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LICENSING SUB-COMMITTEE

Wednesday, 16 June 2021 at 10.00 am
Virtual

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PLEASE NOTE: VIRTUAL MEETING

Please click [Here](#) to view the meeting or copy and paste the link below into your web browser:

<https://bit.ly/3zb0NnC>

Councillors : Doug Taylor (Chair), Mahmut Aksanoglu and Jim Steven

AGENDA – PART 1

1. WELCOME AND APOLOGIES FOR ABSENCE

2. DECLARATION OF INTERESTS

Members are asked to declare any disclosable pecuniary, other pecuniary or non pecuniary interests relating to items on the agenda.

3. MERKUR SLOTS, 292 GREEN LANES, PALMERS GREEN, LONDON N13 5TW (Pages 1 - 686)

Review of Bingo Premises Licence.

4. MINUTES OF PREVIOUS MEETING (Pages 687 - 698)

To receive and agree the minutes of the meeting held on Wednesday 10 March 2021.

5. EXCLUSION OF THE PRESS AND PUBLIC

If necessary, to consider passing a resolution under Section 100A(4) of the Local Government Act 1972 excluding the press and public from the meeting for any items of business moved to part 2 of the agenda on the grounds that they involve the likely disclosure of exempt information as defined in those paragraphs of Part 1 of Schedule 12A to the Act (as amended by the Local Government (Access to Information) (Variation) Order 2006).
(There is no part 2 agenda)

MUNICIPAL YEAR 2021/22 REPORT NO.

COMMITTEE :
Licensing Sub-Committee
16 June 2021

REPORT OF :
Principal Licensing Officer

LEGISLATION :
Gambling Act 2005

Agenda - Part	Item
<p>SUBJECT : REVIEW OF BINGO PREMISES LICENCE</p> <p>PREMISES : Merkur Slots, 292 Green Lanes, Palmers Green, LONDON, N13 5TW</p> <p>WARD : Palmers Green</p>	

1 LICENSING HISTORY & CURRENT POSITION:

- 1.1 The premises previously traded as William Hill, which was granted betting premises licence LN/200800092 on 30 September 2007 following a fast track conversion application (as the premises held an equivalent betting licence under the previous licensing regime). This betting premises licence was surrendered on 14 October 2019. This William Hill licence was not subject to any licence review or licensing prosecution action.
- 1.2 Cashino Gaming Limited submitted a new bingo premises licence application and the consultation took place between 30 November 2020 and closed on 27 December 2020. The application was made correctly as follows:
- In accordance with the principles set out in Section 153 of the Gambling Act 2005 (the Act);
 - In accordance with Section 159 of the Act;
 - In accordance with Section 160 of the Act and Part 3 of The Gambling Act 2005 (Premises Licences and Provisional Statements Regulations 2007). All the statutory Responsible Authorities received notice of the application including the Gambling Commission, Licensing Authority, local police, and body responsible for the protection of children.
- 1.3 A copy of the application and risk assessment submitted by Cashino Gaming Limited is produced in Annex 1.
- 1.4 Cashino Gaming Limited satisfied the requirements for advertising the application, in accordance with Regulation 12(6) of The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007, made under Section 160 of the Gambling Act 2005.
- 1.5 Neither Government nor Parliament have sought to amend the legislative framework for licence applications. Therefore, no legal dispensation to the advertising requirements to allow for Covid-19 considerations was given, and the Licensing Team do not have any discretion to extend the consultation period or require additional consultation requirements.
- 1.6 The Metropolitan Police and Licensing Authority initially submitted representations to the new bingo premises licence application, namely seeking an amended risk assessment and to apply additional conditions. The applicant

agreed therefore those representations were withdrawn. The amended risk assessment is produced in Annex 2.

- 1.7 As a result of no outstanding representations, bingo premises licence LN/202000311 was granted to Cashino Gaming Limited on 4 January 2021 by delegated authority. A copy of the bingo premises licence is produced in Annex 3.
- 1.8 The bingo premises licence applies the default condition that bingo facilities may only be made available between the hours of 09:00 and 00:00 (midnight). There are no time restrictions applied to the use of the gaming machines that may be made available for use by virtue of the bingo premises licence, and therefore could be used 24 hours per day.
- 1.9 On 7 April 2021, according to Companies House records, Cashino Gaming Limited changed its name to Merkur Slots UK Limited. The company number, 01038403, remains the same as does the registered address: Seebeck House, 1A Seebeck Place, Milton Keynes, MK5 8FR. The company will be applying to amend the names on all licences.
- 1.10 In order to provide bingo, an Operating Licence is also required from the Gambling Commission. Cashino Gaming Limited's Operating Licence number is 000-003266-N-103444.
- 1.11 Merkur Slots at 292 Green Lanes has not yet opened (correct of 7 June 2021).
- 1.12 The following premises are licensed under the Gambling Act 2005, in Palmers Green. Note there are only betting premises licences, no other gambling premises are in Palmers Green (besides Merkur Slots):
 - Betfred, 319 Green Lanes, LONDON, N13 4TY.
 - Ladbrokes, 402 Green Lanes, LONDON, N13 5PD.
 - Paddy Power, 314 Green Lanes, LONDON, N13 5TT.
- 1.13 The opening hours for these betting premises are in line with the associated default condition, namely that gambling facilities may only be provided between 7am and 10pm daily.
- 1.14 None of the above betting premises have been subject to a licence review or licensing formal action/prosecution.

2 THIS APPLICATION:

- 2.1 On 14 April 2021, Councillor Nesil Caliskan of Enfield Council as an Interested Party, submitted a review application of bingo premises licence LN/202000311 for Merkur Slots, 292 Green Lanes, Palmers Green, LONDON, N13 5TW.
- 2.2 The consultation period for receiving representations in response to the review took place between 21 April 2021 and 18 May 2021.
- 2.3 The grounds of the review application are made that bingo premises licence LN/202000311 does not meet the following two licensing objectives:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;
 2. Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 2.4 The review application seeks to revoke bingo premises licence LN/202000311.
- 2.5 The review application and supporting documents are produced in Annex 4.
- 2.6 The decision to grant the review application in accordance with Section 199 of the Gambling Act 2005 was based on the following being satisfied:
- 2.6.1 The application for the review was made by an interested party;
 - 2.6.2 The application has been in the prescribed form and manner;
 - 2.6.3 The grounds of the review have been specified in the review application, namely that the bingo premises licence does not meet two licensing objectives;
 - 2.6.4 The grounds that the licensing authority may refuse a review application, as set out by section 198 of the Act, were not met. Specifically, the review does provide information regarding concerns with the licensing objectives, which is a Principle to be applied in accordance with section 153 (1) (c) of the Act. Furthermore, the review is not considered to be vexatious or frivolous, and the information in the review was not used in a representation when the new bingo premises licence application was made.
- 2.7 The review application was advertised in accordance with Regulation 5 of the Gambling Act 2005 (Premises Licences) (Review) Regulations 2007.
- 2.8 Each of the Responsible Authorities were consulted in respect of the review application.

3 RELEVANT REPRESENTATIONS:

- 3.1 **Licensing Authority** – the Licensing Authority supports the review in that their representation seeks additional conditions be added to the bingo premises licence which would help prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime and also to protect children and other vulnerable persons from being harmed or exploited by gambling. These conditions have not been agreed by the licence holder.
- 3.2 The Licensing Authority representation is produced in Annex 5.

- 3.3 **Interested Parties** – 239 emails were received in response to the review application, however, only 96 were considered to be valid under the requirements of the Gambling Act 2005. The Interested Parties include Bambos Charalambous MP (Enfield Southgate), Joanne McCartney AM (London Assembly Member for Enfield and Haringey), Stop PG Merkur Slots Campaign, residents associations, local business owners and local residents.
- 3.4 A copy of the valid representations are produced in Annex 6, note the Interested Parties have been given references such as IP1, IP2 etc.
- 3.5 **Licence Holder** - The licence holder has provided a written response to the review application, which is produced in Annex 7.

4 PROPOSED LICENCE CONDITIONS:

- 4.1 The list of current conditions applied to bingo premises licence LN/202000311 and the conditions proposed by the Licensing Authority in their representation are produced in Annex 8.

5 RELEVANT LAW, GUIDANCE & POLICIES:

- 5.1 The paragraphs below are extracted from either :
- 5.1.1 the Gambling Act 2005 ('Act'); or
 - 5.1.2 the 5th edition of the Gambling Commission guidance to Licensing Authorities (September 2015, updated September 2016) ('Guid'); or
 - 5.1.3 the London Borough of Enfield's Statement of Principles of January 2019 ('Pol').

The Gambling Act 2005 - General Principles :

- 5.2 The Licensing Sub-Committee must carry out its functions with a view to promoting the licensing objectives (Section 1):
- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
 - Ensuring that gambling is conducted in a fair and open way;
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 5.3 The Council is aware that, as per Section 153 of the Act, in making decisions about premises licences it should aim to permit the use of premises for gambling insofar as it thinks it is:
- In accordance with any relevant code of practice issued by the Gambling Commission;
 - In accordance with any relevant guidance issued by the Gambling Commission;
 - Reasonably consistent with the licensing objectives;
 - In accordance with the Council's Statement of Licensing Policy. In particular, the Council requires operators to take account of the local area profile of the borough contained within this policy.

5.4 Section 158 defines an Interested Party:

For the purposes of this Part a person is an interested party in relation to a premises licence or in relation to an application for or in respect of a premises licence if, in the opinion of the licensing authority which issues the licence or to which the application is made, the person—

- (a) lives sufficiently close to the premises to be likely to be affected by the authorised activities,
- (b) has business interests that might be affected by the authorised activities, or
- (c) represents persons who satisfy paragraph (a) or (b).

5.5 The Gambling Commission Guidance to Licensing Authorities

Licensing authority decisions

4.9 S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:

- a. in accordance with any relevant code of practice under s.24
- b. in accordance with any relevant guidance issued by the Commission under s.25
- c. reasonably consistent with the licensing objectives (subject to a and b above),
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

4.10 Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the guidance contained in this document, any relevant Commission code of practice, the licensing objectives or the licensing authority's own policy statement.

Licensing objectives

5.1 In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:

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

5.2 It is expected that the licensing authority will have set out their approach to regulation in their policy statement, having taken into account local circumstances. This is dealt with in more detail at [Part 6](#).

5.4.1 Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

5.3 Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in [Part 6](#). A non-exhaustive list of licence conditions is provided at Appendix F.

5.4 A licensing authority will need to consider questions raised by the location of gambling premises when:

- formulating its statement of licensing policy
- receiving relevant representations to an application
- dealing with applications as a responsible authority in its own right
- considering applications before it.

5.5 In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.

5.6 Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.

5.7 Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003/Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

5.8 In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in [Part 9](#) of this guidance.

5.9 There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers. Further information can often be found on the websites of industry trade associations.

5.10 Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

Objective 3 : Protecting children and other vulnerable persons from being harmed or exploited by gambling

5.13 In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (e.g. bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

5.14 Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.

5.15 If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.

5.16 In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the [Licence conditions and codes of practice](#) (LCCP) or as [Gambling codes of practice - consolidated for all forms of gambling](#). In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in [Parts 9](#) and [17](#) of this guidance.

5.17 The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define

'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.

5.18 Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's policy statement. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

Section 153 principles

5.19 S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:

- a. in accordance with any relevant code of practice under s.24 (the LCCP)
- b. in accordance with any relevant guidance issued by the Commission under s.25 (this guidance)
- c. reasonably consistent with the licensing objectives (subject to a and b above)
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

5.20 Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this guidance, any relevant Commission code of practice, its own statement of licensing policy, and the licensing objectives.

5.21 In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this guidance, and its own policy statement or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this guidance take precedence.

5.22 In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to :

- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
- s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.

5.23 A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.

Other considerations

5.31 Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions. In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.

5.32 Licensing authorities must ensure that the application is in accordance with the relevant codes of practice, this guidance, the licensing objectives and the licensing authority's own policy statement. There is, therefore, significant scope for licensing authorities to request additional information from the applicant where they have concerns about both new applications and variations.

5.33 Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in [Part 9](#) and a non-exhaustive list of licence conditions is included at Appendix F of this guidance.

5.34 Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

Interested parties

8.9 S.158 of the Act defines interested parties. To accept a representation from an interested party, the licensing authority must take the view that the person:

- lives sufficiently close to the premises to be likely to be affected by the authorised activities
- has business interests that might be affected by the authorised activities
- represents persons in either of these two groups. Licensing authorities will need to have regard to anything an interested party says about their status to make representations.

8.10 The approach taken by licensing authorities in determining who is an interested party should be dealt with in their policy statement. As with responsible authorities, regulations require this information to be in a separate section of the policy statement, as outlined in [Part 6](#) at paragraph 6.18 onwards.

8.11 The following gives further advice on how licensing authorities can determine whether someone is an interested party.

People living close to the premises

8.12 There are a number of factors that licensing authorities should take into account when determining whether a person ‘lives sufficiently close to the premises’. These might include:

- the size of the premises
- the nature of the premises
- the distance of the premises from the location of the person making the representation
- the potential impact of the premises such as the number of customers, routes likely to be taken by those visiting the establishment
- the circumstances of the person who lives close to the premises. This is not their personal characteristics, but their interests which may be relevant to the distance from the premises.

8.13 Relevant factors will depend on the particular application. For example, it is reasonable for a licensing authority to consider that living sufficiently close to premises to likely be affected could have a different meaning for (a) a private resident, (b) a residential school for children with truanting problems and (c) a residential hostel for vulnerable adults.

The nature and scope of business interests that could be affected

8.14 It could be argued that any gambling business could be affected by another gambling business expanding into any part of Great Britain. But that is unlikely to be enough to satisfy the test of being ‘a person with business interests that might be affected by the premises’ under consideration. For example, an operator in a particular sector be it casino, bingo, betting etc, should not be able to lodge representations on every application put in by a rival operator anywhere in the country, simply because they are in competition within the same gambling sector. Specifically, licensing authorities are reminded that the ‘demand test’ from previous gambling legislation does not apply under the Act.

8.15 The licensing authority should be satisfied that the relevant business is likely to be affected. Factors that are likely to be relevant include:

- the size of the premises
- the ‘catchment’ area of the premises, that is, how far people travel to visit the premises
- whether the person making the representation has business interests in that catchment area that might be affected.

People representing those in the above categories

8.16 Interested parties can be people who are democratically elected such as councillors and MPs, as persons representing individuals in the other categories. This would include county, parish and town councillors. Other representatives might include bodies such as trade associations and trade unions, and residents’ and tenants’ associations. A school head or governor might act in representing the interests of

pupils or parents and a community group might represent vulnerable people living near to the proposed premises.

8.17 Save for democratically elected persons, licensing authorities should satisfy themselves on a case by case basis that a person does represent interested parties, and request written evidence where necessary. A letter from the interested person(s) they are representing would be sufficient.

Conditions that may not be attached to premises licences by licensing authorities

9.32 The Act sets out certain matters that may not be the subject of conditions:

- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
- s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
- s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

Part 10: Review of premises licence by licensing authority

Introduction

10.1 A premises licence may be reviewed by the licensing authority of its own volition or following the receipt of an application requesting a review from a responsible authority or an interested party (as defined in s.157 and s.158 of the Act). Licensing authorities should note that reviews cannot be delegated to an officer of the licensing authority – the lowest level of delegation permitted is to a licensing sub-committee.

10.2 The ‘aim to permit’ framework provides wide scope for licensing authorities to review premises licences where there is a potential conflict with the Commission’s [Licence conditions and codes of practice](#) (LCCP) and this guidance, the licensing objectives or the licensing authorities own statement of policy. Whilst the Act does not provide a pre-defined list of issues that might prompt a licence review, it is expected that the licensing authority will have set out its view on local issues and priorities that underpin its approach to regulation in its statement of policy in any event, which might then prompt a review.

10.3 Licensing authorities are expected to act in a manner that is in accordance with the powers set out under the Act. This means that licensing authority actions, including reviews, should be in pursuit of the principles set out in s.153 of the Act or underpinned by reasonable concerns, such as changes to the local environment or resident complaints.

10.4 Licensing authorities might consider it prudent to have constructive discussions with operators about any such concerns, prior to discharging its powers. To this end,

the operator might be asked to provide the licensing authority with its own local risk assessment (as provided for under ordinary code 10.1.2 of the LCCP which sets out the controls it has put in place to mitigate risks). The licensing authority has the right to exercise its powers under the Act, if the operator does not offer reasonable or practical suggestions for mitigating risks

Application for a review

10.11 S.197 of the Act provides that an application for review may be made by a responsible authority or an interested party, detailed in [Part 8](#) of this guidance. Such applications must be submitted to the licensing authority in the prescribed form and state the reasons why a review is being requested, together with any supporting information and documents.

Decision whether to grant an application for a review

10.14 S.199 provides that a licensing authority must grant an application for a review, unless it decides to reject the application under s.198 of the Act. By virtue of s.198, an application may, but need not, be rejected if the licensing authority thinks that the grounds on which the review is sought:

- a) are not relevant to the principles that must be applied by the licensing authority in accordance with s.153, namely the licensing objectives, the Commission's codes of practice and this guidance, or the licensing authority's statement of policy
- b) are frivolous
- c) are vexatious
- d) will certainly not cause the licensing authority to revoke or suspend a licence or to remove, amend or attach conditions on the premises licence
- e) are substantially the same as the grounds cited in a previous application relating to the same premises
- f) are substantially the same as representations made at the time the application for a premises licence was considered.

10.15 In the case of e) and f), the licensing authority shall take into account the period of time that has passed since the previous application or representations were made, in deciding whether this is a reasonable basis for not reviewing the licence.

10.16 As licensing authorities are required to permit the use of premises for gambling, in so far as it is in accordance with the s.153 principles, applications that raise general objections to gambling as an activity, that relate to demand for gambling premises, or raise issues relating to planning, public safety, and traffic congestion are unlikely to be considered an appropriate basis for review, leading to rejection under a) above.

10.17 The decision to grant a review must not amount to pre-judging the outcome of a review.

Carrying out a review

10.18 Having given notice of their intention to initiate a review or having decided to grant a review following an application, s.201 of the Act requires the licensing authority to carry out the review as soon as possible after the 28 day period for making representations has passed.

10.19 The purpose of the review will be to determine whether the licensing authority should take any action in relation to the licence, namely:

- add, remove or amend a licence condition imposed by the licensing authority
- exclude a default condition imposed by the Secretary of State or Scottish Ministers (for example, relating to opening hours) or remove or amend such an exclusion
- suspend the premises licence for a period not exceeding three months
- revoke the premises licence.

10.20 In particular, the licensing authority may take the above action on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them. Equally, the premises licence holder must only offer the type of gambling that they are permitted to.

10.21 The licensing authority must hold a hearing, unless the applicant and any person who has made representations consent to the review being conducted without one. The licensing authority must have regard to any relevant representations when reviewing the matter, and must have regard to the principles in s.153 of the Act.

Part 18: Bingo

Introduction

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

- cash bingo, where the stakes paid make up the cash prizes that are won
- prize bingo, where various forms of prizes are won, not directly related to the stakes paid.

