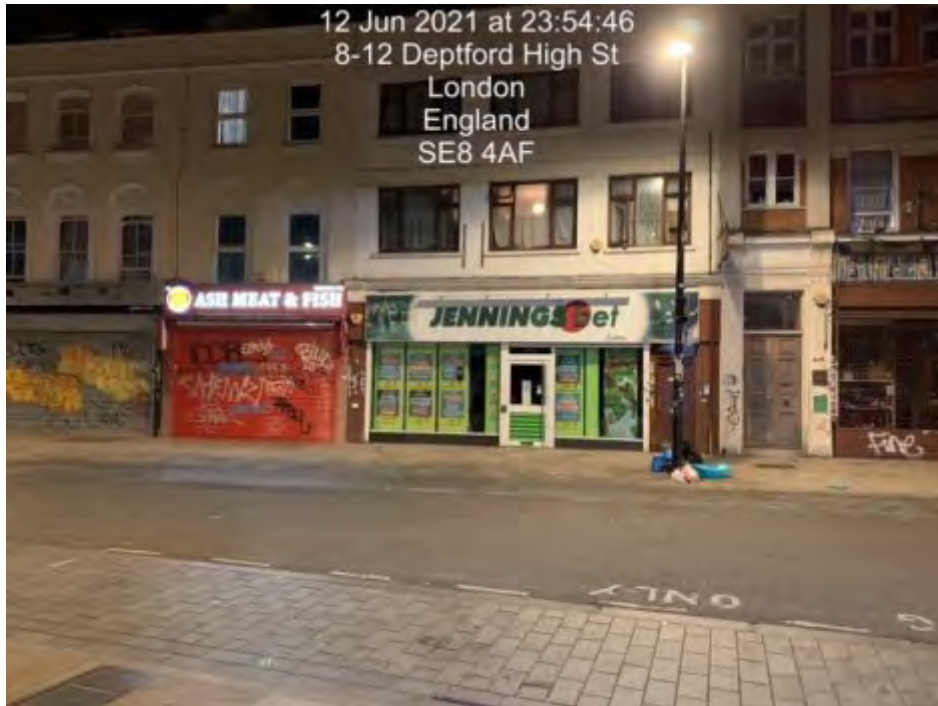


Image A50

Deptford High Street looking north towards premises - 23:55hrs

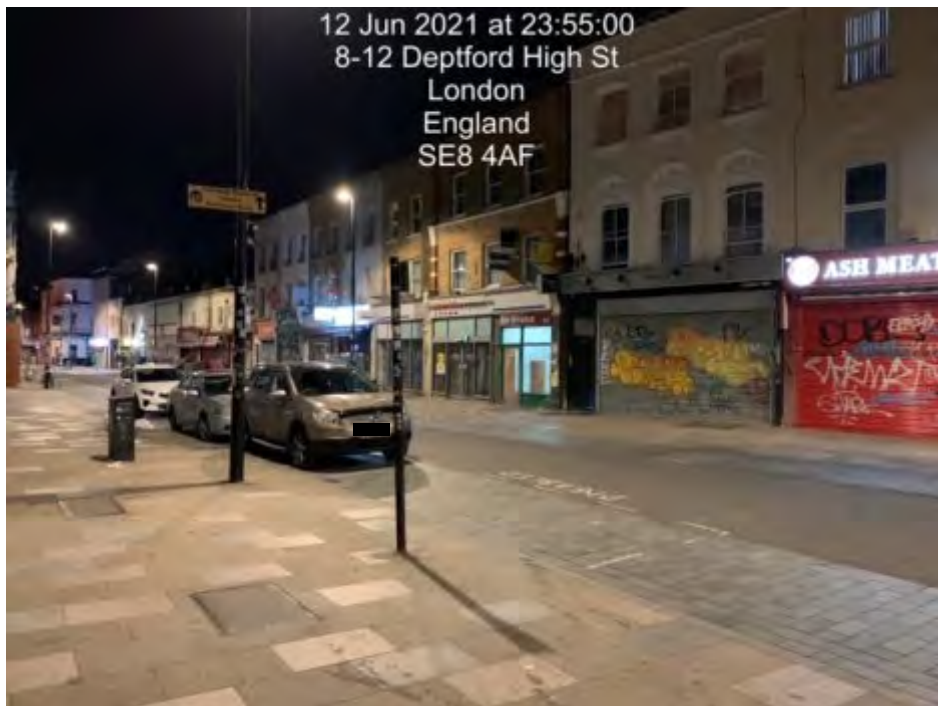


Image A51

Deptford High Street looking north towards Evelyn Street - 00:07hrs

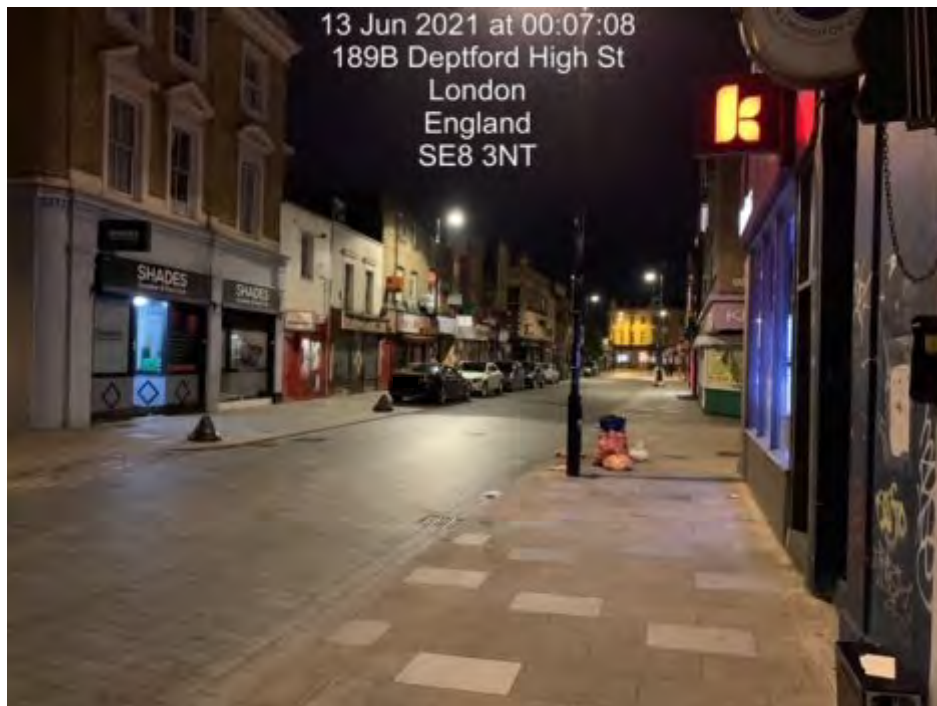


Image A52
Paddy Power Bookmakers 175, Deptford High Street - 00:08hrs



Image A53
Looking south towards Deptford Rail Station - 00:10hrs



Image A54
After School Club 161, Deptford High Street - 00:10hrs

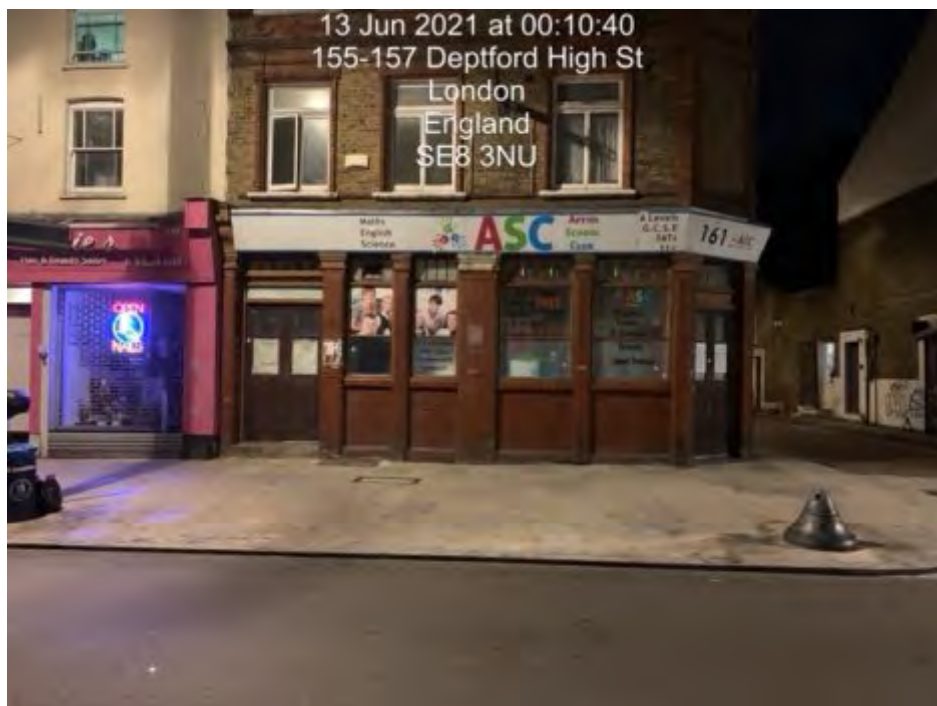


Image A55

Deptford High Street looking north towards premises - 01:19hrs

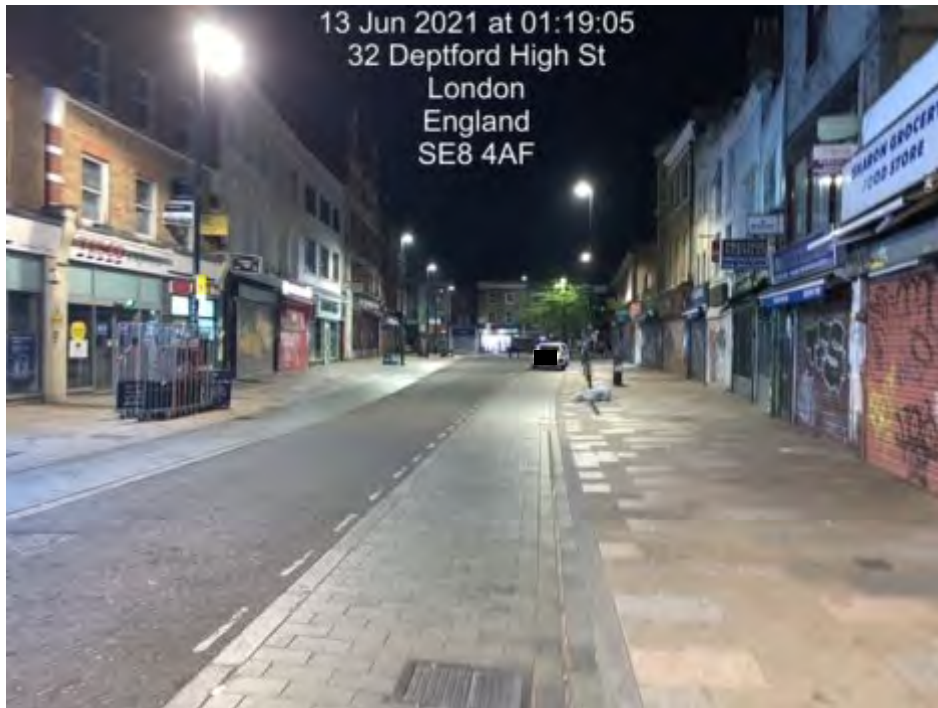


Image A56

40 Deptford High Street, London SE8 4AF - 01:20hrs



Image A57
Outside premises looking south - 01:20hrs



Appendix 'B'