18.2 The game and rules of bingo have evolved to the point where, despite the absence of any formal industry standard, the way in which bingo is played is broadly similar throughout Great Britain. Bingo is equal chance gaming. The Commission has published its view of what bingo is and how it differs from other forms of gambling. This can be found in the advice note [What constitutes bingo](#) (this advice does not form part of the *Guidance to licensing authorities*). This advice was developed with the support of key stakeholders from the bingo industry.

18.3 Cash bingo is the main type of bingo played in commercial bingo premises. They also offer prize bingo, largely as games played in the intervals between main stage games. This means that only premises with a bingo premises licence, or a large

casino premises licence issued under the Act (where the operator holds a bingo as well as a casino operating licence), will be able to offer bingo in all its forms.

18.5 Licensing authorities need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. An operator may choose to vary their licence to exclude a previously licensed area of that premises, and then apply for a new premises licence, or multiple new premises licences, with the aim of creating separate premises in that area. Essentially providing multiple licensed premises within a single building or site. Before issuing additional bingo premises licences, licensing authorities need to consider whether bingo can be played at each of those new premises.

Protection of children and young persons

18.6 Under the Act, children and young persons (anyone up to the age of 18) cannot be employed in providing any facilities for gambling on bingo premises, and children (under 16) cannot be employed, in any capacity, at a time when facilities for playing bingo are being offered. However, young persons, aged 16 and 17, may be employed in bingo premises (while bingo is being played), provided the activities on which they are employed are not connected with the gaming or gaming machines. Licensing authorities are able to find information about the restrictions that apply in [Licence conditions and codes of practice](#) (LCCP).

18.7 Children and young people are allowed into bingo premises; however they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. Social Responsibility (SR) code 3.2.5(3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling.

Gaming machines

18.8 S.172(7), as amended, provides that the holder of a bingo premises licence may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. For example, a premises with a total of 25 gaming machines available for use can make five or fewer category B3 gaming machines available on that premises. Premises that were licensed before 13 July 2011 are entitled to make available eight category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. There are no restrictions on the number of category C or D machines that can be made available. Regulations state that category B machines at bingo premises are restricted to sub-category B3 (SI 2007/2158: Categories of Gaming Machine Regulations 2007) (but not B3A) and B4 machines.

18.9 The gaming machines must remain within the licensed area covered by the premises licence. In the unusual circumstance that an existing bingo premises covered by one premises licence applies to vary the licence and acquire additional bingo premises licences (so that the area that was the subject of a single licence will become divided between a number of separate licensed premises) it is not permissible for all of the gaming machines to which each of the licences brings an entitlement to be grouped together within one of the licensed premises.

18.10 Equipment operated by a bingo operating licence for the purpose of playing bingo, for example what are currently known as mechanised cash bingo, electronic bingo terminal (EBTs) and video bingo terminals (VBTs), will be exempt from controls on gaming machines provided they comply with any conditions set by the Commission and, in the case of EBTs, do not hold gaming machine content.

18.11 An EBT that offers gaming machine content in addition to bingo content is considered to be a gaming machine and would count towards the total number of gaming machines or towards the offering of bingo. Any EBTs that do not offer gaming machine content would not count towards the number of gaming machines.

Bingo premises licence conditions

18.17 [Part 9](#) of this guidance discusses the mandatory and default conditions that attach to premises licences.

Mandatory conditions

18.18 A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

18.19 No customer shall be able to enter bingo premises directly from a casino, an adult gaming centre or betting premises (other than a track).

18.20 Over 18 areas, within bingo halls that admit under-18s, must be separated by a barrier with prominently displayed notices stating that under-18s are not allowed in that area and with adequate supervision in place to ensure that children and young people are not able to access these areas or the category B or C machines. Supervision may be done either by placing the terminals within the line of sight of an official of the operator or via monitored CCTV.

18.21 Any admission charges, the charges for playing bingo games and the rules of bingo must be displayed in a prominent position on the premises. Rules can be displayed on a sign, by making available leaflets or other written material containing the rules, or running an audio-visual guide to the rules prior to any bingo game being commenced.

18.22 Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

Default conditions

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

Controlling where gaming machines may be played – bingo

18.24 The following policy objectives summarise the key elements that underpin the approach to controlling where gaming machines may be played:

- with very few low risk exceptions, non-remote gambling should be confined to dedicated gambling premises
- the distinctions between different types of licensed gambling premises are maintained
- gambling activities are supervised appropriately
- within casino, bingo and betting premises, gaming machines are only made available in combination with the named non-remote activity of the operating licence.

18.25 The Act and associated regulations set out a comprehensive regulatory framework for controlling gaming machines. By linking different machine entitlements to different types of premises, the framework seeks to ensure the number and power (in terms of stakes, prizes and speed of play) of machines is proportionate to the premises. For such a framework to have any meaningful effect it must be possible for regulatory authorities and consumers to distinguish between different gambling premises.

18.26 The LCCP requires (Social Responsibility Code Provision 9) that gaming machines are only made available in combination with the named non-remote activity of the operating licence. So, unless a bingo premises operator offers substantive facilities for non-remote bingo it should not make gaming machines available for use on the premises in question. To contain the unavoidable risk to the licensing objectives associated with gaming machines, premises which offer machines must be appropriately supervised.

18.27 The current regulatory framework prescribes that category B gaming machines may only be made available in licensed gambling premises and not in locations which may prompt more ambient gambling such as pubs. Maintaining distinctions between different gambling venues allows individuals to make a deliberate choice whether to enter that particular gambling environment. In carrying out their functions under the Act licensing authorities should satisfy themselves that a premises applying for or licensed for bingo is operating or will operate in a manner which a customer would reasonably be expected to recognise as a premises licensed for the purposes of providing facilities for bingo.

18.28 Licensing authorities are not being asked to impose a 'one size fits all' view of how a bingo premises should look and function. Rather they are ensuring that a premises licensed for the purposes of providing facilities for bingo is operating as such and is not merely a vehicle to offer higher stake and prize gaming machines.

18.29 In exercising its functions under the Act a licensing authority should take account of the relevant code of practice on 'controlling where gaming machines may be played'. It is specifically obliged to do so when exercising functions under section 153 of the Act. In circumstances where a licensing authority considers an existing premises is not compliant with these general requirements they should contact the Commission at the earliest opportunity.

18.30 Both the Commission and licensing authorities have the power to attach specific conditions to operating or premises licences in circumstances where additional assurance is required. The Commission favours the approach of general conditions for all supplemented by operator-specific conditions in cases where novel or contentious operating models are used which include the provision of gaming machines. This is to deliver the policy objectives above and ensure the risk to the licensing objectives is minimised.

18.31 In the Commission's view the above approach would ideally be adopted at licensing stage. Licensing authorities should ensure that they request all the information required from an applicant for a new premises or for a variation to an existing premises in order to satisfy themselves as to the matters set out at s153 of the Act. This includes the codes of practice and this guidance. The approach of adding case specific conditions can equally be deployed in respect of an existing unit where concerns arise or when changes are made to the operating model.

5.6 London Borough of Enfield's Statement of Principles of January 2019

1.7 Interested Parties

1.7.1 Interested Parties can make representations about licence applications, or apply for a review of an existing licence based on the three licensing objectives as detailed in paragraph 1.3 of this Policy Statement. An Interested Party is someone who in the opinion of the Council: -

- a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities; and/or
- b) Has business interests that might be affected by the authorised activities; or
- c) Who Represent persons who satisfy paragraph (a) or (b).

1.7.2 The following are not valid reasons to reject applications for premises licences:

- a) Moral objections to gambling
- b) The 'saturation' of gambling premises unless there is evidence that the premises poses a risk to the licensing objectives in that locality
- c) A lack of 'demand'
- d) Whether the proposal is likely to receive planning or building regulations consent

1.7.3 The Council has not specified a distance from the premises within which a person must live or have a business interest in order to be considered an interested party, and will judge each case on its merits. The factors the Council may take into account when determining what 'sufficiently close' means for a particular application include:

- • The size and nature of the premises
- • The distance of the premises from the person making the representation, and the nature of their interest
- • The potential impact of the premises and its catchment area

1.7.4 The term 'has business interests' will be given the widest possible interpretation in accordance with paragraph 1.7.3 and include partnerships, charities, faith groups and medical practices.

1.7.5 Interested Parties may include trade associations and trade unions, and residents' and tenants' associations. The Council will not however generally view these bodies as Interested Parties unless they have a member who can be classed as an interested person i.e. lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities.

1.7.6 Interested Parties may be persons who are democratically elected such as Councillors and MPs. No specific evidence of being asked to represent an interested person will be required as long as the Councillor/MP represents the Ward(s) likely to be affected. Other than these however, the Council will generally require written evidence that a person/body (e.g. an advocate/relative) 'represents' someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities. A letter from one of these persons, requesting the representation is sufficient.

1.7.7 If individuals wish to approach Councillors to ask them to represent their views then care should be taken that the Councillors are not part of the Licensing Committee dealing with the licence application.

2.1.4 It is appreciated that as per the Gambling Commission's Guidance for local authorities "moral objections to gambling are not a valid reason to reject applications for Premises Licences" and also that unmet demand is not a criterion for a licensing authority.

2.4.1 The Council is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives are relevant to its decision making. As per the Gambling Commission's Guidance for local authorities, the Council will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.

2.4.2 The Council will give careful consideration to premises located close to:

- Schools
- Youth clubs
- Recreational areas, particularly those catering for young persons
- Establishments providing care for children and young adults
- Establishments providing care for persons with learning difficulties or mental health issues
- Establishments used or occupied by gambling addicts
- Establishments likely to attract or house population groups likely to be vulnerable to risk of problematic gambling.

2.4.3 The Council has produced a local area profile including the information listed in 2.4.2 above; further details can be seen in the separate Local Area Profile document attached to this Policy.

2.4.4 It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, and operators are

encouraged to provide information in their application that demonstrates they have existing policies and procedures to mitigate any risks.

2.4.5 Applicants will be expected to prepare risk assessments based on the location and identify risk controls (taking account of the local area risk profile produced by the Council), the type of gambling operation and the design of the premises. For further details see the separate Local Area Profile document attached to this Policy.

2.4.6 The Council will in all cases consider what measures may be needed to mitigate risk to the licensing objectives. In doing so it will take account of the information provided in the application by the operator, the local area profile, the risk assessment and whether any additional conditions are required to mitigate risk by reference to the LCCP produced by the Gambling Commission.

2.6 Licensing Objectives

2.6.1 Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, the Council has considered the Gambling Commission's Guidance to licensing authorities and some comments are made below.

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime:

2.6.2 The Council is aware that the Gambling Commission takes a leading role in preventing gambling from being a source of crime. The Gambling Commission's Guidance does, however, envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the Council will consider what, if any, controls (e.g. conditions) might be appropriate to prevent those premises being associated with or used to support crime. These might be conditions identified by the operator's own risk assessment or conditions the Council consider appropriate due to the local area profile. The Council is aware of the distinction between disorder and nuisance. Issues of nuisance cannot be addressed via the Gambling Act provisions. For example, noise from music, gambling machines or customers from a gambling premises cannot be addressed under the Gambling Act, but can using other legislation. This licensing objective is concerned with crime or disorder. Examples of this are if the premises were associated with gang activity, violence, drugs, or organised crime.

Protecting children and other vulnerable persons from being harmed or exploited by gambling:

2.6.4 The Council has noted the Gambling Commission's Guidance for local authorities states that this objective means preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children). The Council will, therefore, consider, as suggested in this Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances/machines, segregation of areas, etc.

2.6.5 The Council is also aware of the Codes of Practice, which the Gambling Commission issues as regards this licensing objective, in relation to specific premises.

2.6.6 As regards the term “vulnerable persons” it is noted that the Gambling Commission does not seek to offer a definition but states that “it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs”. The Council will consider this licensing objective on a case by case basis.

2.6.7 Geofutures Gambling and Place research for Westminster and Manchester City Councils¹ identified the following groups as more vulnerable:

- children, adolescents and young adults (including students)
- people with mental health issues, including those experiencing substance abuse issues (problem gambling is often ‘co-morbid’ with these substance addictions⁸)
- individuals from certain minority ethnic groups, such as Asian/Asian British, Black/Black British and Chinese/other ethnicity
- the unemployed
- the homeless
- those with low intellectual functioning
- problem gamblers seeking treatment
- people with financially constrained circumstances
- those living in deprived areas.

2.6.8 Section 7 of the Gambling Commission Guidance to Local Authorities sets out considerations that an operator must make in order to protect children, young people and vulnerable persons from accessing gambling premises.

2.6.9 The Licence Conditions and Codes of Practice (LCCP, Code 3.2 issued in 2018) prescribe how operators must prevent children from using age restricted gaming or gambling activities, particularly where gaming machines are licensed.

2.6.10 The council will expect all operators to have policies and procedures in place as required by the LCCP codes on social responsibility to cover all aspects of the code, in particular staff training records and self-exclusion records.

2.13 Bingo Premises

2.13.1 This Council notes that the Gambling Commission’s Guidance states: Licensing Authorities will need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. This will be a relevant consideration where the operator of an existing bingo premises applies to vary their licence to exclude an area of the existing premises from its ambit and then applies for a new premises licence, or multiple licences, for that or those excluded areas.

2.13.2 The Council is aware that a holder of bingo premises licences may make available for use of a number of category B gaming machines, not exceeding 20% of the total number of gaming machines, which are available for use on the premises

2.13.3 Children and young people are allowed into bingo premises; however, they are not permitted to participate in the bingo and if category B or C machines are made available for use, these must be separated from areas where children and young people are allowed. Social Responsibility (SR) code 3.2.5(3) states that 'licensees must ensure that their policies and procedures take into account of the structure and layout of their gambling premises' in order to prevent underage gambling.

2.13.4 The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority, for example, that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machine areas.

2.13.5 Other appropriate measures may cover (but are not limited to) issues such as:

- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare and self-exclusion forms in both prominent and discreet areas of the premises
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information
- Measures / training for staff on how to deal with suspected truant school children on the premises

5.3 Giving Reasons for Decisions

5.3.1 In anticipation of such appeals, the Council will give full reasons for its decisions. The Council will address the extent to which decisions have been made with regard to any relevant codes of practice and guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and in accordance with this Policy Statement.

5.6 Reviews

5.6.1 Requests for a review can be made by Interested Parties or Responsible Authorities. However, it is for the Council to decide whether the review is to be carried out based upon any relevant codes of practice and guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and in accordance with this Policy Statement.

5.6.2 The request for the review will also be subject to the consideration by the Council as to whether it is frivolous, vexatious, or whether it will not cause this Council to alter/revoke/suspend the licence, or whether it is substantially the same as previous representations or requests for review.

5.6.3 The Council can also initiate a review of a particular premises licence, or a particular class of premises licence on the basis of any reason, which it thinks is appropriate.

5.6.4 Once a valid application for a review has been received by the Council, representations can be made by responsible authorities and interested parties during a 28-day period. This period begins 7 days after the application was received by the Council, who will publish notice of the application within 7 days of receipt.

5.6.4 The Council must carry out the review as soon as possible after the 28-day period for making representations has passed.

5.6.5 The purpose of the review will be to determine whether the Council should take any action in relation to the licence. If action is justified, the options open to the Council are: -

- add, remove or amend a licence condition imposed by the Council;
- exclude a default condition imposed by the Secretary of State (e.g. opening hours) or remove or amend such an exclusion;
- suspend the premises licence for a period not exceeding three months; and
- revoke the premises licence.

5.6.6 In determining what action, if any, should be taken following a review, the Council must have regard to the principles set out in Section 153 of the Act, as well as any relevant representations, and what consideration was given to local area risk profile. In particular, the Council may also initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.

6.2 Risk Assessments

6.2.1 A risk assessment is required from all operators. In accordance with SR Code Provision 10.1.1, all licensees must assess local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, have policies, procedures and control measures to mitigate those risks. This is a social responsibility code provision and compliance is mandatory. It is a condition of an operating licence that there is compliance with social responsibility code provisions.

6.2.2 Operators shall submit the risk assessment to licensing authorities upon application either for new premises licence or variation of a premises licence, or otherwise on request, and this will form part of the council's inspection regime and shall be requested when officers are investigating complaints.

6.2.3 Any failure to provide a competent risk assessment will be taken into account by the Council in determining the application, and such inferences will be made about potential harm to the licensing objectives as appear appropriate.

6.2.3 The Council considers that these local risk assessments are a key component of the overall assessment and management of the local risks. This council

expects the Borough's local area profile and matters such as the following to be considered by operators when making their risk assessment:

- Information held by the licensee regarding self-exclusions and incidences of underage gambling;
- Gaming trends that may reflect benefit payments;
- Arrangement for localised exchange of information regarding self-exclusions and gaming trends;
- Urban setting such as proximity to schools, commercial environment, factors affecting footfall;
- Range of facilities in proximity to the licensed premises such as other gambling outlets, banks, post offices, refreshment and entertainment type facilities;
- Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activities, etc.;
- The ethnicity, age, economic makeup of the local community.

6.2.4 The risk assessment should cover the risks and character of the local area, the gambling operation and the design of the premises.

6.6 Local Area Profile

6.6.1 Enfield's local area profile is our assessment of the local environment and the maps in Section 1 of the Local Area Profile document identifies the key characteristics of Enfield. It is intended that the local area profile will provide us; operators and the public with a better understanding and awareness of the gambling-related risks in the Borough. In this context, risk includes actual and potential risk and also takes into account any future or emerging risks.

6.6.2 Our local area profile takes account of a wide number and range of factors and information. It enables us better serve our local community by providing clarity for operators as to the relevant factors we will consider in our decision making and it enables us to make evidence-based decisions from a clear and published set of factors and risks

6.6.3 We expect that the local area profile will lead to improved premises licence applications and that operators will be able to incorporate controls and measures within their applications to mitigate risk. Through this pro-active approach to risk, we expect to achieve a reduction in non-compliance and enforcement action.

6.6.4 We accept that the local environment can change and we must therefore retain the ability to review and quickly update the local area profile so that we remain aware of the current and emerging risks. For this reason, we have not included our local area profile within the body of this Policy and we have published it as a separate document. This will allow us to update factual information within the local area profile and to quickly assess new or emerging risks from which to inform our decisions without the need for full consultation.

6.6.5 We expect operators to update their local risk assessments to take account of any changes in Enfield's local area profile. To assist, we will inform all operators when we make any changes to our local area profile.

6. Decision:

Section 202 of the Act sets out the Licensing Sub-Committee's Action following review as follows:

(1) As a result of a review of a premises licence under section 201, the Licensing Sub-Committee may—

(a) revoke the licence;

(b) suspend the licence for a specified period not exceeding three months;

(c) exclude a condition attached to the licence under section 168 or remove or amend an exclusion;

(d) add, remove or amend a condition under section 169.

Or, take no action.

(2) If the licensing authority decide to take action of a kind specified in subsection (1) they shall specify the time at which the action shall take effect.

(3) A licensing authority may, in particular, take action under subsection (1) on the grounds that the licensee has not used the licence.

Background Papers:

[Gambling Act 2005](#)

[The 5th edition of the Gambling Commission guidance to Licensing Authorities](#)

[The London Borough of Enfield's Statement of Principles of January 2019](#) and [Local Area Profile](#)

Contact Officer:

Ellie Green on 0208 1322 128

**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes No

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: _____ Other name(s): _____

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: **Cashino Gaming Limited**

7. The applicant's registered or principal address:

Seebeck House

1A Seebeck Place

Milton Keynes

Postcode: **MK5 8FR**

8(a) The number of the applicant's operating licence (as given in the operating licence):

000-003266-N-103444

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: **N/A**

9. Tick the box if the application is being made by more than one organisation.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): **Merkur Slots**

11. Address of the premises (or, if none, give a description of the premises and their location):

292/292A Green Lanes

London

Postcode: **N13 5TW**

12. Telephone number at premises (if known): **N/A**

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

Ground floor premises, high street location.

14(a) Are the premises situated in more than one licensing authority area? **No**

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, other than the licensing authority to which this application is made:

N/A

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **No**

[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence. **N/A**

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates: **No**

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued):

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **No**

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?
No

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

20. Please set out any other matters which you consider to be relevant to your application:

The Applicant operates a national estate of licensed bingo premises which include the provision of bingo tablets and Bingo Plus and Bingo Express terminals. Substantive facilities for non-remote bingo will be made available in accordance with legislative provisions.

The operator has full authority to provide licensed bingo by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are implemented and policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.

A copy of Cashino Gaming Limited's Operational Standards has been provided in support of the application and full copies of the Applicant's policies and procedures are available, if required.

A copy of Cashino Gaming Limited's 'Working Together' document has also been supplied in support of the application, which provides an overview of the licensee's proposed operation.

Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee is enclosed

- | | |
|--|-------------------------------------|
| • A plan of the premises is enclosed | <input checked="" type="checkbox"/> |
| • We understand that if the above requirements are not complied with the application may be rejected | <input checked="" type="checkbox"/> |
| • We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities | <input checked="" type="checkbox"/> |

Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: Poppleston Allen

Date:



Capacity:

Solicitors for & on behalf of the applicant

22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: _____

Date: _____

Capacity: _____

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

Natasha Beck

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

0115 9349 192

24. Postal address for correspondence associated with this application:

Natasha Beck

Poppleston Allen

37 Stoney Street

The Lace Market

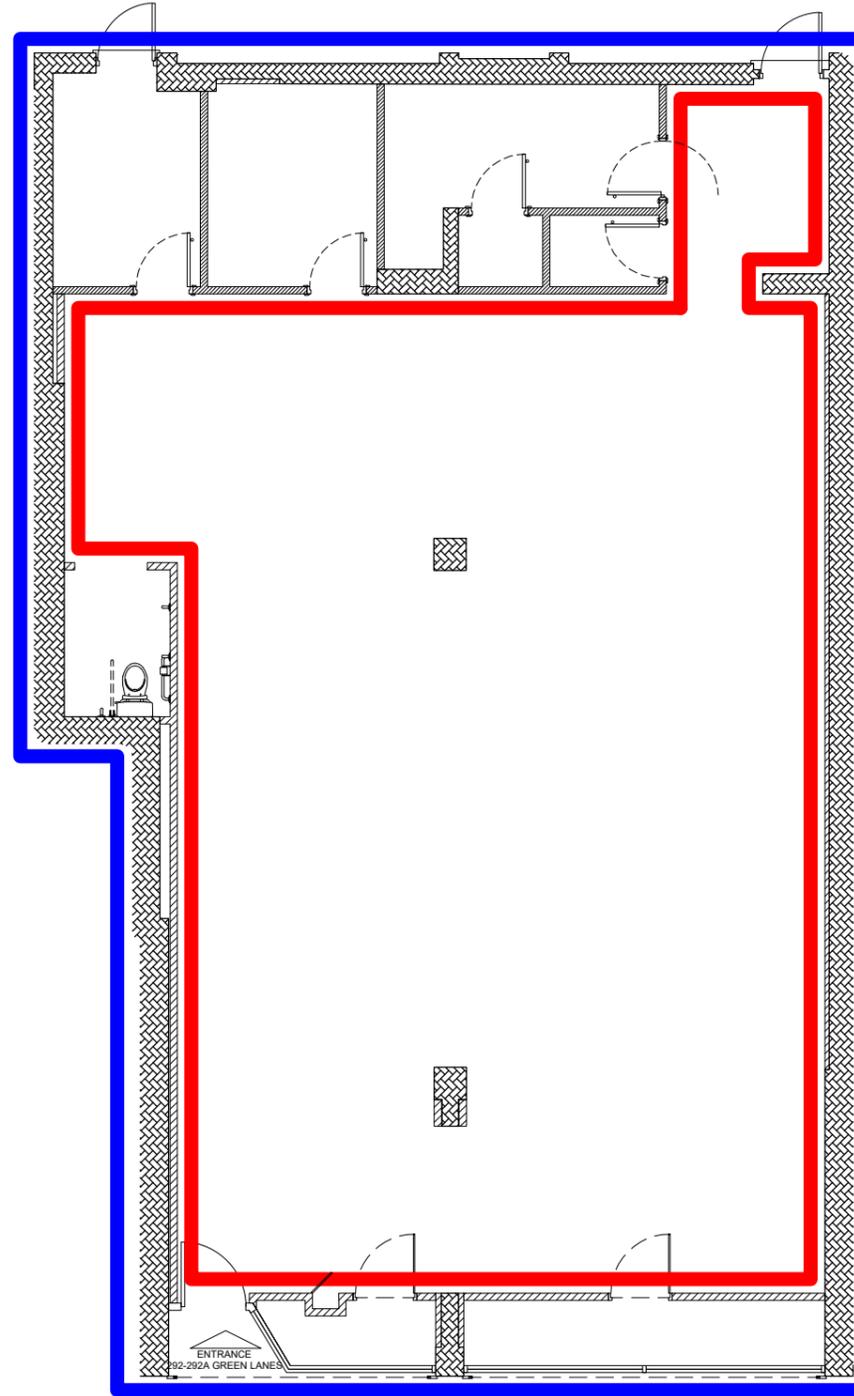
Nottingham

Postcode: **NG1 1LS**

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

n.beck@popall.co.uk

PROPOSED GAMING AREA: 146.6m²



LICENSE PLAN LEGEND	
LINE TYPE	LINE TYPE DESCRIPTION
	AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.
	EXTENT OF PREMISES

GAMBLING ACT 2005 LICENSING PLAN
 Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licenses and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.

REVISIONS

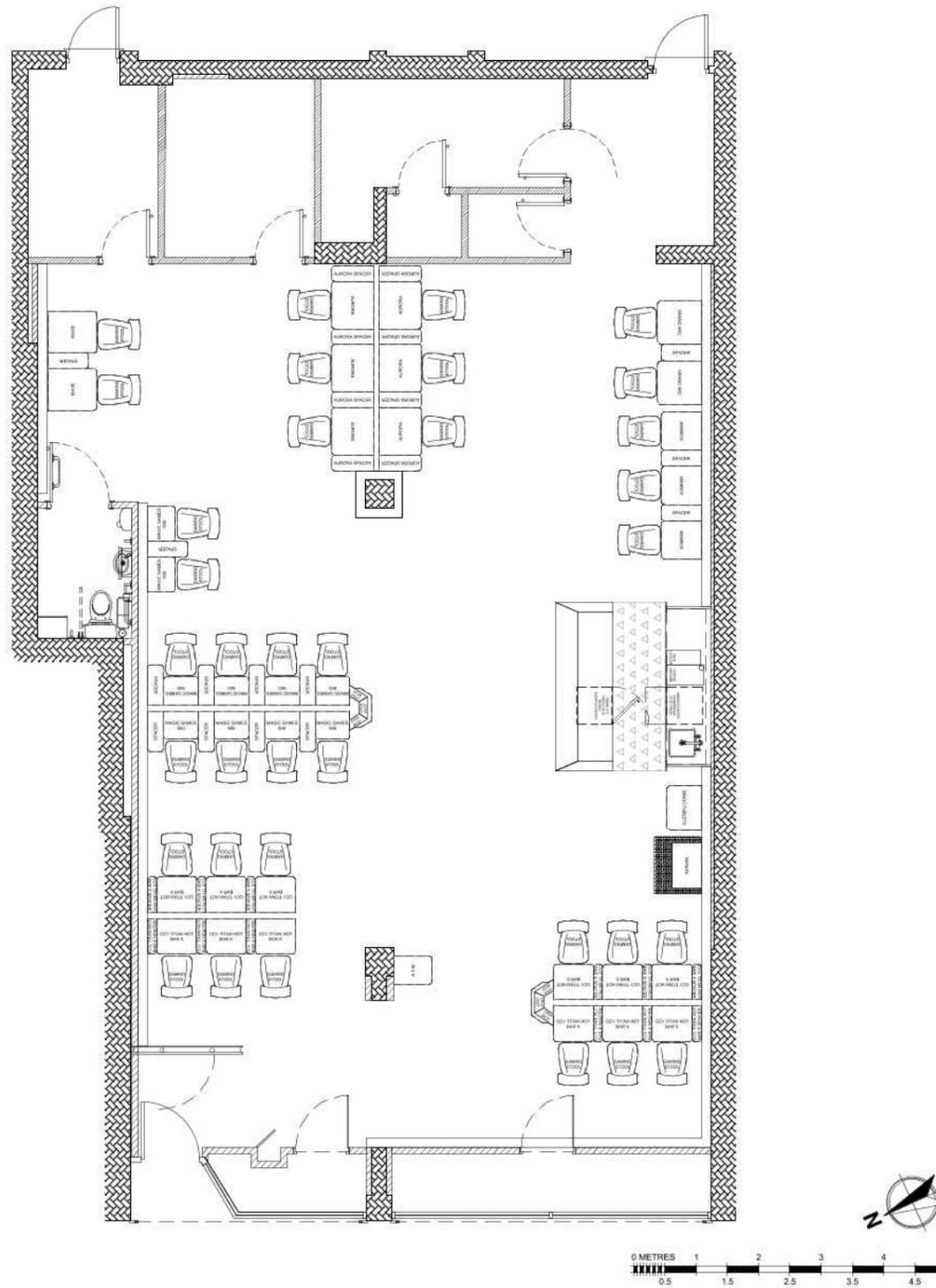
FIT OUT TYPE MERKUR SLOTS
PROJECT MERKUR SLOTS 292-292A GREEN LANES PALMERS GREEN LONDON N13 5TW
DESCRIPTION PROPOSED LICENSE PLAN

REFERENCE DRAWINGS	
SCALE 1:50	DRAWN BY MG
DATE 19/11/20	DRAWING No. 999-PR-07
REVISION 03	



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REVISIONS	FIT OUT TYPE MERKUR SLOTS	REFERENCE DRAWINGS	
	PROJECT MERKUR SLOTS 292-292A GREEN LANES PALMERS GREEN N13 5TW	SCALE 1:50	DRAWN BY LC
	DESCRIPTION PROPOSED MACHINE PLAN	DATE 23/11/20	DRAWING No. 999-PR-05
			REVISION 03

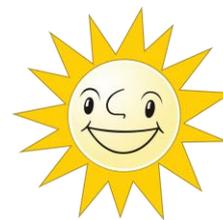


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Cashino Gaming Limited

Operational Standards



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Cashino Gaming Limited premises operate digital CCTV and customer areas are supervised.
- Cashino Gaming operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- The employees in Cashino Gaming premises are required to carry a portable alarm which is provided by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Cashino Gaming Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Cashino Gaming employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Cashino Gaming operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Cashino Gaming does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

Cashino Gaming Limited

Operational Standards



- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

Merkur Slots, 292/292A Green Lanes, Palmers Green, London, N13 5TW

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	292/292A Green Lanes, Palmers Green, London, N13 5TW
Local Authority:	London Borough of Enfield
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-024 (Cashino Gaming Ltd)
Company Details:	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
Name and Title of Assessor:	Agnieszka Szczerkowska and Iwona Grynczel (Internal Compliance Auditors). Amanda Kiernan (Head of Compliance)
Date of Assessment:	26/08/2020 and 23/11/20
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots Palmers Green is located on Green Lanes in Enfield in the London region of England. Green Lanes, Palmers Green is a busy high street with a variety of typical high street businesses. The premises on the road include coffee shops, restaurants, takeaways, banks, supermarkets, hair and beauty salons, betting shops, pawnbrokers, jewellery shops, charity shops, solicitors and accountants' offices. The venue is a former betting shop (William Hill). There is Lodge Drive bus stop situated right outside Merkur Slots Palmers Green premises
Establishments of note:	There are 4 bookmakers on Green Lanes, Palmers Green in close vicinity – Betfred, Ladbrokes x2 and Paddy Power. Two doors away from Merkur Slots Palmers Green is Gossip restaurant, 160ft away is McDonalds restaurant with Co-op supermarket right next to it. 466ft away is Explore Learning – tuition centre for kids 4-14 years old. KB02 Venue Hire, popular location for children's parties is close by, only 0.1miles away. There is Palmers Green train station 0.2 miles away and Palmers Green Public Library 0.3 miles away. In close vicinity is also Med Star Social Care and Training Services Ltd which is supporting vulnerable adults in local area.
Adjoining premises:	Merkur Slots Palmers Green premises is located between Kodak Express on the left and Mantella Jewellers shop on the right. There are offices above all named premises.
Crime statistics:	Green Lanes, Enfield, London, N13 5TW is within the Palmers Green policing neighbourhood, under the Metropolitan Police Service force area. Crime rates in this area are high and have been rising in the past 3 years. Most commonly reported crimes in the past 12 months include anti-social behaviour, vehicle crime, violence and sexual offences, burglary, shoplifting and other theft. In June 2020, there were 198 crime incidents reported within half a mile from Merkur Slots Palmers Green postcode predominantly consisting of anti-social behaviour (72), violence and sexual offences (39) and vehicle crime (23). 4 out of all 198 incidents occurred directly on Green Lanes (2 shoplifting, 1 robbery and 1 violence and sexual offence incident).
Population:	Palmers Green area, where Merkur Slots is located, has a population of 15,162 people. This area is popular with younger population. Dominating age groups are 30-44, 20-24 and 25-29. 15% of all local residents are underage. People living here are predominantly single -56.6% compared with 34% UK average. 32% of local population is degree educated and 19% has no qualification, which does not show a significant deviation from the average figures for the UK.
Culture:	Green Lanes, Palmers Green can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 86% white, with only 62% of residents in this area being white. Other sizable ethnic groups are Pakistani (7.7%), Mixed Ethnicity (7.2%), Black African and Caribbean (9.8%), Chinese (3.5%), Indian (1.4%) and other ethnic groups (8.4%). The area surrounding Merkur Slots Palmers Green has a high concentration of immigrants from European countries (including European Union), around 30% of all residents. Majority of local population is Christian (51.4%) compared with 59.3% UK average, 28% claim to have no religion or did not state their religious views, 18.5% identify themselves as Muslim and 1.2% Hindu.
Unemployment:	Unemployment rate in Green Lanes, Palmers Green area was 7% (Census 2011). This is higher than national average of 4%. This address has a higher than average concentration of student residents - 17% of the resident population. Majority of people (33.5%) are in full-time employment, 14% is working part-time and 12.6% is self-employed. 33% of residents economically active are semi-skilled, unskilled and lowest grade workers and 32% works in supervisory, clerical, and junior managerial, administrative and professional roles. Main source of employment in this area are wholesale and retail trades, followed by food and accommodation, health (including social work) and construction.
Deprivation:	Merkur Slots Palmers Green area is amongst 50% least deprived neighbourhoods in the country according to Index of Multiple Deprivation 2019. It has improved since 2015 when it was measured previously. Indices of deprivation which are better here than in other parts of UK include: health – 80% better, education skills and training – 70% better, employment – 60% better and income deprivation – 50% better than other neighbourhoods. Indices of deprivation which require improvements are living environment, income deprivation affecting older people and crime deprivation (within 20% most deprived areas in UK).
Local Police:	Green Lanes, Enfield, London, N13 5TW is within the Palmers Green policing neighbourhood, under the Metropolitan Police Constabulary.

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 account London Borough of Enfield local authority Statement of Gambling Principles, reference Section 2, paragraph 2.13 Bingo Centres and Enfield Borough Profile 2011.