Monday 14th June 2021 15:40hrs – 19:44hrs

Image B1

After School Club 161, Deptford High Street - 15:40hrs



Image B2

H and T Pawnbrokers 72, Deptford High Street north of premises - 16:01hrs



Image B3
40 Deptford High Street, London SE8 4AF - 16:03hrs



Image B4
Deptford High Street looking north from New Cross Road - 16:07hrs



Image B5
Deptford High Street looking north from New Cross Road - 16:08hrs



Image B6
Entrance to Tidemill Academy, Giffin Street 17:15hrs



Image B7
Giffin Street looking towards Deptford High Street - 17:16hrs



Image B8

Deptford High Street junction with Hamilton Street - 17:21hrs

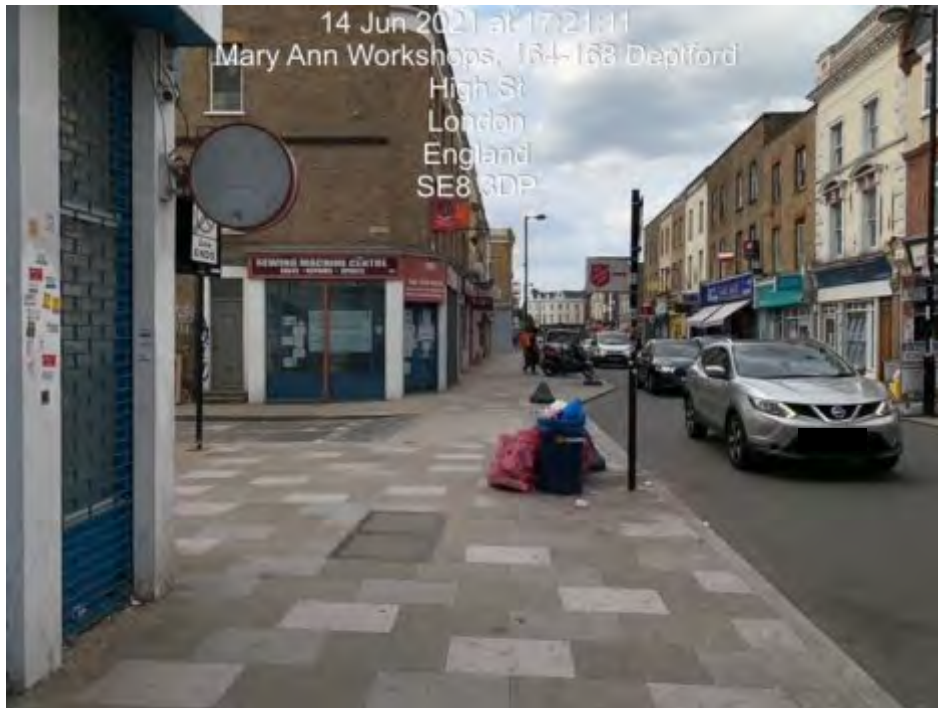


Image B9

Paddy Power 175 Deptford High Street - 17:22hrs

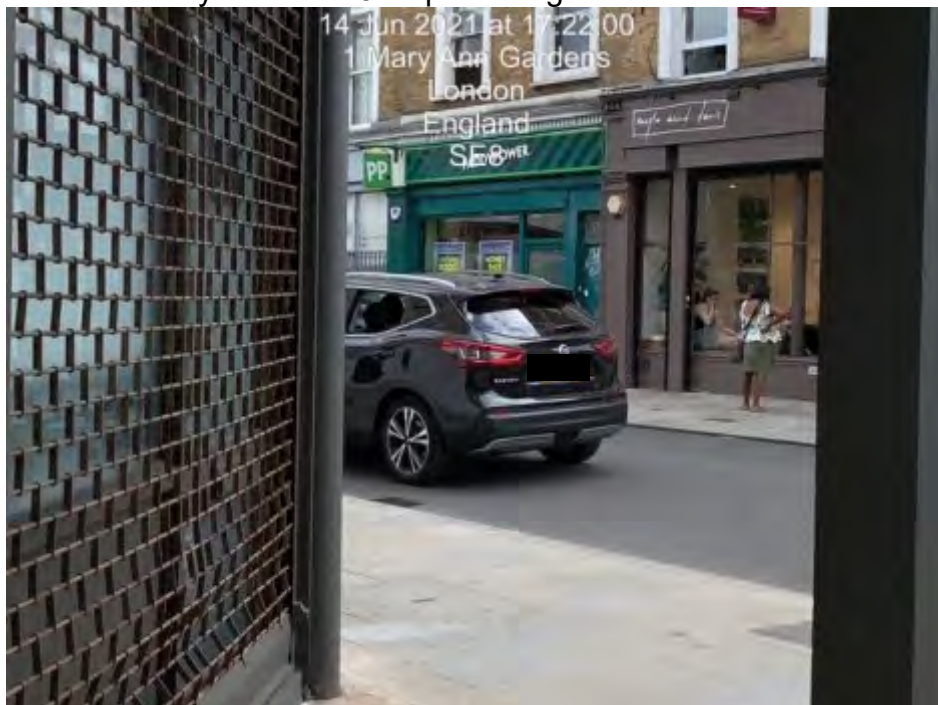


Image B10

Market Yard at Deptford Rail Station - 17:24hrs



Image B11

Looking south towards Giffin Street - 17:23hrs



Image B12

H and T Pawnbrokers 72, Deptford High Street north of premises - 17:28hrs



Image B13

Jennings Bet Bookmakers 14, Deptford High Street - 17:34hrs



Image B14
Looking south towards New Cross Road - 17:34hrs

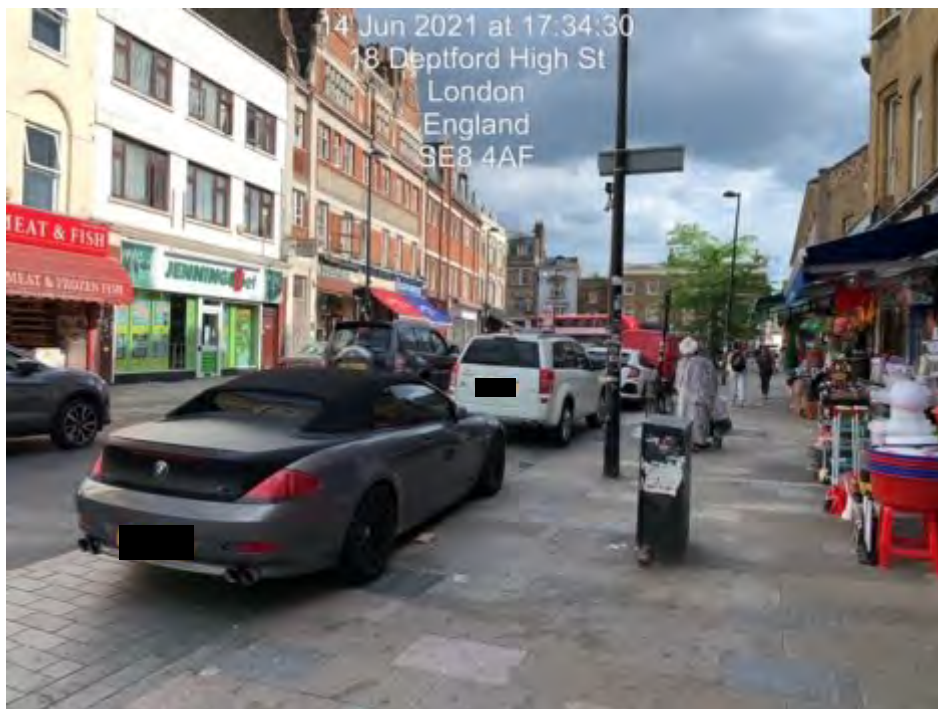


Image B15
Paddy Power Bookmakers north of premises, 52 Deptford High Street - 17:36hrs



Image B16

Deptford Methodist Mission, Creek Road north of Deptford High Street - 18:32hrs

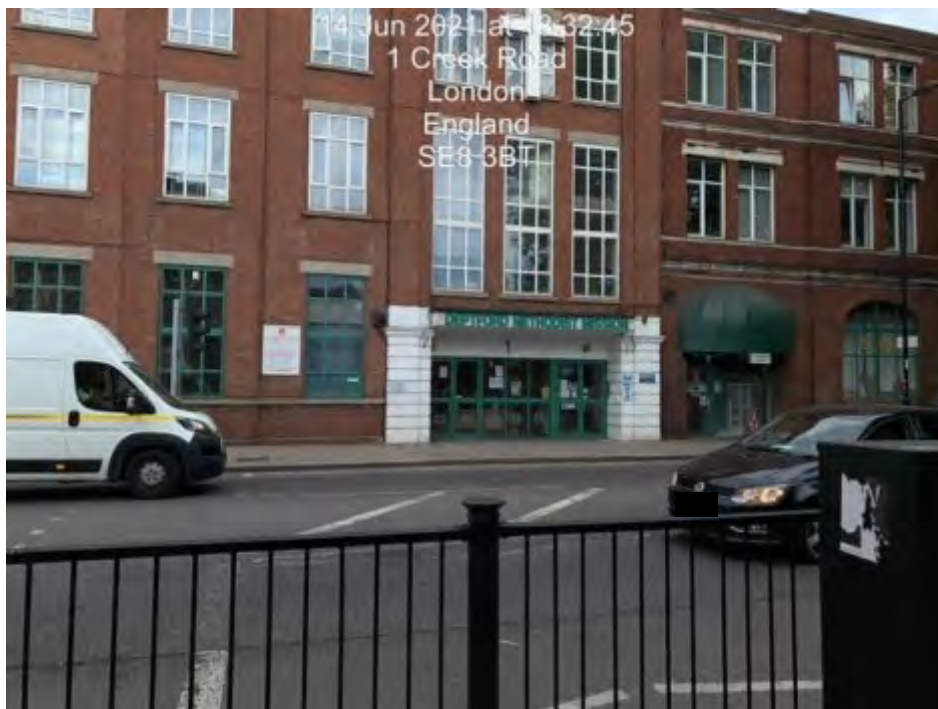


Image B17

Creek Road looking towards northern end of Deptford High Street- 18:33hrs



Image B18
Paddy Power Bookmakers 175, Deptford High Street - 18:37hrs

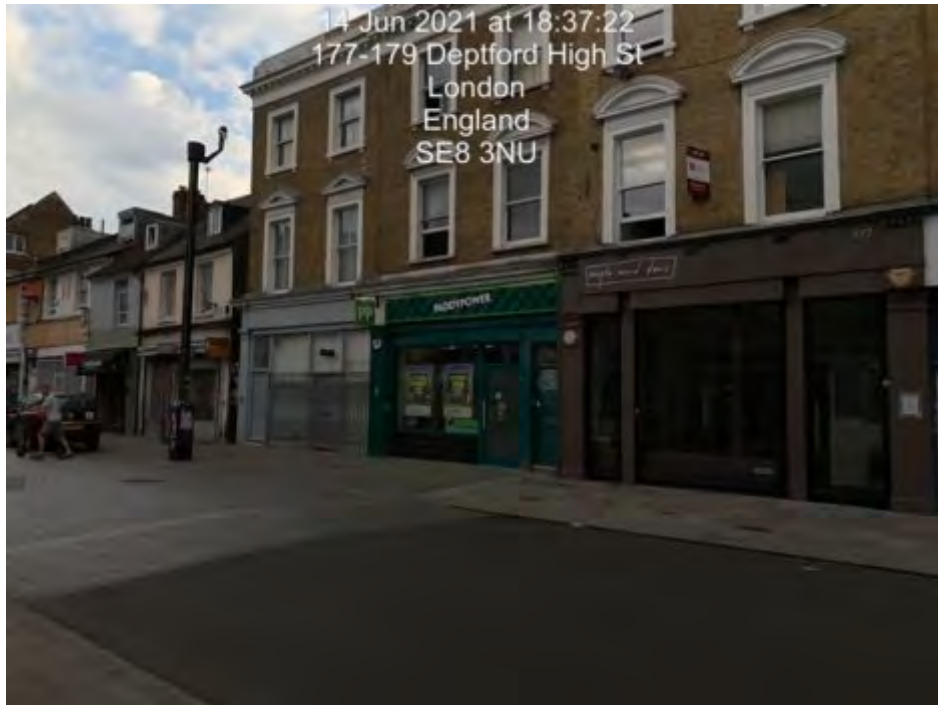


Image B19

After School Club 161, Deptford High Street - 18:38hrs



Image B20

Market Yard at Deptford Rail Station - 18:41hrs



Image B21
Deptford Rail Station - 18:42hrs



Image B22
Market Yard outside Deptford Rail Station - 18:43hrs



Image B23

Market Yard outside Deptford Rail Station - 18:44hrs



Image B24

Deptford High Street junction with Giffin Street looking towards Tidemill Academy - 18:59hrs



Image B25

40 Deptford High Street, London SE8 4AF - 19:02hrs



Image B26

Jennings Bet Bookmakers 14, Deptford High Street - 19:04hrs



Image B27

New Cross Road junction south end of Deptford High Street looking towards Addey and Stanhope School- 19:04hrs