Environmental Factors

In preparing this assessment Praesepe has considered the relevance of environmental factors. In this context, environmental factors include the physical location of schools, playgrounds, residential areas, other retail premises and locations (bus stations, tube stations) which influence footfall. 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 Unemployment rate in Green Lanes, Palmers Green area was 7% (Census 2011). This is higher than national average of 4%. This address has a higher than average concentration of student residents - 17% of the resident population. Majority of people (33.5%) are in full-time employment, 14% is working part-time and 12.6% is self-employed. 33% of residents economically active are semi-skilled, unskilled and lowest grade workers and 32% works in supervisory, clerical, and junior managerial, administrative and professional roles. Main source of employment in this area are wholesale and retail trades, followed by food and accommodation, health (including social work) and construction.</p> <p>Deprivation Merkur Slots Palmers Green area is amongst 50% least deprived neighbourhoods in the country according to Index of Multiple Deprivation 2019. It has improved since 2015 when it was measured previously. Indices of deprivation which are better here than in other parts of UK include: health – 80% better, education skills and training – 70% better, employment – 60% better and income deprivation – 50% better than other neighbourhoods. Indices of deprivation which require improvements are living environment, income deprivation affecting older people and crime deprivation (within 20% most deprived areas in UK).</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 Praesepe operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Palmers Green 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 Hazelwood School, 63 Hazelwood Ln, N13 5HE Barnet and Southgate College, 340 Green Lanes, N13 5TS Tottenham Infant School, Tottenham Rd, N13 6HX Bright Horizons Palmers Green Day Nursery and Preschool, 3 Old Park Rd, N13 4RG St. Anne's Catholic High School for Girls, Upper Site, 6 Oakthorpe Rd, N13 5TY St Michael at Bowes Church of England Junior School, Tottenham Rd, N13 6JB St. John's Nursery, St. John's Church Hall, 1 Bourne Hill, N13 4DA Leading Strings PreSchool, St John's Church Hall, 1 Bourne Hill, N13 4DA Burford Pre-School Playgroup, Fox Ln, N13 4AL Hazelwood Children's Centre, Riverway, N13 5JU Aplomb Day Nursery, 32 Bourne Hill, N13 4LY Palmers Green High School, 104 Hoppers Rd, N21 3LJ Shiny Star Nursery, 109 N Circular Rd, N13 5EL Bright Stars Pre-School, Scout and Guide HQ, Cannon Rd, N14 7HE St Monica's Catholic Primary School, Cannon Rd, N14 7HE Highfield Primary School, Highfield Rd, Winchmore Hill, N21 3HE Brown Bears Nursery, Trinity-at-Bowes Church, Palmerston Rd, N22 8RA</p> <p>Community Centres and Youth Centres Darji Mitra Mandal of the UK Community Centre, 26 Oakthorpe Rd, N13 5JL TaB Centre Plus Community Centre, Palmerston Rd, N22 8RA AEK Youth Football Club, Hazelwood Recreation Ground, Hedge Ln, N13 5ST</p> <p>Parks, play grounds and sports/leisure facilities Tatem Park Recreation Ground, 263 Hedge Ln, N13 5DE Hazelwood Recreation Ground, N13 5BS (AEK Youth Football Club) Broomfield Playground, Broomfield Ln, N13 4HB Urbs Gardens, 46 Tottenham Rd, N13 6HX</p> <p>Vulnerable and addiction support services Medstar- UK, 200 Green Lanes, N13 5UE</p> <p>Pawnbrokers and Loan Shops Cashpoint Pawnbrokers, 12 Aldermans Hill, N13 4PJ G Mantella Ltd. Jewellers Since 1982, 290A Green Lanes, N13 5TW</p>	<p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p>
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	<p>Medical Centres, Care Homes and Mental Health facilities Grovelands Medical Centre, 1 Grovelands Rd, N13 4RJ North London Health Centre, N13 4JJ Dr D Gill - Park Lodge Medical Centre, Park Lodge, 122 Aldermans Hill, N13 4RG The Acupuncture & Tui Na Clinic, 316-322 Green Lanes, N13 5TT Grenoble Gardens Surgery, 1 Grenoble Gardens, N13 6JE Clinic, 265 Green Lanes, N13 4XE Acupuncture Massage Centre, 373 Green Lanes, N13 4JG Medicspot Clinic, 38 - 40 Aldermans Hill, N13 4PN Dr Howard Daitz, Broomfield Ave, N13 4JJ Arcadian Gardens NHS Medical Centre, 1 Arcadian Gardens, N22 5AB Gillan House Surgery, 457 Green Lanes, N13 4BS Hazelwood Dental Practice, 1e Hazelwood La/Palmers Green, N13 5EU Specsavers Opticians and Audiologists, 359 Green Lanes, N13 4JG Green Lanes Clinic, 551a Green Lanes, N13 4DR Woodlands Residential Care Home, 33-35 Fox Ln, N13 4AB Abbeylea Care Home, 51-53 Fox Ln, N13 4AJ Roland Residential Care Homes, 231 N Circular Rd, N13 5JF The Hollies, 9-11 Fox Ln, Palmers Green, N13 4AB Palm Tree Lodge Care Home, 36 Sidney Ave, N13 4UY Barchester - Southgate Beaumont Care Home, Southgate House, 15 Cannon Hill, N14 7DJ Saivi House, 39 Doveridge Gardens, N13 5BJ</p> <p>Gambling premises Ladbrokes, 363-365 Green Lanes, N13 4JG Betfred, 319 Green Lanes, N13 4TY Ladbrokes, 402 Green Lanes, N13 5PD Ladbrokes, 65 Green Lanes, N13 4TD Ladbrokes, 10 Green Lanes, N13 6JR Coral, 40 Cannon Hill, N14 6LG Paddy Power, 314 Green Lanes, N13 5TT Buzz Bingo and The Slots Room, Dearsley Rd, Enfield EN1 3FB</p> <p>Residential Areas The area containing Green Lanes, Palmers Green in London consists predominantly of flats – 54% of all housing spaces. There is also high percentage of residences in commercial buildings – 35%. This area contains a higher than average level of rented housing (excluding social housing) - 78% of household spaces, which contrasts with the national average of just over 16%. Most of households are occupied by multiple residents.</p>	<p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <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 Palmers Green if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees.</p>
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	<p>Bus stops and other Transport links Lodge Drive Bus Stop, N13 5TT Palmers Green Station, Aldermans Hill, N13 4PN</p> <p>Locally Identified Premises Palmers Green Library, Broomfield Ln, N13 4EY</p> <p>Public Houses and Alcohol Licensed Premise The Alfred Herring, 316-322 Green Lanes, N13 5TT The Wishing Well, 9 Aldermans Hill, N13 4YD The Woodman, 128 Bourne Hill, N13 4BD The Occasional Half, 67-77 Green Lanes, N13 4TD Club Planet, 30-32 Green Lanes, N13 6HT The Bird Lounge, 100 Tottenham Rd, N13 6DG Aksular Restaurant, 232, 234 Green Lanes, N13 5UD</p>	<p>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>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</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>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 Crime rates in this area are high and have been rising in the past 3 years. Most commonly reported crimes in the past 12 months include anti-social behaviour, vehicle crime, violence and sexual offences, burglary, shoplifting and other theft. In June 2020, there were 198 crime incidents reported within half a mile from Merkur Slots Palmers Green postcode predominantly consisting of anti-social behaviour (72), violence and sexual offences (39) and vehicle crime (23). 4 out of all 198 incidents occurred directly on Green Lanes (2 shoplifting, 1 robbery and 1 violence and sexual offence incident).</p> <p>Local Police Green Lanes, Enfield, London, N13 5TW is within the Palmers Green policing neighbourhood, under the Metropolitan Police Constabulary. The Police have been consulted with regarding the application and to date have raised no concerns.</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Palmers Green 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 Palmers Green 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</p>

	<p>Public Houses and Alcohol Licensed Premise The Alfred Herring, 316-322 Green Lanes, N13 5TT The Wishing Well, 9 Aldermans Hill, N13 4YD The Woodman, 128 Bourne Hill, N13 4BD The Occasional Half, 67-77 Green Lanes, N13 4TD Club Planet, 30-32 Green Lanes, N13 6HT The Bird Lounge, 100 Tottenham Rd, N13 6DG Aksular Restaurant, 232, 234 Green Lanes, N13 5UD</p> <p>Pawnbrokers and Loan Shops Cashpoint Pawnbrokers, 12 Aldermans Hill, N13 4PJ G Mantella Ltd. Jewellers Since 1982, 290A Green Lanes, N13 5TW</p> <p>Gambling premises Ladbrokes, 363-365 Green Lanes, N13 4JG Betfred, 319 Green Lanes, N13 4TY Ladbrokes, 402 Green Lanes, N13 5PD Ladbrokes, 65 Green Lanes, N13 4TD Ladbrokes, 10 Green Lanes, N13 6JR Coral, 40 Cannon Hill, N14 6LG Buzz Bingo and The Slots Room, Dearsley Rd, Enfield EN1 3FB</p> <p>Residential Areas (impacted by Anti-Social Behaviour) The area containing Green Lanes, Palmers Green in London consists predominantly of flats – 54% of all housing spaces. There is also high percentage of residences in commercial buildings – 35%. This area contains a higher than average level of rented housing (excluding social housing) - 78% of household spaces, which contrasts with the national average of just over 16%. Most of households are occupied by multiple residents.</p> <p>Crime rates in the area surrounding Merkur Slots premises are high and have been rising in the past 3 years. Anti-social behaviour is most commonly reported crime incident type here. There have been 72 of them recorded in June 2020 mainly concentrated around Bridge Drive, Broadway Mews, Greenwood Gardens and Lodge Drive.</p>	<p>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 <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for Swale - Chalkwell policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with Kent Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <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 Palmers Green 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>
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		<p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p>Money Laundering <i>Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.</i></p> <p>Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.</p> <p>There are 2 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.</p> <p>IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.</p> <p>Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.</p> <p>Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.</p> <p>Adequate staff will always be maintained and subject to regular review and risk assessment.</p>
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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 Palmers Green 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.

		<p>'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>Bingo/Gaming Machine and Supervision The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p>Customer Complaints <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p>

		<p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p>Marketing Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</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 Palmers Green United Reformed Church, N13 4AL St John the Evangelist, St John's Church, 1 Bourne Hill, N13 4DA New Life Church, 211 Green Lanes, N13 4UH Saint Monica's Catholic Church, 1 Stonard Rd, N13 4DJ Southgate Christian Fellowship, 12 Caversham Ave, N13 4LN Riverside Community Church, 64 Russell Rd, N13 4RP National Spiritualist Christian Church, 101 Green Lanes, N13 4SP Christian Action Housing Association, 53 Palmerston Cres, N13 4UF Winchmore Hill Baptist Church, Compton Rd, N21 3PA Saint Michael-At-Bowes Church of England, 103 Palmerston Rd, N22 8QX Holy Trinity Winchmore Hill, Green Lanes, Winchmore Hill, N21 3RS Palmers Green Mosque, 30 Oakthorpe Rd, N13 5JL</p>	<p>Ethnicity and Local Area Demographic 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 Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Praesepe have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p>

		<p>Praesepe work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p> <p>COVID 19 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 Palmers Green Premise Layout

Premise level:	Merkur Slots Palmers Green is a ground floor premises.
Premise frontage:	Merkur Slots Palmers Green 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 Palmers Green 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 Palmers Green 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 Palmers Green 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 Palmers Green 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

Praesepe Group already operate one other premise under London Borough of Enfield Local Authority, Merkur Cashino, 19 The Concourse, Edmonton Green Shopping Centre, N9 0TQ. This premise has never been subject to a local authority or Gambling Commission review.

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

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

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

Assessors Name:	AMANDA KIERNAN
Signature:	
Date:	23/11/20

Merkur Slots, 292/292A Green Lanes, Palmers Green, London, N13 5TW



Grovelands Medical Centre

Nissi Takeaway

Venture Photography

Chalk

Palmers Green

Boots Palmers Green

Barclays Bank

CeX Mobile Phone Shop

Morrisons Takeaway

HSBC

KFC Palmers Green

Unikat-2 Bulgarian Takeaway · Delivery

McDonald's Palmers Green Takeaway · Delivery

Lodge Dr

Explore Learning

Bain Harley Optician

Smokers Paradise Vapouriser Shop

Lloyds Bank

JOJO & FLO LONDON

Roller Station

Khin Lee Chinese Takeaway · Delivery

Sainsbury's Local

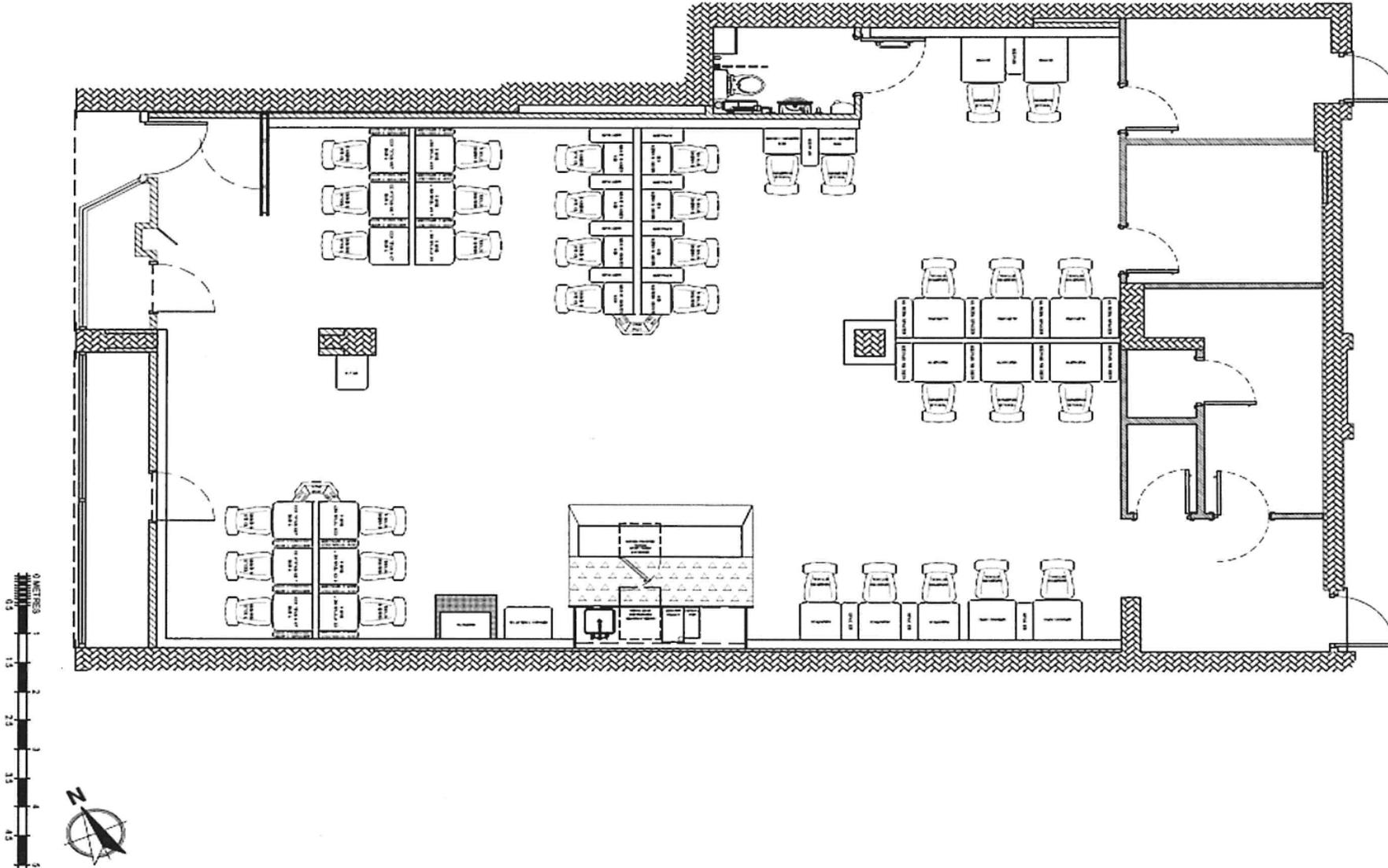
Crown Nails

Rimini Takeaway · Delivery

Palmers Green Post Office

Windsor

Merkur Slots, 292/292A Green Lanes, Palmers Green, London, N13 5TW



Merkur Slots, 292/292A Green Lanes, Palmers Green, N13 5TW – Shop front example



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Merkur Slots, 292/292A Green Lanes, Palmers Green, London, N13 5TW

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	292/292A Green Lanes, Palmers Green, London, N13 5TW
Local Authority:	London Borough of Enfield
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-024 (Cashino Gaming Ltd)
Company Details:	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
Name and Title of Assessor:	Agnieszka Szczerkowska and Iwona Grynczel (Internal Compliance Auditors). Amanda Kiernan (Head of Compliance)
Date of Assessment:	26/08/2020 and 23/11/2020 – updated 11/12/2020
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	<p>Merkur Slots Palmers Green is located on Green Lanes in Enfield in the London region of England. Green Lanes, Palmers Green is a busy high street with a variety of typical high street businesses. The premises on the road include coffee shops, restaurants, takeaways, banks, supermarkets, hair and beauty salons, betting shops, pawnbrokers, jewellery shops, charity shops, solicitors and accountants' offices. The venue is a former betting shop (William Hill). There is Lodge Drive bus stop situated right outside Merkur Slots Palmers Green premises</p>
Establishments of note:	<p>There are 4 bookmakers on Green Lanes, Palmers Green in close vicinity – Betfred, Ladbrokes x2 and Paddy Power. Two doors away from Merkur Slots Palmers Green is Gossip restaurant, 160ft away is McDonalds restaurant with Co-op supermarket right next to it. 466ft away is Explore Learning – tuition centre for kids 4-14 years old. KB02 Venue Hire, popular location for children's parties is close by, only 0.1miles away. There is Palmers Green train station 0.2 miles away and Palmers Green Public Library 0.3 miles away. In close vicinity is also Med Star Social Care and Training Services Ltd which is supporting vulnerable adults in local area.</p>
Adjoining premises:	<p>Merkur Slots Palmers Green premises is located between Kodak Express on the left and Mantella Jewellers shop on the right. There are offices above all named premises.</p>
Crime statistics:	<p>Green Lanes, Enfield, London, N13 5TW is within the Palmers Green policing neighbourhood, under the Metropolitan Police Service force area. Crime rates in this area are high and have been rising in the past 3 years. Most commonly reported crimes in the past 12 months include anti-social behaviour, vehicle crime, violence and sexual offences, burglary, shoplifting and other theft. In June 2020, there were 198 crime incidents reported within half a mile from Merkur Slots Palmers Green postcode predominantly consisting of anti-social behaviour (72), violence and sexual offences (39) and vehicle crime (23). 4 out of all 198 incidents occurred directly on Green Lanes (2 shoplifting, 1 robbery and 1 violence and sexual offence incident).</p>
Population:	<p>Palmers Green area, where Merkur Slots is located, has a population of 15,162 people. This area is popular with younger population. Dominating age groups are 30-44, 20-24 and 25-29. 15% of all local residents are underage. People living here are predominantly single -56.6% compared with 34% UK average. 32% of local population is degree educated and 19% has no qualification, which does not show a significant deviation from the average figures for the UK.</p>
Culture:	<p>Green Lanes, Palmers Green can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 86% white, with only 62% of residents in this area being white. Other sizable ethnic groups are Pakistani (7.7%), Mixed Ethnicity (7.2%), Black African and Caribbean (9.8%), Chinese (3.5%), Indian (1.4%) and other ethnic groups (8.4%). The area surrounding Merkur Slots Palmers Green has a high concentration of immigrants from European countries (including European Union), around 30% of all residents. Majority of local population is Christian (51.4%) compared with 59.3% UK average, 28% claim to have no religion or did not state their religious views, 18.5% identify themselves as Muslim and 1.2% Hindu.</p>
Unemployment:	<p>Unemployment rate in Green Lanes, Palmers Green area was 7% (Census 2011). This is higher than national average of 4%. This address has a higher than average concentration of student residents - 17% of the resident population. Majority of people (33.5%) are in full-time employment, 14% is working part-time and 12.6% is self-employed. 33% of residents economically active are semi-skilled, unskilled and lowest grade workers and 32% works in supervisory, clerical, and junior managerial, administrative and professional roles. Main source of employment in this area are wholesale and retail trades, followed by food and accommodation, health (including social work) and construction.</p>
Deprivation:	<p>Merkur Slots Palmers Green area is amongst 50% least deprived neighbourhoods in the country according to Index of Multiple Deprivation 2019. It has improved since 2015 when it was measured previously. Indices of deprivation which are better here than in other parts of UK include: health – 80% better, education skills and training – 70% better, employment – 60% better and income deprivation – 50% better than other neighbourhoods. Indices of deprivation which require improvements are living environment, income deprivation affecting older people and crime deprivation (within 20% most deprived areas in UK).</p>
Local Police:	<p>Green Lanes, Enfield, London, N13 5TW is within the Palmers Green policing neighbourhood, under the Metropolitan Police Constabulary.</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 account London Borough of Enfield local authority Statement of Gambling Principles, reference Section 2, paragraph 2.13 Bingo Centres and Enfield Borough Profile 2011.

Environmental Factors

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

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p>Unemployment</p> <p>Unemployment rate in Green Lanes, Palmers Green area was 7% (Census 2011). This is higher than national average of 4%. This address has a higher than average concentration of student residents - 17% of the resident population. Majority of people (33.5%) are in full-time employment, 14% is working part-time and 12.6% is self-employed. 33% of residents economically active are semi-skilled, unskilled and lowest grade workers and 32% works in supervisory, clerical, and junior managerial, administrative and professional roles. Main source of employment in this area are wholesale and retail trades, followed by food and accommodation, health (including social work) and construction.</p> <p>Deprivation</p> <p>Merkur Slots Palmers Green area is amongst 50% least deprived neighbourhoods in the country according to Index of Multiple Deprivation 2019. It has improved since 2015 when it was measured previously. Indices of deprivation which are better here than in other parts of UK include: health – 80% better, education skills and training – 70% better, employment – 60% better and income deprivation – 50% better than other neighbourhoods. Indices of deprivation which require improvements are living environment, income deprivation affecting older people and crime deprivation (within 20% most deprived areas in UK).</p>	<p>Age Verification</p> <p><i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Praesepe operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Palmers Green 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>Hazelwood School, 63 Hazelwood Ln, N13 5HE Barnet and Southgate College, 340 Green Lanes, N13 5TS Tottenham Infant School, Tottenham Rd, N13 6HX Bright Horizons Palmers Green Day Nursery and Preschool, 3 Old Park Rd, N13 4RG St. Anne's Catholic High School for Girls, Upper Site, 6 Oakthorpe Rd, N13 5TY St Michael at Bowes Church of England Junior School, Tottenham Rd, N13 6JB St. John's Nursery, St. John's Church Hall, 1 Bourne Hill, N13 4DA Leading Strings' Preschool, St John's Church Hall, 1 Bourne Hill, N13 4DA Burford Pre-School Playgroup, Fox Ln, N13 4AL Hazelwood Children's Centre, Riverway, N13 5JU Aplomb Day Nursery, 32 Bourne Hill, N13 4LY Palmers Green High School, 104 Hoppers Rd, N21 3LU Shiny Star Nursery, 109 N Circular Rd, N13 5EL Bright Stars Pre-School, Scout and Guide HQ, Cannon Rd, N14 7HE St Monica's Catholic Primary School, Cannon Rd, N14 7HE Highfield Primary School, Highfield Rd, Winchmore Hill, N21 3HE Brown Bears Nursery, Trinity-at-Bowes Church, Palmerston Rd, N22 8RA</p> <p>Community Centres and Youth Centres</p> <p>Darji Mitra Mandal of the UK Community Centre, 26 Oakthorpe Rd, N13 5LJ TAB Centre Plus Community Centre, Palmerston Rd, N22 8RA AEK Youth Football Club, Hazelwood Recreation Ground, Hedge Ln, N13 5ST</p> <p>Parks, play grounds and sports/leisure facilities</p> <p>Tatam Park Recreation Ground, 263 Hedge Ln, N13 5DE Hazelwood Recreation Ground, N13 5BS (AEK Youth Football Club) Broomfield Playground, Broomfield Ln, N13 4HB Urbs Gardens, 46 Tottenham Rd, N13 6HX</p> <p>Vulnerable and addiction support services</p> <p>Medstar- UK, 200 Green Lanes, N13 5UE</p> <p>Pawnbrokers and Loan Shops</p> <p>Cashpoint Pawnbrokers, 12 Aldermans Hill, N13 4PJ G Mantella Ltd. Jewellers Since 1982, 290A Green Lanes, N13 5TW</p>	<p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>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> <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>
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	<p>Medical Centres, Care Homes and Mental Health facilities</p> <p>Grovelands Medical Centre, 1 Grovelands Rd, N13 4RU North London Health Centre, N13 4JJ Dr D Gill - Park Lodge Medical Centre, Park Lodge, 122 Aldermans Hill, N13 4RG The Acupuncture & Tui Na Clinic, 316-322 Green Lanes, N13 5TT Grenoble Gardens Surgery, 1 Grenoble Gardens, N13 6JF Clinic, 265 Green Lanes, N13 4XE Acupuncture Massage Centre, 373 Green Lanes, N13 4JG Medicspot Clinic, 38 - 40 Aldermans Hill, N13 4PN Dr Howard Daitz, Broomfield Ave, N13 4JJ Arcadian Gardens NHS Medical Centre, 1 Arcadian Gardens, N22 5AB Gillian House Surgery, 457 Green Lanes, N13 4BS Hazelwood Dental Practice, 1e Hazelwood La/Palmers Green, N13 5EU Specsavers Opticians and Audiologists, 359 Green Lanes, N13 4JG Green Lanes Clinic, 551a Green Lanes, N13 4DR Woodlands Residential Care Home, 33-35 Fox Ln, N13 4AB Abbeylea Care Home, 51-53 Fox Ln, N13 4AJ Roland Residential Care Homes, 231 N Circular Rd, N13 5JF The Hollies, 9-11 Fox Ln, Palmers Green, N13 4AB Palm Tree Lodge Care Home, 36 Sidney Ave, N13 4UY Barchester - Southgate Beaumont Care Home, Southgate House, 15 Cannon Hill, N14 7DJ Saiwi House, 39 Doveridge Gardens, N13 5BJ</p> <p>Gambling premises</p> <p>Ladbrokes, 363-365 Green Lanes, N13 4JG Betfred, 319 Green Lanes, N13 4TY Ladbrokes, 402 Green Lanes, N13 5PD Ladbrokes, 65 Green Lanes, N13 4TD Ladbrokes, 10 Green Lanes, N13 6JR Coral, 40 Cannon Hill, N14 6LG Paddy Power, 314 Green Lanes, N13 5TT Buzz Bingo and The Slots Room, Dearsley Rd, Enfield EN1 3FB</p> <p>Residential Areas</p> <p>The area containing Green Lanes, Palmers Green in London consists predominantly of Flats – 54% of all housing spaces. There is also high percentage of residences in commercial buildings – 35%. This area contains a higher than average level of rented housing (excluding social housing) - 78% of household spaces, which contrasts with the national average of just over 16%. Most of households are occupied by multiple residents.</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> <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 Palmers Green if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees.</p>
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	<p>Bus stops and other Transport links</p> <p>Lodge Drive Bus Stop, N13 5TT Palmer's Green Station, Aldermans Hill, N13 4PN</p> <p>Locally Identified Premises</p> <p>Palmer's Green Library, Broomfield Ln, N13 4EY</p> <p>Public Houses and Alcohol Licensed Premise</p> <p>The Alfred Herring, 316-322 Green Lanes, N13 5TT The Wishing Well, 9 Aldermans Hill, N13 4YD The Woodman, 128 Bourne Hill, N13 4BD The Occasional Half, 67-77 Green Lanes, N13 4TD Club Planet, 30-32 Green Lanes, N13 6HT The Bird Lounge, 100 Tottenham Rd, N13 6DG Aksular Restaurant, 232, 234 Green Lanes, N13 5UD</p>	<p>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>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> <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>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>Crime rates in this area are high and have been rising in the past 3 years. Most commonly reported crimes in the past 12 months include anti-social behaviour, vehicle crime, violence and sexual offences, burglary, shoplifting and other theft. In June 2020, there were 198 crime incidents reported within half a mile from Merkur Slots Palmer's Green postcode predominantly consisting of anti-social behaviour (72), violence and sexual offences (39) and vehicle crime (23). 4 out of all 198 incidents occurred directly on Green Lanes (2 shoplifting, 1 robbery and 1 violence and sexual offence incident).</p> <p>Local Police</p> <p>Green Lanes, Enfield, London, N13 5TW is within the Palmer's Green policing neighbourhood, under the Metropolitan Police Constabulary. The Police have been consulted with regarding the application and to date have raised no concerns.</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 Palmer's Green 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 Palmer's Green 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</p>

	<p>Public Houses and Alcohol Licensed Premise</p> <p>The Alfred Herring, 316-322 Green Lanes, N13 5TT The Wishing Well, 9 Aldermans Hill, N13 4YD The Woodman, 128 Bourne Hill, N13 4BD The Occasional Half, 67-77 Green Lanes, N13 4TD Club Planet, 30-32 Green Lanes, N13 6HT The Bird Lounge, 100 Tottenham Rd, N13 6DG Aksular Restaurant, 232, 234 Green Lanes, N13 5UD</p> <p>Pawnbrokers and Loan Shops</p> <p>Cashpoint Pawnbrokers, 12 Aldermans Hill, N13 4PJ G Mantella Ltd. Jewellers Since 1982, 290A Green Lanes, N13 5TW</p> <p>Gambling premises</p> <p>Ladbrokes, 363-365 Green Lanes, N13 4JG Betfred, 319 Green Lanes, N13 4TY Ladbrokes, 402 Green Lanes, N13 5PD Ladbrokes, 65 Green Lanes, N13 4TD Ladbrokes, 10 Green Lanes, N13 6JR Coral, 40 Cannon Hill, N14 6LG Buzz Bingo and The Slots Room, Dearsley Rd, Enfield EN1 3FB</p> <p>Residential Areas (Impacted by Anti-Social Behaviour)</p> <p>The area containing Green Lanes, Palmers Green in London consists predominantly of flats – 54% of all housing spaces. There is also high percentage of residences in commercial buildings – 35%. This area contains a higher than average level of rented housing (excluding social housing) - 78% of household spaces, which contrasts with the national average of just over 16%. Most of households are occupied by multiple residents.</p> <p>Crime rates in the area surrounding Merkur Slots premises are high and have been rising in the past 3 years. Anti-social behaviour is most commonly reported crime incident type here. There have been 72 of them recorded in June 2020 mainly concentrated around Bridge Drive, Broadway Mews, Greenwood Gardens and Lodge Drive.</p>	<p>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 <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police: UK hot-spot mapping for Palmers Green policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with Kent Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <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 Palmers Green 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>
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	<p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p>Money Laundering <i>Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.</i></p> <p>Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML policies with clear escalation and reporting processes.</p> <p>There are 2 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.</p> <p>IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.</p> <p>Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.</p> <p>Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.</p> <p>Adequate staff will always be maintained and subject to regular review and risk assessment.</p>
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	<p>Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 5am.</p> <p>In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.</p> <p>Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.</p> <p>Merkur Slots Palmers Green will operate TITO machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</p> <p>As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p>Alcohol and Drugs</p> <p>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.</p>
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		<p>'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending</p> <p>Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>Bingo/Gaming Machine and Supervision</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>Palmer's Green United Reformed Church, N13 4AL St John the Evangelist, St John's Church, 1 Bourne Hill, N13 4DA New Life Church, 211 Green Lanes, N13 4UH Saint Monica's Catholic Church, 1 Stonard Rd, N13 4DJ Southgate Christian Fellowship, 12 Caversham Ave, N13 4LN Riverside Community Church, 64 Russell Rd, N13 4RP National Spiritualist Christian Church, 101 Green Lanes, N13 4SP Christian Action Housing Association, 53 Palmerston Cres, N13 4UF Winchmore Hill Baptist Church, Compton Rd, N21 3PA Saint Michael-At-Bowes Church of England, 103 Palmerston Rd, N22 8QX Holy Trinity Winchmore Hill, Green Lanes, Winchmore Hill, N21 3RS Palmer's Green Mosque, 30 Oakthorpe Rd, N13 5LL</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>Praesepe have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p>

	<p>Prasepe work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p> <p>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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Mercur Slots Palmers Green Premise Layout

Premise level:	Mercur Slots Palmers Green is a ground floor premises.
Premise frontage:	Mercur Slots Palmers Green 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>Mercur Slots Palmers Green 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:	Mercur Slots Palmers Green 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>Mercur Slots Palmers Green 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:	Mercur Slots Palmers Green 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

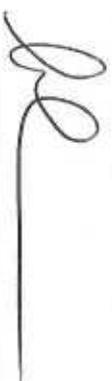
Praesepe Group already operate one other premise under London Borough of Enfield Local Authority, Merkur Cashino, 19 The Concourse, Edmonton Green Shopping Centre, N9 0TQ. This premise has never been subject to a local authority or Gambling Commission review.

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

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

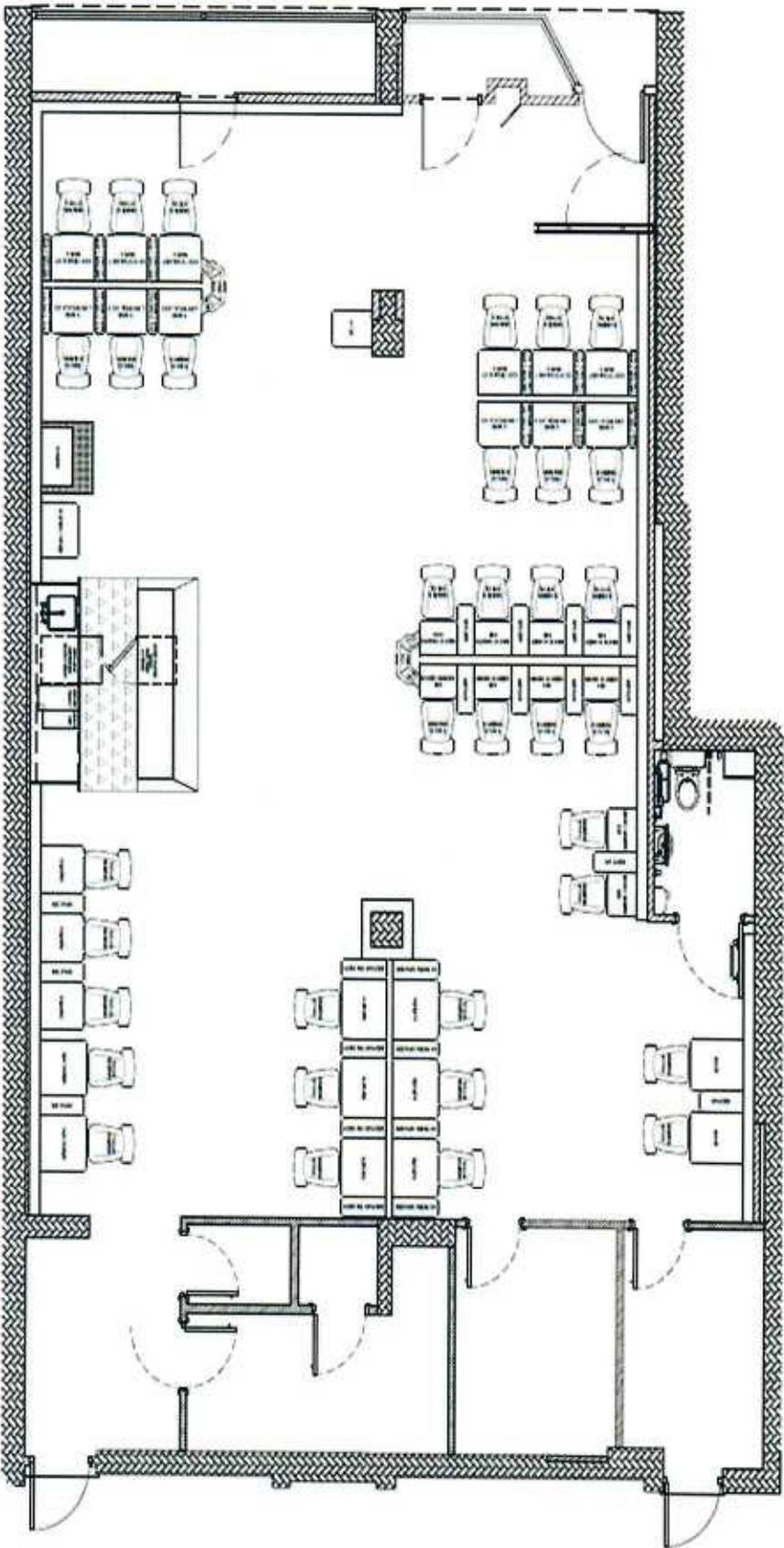
Where relevant, Praesepe has also considered any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However, the company does not operate discriminatory policies against any identified groups based on social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

Assessors Name:	AMANDA KIERMAN
Signature:	
Date:	11/12/20

Merkur Slots, 292/292A Green Lanes, Palmers Green, London, N13 5TW



Merkur Slots, 292/292A Green Lanes, Palmers Green, London, N13 5TW



Merkur Slots, 292/292A Green Lanes, Palmers Green, N13 5TW – Shop front example



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Gambling Act 2005



Bingo Premises Licence

**This licence is issued under section 164 of the Gambling Act 2005
by the London Borough of Enfield as Licensing Authority**

Premises Licence Number: LN/202000311

Part 1 – Details of person to whom licence is issued

This premises licence is issued to:	Cashino Gaming Limited
of the following address:	Seebeck House, 1A Seebeck Place, Milton Keynes, MK5 8FR
who holds an operating licence which has been given the following operating licence number by the Gambling Commission:	000-003266-N-103444

Part 2 – Details of the premises in respect of which the licence is issued

Facilities for gambling may be provided in accordance with this licence on the following premises:	Merkur Slots, 292 Green Lanes, LONDON, N13 5TW
The place in the area of the licensing authority in which the vessel is wholly or partly situated (within the meaning of section 211(3) of the Gambling Act 2005) is: Not applicable	

Part 3 – Premises licence details

This licence came into effect on:	4 January 2021
This licence is of unlimited duration	
Where applicable, this licence has been re-issued following the grant of an application to vary the licence. The variations to the licence take effect on:	Not applicable
Where applicable, this licence has been re-issued following the grant of an application to	Not applicable

transfer the licence. The transfer of the licence takes effect on:	
Where applicable, this licence has been re-issued following the grant of an application for reinstatement of the licence. The reinstatement takes effect on:	

Conditions applicable to the licence:

- **Any conditions attached to the licence by virtue of regulations made under sections 167 and 168 of the Gambling Act 2005 (other than any conditions under section 168 which have been excluded by the licensing authority); and**
- **Any conditions attached to the licence by virtue of specific provisions of the Gambling Act 2005.**

See Annex 1 for the list of default conditions correct at time of issue.

The following conditions have been attached to the licence by the issuing authority under Section 169(1)(a) of the Gambling Act 2005:

1. **The premises shall install and maintain a comprehensive CCTV system. All entry and exit points must be covered enabling frontal identification of every person entering in a light condition including customer facing areas. The CCTV system shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Subject to data protection legislation, recordings shall be made available upon the request of Police or authorised officer of the Licensing Authority.**
2. **A staff member from the premises who is conversant with the operation of the CCTV system shall be in the premises at all times when the premises is open.**
3. **Notices shall be prominently displayed within the premises stating that CCTV is in operation.**
4. **An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:**
 - (a) **all crimes reported to the venue**
 - (b) **all ejections of patrons**
 - (c) **any complaints received concerning crime and disorder**
 - (d) **any incidents of disorder**
 - (e) **all seizures of drugs or offensive weapons**
 - (f) **any visit by a relevant authority or emergency service.**
 - (g) **any attempts by children and young persons to gain access to the premises**

to gamble

(h) any Challenge 25 Refusals.

5. A Think 25 proof of age scheme shall be operated at the premises where Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

6. A record of refusals shall be kept on the premises and completed when necessary. This record shall contain the date and time of the refusal, a description of the customer, the name of the staff member who made the refusal and the reason for the refusal. This record shall be made available to Police and/or the Local Authority upon request and shall be kept for at least one year from the date of the last entry.

7. The licensee shall provide induction training to all staff on the specific local risks to the licensing objectives that have been identified for these premises.