Image B28

Looking north in Deptford High Street from New Cross Road - 19:05hrs

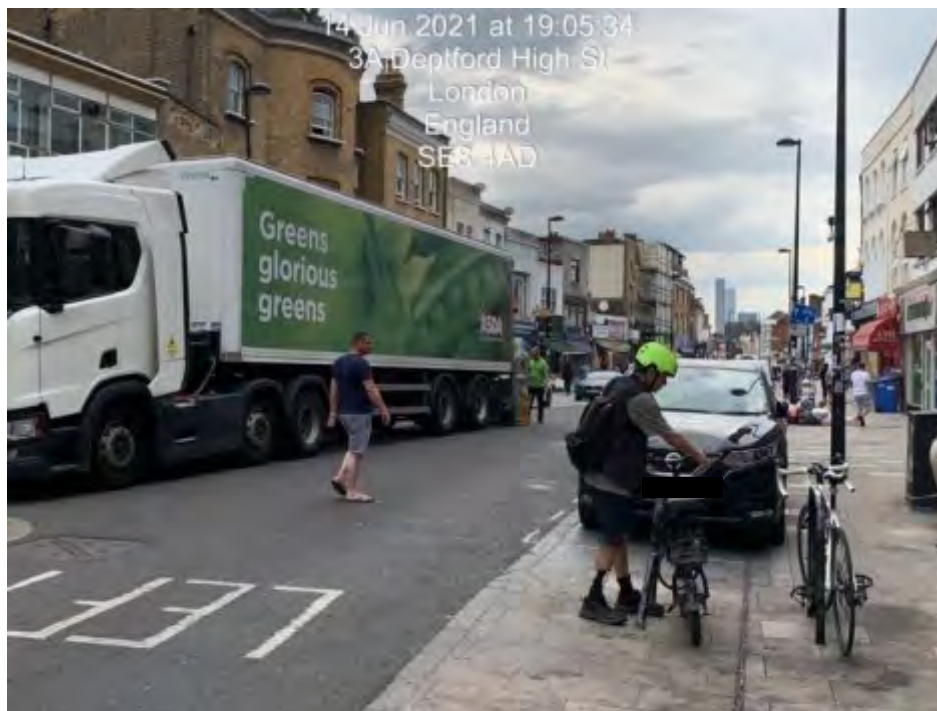


Image B29

Paddy Power Bookmakers north of premises, 52 Deptford High Street - 19:07hrs



Image B30

Giffin Street looking towards entrance to Tidemill Academy - 19:37hrs



Image B31

Giffin Street near Tidemill Academy - 19:38hrs

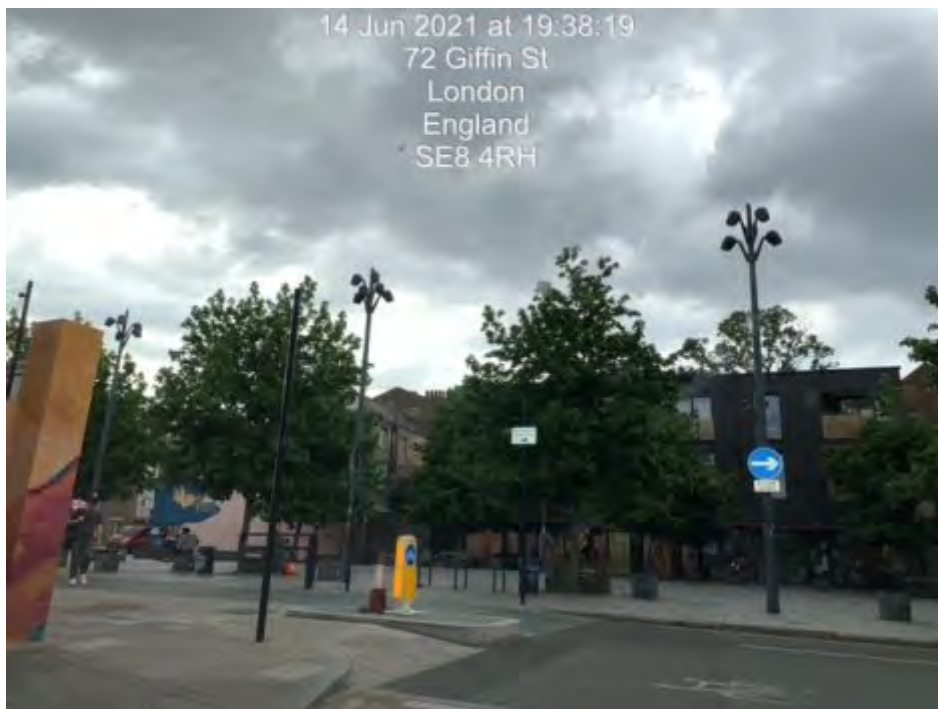


Image B32

Looking south from premises - 19:43hrs

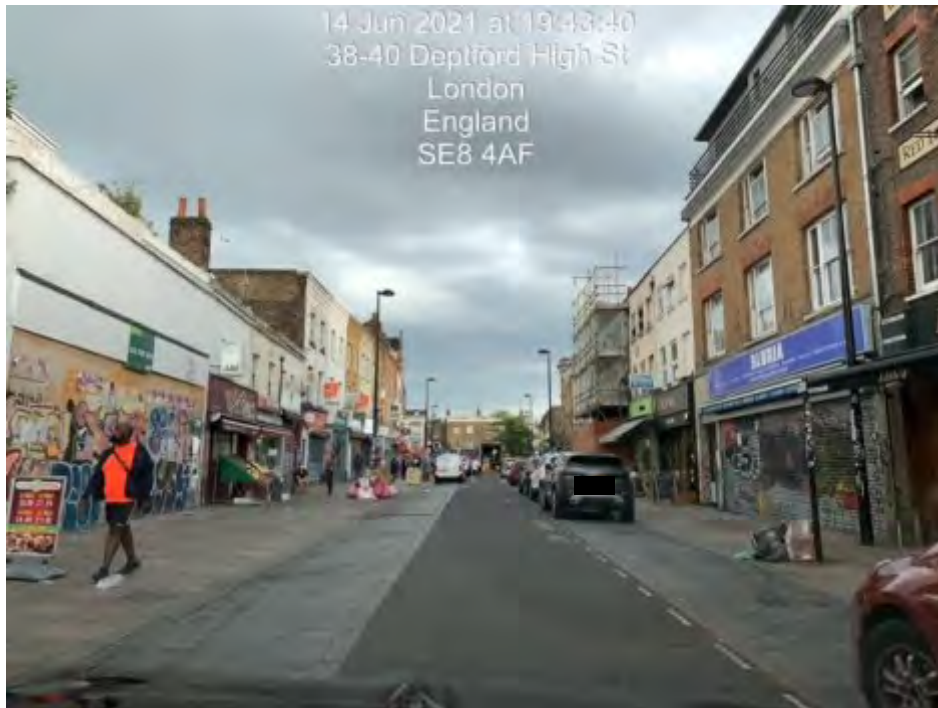
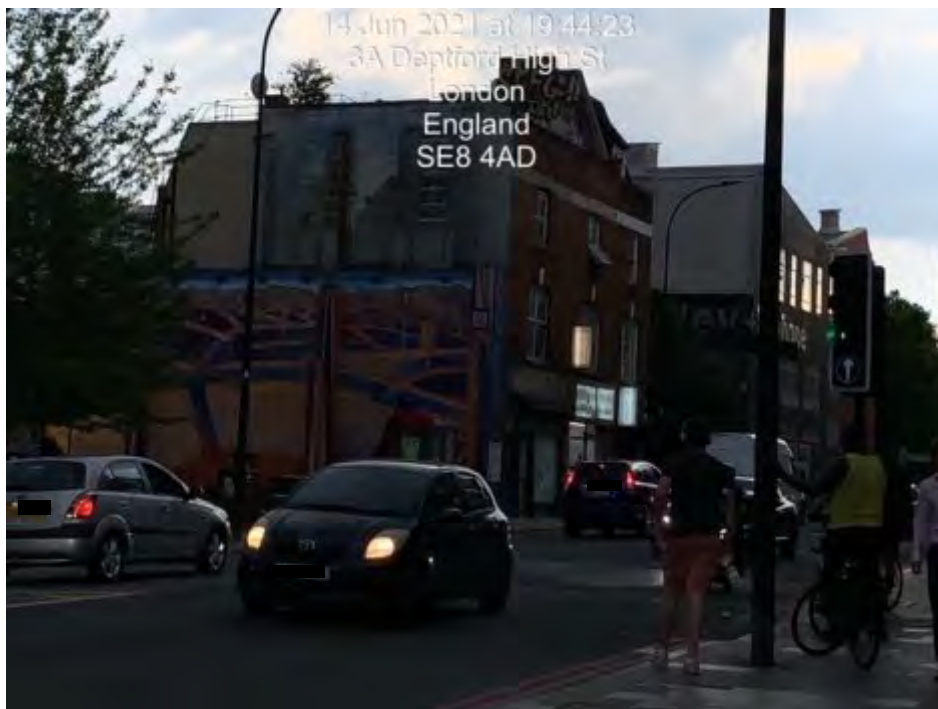


Image B33

Deptford High Street junction with New Cross Road looking towards Addey and Stanhope School -19:44hrs



Appendix 'C'

Wednesday 16th June 2021 14:54hrs – 18:37hrs

Image C1

Giffin Street looking towards Tidemill Academy - 14:54hrs



Image C2

Deptford High Street looking north towards Deptford Rail Station - 14:55hrs

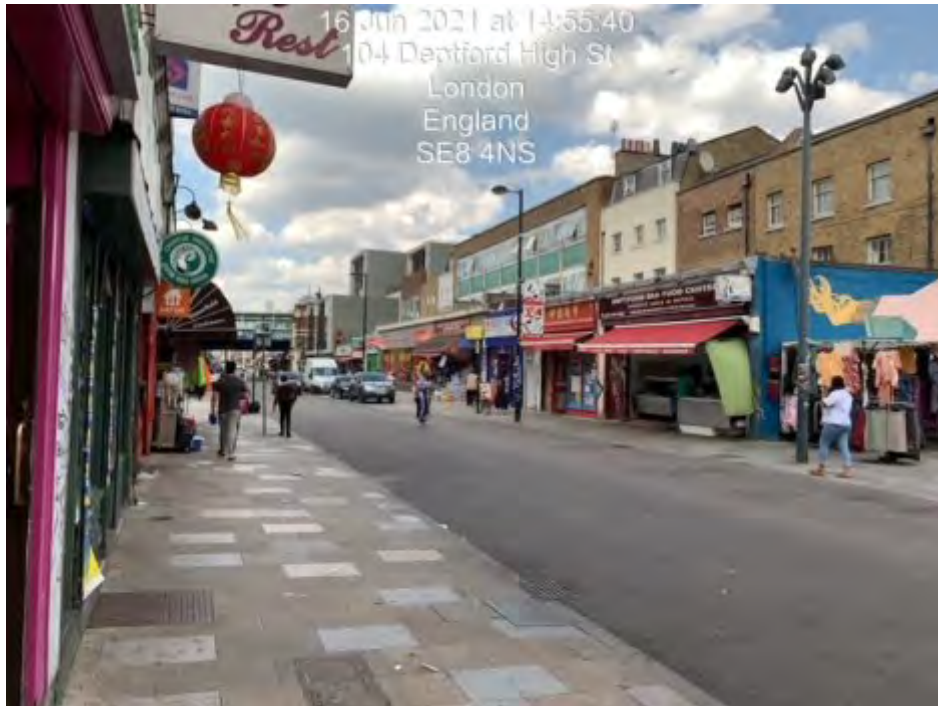


Image C3
Nightingale Pharmacy junction with Giffin Street - 14:56hrs

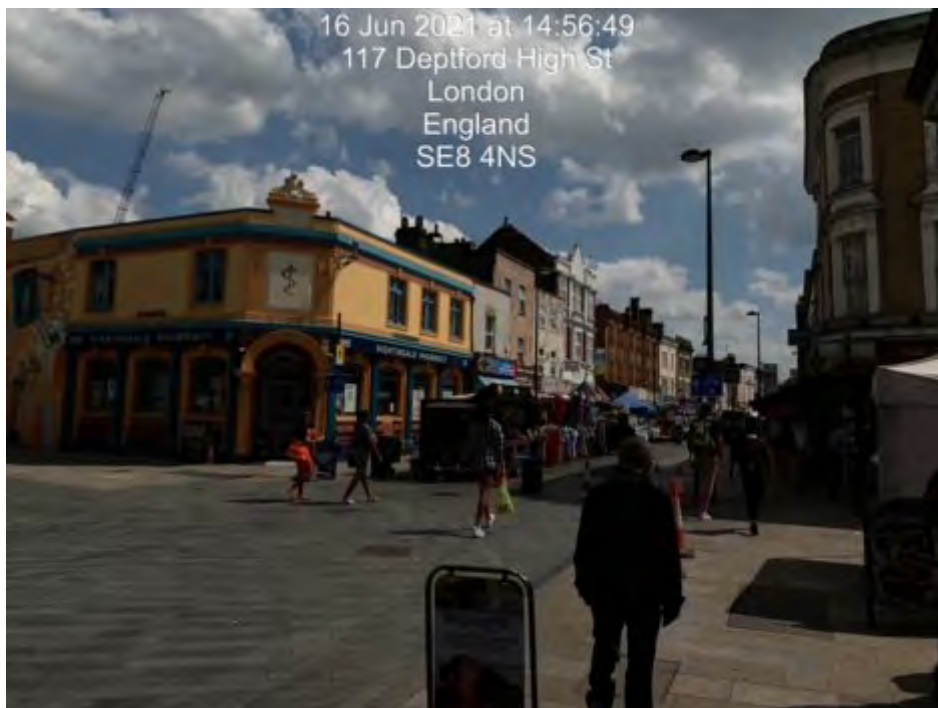


Image C4
H and T Pawnbrokers 72, Deptford High Street north of premises - 14:58hrs

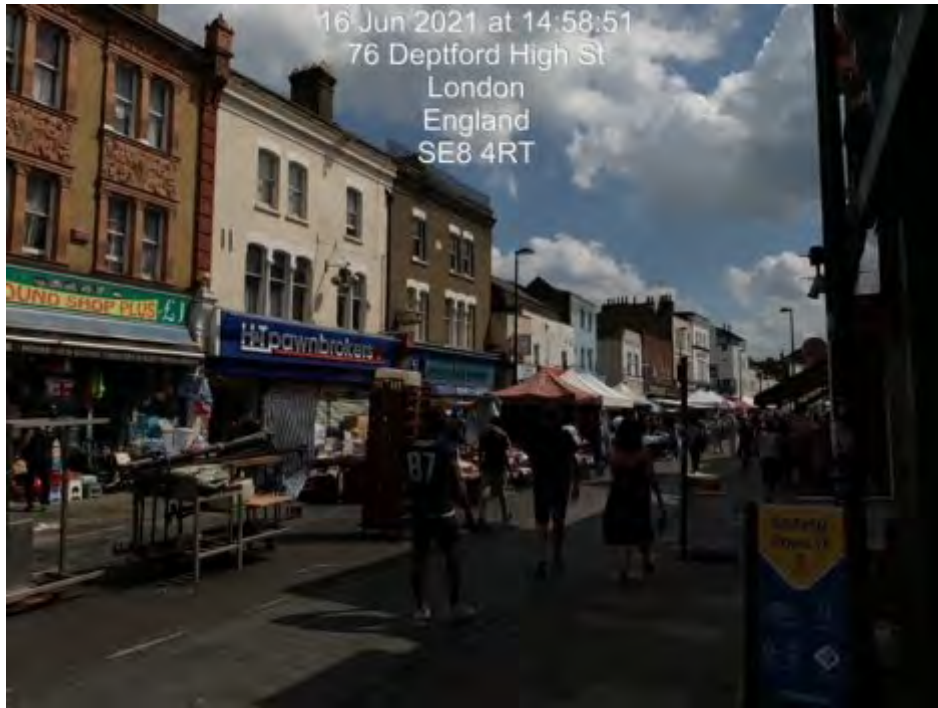


Image C5
40 Deptford High Street, London SE8 4AF - 15:01hrs



Image C6

Deptford High Street looking north towards the premises - 15:03hrs



Image C7

Deptford High Street looking south towards New Cross Road - 15:05hrs



Image C8
Market Yard at Deptford Rail Station - 15:24hrs



Image C9
Entrance to Tidemill Academy, Giffin Street - 15:38hrs



Image C10

40 Deptford High Street, London SE8 4AF - 16:43hrs



Image C11

Addey and Stanhope School - 16:48hrs



Image C12

Paddy Power Bookmakers north of premises, 52 Deptford High Street - 16:55hrs



Image C13

Paddy Power Bookmakers 175, Deptford High Street - 17:02hrs



Image C14
Deptford High Street north end looking south towards rail station - 17:04hrs

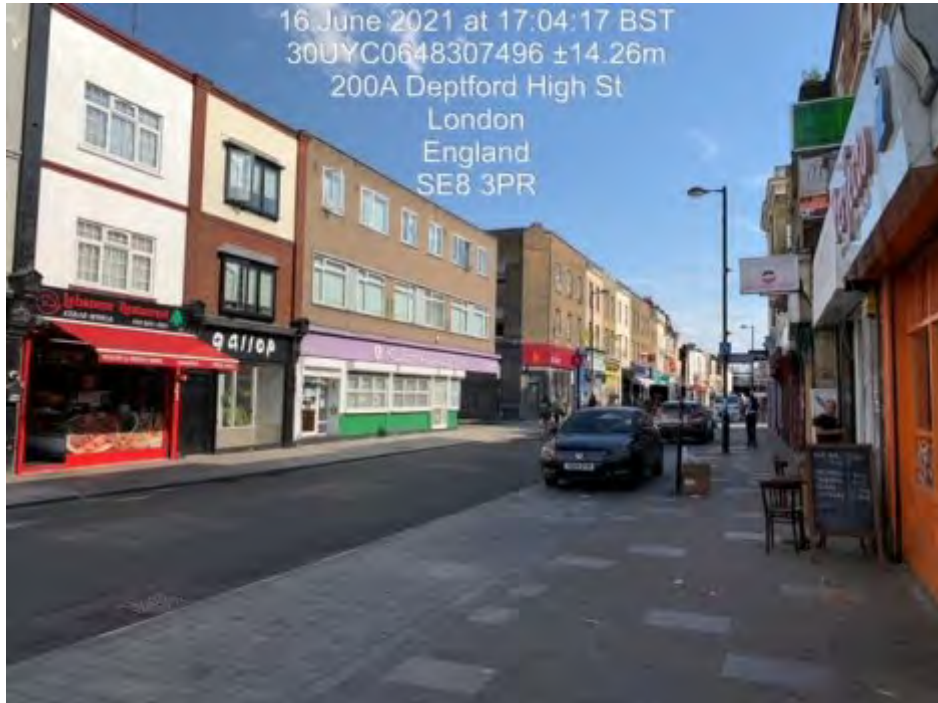


Image C15
After School Club 161, Deptford High Street - 17:13hrs



Image C16

Deptford High Street access gate to St Joseph's School - 17:14hrs



Image C17

Market Yard at Deptford Rail Station - 17:15hrs



Image C18
Market Yard at Deptford Rail Station - 17:15hrs



Image C19

Looking north in Deptford High Street from New Cross Road - 18:17hrs



Image C20

Jennings Bet Bookmakers 14, Deptford High Street - 18:19hrs



Image C21

40 Deptford High Street, London SE8 4AF - 18:19hrs



Image C22

H and T Pawnbrokers 72, Deptford High Street north of premises - 18:23hrs



Image C23

Main entrance to St Joseph's School -18:28hrs



Image C24

Paddy Power Bookmakers 175, Deptford High Street - 18:29hrs



Image C25

Deptford High Street looking north towards Creek Road -18:30hrs



Image C26

Market Yard at Deptford Rail Station - 18:34hrs



Image C27

Resolution Way under rail arches at Deptford Rail Station - 18:34hrs

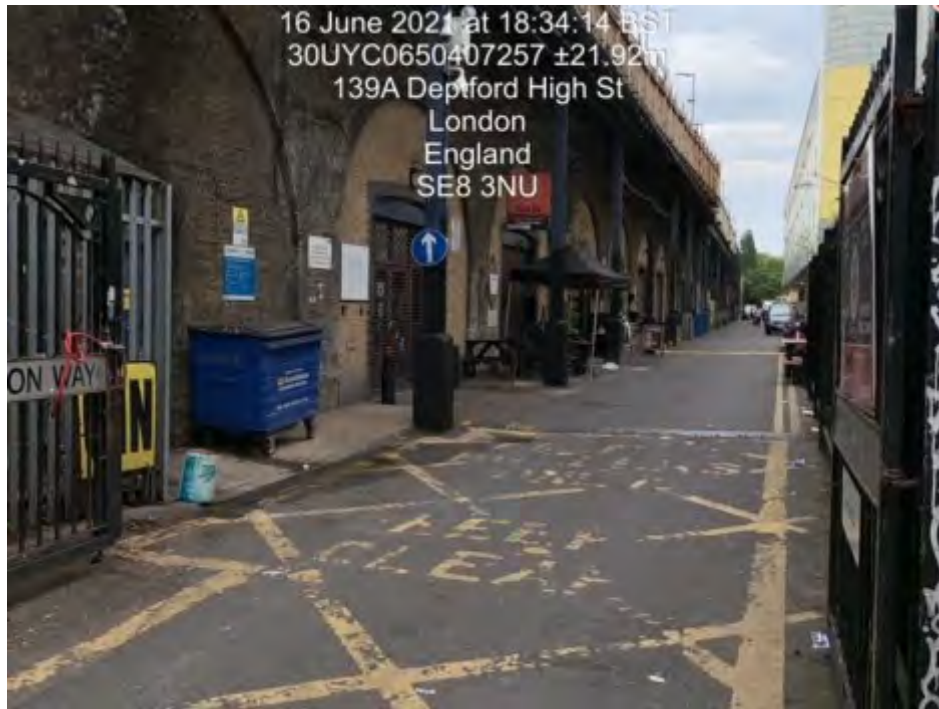


Image C28

Giffin Street looking towards entrance to Tidemill Academy - 18:37hrs



16 June 2021 at 18:37:00 BST
30UYC0656207130 #13.61m
Frankham St
London
England
SE8



Independent Observation Report

Nicholas Mason – Consultant

Leveche Associates Limited

Merkur Slots

40 Deptford High Street, London SE8 4AF

Introduction

1. I have been asked to conduct independent research and observation on premises situated at 40, Deptford High Street, London SE8 4AF - the premises.
2. Additionally, I am instructed to review crime data relevant to this and other Merkur Slots (previously Cashino Gaming) premises. (Source - data.police.uk).
3. The premises was a former William Hill Bookmakers. It is currently closed and not trading. Merkur Slots UK Limited have applied for a Bingo Premises Licence for the premises under Section 159 of the Gambling Act 2005.
4. I am informed that there are concerns that the presence of these premises may impact on the local community with an increase in local crime trends, in particular, an increase in anti-social behaviour with a risk to children and vulnerable adults.
5. The premises come under the jurisdiction of Lewisham Council.

6. As part of my review of the observations I have considered the Licensing Objectives under the Gambling Act 2005.
 - i) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
 - ii) Ensuring that gambling is conducted in a fair and open way.
 - iii) Protecting children and other vulnerable persons from being harmed or exploited by gambling.

Personal Summary – Nicholas Mason

7. 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.
8. 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.
9. 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.
10. 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.
11. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
12. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
13. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Site Observations

14. I attended the location of the premises, 40, Deptford High Street, London SE8 on Saturday 12th June 2021 from 19:30hrs to 23:30hrs.

15. The premises are situated on Deptford High Street that geographically runs North - South with the busy A2 New Cross Road in the south and Evelyn Street in the north, forming a natural boundary for the observations.
16. Displayed at the front of the premises and visible from the street is the Notice of Application for a Bingo Premises Licence under the Gambling Act 2005. Also displayed next to this was a Lewisham Council Public Notice regarding a Planning Application for an adult gaming centre and the installation of new shopfront at the front of the premises with a fire exit at the rear.
17. Immediately south of the premises next door is the Fu Quing Chao Shi Chinese Supermarket and to the North a Pizza take-away shop, Star Pizza, which were both open. Immediately opposite was 'Bluria' soft furnishings shop that was closed and had a graffiti covered metal shuttering pulled down at the front. The graffiti was present on many of the premises in Deptford High Street giving the area the appearance of being run down in many places, though this was contrasted by some of the busy bars in the area
18. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout my observations. The weather was dry and warm for my visit.
19. There is a diverse community and demographic make-up. There is a mixture of privately owned and rental accommodation with flats situated above retail premises and other residential property in the numerous adjoining residential roads.
20. There is a large number of retail outlets that include Hair salons, Tesco Express, an Asda store, Bookmakers, Caribbean Grocer shops, various coffee shops and bars, fast food premises, licensed restaurants and small home furnishing stores.
21. During my visit to the area I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
22. There are no apparent bus routes along Deptford High Street but there are bus routes serving the area running along New Cross Road at the southern end and Evelyn Road into Creek Road at the northern end. Some 400m north of the premises is Deptford Rail Station and outside this is a large courtyard area with a number of bars and coffee shops.
23. On the Saturday night that I was at this location Deptford High Street was relatively quiet with a large number of the shop premises closed with shutters down, Bars and cafes were still open. Opposite the area of courtyard outside Deptford rail station was an area of arches under the rail tracks known as Resolution Way. This was busy with people drinking at bars, as were the bars at Deptford Rail Station

24. I observed three traditional betting shops in the immediate vicinity of the premises with Jennings Bet south at number 14, Paddypower to the north at number 52 and another Paddypower premises at 175 near the junction with Ffinch Road. These premises generally operated opening times from 08:00hrs to 22:00hrs. Any internal view of the Paddy Power premises was obscured by the front display units but looking into the Jennings premises it was possible to see customers seated within the premises watching sport on the televisions attached to the internal walls.
25. At number 72, H and T Pawnbrokers are situated north of the premises but this was closed at the time of my observations. Other significant premises included St Paul's Church at St Pauls Courtyard and Deptford Catholic Church near the rail bridge.
26. Situated at 161 and near the junction with Ffinch Street is an after-school club premises, this was closed at the time of my observations. At 217 is the White Swan Pub but this was clearly closed, not trading and had graffiti on its walls and windows.
27. At the junction with Giffin Street outside the Nightingale Pharmacy I observed a male in a blue T-shirt. He was playing a violin that was amplified through a speaker. He had the violin case in front of him and I saw a passing pedestrian throw some coins into it, he was clearly begging.
28. Opposite the Nightingale Pharmacy was a large pile of rubbish on the pavement and this was a feature along many parts of Deptford High Street.
29. During the period of observations there was no evidence of any other anti-social behaviour, street drinking, drug taking, urinating in the street or any other criminality. I did not see any groups of youths or other persons gathering.
30. Photographic images of what was seen during the observations on Saturday 12th June 2021 were obtained to support my findings and recommendations. These images are documented in Appendix A.

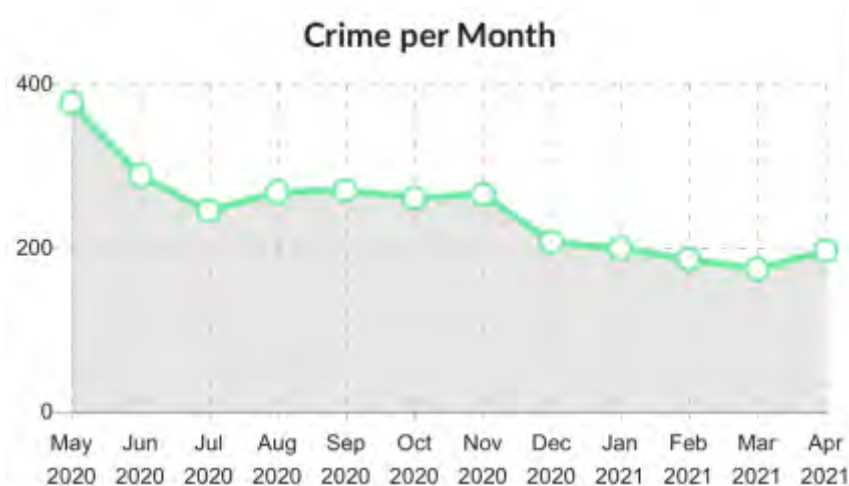
Crime Reporting and review of Crime Data

31. I am instructed to review the concerns regarding local crime statistics and how the licensing of premises of this type may impact on the community in respect of local crime trends.
32. Dealing with the reporting of crime in this area is the responsibility of the Metropolitan Police Service (MPS) who need to manage public expectation for those who fall victim to others with criminal intent. The impact of crime will always be a serious matter to those it affects and police rightly give this due regard. It is important to understand the reasons for reporting and the structures in place to manage the investigation of those reports.

33. Crime reporting and its subsequent investigation in its simplest terms is broken into two classes:
- (i) 'Screened In' Crimes – There is evidence available to continue an investigation to identify a perpetrator;
 - (ii) 'Screened Out' Crimes – There is no evidence to progress an investigation or where the report has been made for other reasons e.g. reports made to obtain a crime reference number for an insurance company, reports made for 'record only' or malicious allegations.
34. The 'Screening' process works to an approved National Standard and is dealt with by the Metropolitan Police Service Crime Reporting Investigation Bureau (CRIB), a central unit that controls all crime reports that fall within the jurisdiction of the MPS. It is a single dedicated command that focuses on crime investigation, quality victim service, bringing offenders to justice and ethical crime recording.
35. Where there is an allegation of crime, there should be a record and for the MPS this is recorded by way of the Crime Reporting Information System - 'CRIS' and managed by the 'CRIB'. Each crime has its own unique reference number and will go through the screening process I have described above.
36. Once an initial assessment has been undertaken the allegation will be classified as a 'Crime' or 'No Crime'. For statistical purposes all allegations are recorded and shown on police data records. It is important to note that where there is no 'CRIS' report then it follows that there is no crime, equally if there is an allegation of crime it can still be classified as 'No Crime' but will still feature on police crime statistics.
37. Other sources of data are available in the form of 'CAD' messages (Calls to police) and the CAD - CRIS conversion rate but this is material held by the Metropolitan Police that I do not have access to.