8. Refresher training shall take place at least every six months on the specific local risks to the licensing objectives.

9. All training shall be documented and records kept at the premises. These records shall be made available to the Police and/or Local Authority upon request and shall be kept for at least one year.

10. Staff shall have a clear view of the entrance from the sales desk and shall circulate the premises to enable good visibility and supervision of the machines and premises.

A scale plan is attached to this licence.

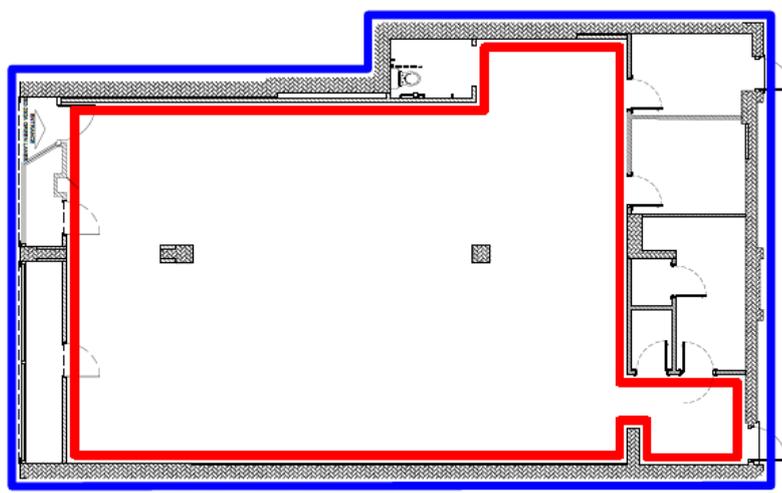
Signed: 

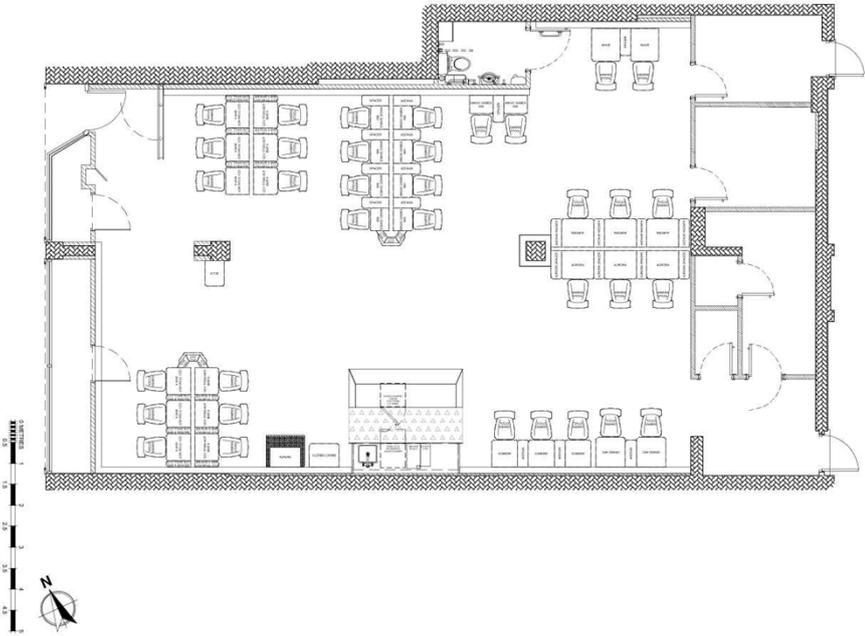
Date: 4 January 2021

for and on behalf of the
London Borough of Enfield
Licensing Team,
Civic Centre, Silver Street,
Enfield EN1 3ES



PLAN(s):

<p>LICENSING PLAN LEGEND</p> <p>LINE TYPE: Red MERKUR SLOTS; Blue MERKUR SLOTS AND GREEN LAMES; Black FURNITURE</p> <p>GAMBLING ACT 2005 LICENSING PLAN</p> <p>Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licenses and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.</p>		<p>REGIONS</p>		<p>FIT OUT TYPE</p> <p>MERKUR SLOTS</p> <p>PROJECT: MERKUR SLOTS 282-292A GREEN LAMES FALMERS GREEN 1000000 N13.5TM PROPOSED LICENSE PLAN</p>		<p>REFERENCE DRAWINGS</p> <p>SCALE: 1:50 DRAWN BY: MG DATE: 19/1/20</p>		<p>REVISION</p> <p>DRAWING NO. 999-PR-07 REVISION 03</p>		 <p><small>Copyright is reserved by Merkur Ltd and it is hereby notified that it is the intention of Merkur Ltd to apply for a patent in respect of the design of the Merkur Cashino logo. The Merkur Cashino logo is a registered trademark of Merkur Ltd. The Merkur Cashino logo is a registered trademark of Merkur Ltd. The Merkur Cashino logo is a registered trademark of Merkur Ltd. The Merkur Cashino logo is a registered trademark of Merkur Ltd.</small></p>	
											
<p>PROPOSED GAMING AREA: 146.6m²</p>											



<p>REVISIONS</p>	<p>FIT OUT TYPE MERKUR SLOTS</p>	<p>COMPANION IS ASSURED BY MERKUR P.C. AND IS BASED ON THE ASSUMPTION THAT IT IS NOT CAPABLE OF BEING REPRODUCED BY ANY MEANS WHATSOEVER WITHOUT THE WRITTEN CONSENT FROM THE DRAWING PRODUCER. THE CONTRACTOR SHALL CHECK ALL DIMENSIONS ON SITE. ANY ERRORS OR OMISSIONS SHOULD BE REPORTED TO MERKUR P.C.</p>
<p>PROJECT MERKUR SLOTS 292-292A GREEN LANES PALMERS GREEN N13 5TW</p>	<p>REFERENCE DRAWINGS</p> <p>SCALE 1:50 DRAWN BY LC DATE 23/11/20</p>	<p></p>
<p>DESCRIPTION PROPOSED MACHINE PLAN</p>	<p>DRAWING NO. 999-PR-05</p>	<p>REVISION 03</p>

Gambling Act 2005

Summary of the terms and conditions of a Premises Licence

This summary is issued under section 164 of the Gambling Act 2005 by the London Borough of Enfield as Licensing Authority

Premises Licence Number: LN/202000311

This summary is issued to: Cashino Gaming Limited

of the following address: Seebeck House, 1A Seebeck Place, Milton Keynes, MK5 8FR

A premises licence of the following type: Bingo

has been issued in respect of the following premises: Merkur Slots, 292 Green Lanes, LONDON, N13 5TW

The place in the area of the licensing authority in which the vessel is wholly or partly situated (within the meaning of section 211(3) of the Gambling Act 2005) is: Not applicable

Summary of the Terms and Conditions of the Premises Licence

1. The premises licence will run in perpetuity unless :
 - the Secretary of State prescribes a period after which the licence will expire under section 191 of the Gambling Act 2005;
 - the licence holder surrenders the licence under section 192 of the Gambling Act 2005;
 - the licence lapses under section 194 of the Gambling Act 2005;
 - the licence is revoked under section 193 or 202(1) of the gambling Act 2005.
2. The premises licence applies only in relation to the premises specified in Part 2 of the licence and may not be varied so that it applies to any other premises.

- 3. The premises licence authorises the premises to be used for .**
- 4. The premises licence is subject to:**
 - **any conditions specified on the face of the licence as being attached under section 169(1)(a) of the Gambling Act 2005;**
 - **any other conditions attached to the licence by virtue of regulations made under sections 167 and 168 of the Gambling Act 2005 (other than any conditions under section 168 which have been excluded by the licensing authority); and**
 - **any conditions attached to the licence by virtue of specific provisions of the Gambling Act 2005.**
- 5. In particular, it is a condition of the premises licence under section 185 of the Gambling Act 2005 that the holder keeps the licence on the premises and arranges for it to be made available on request to a constable, enforcement officer or local authority officer. The holder of the licence commits an offence if he fails to comply with this condition.**

Annex 1 – Default Conditions

The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007 - SCHEDULE 2 Conditions attaching to bingo premises licences

PART 1 - Mandatory conditions attaching to bingo premises licences

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect—

(a) a casino premises licence;

(b) an adult gaming centre premises licence;

(c) a betting premises licence other than a track premises licence; and

3.—(1) This paragraph shall apply where children or young persons or both are permitted by the licence holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.

(2) Any area of the premises to which category B and C gaming machines are located—

(a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;

(b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and

(c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

(3) The reference to supervision in this paragraph means supervision by—

(a) one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or

(b) closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4.—(1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.

(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.

(3) The notice in sub-paragraph (2) shall include the following information—

(a) the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;

(b) in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and

(c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.

(4) The notice may be displayed in electronic form.

(5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.

5.—(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.

(2) The condition in sub-paragraph (1) may be satisfied by—

(a) displaying a sign setting out the rules,

(b) making available leaflets or other written material containing the rules, or

(c) running an audio-visual guide to the rules prior to any bingo game being commenced.

6. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

PART 2 - Default conditions attaching to bingo premises licences

1. Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.

2. The condition in paragraph 1 (Part 2) shall not apply to making gaming machines available for use.

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NOTICE OF APPLICATION FOR A REVIEW OF A PREMISES LICENCE

This notice is given in accordance with regulations made under section 197 of the Gambling Act 2005

Notice is hereby given that:

Councillor Nesil Caliskan

[Give the full name of the applicant(s) as set out in Part 1 of the application for a review of the premises licence]

has made an application under section 197 of the Gambling Act 2005 for a review of the premises licence which is in force at the following premises:

Premises address: Merker Slots, 292-292A Green Lanes, Palmers Green, London N13 5TW

Trading name: Cashino Gaming Limited

Seebeck House

1A Seebeck Place

Milton Keynes

MK5 8FR

[Give the trading name used at the premises, and the address of the premises (or, if not known, give a description of the premises and their location).]

The applicant is:

a responsible authority an interested party *[check or tick the appropriate box]*

The following type of premises licence has effect in respect of the premises:

Bingo premises licence

[Indicate the type of premises licence which applies to the premises, e.g. bingo premises licence, adult gaming centre premises licence etc.]

The application for a review of the premises licence has been made to the following licensing authority:

Enfield Council Licensing Authority

Enfield Civic Centre

Silver Street

Postcode: EN1 3XA

Website: <https://new.enfield.gov.uk/>

[Insert name of the licensing authority and the address of its principal office, followed by the address of its website]

Information about the application is available from the licensing authority, including the arrangements for viewing details of the application.

The following person connected with the applicant is able to give further information about the application:

Sophie Iliffe, Cabinet Support Officer

[This entry is optional and is to be included if the applicant wishes to provide the name, telephone number and (if available) e-mail address of a person connected with the applicant who is able to answer questions and provide further information about the application.]

The grounds on which a review is being sought are:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
2. Protecting children and other vulnerable persons from being harmed or exploited by gambling

Representations about the application may be made in writing to the licensing authority by the licence holder, a responsible authority or an interested party during the period of 28 consecutive days beginning on 21.04.2021 (which is 7 days after the date on which the application for a review was made to the licensing authority). The last day for making representations is: 18.05.21

Following a review under section 201 of the Gambling Act 2005 a licensing authority may decide to take any of the following kinds of action:

- **revoke the licence**
- **suspend the licence for a specified period not exceeding 3 months**
- **add, remove or amend a condition attached to the licence**

Application for a review of a premises licence under the Gambling Act 2005

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Part 1 – Applicant Details

1. Name of Applicant: Councillor Nesil Caliskan

[Where the applicant is an individual please give your first name(s) as well as your surname]

2. Applicant's address (home or business *[check or tick appropriate box]*)

Enfield Civic Centre
Silver Street
Enfield
London

Postcode: EN1 3XA

3(a) Are you making the application as a responsible authority? Yes No

3(b) If the answer to question 3(a) is yes, indicate the type of responsible authority:

4(a) If the answer to question 3(a) is no, please confirm by ticking or checking the box that you are applying as an interested party

4(b) If you have ticked or checked the box in answer to question 4(a), please indicate on what basis you qualify as an interested party:

I am an interested party as a local councillor who has been contacted by local residents. There is widespread concern about this premises which led me to apply for the review.

[Where there are further applicants, the information required by questions 1 to 4(b) should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants"]

Part 2 – Premises Details

5. Give the trading name used at the licensed premises to which the application for a review relates: Merkur Slots

6. Give the address of the premises or, if not known, give a description of the premises and its location. Where the premises are a vessel, then (if known) give the place indicated in the premises licence as the place in the licensing authority's area where the vessel is wholly or partly situated. If possible, any address should include a postcode:

292-292A Green Lanes
Palmers Green

Postcode: N13 5TW

7. Type of premises:

Casino

Bingo Hall

Adult Gaming Centre

(arcade restricted to those who are 18 or over)

Betting (track)

Betting (other)

Family entertainment centre

(arcade which admits both over and under 18s)

8. Premises licence (if known): LN/202000311

9. Give the name of the person(s) or organisation(s) in whose name the licence is held.

Cashino Gaming Limited
Seebeck House
1A Seebeck Place
Milton Keynes
MK5 8FR

[Where an individual is the licence holder please give their first name(s) as well as their surname.]

Part 3 – Details of grounds on which a review is being sought

10(a) Please give details of the grounds on which a review is being sought.

This review is being sought on the following two grounds:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
2. Protecting children and other vulnerable persons from being harmed or exploited by gambling

Reasons why I believe this licence application does not meet these two grounds are set out in the supporting evidence contained in the appendix.

10(b) Indicate any specific actions you consider the licensing authority should take following the review, including the reasons why you consider those actions are appropriate:

To review this premises licence and revoke it.

Part 4 – Supporting Documents

11. List any supporting documents which you are submitting with the application:

- Letter of Support from applicant Cllr Nesil Caliskan
- Appendix of Supporting Evidence:
 - Crime and disorder evidence
 - Children and vulnerable people evidence
 - Copies of emails from local residents
 - Copies of government consultation responses on gambling premises licences
 - Statement of Support from Palmers Green Ward Councillors

Please see attached appendix for supporting documents and evidence.

Part 5 – Declarations and Checklist

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

I/We understand that it is now necessary to give notice to the licence holder and the responsible authorities in relation to the premises

Part 6 – Signatures

12. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:



Signature: _____

Print Name: NESIL CALISKAN

Date: 14.04.2021 (dd/mm/yyyy)

Capacity: Councillor at Enfield Council

[Where there is more than one applicant, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include, for each additional applicant, all the information requested in paragraph 12.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 7 – Contact Details

13(a) Please give the name of a person who can be contacted about the application:

Councillor Nesil Caliskan

13(b) Please give one or more telephone numbers at which the person identified in question 13(a) can be contacted:

020 8379 4116

14. Postal address for correspondence associated with this application:

Enfield Civic Centre

Silver St, Enfield

Postcode:EN1 3XA

15. If you are happy for correspondence in relation to the application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

Cllr.Nesil.Caliskan@enfield.gov.uk

Please reply to: Cllr Nesil Caliskan

Email: cllr.nesil.caliskan@enfield.gov.uk

Phone: 020 8379 4116

Date: Wednesday 14 April 2021

Dear Enfield Licensing Authority

Re: Letter of Support – Merkur Slots Licence Review

As an interested party, I am applying for a review of the premises licence granted to Merkur Slots at 292-292A Green Lanes.

I am completely opposed to any new betting shops or gambling premises opening in Enfield and remain concerned about their impact on local communities and high streets. Palmers Green already has a significant cluster of betting shops however the local authority does not have the power to prevent the concentration of betting shops and other gambling activities.

With local residents and ward councillors, supporting evidence has been collated to demonstrate that this particular licence in our view does not meet the objectives of the Gambling Act 2005. My application for a licence review is being sought on the two following grounds:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
2. Protecting children and other vulnerable persons from being harmed or exploited by gambling

This application to review the premises licence is also supported by the MP for Enfield Southgate, Enfield Council Cabinet Member for Licensing & Regulatory Services, Palmers Green residents and all three Palmers Green ward councillors. Below, I have outlined my own concerns about the addition of this type of business to Palmers Green town centre:

Impact on town centres and high streets

Betting shops and gambling venues are a blight on our town centres. They encourage behaviour that has a negative impact on individuals, families and our communities. Town centres should be inclusive, attractive and safe places for residents and visitors of all ages. We also want to rebuild our local economy after the devastating impact of COVID-19 and help both businesses and residents to thrive. I do not believe that allowing such gambling activities is the right way to re-open our high streets and town centres.

Tackling crime and anti-social behaviour

The representations I have received from local residents raise valid concerns about a potential increase in anti-social behaviour and crime in the area. I share these concerns and believe a venue with a 24 hour licence will have a negative impact on safety in the area. Enfield Council is already investing in tackling crime and anti-social behaviour and the proliferation of these types of businesses undermines the work we are doing to keep residents safe. I am especially concerned that the 24 hour element of this licence will make it difficult to prevent crime or disorder associated with problem gambling. Furthermore a 24 hour venue will naturally put additional strain on policing resources.

Protecting children and vulnerable people

I am concerned that the addition of another business in Palmers Green which promotes gambling activity will cause harm to children and vulnerable people in the area. I do not believe that the risk assessment completed by Merkur Slots sufficiently sets out how it will protect children and vulnerable young people from being harmed or exploited by gambling. While controls such as age verification may prevent children from entering the venue, it does not prevent the gambling related harm that affects children and families. The Merkur Slots address is located less than a ten minute walk from two schools and is directly next to a well used bus stop, and I am concerned that any potential crime or disorder linked to the premises will pose a risk to local children and vulnerable people passing through or spending time in the area.

Poverty and inequality in Enfield

The past year has been very financially challenging for families. Gambling adversely impacts on the poorest communities and the clustering of gambling activities and betting shops in an area where deprivation exists is entirely inappropriate. Enfield is a borough where more and more households are living in poverty, including Palmers Green. The Palmers Green ward is within the top 40% most deprived wards in the country and we know that during the pandemic, financial hardship and debt has worsened for many households. Town centres and high streets should not be places where people are encouraged to get into debt.

Palmers Green and wider community response

There has been an overwhelming negative response from the local community in Palmers Green and surrounding neighbourhoods at the prospect of this business opening. Local residents have voiced their opposition through writing to their councillors, created petitions and written to me directly. I am yet to receive any support for this business opening. Residents are at the heart of feeding into our plans for developing and regenerating our town centres and they want to see their town centre thrive. It is important that their views are taken into account.

It is disappointing that local authorities have limited powers to prevent the clustering of gambling businesses and are unable to control gambling related harm. As a Council we have raised this in the recent government consultation and will continue to highlight our concerns about the impact of gambling on the safety our town centres and local communities. In their consultation response, the Local Government Association has called on the Government to reform the Gambling Act so that local authorities are able to determine whether it is appropriate for new gambling premises of any type to open in their areas.

I hope that this application provides a strong case for revising the premises licence that has been granted to Merkur Slots to ensure that it does not cause crime and disorder and it does not cause harm to children or vulnerable people.