Local Crime Statistics - High Street Deptford

38. As previously detailed the local authority covering the premises at 40 Deptford High Street, SE8 4AF is Lewisham Council under the ward of New Cross.
39. The following graph shows the change in the overall crime rate for the period May 2020 to April 2021 for the ward of New Cross an area where Merkur Slots are not currently trading.



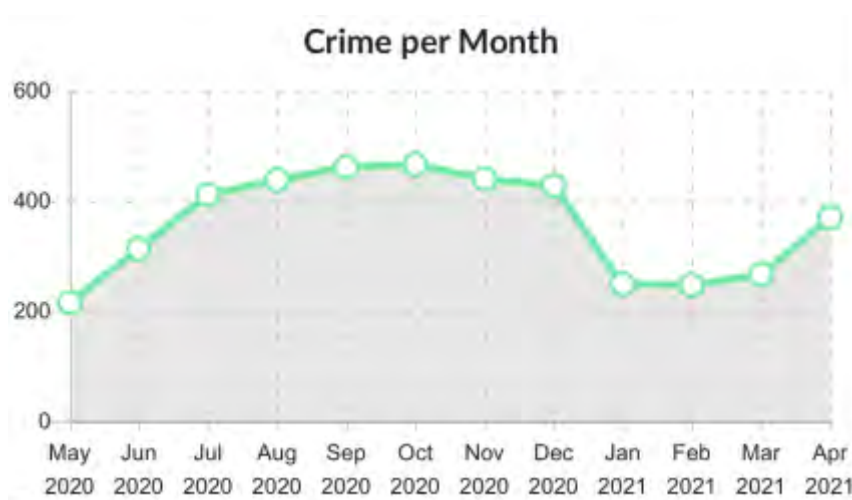
40. In April 2021 a total of 196 crimes were reported in this area specifically:

- i. Violence and Sexual Offences - 51
- ii. Anti-Social Behaviour - 49
- iii. Other theft - 16
- iv. All other crime - 80

41. This provides a base line for analysis and comparison of crime trends where Merkur Slots have opened premises at different locations.

Local Crime Statistics - Lower Marsh, Waterloo

42. Merkur Slots opened premises at 123-124, Lower Marsh, Waterloo, London SE1 7AE. This is located under Bishops Ward of Lambeth Borough Council and commenced trading at this location on 2nd November 2020 prior to the implementation of UK Government Covid-19 restrictions. Police data recorded a general reduction in crime since the opening of these premises.



43. In May 2020 there were 215 reported crimes in this area.

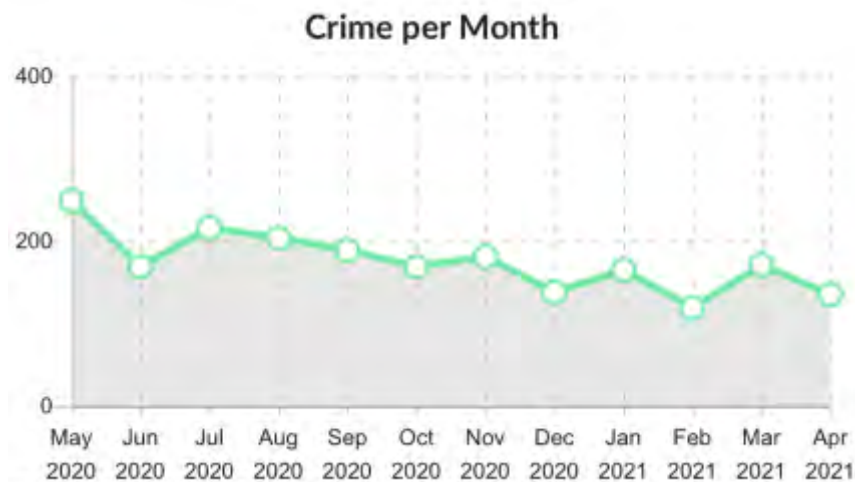
44. In April 2021 a total of 370 crimes were reported in this area specifically:

- i. Violence and Sexual Offences - 73
- ii. Anti-Social Behaviour - 103
- iii. Other theft - 49
- iv. All other crime - 145

45. As can be seen from the data detailed above in April 2021 there was an increase in reported crime in this area. This can be attributed to the lifting of the UK Governments Covid-19 restrictions.

Local Crime Statistics - King Street Southall

46. Merkur Slots opened premises at 37-39 King Street, Southall, UB2 4DQ. This is located under Southall Green Ward of Ealing Borough Council and commenced trading at this location on 29th June 2020 with the easing of UK Government Covid-19 restrictions. Police data recorded a general reduction in crime since the opening of these premises.



47. In May 2020 there were 249 reported crimes in this area.

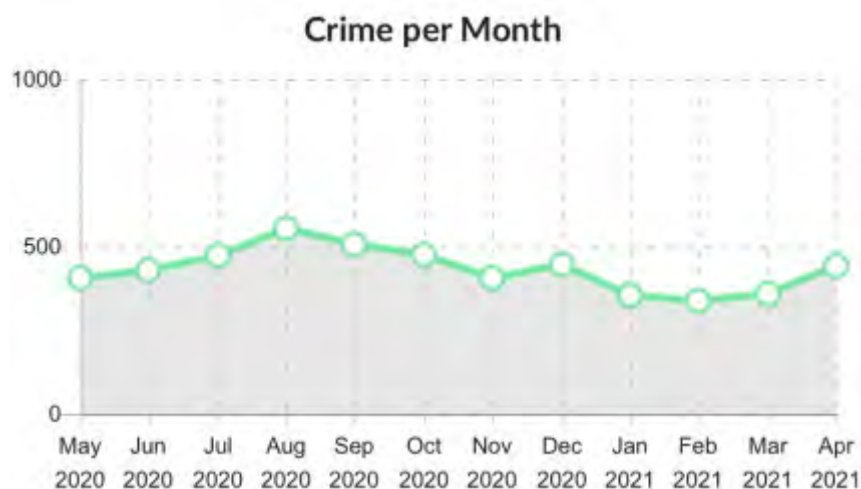
48. In April 2021 a total of 102 crimes were reported in this area specifically:

- i. Anti-Social Behaviour - 42
- ii. Violence and Sexual Offences - 37
- iii. Vehicle crime - 12
- iv. Public order- 11

49. There was no increase in reported crime in April 2021, specifically Anti-Social Behaviour and this went against the national trend.

Local Crime Statistics - High Street Croydon

50. Merkur Slots have premises at 12, High Street, Croydon, CR0 1YA an area of higher reported crime located under the Fairfield Ward of Croydon Council. Due to UK Government Covid-19 restrictions the premises were restricted in opening during the period reviewed. The premises reopened on 3rd July 2020 after National Lockdown and continued trading until 4th November 2020 when another lockdown forced its closure.



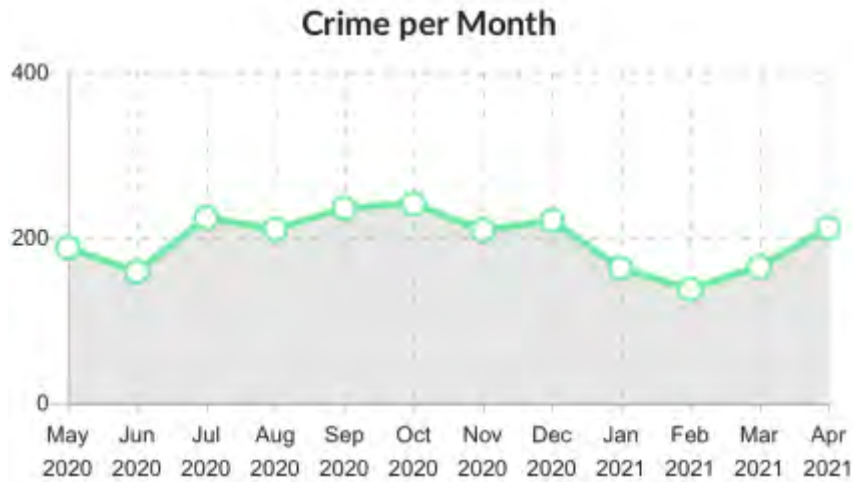
51. In May 2020 there were 406 reported crimes in this area.
52. In April 2021 a total of 442 crimes were reported in this area specifically:
- i. Violence and Sexual Offences - 86
 - ii. Anti-Social Behaviour - 116
 - iii. Drugs (no data recorded for other theft) - 40
 - iv. All other crime - 200

53. Police data recorded a slight increase in crime when the premises reopened on 3rd July 2020 after National Lockdown. The premises continued trading until 4th November 2020 and there was a downward trend of reported crime figures with no marked spike in reported offences.

Local Crime Statistics - High Street Hounslow

54. Merkur Slots have premises at 237-239, High Street, Hounslow. TW3 1EA located under the Hounslow Town Centre Ward of the London Borough of Hounslow Council. Like the Croydon premises, this venue reopened on 3rd

July 2020 after National Lockdown and continued trading until 4th November 2020 when another lockdown forced its closure.



55. In May 2020 there were 188 reported crimes in this area.

56. In April 2021 a total of 212 crimes were reported in this area specifically:

- i. Violence and Sexual Offences - 42
- ii. Anti-Social Behaviour - 51
- iii. Shoplifting (no data recorded for other theft) - 29
- iv. All other crime - 90

57. Police data recorded a slight decrease in crime when the premises reopened on 3rd July 2020 after National Lockdown. The premises continued trading until 4th November 2020 and there was a downward trend of reported crime figures with no marked spike in reported offences.

Summary

58. I have reviewed a number of different venues to get a broad picture of the crime trends in areas that surround Merkur Slots premises.

59. One of the key concerns of UK Police authorities is the impact upon their resources should premises of this type be opened at a particular location, the perception being that it will attract anti-social behaviour and crime of various type, thereby increasing local reported crime figures.

60. This case raises important concerns regarding criminality in the area. However, the facts concerning crime trends, from my observations and the information I have identified and reviewed, do not support these concerns.

61. The information detailed above shows that there is either no significant increase or no increase at all in reported crime where a Merkur Slots

premises started trading and therefore no additional impact upon police resources.

62. In premises located at Lower Marsh Waterloo, King Street Southall and High Street Hounslow there was a decrease in reported crime for the areas surrounding these venues when they opened after the UK Government 'Lock down' and only a minimal short-term increase for the premises at High Street Croydon, followed by a downward trend of reported crime.
63. It is clear to see that the opening of a Merkur Slots premises does not cause a statistical spike in reported crime. Comparing those premises that present similar reported crime figures to the Deptford address it can be seen that crime does not increase when Merkur slots are trading and there is no reason to believe there would be an increase in reported crime should the premises at Deptford High Street be granted a license to trade.
64. The general increase in crime in April 2021 and specifically an increase in Anti-Social Behaviour is a National trend and not linked to a particular gaming / gambling establishment. The rise in Anti-Social Behaviour and its links to the Covid-19 restrictions has been widely reported in the UK media.
65. I have carried out observations on numerous other gaming establishments. For those under the control of Merkur Slots Limited. I found no evidence of crime and disorder, anti-social behaviour, street drinking or drug dealing.
66. The facts in my report are honest and true. The observations I have made, and 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.

Nick Mason - Consultant
Leveche Associates Limited
14th June 2021



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

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

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

Summary

26. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
27. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
28. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
29. At the time of my visit on Tuesday 1st 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 8th January 2021 at 18:10hrs and Thursday 11th 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 1st 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 1st 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 1st June 2021 between approximately 20:50hrs and 21:25hrs I covertly visited the Merkur Slots premises at 456, Holloway Road, London N7 6QA.
11. Situated on the corner of Holloway Road at the junction with Camden Road, this is a larger Merkur premises than I have previously visited. The front display of the premises is smart and well-lit with a clean, well maintained and professional appearance.
12. The premises are advertised as being open for 24 hours per day.
13. The front door of the premises was controlled by a door supervisor monitoring entry and exit. He was a white male, smartly dressed in a dark suit, wearing a face mask and displaying an SIA licence on his right arm. There was also a side door in Camden Road though this was closed for access to the premises.
14. The glass on the front door of the premises displayed information including a warning that CCTV was in operation, no smoking and over 18's only.
15. I entered the premises being greeted by the door supervisor as I did so. In the entrance area was information regarding Covid-19 and the use of hand sanitisers, social distancing and face coverings. I was able to use the hand sanitiser situated at this location.
16. Adjacent to this was an information board displaying the premises licences and rules and there was further clear signage in relation to CCTV in operation.

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

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

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

Summary

26. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
27. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
28. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
29. At the time of my visit on Tuesday 1st 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 1st June 2021 between approximately 17:00hrs and 17:30hrs I covertly visited Merkur Slots, 157, High Street North, East Ham E6 1JB.
11. The front display of the premises was smart and well-lit though older than some of the other Merkur premises I have visited. It appeared well maintained though the area itself was let down by a local authority bin situated on the pavement outside that had a number of sealed bin bags that were spilling onto the pavement.
12. The premises are advertised as being open for 24 hours per day.
13. There appeared to be two doors allowing access to the premises but the door to the left displayed a sign directing customers to use the other door. I entered via the front door on the right where two fire extinguishers and various signage was displayed. The information displayed included:
 - i. The premises license.
 - ii. The premises certificate of insurance.
 - iii. That CCTV is in operation.
 - iv. The premises are a no smoking venue.
14. Adjacent to the signage was a hand sanitiser station that I was able to use and next to this a QR Code and information re social distancing and the wearing of face masks in respect of Covid-19 regulations.
15. I entered the premises and immediately started to play a low value gaming machine. From here I was able to observe that there were gaming machines throughout the length of the floor. Each gaming machine area was defined by

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

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

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

Summary

25. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
26. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
27. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
28. At the time of my visit on Tuesday 1st 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 11th 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 1st June 2021 between approximately 18:10hrs and 18:30hrs I covertly visited Merkur Slots, 62 East Street, Barking IG11 8EQ.