Yours sincerely



Cllr Nesil Caliskan
Enfield Council

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1 Ground for review number one: preventing gambling from being a source of crime or disorder

The addition of another business offering gambling in Palmers Green is concerning because of the risk that crime and disorder will increase due to the gambling activities offered and the potential criminal behaviour connected to this location on the high street. Crucially, Palmers Green already has a significant cluster of betting shops, as identified in the Enfield Council Local Area Risk Profile.

The latest crime and anti-social behaviour statistics for the ward are enclosed to demonstrate the risk that the addition of a new business offering gambling activities will cause an increase in crime and disorder in the area, especially due to the 24 hour aspect of the licence. Crime rates in this area have been rising in the last few years. Most reported crimes in the past 6 months include anti-social behaviour, vehicle crime, violent and sexual offences, burglary, shoplifting and other theft. In June 2020 there were 198 crime incidents reported within half a mile from the Merkur slots postcode predominantly consisting of anti –social behaviour (72) violence and sexual offences (39) vehicle crime (23).

1.1 Palmers Green crime and anti-social behaviour data

a. Domestic abuse incidents

Tables 1 and 2 – domestic abuse incidents in Palmers Green ward¹

Palmers Green - Domestic Abuse Incidents 1st Mar 2018 - 29th Feb 2020					
Month	2018/19	2019/20	Total	Diff	% Change
Mar	10	20	30	10	100%
Apr	9	11	20	2	22%
May	9	18	27	9	100%
Jun	12	12	24	0	0%
Jul	20	10	30	-10	-50%
Aug	19	16	35	-3	-16%
Sep	17	17	34	0	0%
Oct	14	19	33	5	36%
Nov	29	18	47	-11	-37%
Dec	27	17	44	-10	-37%
Jan	20	8	28	-12	-60%
Feb	13	12	25	-1	-8%
Total	199	178	377	-21	-11%

Palmers Green - Domestic Abuse Incidents 1st Mar 2019 - 28th Feb 2021					
Month	2019/20	2020/21	Total	Diff	% Change
Mar	20	16	36	-4	-20%
Apr	11	12	23	1	9%
May	18	27	45	9	50%
Jun	12	31	43	19	158%
Jul	10	25	35	15	150%
Aug	16	27	43	11	69%
Sep	17	19	36	2	12%
Oct	19	23	42	4	21%
Nov	18	23	41	5	28%
Dec	17	23	40	6	35%
Jan	8	21	29	13	163%
Feb	12	6	18	-6	-50%
Total	178	253	431	75	42%

Comparison with Enfield borough wide performance:

- 2018/19 to 2019/20 Enfield increased by 3.6% / London increased by 2.7%.
- 2019/20 to 2020/21 Enfield increased by 12.8% / London increased by 7.6%.

¹ Source: <https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/domestic-and-sexual-violence-dashboard> and internal restricted Police MetaStats

It is important to acknowledge that there is an established link between domestic violence and gambling. Enfield has seen increasing numbers of domestic abuse incidents reported to the police during the past year. The spike in cases last year was linked to the lockdown however we know that gambling and financial problems are linked to domestic violence.

A 2016 [report](#) by the University of Lincoln found that those who gamble are more likely to act violently towards their partner, with 45% of participants struggling with problem gambling having been in some form of physical fight in the last 5 years. We also know that 25% of women and 14% men in the UK experience domestic abuse during their lifetime, and that only a minority of this is [reported to the police](#).²

b. Personal robbery

Tables 3 and 4 – personal robbery offences in Palmers Green ward³

Palmers Green - Personal Robbery 1st Mar 2018 - 29th Feb 2020					
Month	2018/19	2019/20	Total	Diff	% Change
Mar	3	3	6	0	0%
Apr	3	9	12	6	200%
May	1	7	8	6	600%
Jun	2	5	7	3	150%
Jul	3	10	13	7	233%
Aug	2	5	7	3	150%
Sep	4	10	14	6	150%
Oct	7	7	14	0	0%
Nov	7	7	14	0	0%
Dec	3	5	8	2	67%
Jan	5	2	7	-3	-60%
Feb	6	4	10	-2	-33%
Total	46	74	120	28	61%

Palmers Green - Personal Robbery 1st Mar 2019 - 28th Feb 2021					
Month	2019/20	2020/21	Total	Diff	% Change
Mar	3	2	5	-1	-33%
Apr	9	7	16	-2	-22%
May	7	4	11	-3	-43%
Jun	5	3	8	-2	-40%
Jul	10	5	15	-5	-50%
Aug	5	3	8	-2	-40%
Sep	10	3	13	-7	-70%
Oct	7	0	7	-7	-100%
Nov	7	1	8	-6	-86%
Dec	5	4	9	-1	-20%
Jan	2	4	6	2	100%
Feb	4	1	5	-3	-75%
Total	74	37	111	-37	-50%

Borough wide performance:

- 2018/19 to 2019/20 - Enfield increased by 41.5% / London increased by 19.4%.
- 2019/20 to 2020/21 - Enfield decreased by 51.1% / London decreased by 42.4%.

² Source: <https://www.gamcare.org.uk/news-and-blog/blog/ending-violence-against-women/>

³ Source: <https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/crime-dashboard>

c. Anti-social behaviour

Tables 7 and 8 – anti-social behaviour calls to police in Palmers Green ward⁴

Palmers Green - Police Recorded Antisocial Behaviour Calls 1st Mar 2018 - 29th Feb 2020					
	2018/19	2019/20	Total	Diff	% Change
Total Calls	440	525	965	85	19%

Palmers Green - Police Recorded Antisocial Behaviour Calls 1st Mar 2019 - 28th Feb 2021					
	2019/20	2020/21	Total	Diff	% Change
Total Calls	525	899	1424	374	71%

Borough wide performance:

- 2018/19 to 2019/20 - Enfield increased by 5.6% / London increased by 10%.
- 2019/20 to 2020/21 - Enfield increased by 92.2% / London increased by 86.7%.

Palmers Green is the 10th highest ward for anti-social behaviour reports in the borough for the time period monitored. In the past year, Enfield increased by 92.2% in the same period London increased by 86.7%.

Crime and anti-social behaviour hot spots in the area

This part of Green Lanes is already an area where people congregate, and the Local Area Risk Assessment produced by Merkur Slots identifies that this area has a high crime and anti-social behaviour rate. This type of establishment would encourage more congregating and potentially attract an increase in criminal or anti-social behaviour in this part of Green Lanes and in the town centre.

The Merkur Slots address is very close to the Alfred Herring Wetherspoons pub which attracts crime and anti-social behaviour. It is also nearby to the McDonald's which is an area where people congregate and is associated with anti-social behaviour.

There is no established night-time economy in Palmers Green and local residents, especially women, children and other vulnerable people may feel unsafe passing through this area especially as this is a transport hub with a nearby train station and a bus stop right outside the Merkur Slots address.

⁴ Source: <https://data.police.uk/>

d. Palmers Green - All Crime from 2017-2020

All Palmers Green Crime
Recorded between 01/01/2017 and 28/02/2021

Crime Type	Years					Grand Total
	2017	2018	2019	2020	2021	
Violence Against the Person	3	7	8	9	3	30
Sexual Offences	2	0	4	3	0	9
Robbery	1	1	4	1	0	7
Vehicle Offences	6	4	15	16	1	42
Theft	13	10	18	14	2	57
Burglary	2	2	0	2	0	6
Arson and Criminal Damage	5	5	0	2	1	13
Drug Offences	1	1	0	3	1	6
Public Order Offences	2	2	7	4	0	15
Miscellaneous Crimes Against Society	1	1	0	0	0	2
Grand Total	36	33	56	54	8	187

Provided via FOI to Met Police

This data demonstrates that levels of crime have been rising in Palmers Green during the past few years. Due to this trend, this area is an extremely unsuitable location for another business offering gambling.

1.2 Palmers Green demographics and risk factors

Palmers Green population

The population of Palmers Green ward is 15,837 (ONS mid-year estimates 2019). This is the 9th largest population of the 21 wards in Enfield. Palmers Green is the main town centre serving the population of Palmers Green ward, but the town centre also serves nearby neighbourhoods including Winchmore Hill, Bowes and Southgate Green wards.

Palmers Green wider area

It is important to note that the Merkur Slots address is in the Palmers Green ward however the Palmers Green area, and the community which bases itself around Palmers Green, is much wider. The Palmers Green area encompasses the town centre which serves bordering neighbourhoods in Southgate Green, Winchmore Hill and Bowes. As a town centre, Palmers Green is a transport, community and retail hub which serves a wide area including Palmers Green ward and beyond.

Within the evidence presented, both the Palmers Green ward and the Palmers Green area are referred to. This is to capture the fact that Palmers Green town centre serves the wider area and any evidence or discussion about the impact of the gambling licence in this part of Green Lanes should not be limited to the ward itself, as this would not capture all of the people who are part of the local community and area.

Deprivation in Palmers Green ward and the local area

The Local Area Risk Assessment completed by Merkur Slots quotes that in 2019 the deprivation score for Palmers Green was in the 50% least deprived in the country. This is incorrect, in 2019 Palmers Green was in the 40% most deprived in the country. The Merkur Slots risk assessment should be updated to reflect the correct 2019 score and also note that the 2020 deprivation score for Palmers Green was again in the top 40% most deprived wards in England. Furthermore, for many families, the financial hardship caused during the pandemic will continue well into 2021 and beyond. The control factors put in place by Merkur Slots should address the level of deprivation in Palmers Green because this is relevant for mitigating against risks relating to crime and disorder.

The bordering wards of Bowes and Southgate Green are also in the 40% most deprived in the country. These wards are part of the wider Palmers Green area and the communities which the Palmers Green town centre serves.

Employment levels and claimant count

Unemployment in Palmers Green ward is higher than the national average which adds to the vulnerability of local people to gambling, and any crime or disorder which is linked to gambling.

Data for furlough is available at the parliamentary constituency level. Palmers Green is in the Enfield Southgate constituency, which also includes the nearby areas of Bowes, Southgate and Winchmore Hill.

At 28 February 2021, 9,500 Enfield Southgate employments were furloughed – this is 21% of all employments. Since the start of the government furlough scheme, 19,500 employments have been furloughed (this number includes those where the furloughs have ended – either by redundancy or by employment restarting). Currently 19% of all Enfield employments and 15% of all employments in England are in the furlough scheme (as at 28th February 2021). This demonstrates that the Enfield Southgate constituency is higher than both the Enfield and national average.

At July 2020:

- The claimant count in Palmers Green was 860, representing 8.1% of the local working-age population.
- 21% of households in the ward (1,312) were claiming Universal Credit – this includes working households.

The risks associated with this are further explained in the second part of this evidence submission, relating to vulnerable persons.

1.3 Impact of a twenty-four-hour licence

The 24-hour element of this licence could exacerbate problem gambling and increase the risk of crime or anti-social behaviour which is associated with problem gambling.

This type of establishment will encourage the congregating of people outside the premises, like the Paddy Power does and also gives another outlet for the drug dealers in the area to work from, as is the case with the Paddy Power on weekend nights.

1.4 Staffing

The Merkur Slots Risk Assessment states that they may operate a single staff policy and it is not clear how many staff will usually be there. Single staffing is not enough to deter crime and disorder, both inside and immediately outside the business.

The recently published report by the House of Lords: *Gambling Harm – Time for Action* raises the following concerns about lone working in betting shops:

Dr James Banks, Reader in Criminology at Sheffield Hallam University, raised concerns about the practice of lone working in betting shops. He stated that to prevent gambling from being a source of crime or disorder (one of the licensing objectives) “I would encourage LBO [licensed betting office] operators to abolish lone working, with a view to reducing the likelihood of robbery and the risk posed to retail staff.”

His evidence explained that analysis of the robberies committed in betting shops showed that although crimes were committed across betting shop opening hours, “many of the robberies took place in the evening when neighbouring shops will have closed and fewer people will be present either in the shop or the surrounding vicinity.”

To mitigate the risks for both lone-working staff and the individual betting shops involved, Dr Banks suggested: “... previous research has demonstrated that greater numbers of ‘frontline’ staff or the introduction of specialised security personnel into retail environments where there is only a small volume of staff can serve to reduce the occurrence of violent crime.”

Similar concerns were expressed in January 2017 by the Responsible Gambling Strategy Board. In its advice to the Gambling Commission for the 2017 DCMS review of gaming machines and social responsibility measures, it said: “Appropriate staffing levels are key to the detection and mitigation of harmful play. There must be serious doubt about the extent to which a single member of staff on their own in a betting shop, even at less busy times of the day or night, can simultaneously look after the counter, remain alert to the possibility of under-age play and money laundering, and still be expected to identify potentially harmful play and make appropriate interventions. The Gambling Commission should ask all operators to review safe staffing levels. Larger operators should be required specifically to address staffing levels and safety (of employees as well as players) in their annual assurance statements.”

2 Ground for review number two: protecting children and other vulnerable persons from being harmed or exploited by gambling

2.1 Location risk factors for children and vulnerable persons

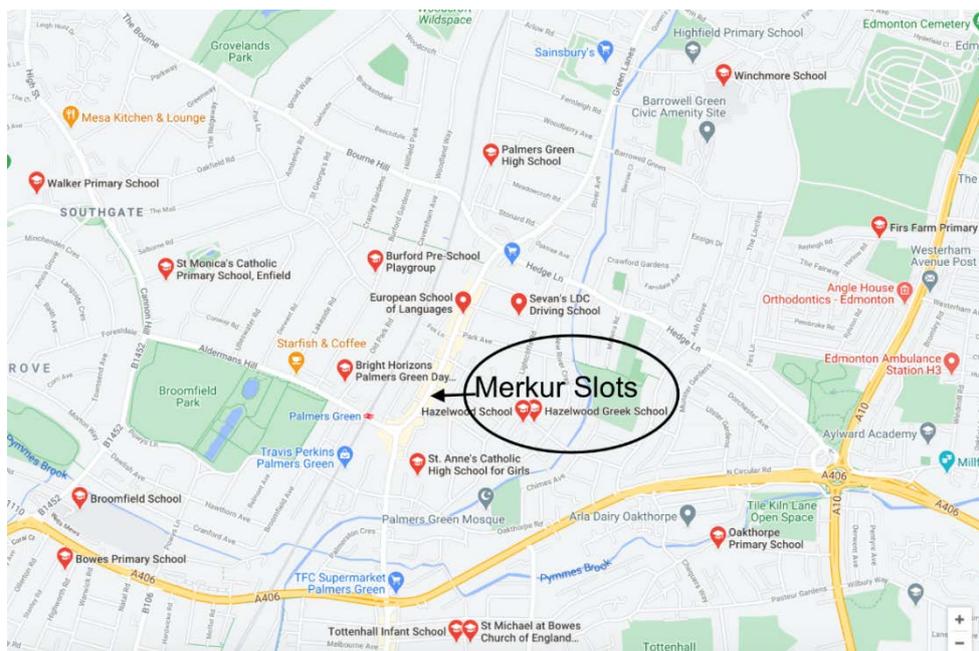
The location of the proposed Merkur Slots gaming centre is in the heart of the Palmers Green town centre and shopping area. Footfall is predominately families and local residents. This area is popular with children and young people and is a major thoroughfare for many children and vulnerable persons visiting places of interest which are listed below.

a. Proximity to schools

The location of the proposed Merkur Slots gaming centre is less than half a mile, and less than a ten-minute walk, from two schools: Hazelwood School and St Anne's School. The area has a higher than national average number students and there are over ten schools in the local area, highlighting the need to ensure the town centre is safe for pupils travelling through and spending time in the area.

While the risk of children gambling is addressed in the Local Area Risk Assessment by implementing control measures such as age verification, this does not prevent children from being impacted by any crime or anti-social behaviour linked to customers frequenting the premises or local area. It also does not mitigate against the impact of children whose family are affected by problem gambling or gambling addiction.

Image 1 – Schools in Palmers Green and the wider area



b. Proximity to places where children and/or vulnerable persons visit and congregate

Transport

The Lodge Drive bus stop is immediately outside the Merkur Slots address. The bus stop is very busy and used by children attending the local schools and those attending Palmers Green High School, Highlands, Ashmole Academy, Southgate School and Southgate College, to name a few. It is especially busy at beginning and end of the school day. A gambling premises with highly colourful and illuminated signage will inevitably attract the attention of young people waiting for buses and provoke curiosity. Peer pressure and the vulnerabilities of children and young people can magnify the effects of this.



Image 2 – Lodge Drive bus stop in front of 292-292A Green Lanes

The location of the Merkur premises is also on a major thoroughfare for children, young adults and vulnerable persons going to Palmers Green Station.

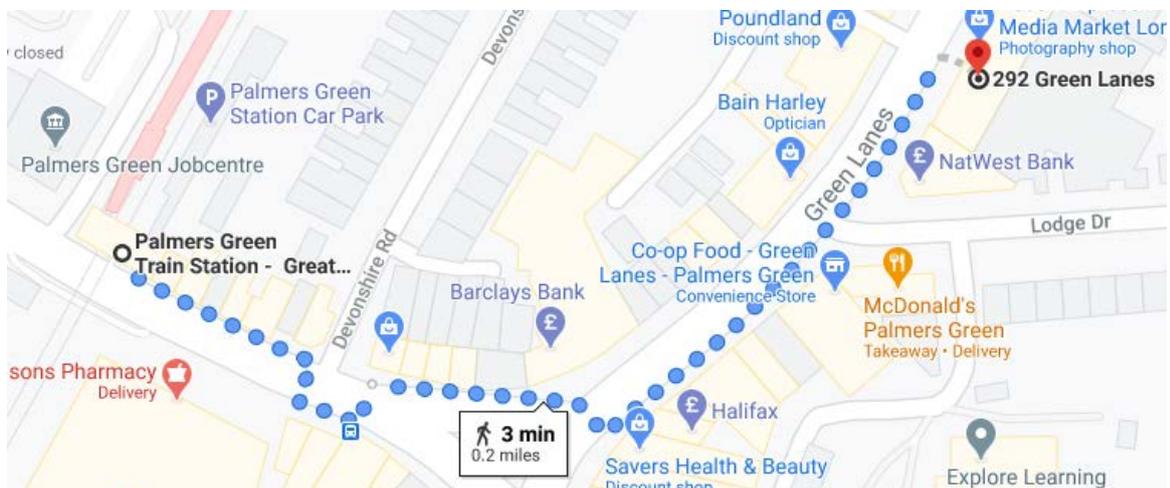


Image 3 – Route between Palmers Green train station and Merkur Slots at 292-292A Green Lanes

Eateries and pubs

The Merkur Slots location is near several eateries where children and vulnerable people often visit or pass by in this area of Green Lanes. The Alfred Herring Wetherspoons Pub and the McDonalds branch on Green Lanes are businesses which are nearby and attract young adults and vulnerable adults. Groups of pupils and young people particularly congregate around McDonalds.



Images 4 and 5 – distance between Merkur Slots and the local McDonalds and Wetherspoons

Palmers Green Jobcentre

The Merkur Slots address is located nearby to the Palmers Green Jobcentre. There are potentially vulnerable persons unemployed or on low incomes who are visiting the area. Furthermore, the Merkur Slots risk assessment notes that Palmers Green has higher than average unemployment.