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

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

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

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

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

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

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

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

Summary

31. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
32. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure they operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
33. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
34. At the time of my visit on Tuesday 1st 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 FFinchley, 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 2nd June 2021 I conducted a covert licensing visit to Merkur Slots, 847 High Road, North Finchley, N12 8PT. My visit took place between 23:00 hours and 23:30 hours.
2. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
3. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open from 08:00 hours to Midnight.
4. I went to the front door of the premises and entered. Once inside the entrance I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
 - i. The premises licence.
 - ii. The company codes of practice.
 - iii. It was a no smoking venue.
 - iv. Think 25 poster.
 - v. GamCare poster.

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

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

Summary

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

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



Independent Covert Licensing Visit Report

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

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

Introduction

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

Personal – Stuart Jenkins

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

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

Covert Observations

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

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

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

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

Summary

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

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited

06/06/2021



Independent Covert Licensing Visit Report

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

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

Introduction

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

Personal – Stuart Jenkins

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

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

Covert Observations

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

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

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

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

Summary

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

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



Independent Covert Licensing Visit Report

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

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

Introduction

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

Personal – Stuart Jenkins

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

Covert Observations

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

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

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

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

Summary

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

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

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



Independent Covert Licensing Visit Report

**Nicholas Mason – Consultant
Leveche Associates Limited**

Merkur Cashino (Slots)

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

Introduction

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

Personal Summary – Nicholas Mason

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

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

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

Observations

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

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

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

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

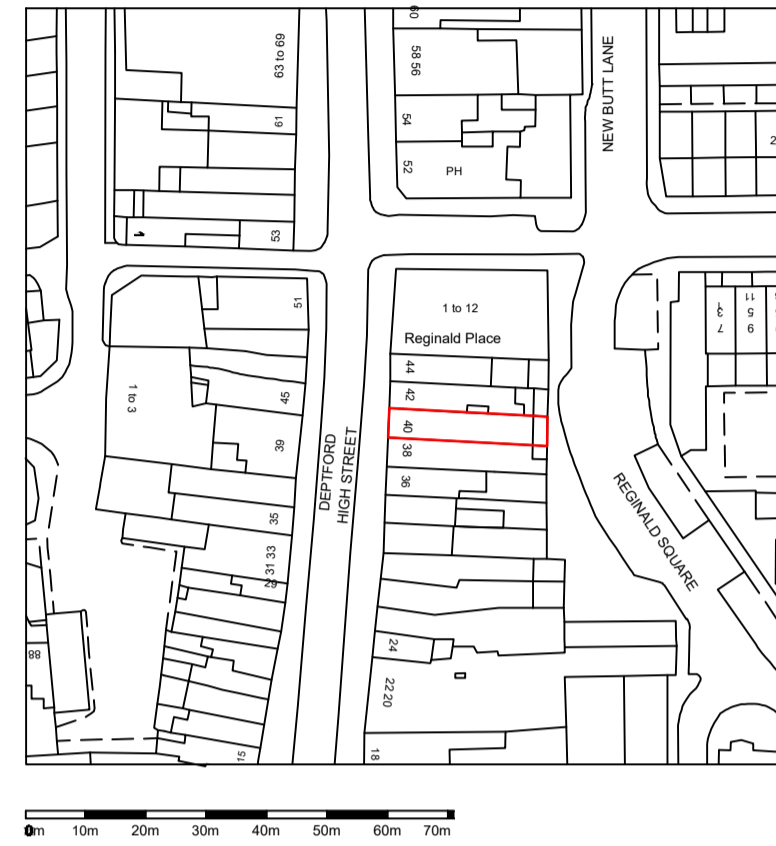
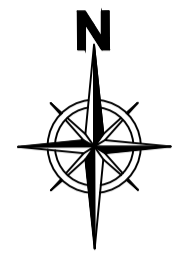
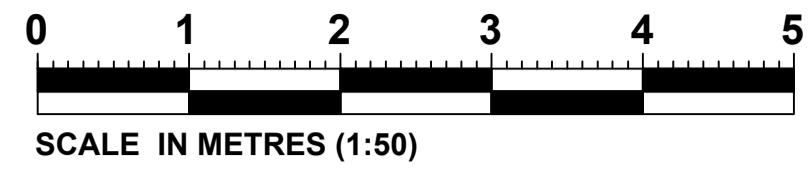
21. The staff member Sally came from behind the counter and asked if she could help. I asked her if she could change two £5 notes into a £10 note which she did at a cash machine next to me. I then sat down and played a high value gaming machine.
22. While I was seated a door to my left and at the rear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

Summary

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

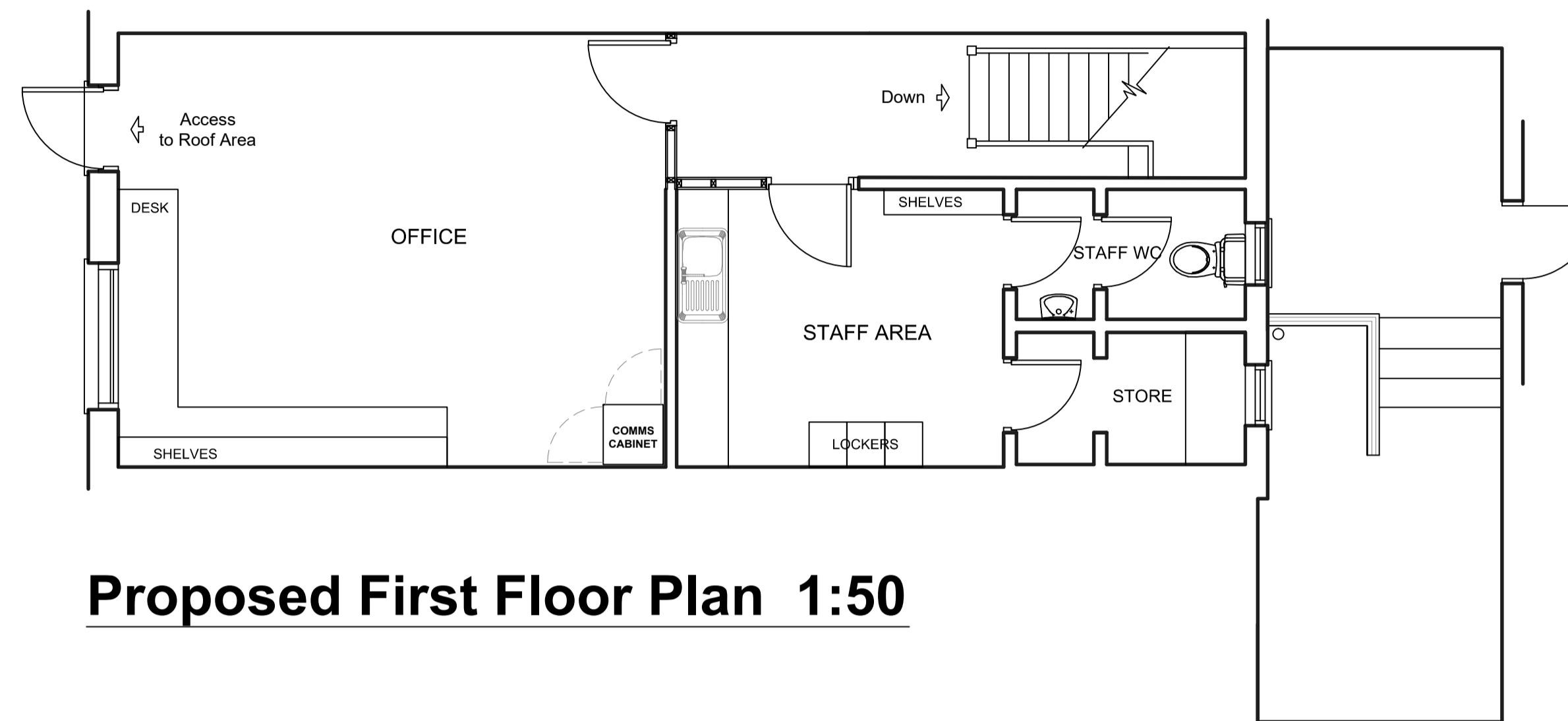
Nicholas Mason
Consultant
Leveche Associates Limited
08/06/2021

Copy of Licensing plan of the premises

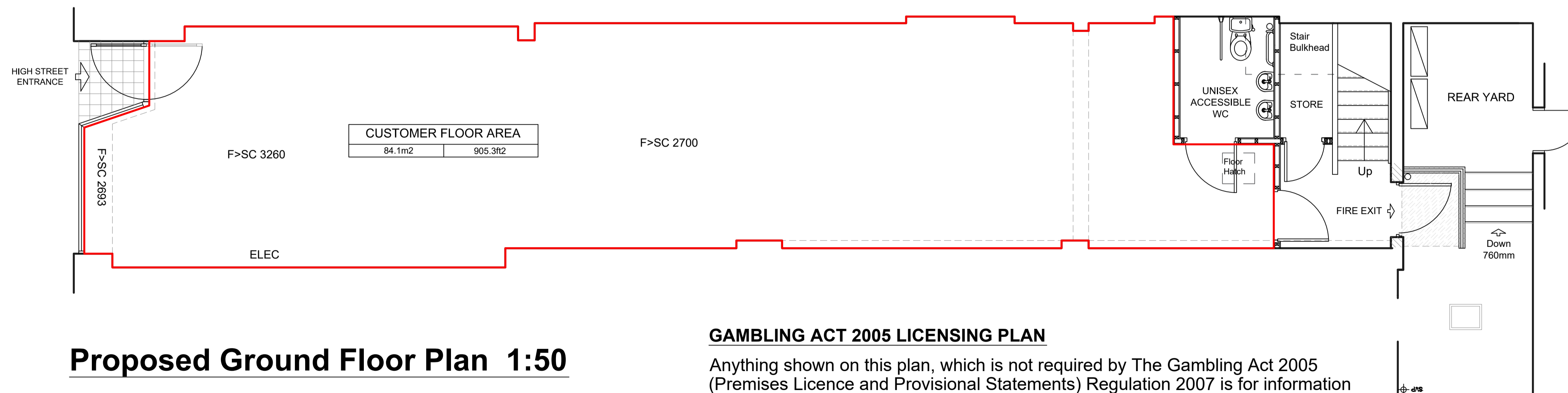


Location Plan 1:1250

FLAT ROOF



Proposed First Floor Plan 1:50



Proposed Ground Floor Plan 1:50

GAMBLING ACT 2005 LICENSING PLAN

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

— Area in which facilities will be provided for gaming.

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



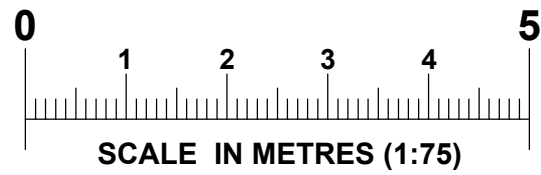
Address
40 DEPTFORD HIGH STREET
DEPTFORD
LONDON
SE8 4AF

Title
LICENCE PLAN

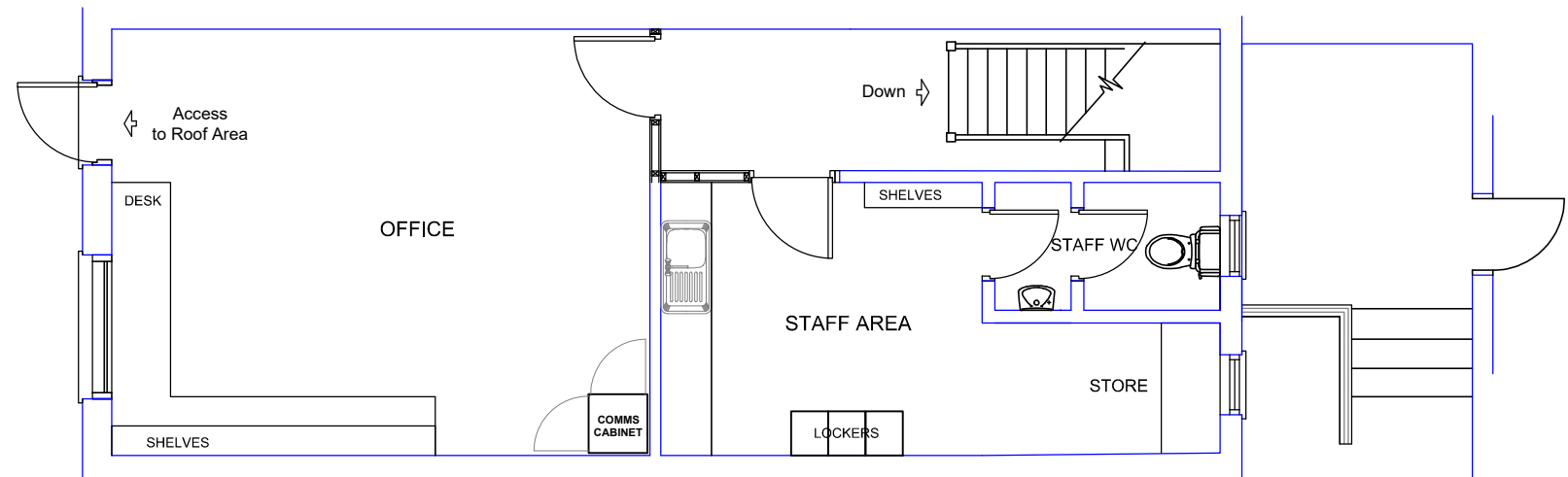
Drawn	Date	Scale
JAM	22/01/2021	1:50 @ A1
Customer Area	84.1M2	
Drawing Number	DHS/DEP/03	Revision A

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

Copy of Illustrative plan of the premises

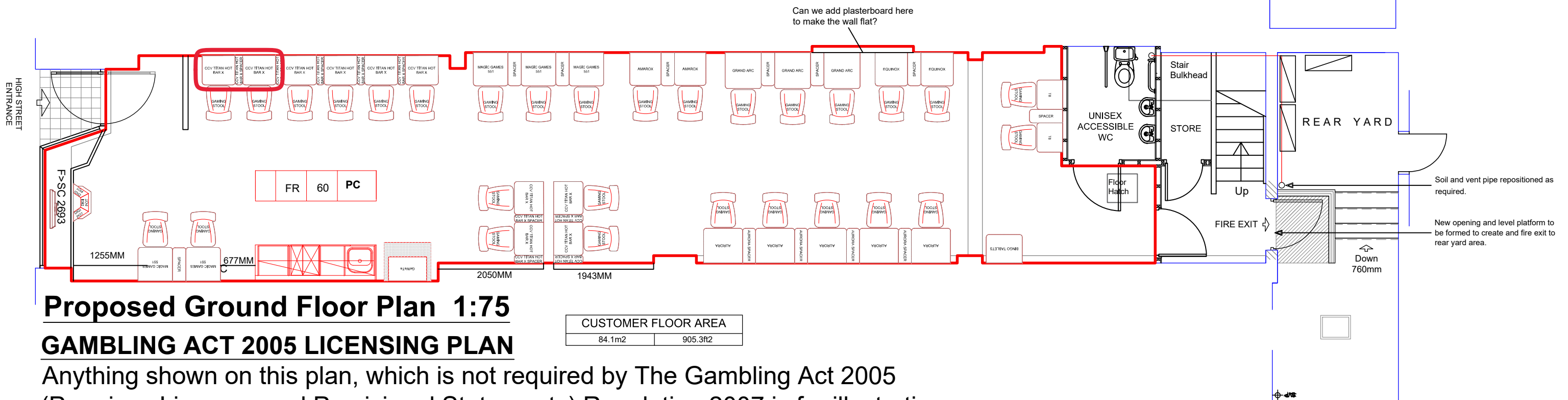


FLAT ROOF



FOR ILLUSTRATION PURPOSES ONLY

Proposed First Floor Plan 1:75



Proposed Ground Floor Plan 1:75

GAMBLING ACT 2005 LICENSING PLAN

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— Area in which facilities for gaming will be made available

CUSTOMER FLOOR AREA	
84.1m ²	905.3ft ²

REVISIONS	FIT OUT TYPE Merkur Slots	REFERENCE DRAWINGS	
	PROJECT Merkur Slots 40 DEPTFORD HIGH STREET DEPTFORD LONDON SE8 4AF	SCALE 1:75	DRAWN BY
	DESCRIPTION PROPOSED MACHINE PLAN	DATE 01/02/2021	
		DRAWING No.	REVISION



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Copy of the Local Area Risk Assessment

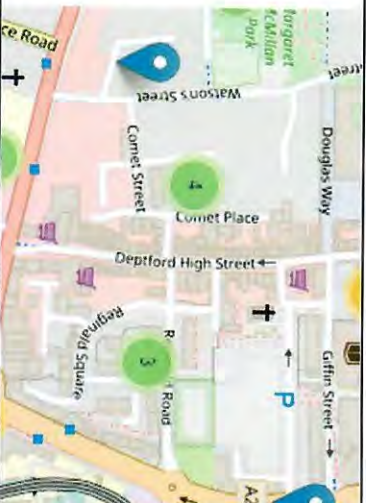
Merkur Slots, 40 Deptford High Street, SE8 4AF

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	40 Deptford High Street, Deptford, SE8 4AF
Local Authority:	London Borough of Lewisham
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
Name and Title of Assessor:	Gill Clulow – Senior Compliance Auditor
Date of Assessment:	01/04/21 and 16/06/21
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	<p>Merkur Slots, a former William Hill Bookmakers, licensed for gambling by the London Borough of Lewisham. The area sits within the New Cross Ward. 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.</p>
Establishments of note:	<p>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. Deptford Neighbourhood Action, c/o Pepps Resource Centre, Old Library, SE8 3BA, a non-political organisation that has been established for the purpose of bringing local people together and developing a Neighbourhood Plan for Deptford. In 2015, they were designated as a Neighbourhood Plan Forum with the 'Community Right' under the Localism Act to develop a statutory Neighbourhood Plan.</p>
Adjoining premises:	<p>The venue is located between Fu Qing Chao Shi Chinese supermarket and Star Pizza Takeaway</p>
Crime statistics:	<p>Deptford High Street, Lewisham, London, SE8 4AF is within the New Cross policing neighbourhood, under the Metropolitan Police Service force area. There are currently no policing polices available.</p> <p>In April 2021 there were 196 crimes reported within a half mile radius of the venue, this has increased during the last few months – Violence and sexual offences (26%), Anti-social behaviour (25%) are the predominant reported offences. During the last 12 months Violent crimes have increased from 22% in relation to Anti-social Behaviour which accounted for 34%. In the April 2021 the crime rates in New Cross were 8 per 1000 residents which is slightly higher than the Borough at 7 per 1000. When compared to other areas in the Metropolitan Police force area crime rates were lower than the average. Merkur Slots currently operate in higher crime areas such as Croydon, Hounslow and Newham. (<i>police.co.uk</i>).</p>
Population:	<p>In the 2011 census, there were 66 people residents in SE8 4AF, of which 40 were male and 26 were female. The area containing Deptford High Street, Lewisham, London consists predominantly of flats, which is common in inner cities, student neighbourhoods and poorer suburban settings. Around 50% of the population live alone.</p>
Culture:	<p>Deptford High Street, Lewisham, London can be considered more ethnically diverse than the UK average with 48% white compared to UK average of 86%. 14% of the area are Black African, 7.3% Chinese, 7.1% other Asian, 5.8% Black Caribbean.</p>
Unemployment:	<p>Census 2011 showed 41.4% of working age population in full time employment, 3.4% in part time employment and 3.4% were students. No one industry was substantially larger than others – the largest industries were Accommodation/food and education at – 2.4%, then professional and scientific, retail and health.</p>
Deprivation:	<p>In relative terms Lewisham has become more deprived since 2015, it is ranked 5,514 out of 32,844 LSOAs in England, where 1 is the most deprived LSOA. This is amongst the 20% most deprived neighbourhoods in the country. Some areas in Lewisham are among the most deprived in the country according to the 2015 Index of Multiple Deprivation². Deprivation in the borough tends to concentrate in the north and south of the borough and this geographical distribution has been consistent over the last 30 years. In New Cross ward, deprivation has significantly increased between 2010 and 2015 relative to other areas of the country. At the same time, neighbouring Evelyn ward has seen an improvement in this relative deprivation in the same period although Evelyn ward is still amongst the most deprived in the country. This creates a complex picture of what poverty and deprivation look like in the borough, and makes it difficult to identify the causes for these changes.</p>
Local Police:	<p>Lewisham Police Station, 43 Lewisham High St, SE13 5JZ</p>



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, Lewisham Council Borough Profile 2011 and Poverty in Lewisham 2016.

Environmental Factors

In preparing this assessment Merkur Slots UK 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>Unemployment: Census 2011 showed 41.4% of working age population in full time employment, 3.4% in part time employment and 3.4% were students. No one industry was substantially larger than others – the largest industries were Accommodation/food and education at –2.4%, then professional and scientific, retail and health.</p> <p>Deprivation: In relative terms Lewisham has become more deprived since 2015, it is ranked 5,514 out of 32,844 LSOAs in England, where 1 is the most deprived LSOA. This is amongst the 20% most deprived neighbourhoods in the country. Some areas in Lewisham are among the most deprived in the country according to the 2015 Index of Multiple Deprivation². Deprivation in the borough tends to concentrate in the north and south of the borough and this geographical distribution has been consistent over the last 30 years. In New Cross ward, deprivation has significantly increased between 2010 and 2015 relative to other areas of the country. At the same time, neighbouring Evelyn ward has seen an improvement in this relative deprivation in the same period although Evelyn ward is still amongst the most deprived in the country. This creates a complex picture of what poverty and deprivation look like in the borough, and makes it difficult to identify the causes for these changes.</p>	<p>Age Verification <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots UK 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>Schools and Education</p> <p>Tidemill Academy, 11 Giffin St, SE8 4RJ Kush Academy, 190-196 Deptford High St, SE8 3PR Deptford Park Primary School, Evelyn St, SE8 5RU 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 Goldsmiths, University of London, 8 Lewisham Way, SE14 6NW</p> <p>Community Centres and Youth Centres</p> <p>Community Hall, Evelyn St, SE8 5QW Lewisham Indo Chinese Community, 33 Clyde St, SE8 5LW Deptford Lounge, 9 Giffin St, SE8 4RJ Riverside Youth Club, 185 Grove St, SE8 3QQ Deptford Church Hall, 131 Deptford High St, SE8 4NS Second Wave Youth Arts, 1 Creek Rd, SE8 3BT</p> <p>Parks, play grounds and sports/leisure facilities</p> <p>Ferranti Park, Creekside, Deptford, SE8 3DW Fordham Park, New Cross, SE14 6LU Margaret McMillan Park, 54 Glenville Grove, SE8 4BP Mary Ann Gardens, 43 Mary Ann Gardens, SE8 3DP Deptford Park, 23 Scawen Rd, SE8 5AE Richard MacVicar Deptford Adventure Playground, New King St, Deptford, London SE8 3JB</p> <p>Vulnerable and addiction support services</p> <p>Deptford Action Group For The Elderly, 71 Deptford High St, SE8 4AA Deptford Methodist Church and Mission, Mary Ann Gardens, SE8 3DP Deptford Reach, 64 Speedwell St, SE8 4AT The Samaritans of Lewisham Greenwich and Southwark, 1-5 Angus St, SE14 6LU Centrepoint, 204 Evelyn St, SE8 5BZ</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 person's gambling participation survey shows that the number of 11-16 years old's 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'</p> <p>https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</p> <p>Vulnerability</p> <p>Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p>
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	<p>Homeless shelters and food banks</p> <p>Lewisham Refugee & Migrant Network, 341 Evelyn St, SE8 5QX Bench Outreach, 14 New King St, SE8 3HS Deptford Reach, 64 Speedwell St, SE8 4AT 999 Club, 21 Deptford Broadway, SE8 4PA The Bear Church, Shaftesbury Christian Centre, Frankham St, SE8 4RN Deptford Salvation Army Centre, Mary Ann Gardens, SE8 3DP</p> <p>Pawnbrokers and Loan Shops</p> <p>H&T Pawnbrokers, 72 Deptford High St, SE8 4RT Cash Exchange, 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</p> <p>Medical Centres, Care Homes and Mental Health facilities</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>Gambling premises</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>Residential Areas</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>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Customer Interaction</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>Player Protection</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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	<p>Bus stops and other Transport links</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>Public Houses and Alcohol Licensed Premise</p> <p>Job Centre, 120-122 Deptford High St, SE8 4NP White Swan, 217 Deptford High St, SE8 3NT Red Lion & Wheatsheaf, 45 Deptford High St, SE8 4AD Winemakers Deptford, 209 Deptford High St, SE8 3NT Little Crown, 495 New Cross Rd, SE14 6TQ STOCKTON, 2 Deptford High St, SE8 4AF Badger, 139 Deptford High St, SE8 3NU Royal Standard, 86 Tanner's Hill, SE8 4PN Plume Feathers, 5-9 Deptford High St, SE8 4AD Taproom, Unit 2, St Paul's House, 3 Market Yard, SE8 4BX The Dog & Bell, 116 Prince St, SE8 3JD Star and Garter, 490 New Cross Rd, SE14 6TJ The Duke, 125 Creek Rd, SE8 3BU Dirty Apron, 4 Deptford Market Yard, 133 Deptford High Street, SE8 4BX Royal Albert, 460 New Cross Rd, SE14 6TJ The Black Horse, 195 Evelyn St, SE8 5RE The Brookmill, 65 Cranbrook Rd, SE8 4EJ Bluethroat Bar, Arch 2 Deptford Station, Deptford High St SE8 4NS The Bunker, 46 Deptford Broadway, SE8 4PH The Venue, 2a Clifton Rise, SE14 6JP Shades Snooker & Pool Club, 197-199 Deptford High St, SE8 3NT Marcella, 165A Deptford High St, SE8 3NU M and D Japanese, 117 Deptford High St, SE8 4NS The Tapas Room, Deptford Market Yard, 133 Deptford High St, SE8 4BX</p>	<p>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 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</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls where received from people within the on-line sector.</p> <p>Deprivation</p> <p>Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p>
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		<p>Homelessness</p> <p>Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>Premise Security and violence in the workplace</p> <p><i>Poor security control measures which may increase vulnerability to crime</i></p> <p><i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots High Street, Deptford is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots High Street, Deptford will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder</p> <p><i>To identify aggressive customers to prevent crime and disorder</i></p> <p><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>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p>Crime statistics:</p> <p>In April 2021 there were 196 crimes reported within a half mile radius of the venue, this has increased during the last few months – Violence and sexual offences (26%), Anti-social behaviour (25%) are the predominant reported offences. During the last 12 months Violent crimes have increased from 22% in relation to Anti-social Behaviour which accounted for 34%.</p> <p>In the April 2021 the crime rates in New Cross were 8 per 1000 residents which is slightly higher than the Borough at 7 per 1000. When compared to other areas in the Metropolitan Police force area crime rates were lower than the average. Merkur Slots currently operate in higher crime areas such as Croydon, Hounslow and Newham. (police.co.uk).</p> <p>Local Police:</p> <p>Lewisham Police Station, 43 Lewisham High St, SE13 5JZ</p> <p>There are currently no policing polices available.</p> <p>Public Houses and Alcohol Licensed Premise</p> <p>Job Centre, 120-122 Deptford High St, SE8 4NP</p> <p>White Swan, 217 Deptford High St, SE8 3NT</p> <p>Red Lion & Wheatsheaf, 45 Deptford High St, SE8 4AD</p> <p>Winemakers Deptford, 209 Deptford High St, SE8 3NT</p> <p>Little Crown, 495 New Cross Rd, SE14 6TQ</p> <p>STOCKTON, 2 Deptford High St, SE8 4AF</p> <p>Badger, 139 Deptford High St, SE8 3NU</p> <p>Royal Standard, 86 Tanner's Hill, SE8 4PN</p> <p>Plume Feathers, 5-9 Deptford High St, SE8 4AD</p> <p>Taproom, Unit 2, St Paul's House, 3 Market Yard, SE8 4BX</p> <p>The Dog & Bell, 116 Prince St, SE8 3JD</p> <p>Star and Garter, 490 New Cross Rd, SE14 6TJ</p> <p>The Duke, 125 Creek Rd, SE8 3BU</p> <p>Dirty Apron, 4 Deptford Market Yard, 133 Deptford High Street, SE8 4BX</p>	

<p>Royal Albert, 460 New Cross Rd, SE14 6TJ The Black Horse, 195 Evelyn St, SE8 5RE The Brookmill, 65 Cranbrook Rd, SE8 4EJ Bluethroat Bar, Arch 2 Deptford Station, Deptford High St SE8 4NS The Bunker, 46 Deptford Broadway, SE8 4PH The Venue, 2a Clifton Rise, SE14 6JP Shades Snooker & Pool Club, 197-199 Deptford High St, SE8 3NT Marcella, 165A Deptford High St, SE8 3NU M and D Japanese, 117 Deptford High St, SE8 4NS The Tapas Room, Deptford Market Yard, 133 Deptford High St, SE8 4BX</p> <p>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</p> <p>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</p> <p>Residential Areas (Impacted by Anti-Social Behaviour) 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 Rushey Green, Dogs on leads 'zone' in Beckenham Place Park, and a dog free zone in Manor House Park.</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 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.</p> <p>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.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p>
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Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

Money Laundering

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

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

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

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

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

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

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

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 6am.

In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots: High street, Deptford will operate TITO machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.

As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.

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

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

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

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

Alcohol and Drugs

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

'No Alcohol Allowed' signage on the door.

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

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

		<p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending</p> <p>Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>Bingo/Gaming Machine and Supervision</p> <p>The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p>Customer Complaints</p> <p><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.</p> <p>4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p>

		<p>Marketing</p> <p>Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
Other	<p>Places of worship and Religious Buildings</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 6TJ</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 Jamme Masjid, 248-250 Westerry Rd, Isle of Dogs, E14 3AG</p> <p>Muslim Cultural Centre, 10 Clifton Rise, New Cross, SE14 6JP</p> <p>Lewisham Islamic Centre, 363-365 Lewisham High St, SE13 6NZ</p> <p>The Akwaaba Centre, Grinling Pl, SE8 5HG</p>	<p>Ethnicity and Local Area Demographic</p> <p>Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility</p> <p>Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots UK 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>Other establishments of note</p>	

	<p>Deptford Neighbourhood Action, c/o Pepps Resource Centre, Old Library, SE8 3BA, a non-political organisation that has been established for the purpose of bringing local people together and developing a Neighbourhood Plan for Deptford. In 2015, they were designated as a Neighbourhood Plan Forum with the 'Community Right' under the Localism Act to develop a statutory Neighbourhood Plan.</p> <p>What is a Neighbourhood Development Plan?</p> <p><i>Producing a Neighbourhood plan is a right for communities introduced through the Localism Act 2011. Communities can shape development in their areas through the production of a Neighbourhood Development Plan. Neighbourhood Development Plans become part of the Local Plan and the policies contained within them are then used in the determination of planning applications. Neighbourhood Plan policies cannot block development that is already an adopted part of the Local or London Plan.</i></p> <p><i>It can shape development, designate sites, protect local green spaces, support local employment and address many more planning matters in greater detail than it is possible for a Local Plan and the London Plan to do.</i></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 Bimonthly and Compliance Auditors twice yearly.</p> <p>COVID 19</p> <p>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

Premise level:	Merkur Slots High street, Deptford is a ground floor premises with residential accommodation above.
Premise frontage:	Merkur Slots High Street, Deptford will be a property will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
Counter Position:	<p>Merkur Slots High Street, Deptford floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> - TITO machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots High Street, Deptford floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
Machine Positions:	<p>Merkur Slots High Street, Deptford will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
Hidden Areas:	Merkur Slots 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.

Additional Comments

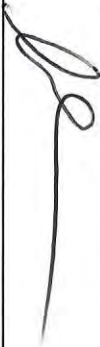
I have worked in the Gaming Industry for 25 years, in operations as a venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management. During my time in the industry, I have managed venues and areas in many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

Merkur Slots UK have operated a Bingo licensed premise within the London Borough of Lewisham Local Authority, Merkur Slots, 97-99 Lewisham High Street, SE13 6BA since 2012. This premise has never been subject to a local authority or Gambling Commission review.

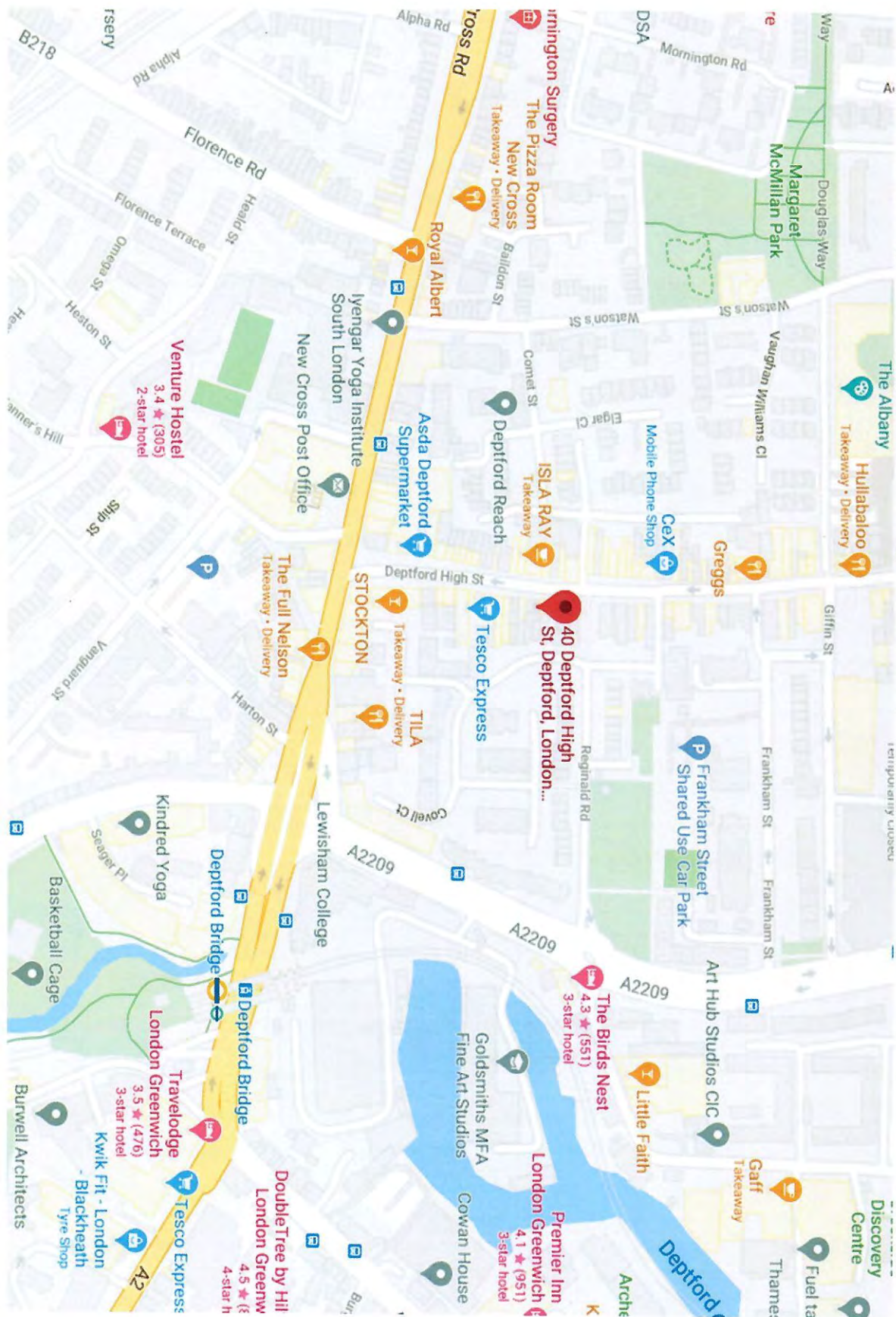
Merkur Slots is accredited by the G4 Global Gambling Guidance Group for Responsible Gambling.

This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Merkur Slots UK 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 UK 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:	17/06/21

Merkur Slots, 40 Deptford High Street, Deptford



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



Indices of Deprivation

Indices of Deprivation 2019, by post code (<https://imd-by-postcode.opendatacommunities.org/imd/2019>)

Merkur operational premises inspected by Leveche Associates Limited

Postcode	Merk Slots Venue	LSOA code	LSOA Name	Index of Multiple Deprivation Rank	Index of Multiple Deprivation Decile*
N22 6BB	Wood Green	E01002026	Haringey 016A E01002026	2796	1
E13 9AU	Upton Park	E01003489	Newham 019B E01003489	6119	2
N7 6QA	Holloway	E01002731	Islington 007B E01002731	11066	4
E6 1JB	East Ham	E01003520	Newham 018A E01003520	9784	3
IG11 8EQ	Barking	E01000010	Barking and Dagenham 015C E01000010	6900	3
N12 8PT	Live	E01000321	Barnet 012E E01000321	19535	6
HA9 7BH	Wembley	E01000635	Brent 020D E01000635	8174	3
NW10 0AD	Neasden	E01000510	Brent 014C E01000510	7979	3
N9 0TQ	Edmonton Green	E01001429	Enfield 030D E01001429	2781	1
N12 8PT	Finchley	E01000321	Barnet 012E E01000321	19535	6
EN8 7LA	Waltham Cross	E01023337	Broxbourne 013B E01023337	11162	4

* Decile -1 = most deprived

Local Authority Indices of deprivation 2019 (extracted from <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>)

Merkur Premises:

Opening 2021
Currently Trading

Local Authority District name (2019)	IMD - Average rank	IMD - Rank of average rank*	IMD - Average score	IMD - Rank of average score	IMD - Proportion of LSOAs in most deprived 10% nationally	IMD - Rank of proportion of LSOAs in most deprived 10% nationally	IMD 2019 - Extent	IMD 2019 - Rank of extent
Blackpool	26765.29	1	45.039	1	0.4149	6	0.5766	5
Manchester	26417.75	2	40.005	6	0.4326	5	0.5999	2
Knowsley	26199.75	3	43.006	2	0.4694	3	0.5992	3
Liverpool	25833.57	4	42.412	3	0.4866	2	0.6213	1
Barking and Dagenham	25551.85	5	32.768	21	0.0364	139	0.4724	20
Birmingham	25319.55	6	38.067	7	0.4131	7	0.5792	4
Hackney	25312.57	7	32.526	22	0.1111	78	0.4319	25
Sandwell	25276.49	8	34.884	12	0.1989	44	0.5349	10
Kingston upon Hull, City of	25222.75	9	40.564	4	0.4518	4	0.5505	8
Nottingham	24458.51	10	34.891	11	0.3077	15	0.5235	11
Burnley	24400.26	11	37.793	8	0.3833	8	0.5357	9
Newham	24138.70	12	29.577	43	0.0244	154	0.2884	67
Hastings	23845.37	13	34.281	17	0.3019	17	0.4376	24
Blackburn with Darwen	23819.60	14	36.013	9	0.3626	9	0.5519	7
Stoke-on-Trent	23797.05	15	34.504	14	0.3208	12	0.5073	12
Middlesbrough	23729.10	16	40.460	5	0.4884	1	0.5710	6
Rochdale	23414.21	17	34.415	15	0.2985	20	0.4758	19
Hyndburn	23297.52	18	34.333	16	0.2692	21	0.4796	17
Wolverhampton	23274.95	19	32.102	24	0.2089	38	0.4828	16
Salford	23233.56	20	34.210	18	0.3000	19	0.4720	21
Bradford	23086.82	21	34.666	13	0.3355	11	0.4981	13
Leicester	22857.96	22	30.877	32	0.2031	42	0.3713	37

Tameside	22774.30	23	31.374	28	0.2057	40	0.4155	28
Great Yarmouth	22767.13	24	33.097	20	0.2459	25	0.3926	33
Hartlepool	22581.98	25	35.037	10	0.3621	10	0.4973	14
South Tyneside	22573.29	26	31.509	27	0.2451	26	0.4508	23
Tower Hamlets	22507.05	27	27.913	50	0.0139	175	0.3057	57
Islington	22490.24	28	27.535	53	0.0488	126	0.2705	74
Oldham	22460.10	29	33.155	19	0.3050	16	0.4790	18
East Lindsey	22178.95	30	29.892	39	0.1605	55	0.3396	49
Walsall	22152.64	31	31.555	25	0.2635	22	0.4844	15
Tendring	22083.12	32	30.484	36	0.1798	48	0.3139	53
Sunderland	21993.93	33	30.586	35	0.2270	34	0.3960	32
Thanet	21985.10	34	31.314	30	0.2143	37	0.3642	42
Lewisham	21959.25	35	26.661	63	0.0296	148	0.2464	84

*1 being the most deprived and 35 the least deprived.