At July 2020:

- The claimant count in Palmers Green was 860, representing 8.1% of the local working-age population⁵.
- 21% of households in the ward (1,312) were claiming Universal Credit – this includes working households.

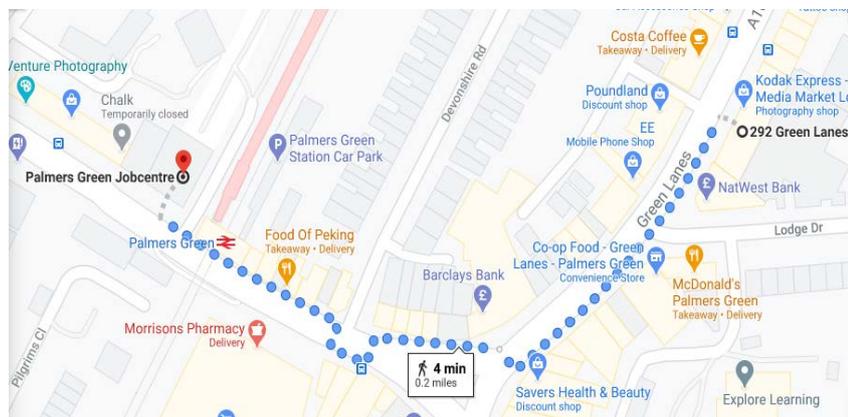


Image 6 – Distance from Merkur Slots to Palmers Green Jobcentre

⁵The claimant count is a measure of unemployment: the number of people receiving either Job Seekers' Allowance, or unemployed claimants of Universal Credit who are required to seek work.

Nearby businesses for families, children and vulnerable persons

Within minutes of the Merkur Slots address and Lodge Drive bus stop are the Explore Learning Centre and the KB02 children’s soft play venue.

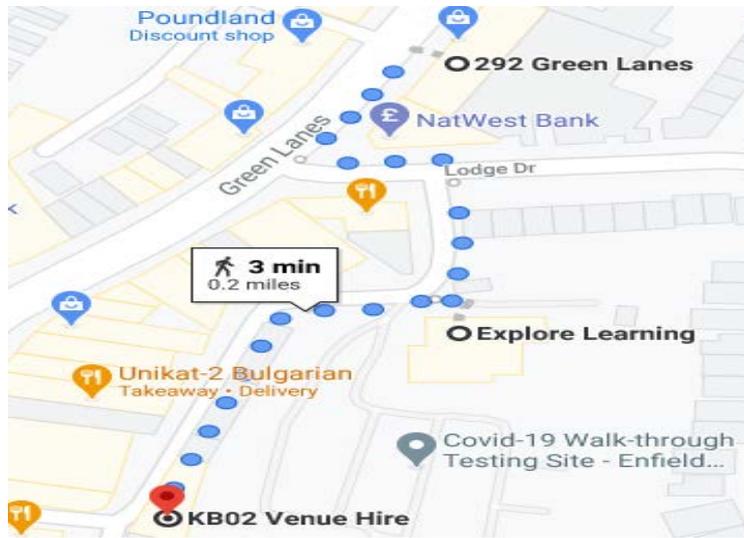


Image 7 – Distance between Merkur Slots and Explore Learning and KB02

The location is half a mile to Broomfield Park which has a sportsground and playground used by local children and families visiting from the local area. It is also on a major thoroughfare for children and young adults going to the Palmers Green Library, which is just a six-minute walk away from the Merkur Slots address.



Images 8 and 9 – distance from Merkur Slots to Broomfield Park and Palmers Green Library

There is an NHS Crisis Prevention and Recovery House nearby at 449-451 Green Lanes which is not listed in Merkur Slot's risk assessment. This service provides short-term residential support for people with mental health problems or in a crisis. MedStar Social Services is based at 200 Green Lanes, a service supporting vulnerable adults. In total, there are 22 medical centres, care homes and mental health facilities in the wider area. The NHS Crisis Prevention House, as well as the other health services, will naturally draw people with vulnerabilities into the area who are at a greater risk of being affected by problem gambling or any crime or disorder in the area.

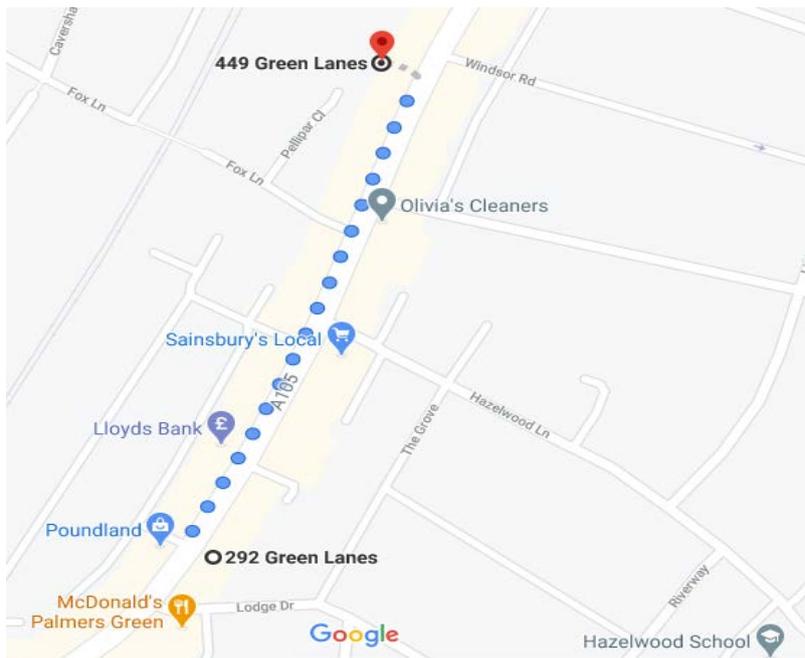


Image 10 – distance between Merkur Slots and NHS Crisis Prevention House

2.2 Dangers of gambling: children and vulnerable persons

The activities offered by Merkur Slots encourage risky behaviour and problem gambling. It is important that the activities offered by Merkur Slots are distinguished from other leisure or entertainment activities, and to note the well documented dangers associated with gambling activity. Crucially, these are activities which potentially put both gamblers and their loved ones at risk, especially children and vulnerable people who may be more at risk of the harm and impact from problem gambling.

There are 3,611 children aged 11-16 years in Palmers Green and the surrounding areas (Southgate Green, Bowes and Winchmore Hill). The risks associated with children's exposure to gambling is well documented and below, compelling national research has been benchmarked against the Palmers Green area.

Government information indicates that in the UK there are over 400,000 addicts (or “problem gamblers”) with a further 2 million2 “at risk”⁶

Palmers Green has a large population at 15,837 and is the 9th largest ward population in Enfield. As well, Palmers Green is one of the main town centres which serves the borough, meaning residents from across Enfield visit, work or spend time in the area. In such a large population, it must be anticipated that a proportion of adults in the area will be gambling addicts.

1.9% of 11-16-year olds in England and Scotland are classified as ‘problem’ gamblers and 2.7% are classified as ‘at risk’⁷

This has increased since 2017. In 2017, 0.9% of 11-16 year olds are classified as ‘problem’ gamblers, 1.3% as ‘at risk’ and 15.5% as non-problem gamblers.

In 2020, 37% of 11-16-year olds in England and Scotland gambled in the last 12 months⁸

The number of young people aged 11-16 years old in who have gambled in the last 12 months has **increased by 30%** since 2019.⁹

In 2020, 9% of 11-16-year olds in England and Scotland spent their own money on gambling activities in the seven days prior to taking part in the survey¹⁰

This has reduced slightly from 2019 however the number of young people who gambled in the last 12 months has significantly increased (30%).

As there are nearly 4,000 children aged 11-16 years in Palmers Green and bordering wards, this is a significant group of people who are at risk of engaging in some way with gambling or problem gambling – or being impacted negatively by problem gamblers.

2.3 Public Health Implications

Gambling disorder was classified as equivalent to drug and alcohol addictions in 2013. Currently, the NHS does not fund specialised treatment services for problem gambling despite the fact that compulsive gambling is recognised by the World Health Organisation under ICD-11 (International Classification of Diseases, 11th edition) as a Mental and Behavioural Disorder. A report by Gamble Aware found fewer than 2 per

⁶ NatCen for the Gambling Commission (2017) Gambling behaviour in Great Britain in 2015: Evidence from England, Scotland and Wales: <http://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2015.pdf>

⁷ <https://www.ipsos.com/ipsos-mori/en-uk/2020-young-people-and-gambling-survey>

⁸ Ibid.

⁹ <https://www.ipsos.com/ipsos-mori/en-uk/2019-young-people-gambling-survey>

¹⁰ <https://www.ipsos.com/ipsos-mori/en-uk/2020-young-people-and-gambling-survey>

cent of problem gamblers are receiving treatment, representing a significant gap in the provision of specialist services.¹¹ This is lower than the treatment received for drug and alcohol addictions which is 15-20%.

2.4 Impact on Mental Health

Betting shops, bingo halls or adult gambling centres are often located in areas where residents are impacted by poor mental health. The Local Area Profile for Enfield identifies that there are greater concentrations of betting shops are located along the Hertford Road corridor, with particular clusters in Edmonton Green, Enfield Town and Southgate. There are also significant clusters of betting shops along Green Lanes, in the Bowes and Palmers Green centres. Figure one demonstrates how in Enfield, betting shops have been clustering in areas of poor mental health.

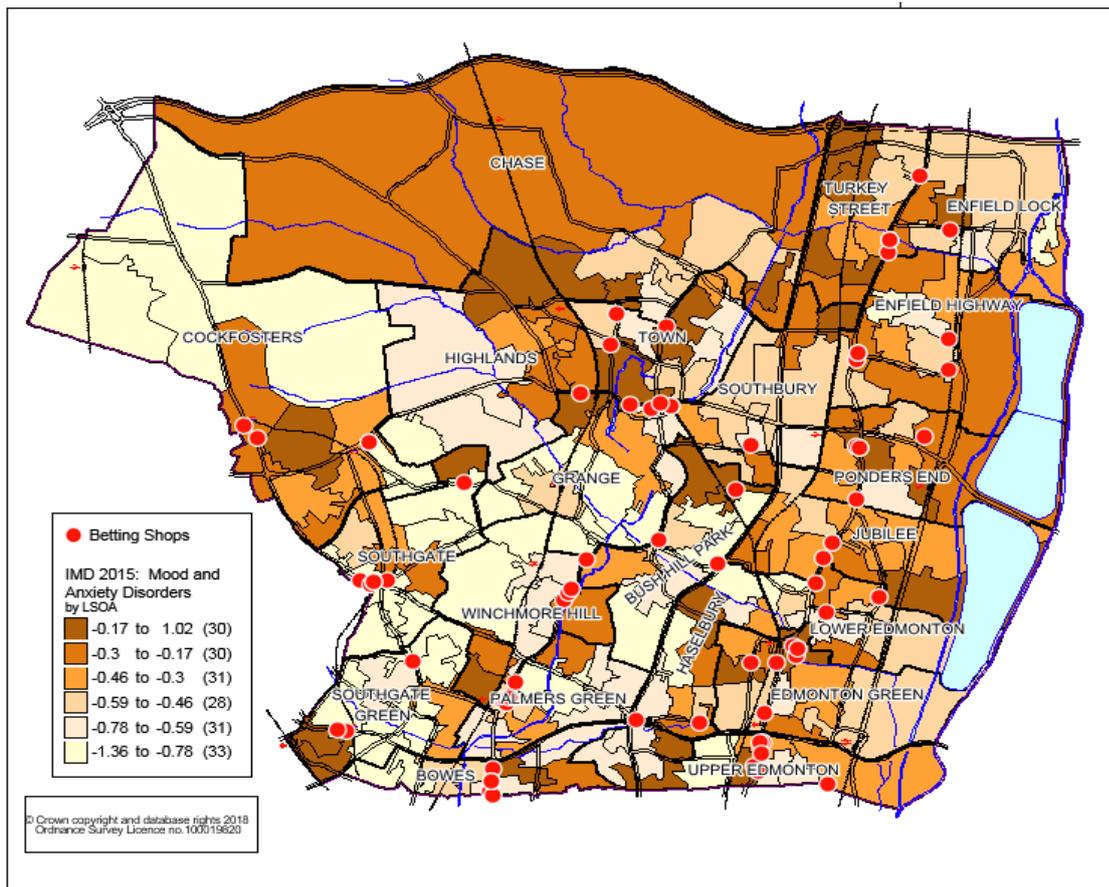


Figure 1 – Mental health mapping of Enfield with concentration of betting shops (Enfield Local Area Profile 2019)

Worryingly, recent research has shown a strong link between gambling problems and thoughts of suicide. More than double the amount of people affected by gambling problems say that they have considered taking their own life compared to those who are not affected by gambling.¹²

¹¹ <https://www.begambleaware.org/media/1628/gambleaware-annual-review-2016-17.pdf>

¹² https://www.begambleaware.org/media/1978/summary_gamblingandsuicide.pdf

There is an NHS Recovery House located at 449-451 Green Lanes which is not included in Merkur Slot's own Local Area Risk Assessment. This service offers accommodation and support to adults in a crisis or struggling with mental health. It is unacceptable for another business offering gambling activities and potentially attracting criminal behaviour, to be in such proximity to people with vulnerabilities or poor mental health.

2.5 Clustering of existing betting shops on Green Lanes

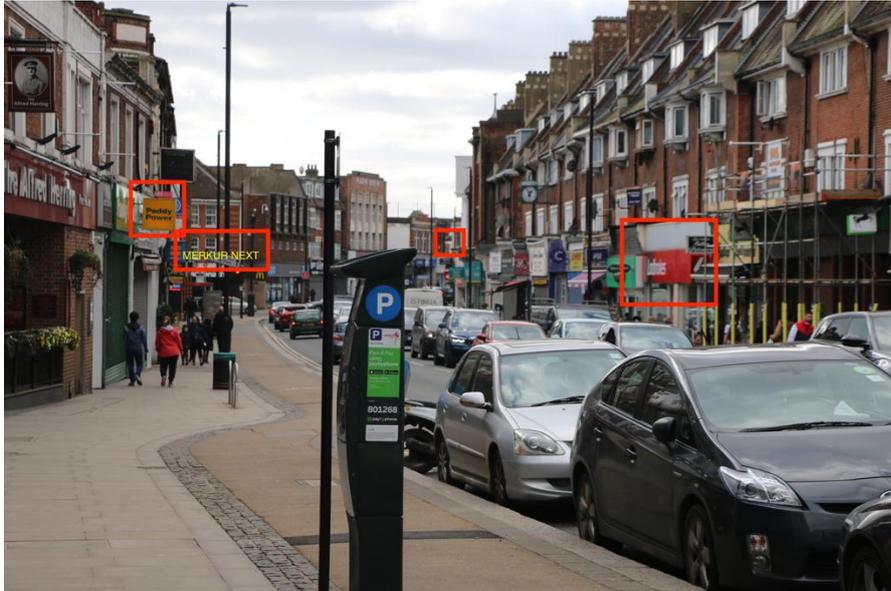


Image 11 – Betting shops nearby on Green Lanes

Betting shops in the area:

- Ladbrookes at 363 Green Lanes N13
- Ladbrookes at 402 Green lanes N13
- Paddy Power at 314 Green lanes
- Betfred at 319 Green Lanes

There are already a number of betting shops in the area and the addition of a business which promotes gambling will have a negative impact on children and vulnerable persons who spend time in the area or who are directly affected by problem gambling.

The opening times of all premises listed above are 7am to 10pm daily because the default position is that gambling facilities may not be offered in betting premises between the hours of 10pm on one day and 7am on the next day, on any day.

There is also a pawnbroker, Cashpoint Pawnbroker, nearby at 12 Aldermans Hill which adds to the number of businesses which are harmful for vulnerable people.

Supporting information and letters

1. Enfield Council response to Department for Culture, Media and Sport consultation on the Gambling Act 2005
2. Local Government Association response to Department for Culture, Media and Sport consultation on the Gambling Act 2005
3. Palmers Green Ward Councillors letter of support
4. Copy of the letter from Councillor Caliskan sent to local residents about Merkur Slots
5. Addendum from local residents about the initial licence consultation
6. Copies of emails from residents against Merkur Slots opening, sent to Councillor Caliskan

Please reply to: Cllr Nesil Caliskan
Leader of the Council
Email: cldr.nesil.caliskan@enfield.gov.uk

Phone: 020 8379 4116

Date: Wednesday 31 March 2021

Nigel Huddleston
Minister for Sport, Tourism and Heritage

Sent via email to:
gamblingactreview@dcms.gov.uk

Dear Mr Huddleston

Re: DCMS Gambling Act Review – Call for Evidence

Thankyou for inviting a review of the Gambling Act which is much needed. We are responding to this consultation on behalf of the Council and residents of Enfield.

We can confirm that this response may be published in connection with this review.

Overall comments

Our overarching concern is that we have minimal ability through the Gambling Act or planning legislation to limit gambling premises and to support our residents in their concerns about clustering, proliferation and impact of gambling premises. This is of particular concern as the borough experiences some of the highest levels of deprivation and poverty. Despite the covid pandemic, over the last year we have seen more applications for gambling premises than we have received for some time. This is of grave concern to us particularly as the borough seeks to support the vitality of our high streets and their recovery from the pandemic.

We support the aim to make gambling safer for both the players and the general public, especially of the most vulnerable, and to strengthen powers available to the local authority in decision making.

Stifled ability in decision making

The London Borough of Enfield has a large, diverse and growing population. Too many of our residents face significant economic and social challenges in their lives. They experience some of the highest levels of unemployment, lowest levels of income, deprivation and child poverty.

Enfield is within the top 25% of the most deprived local authorities in England, with many wards being in the top 10-20% most deprived wards nationally. Deprivation in the borough is worsening with Enfield now the 9th most deprived London Borough (2020), rising from

14th in 2010 and 12th in 2015. Most of the wards in Enfield have a child poverty score worse than the London and England average.

As our [Local Area Profile](#) in our Gambling Policy shows, many of the premises licensed for gambling are concentrated in the areas of our borough with the worst deprivation, poorest mental health, highest unemployment rates and highest number of working age benefit claimants. These are potentially our poorest and most vulnerable residents.

Whilst as a Council we continue to endeavour to 'place make', regenerate our borough and improve the quality of our residents' lives, we are practically powerless to restrict gambling premises under the Gambling Act (or planning legislation). The Gambling Act requires Councils to 'aim to permit' gambling such that it is extremely difficult to refuse a licence despite objections and high levels of community concern. Unlike alcohol control, where the harms are readily apparent in drunken behaviour and nuisance, problem gambling is less visible and have devastating impacts on the person, their relationships, their family, their health and cause significant debt. There is no 'aim to permit' requirement in the Licensing Act regime.

There is also no ability under the Gambling Act to control the concentration of gambling premises (ie 'clustering' of betting shops) like there is with a 'cumulative impact' policy for alcohol licensed premises under the Licensing Act in which we can take into account the impact of nearby pubs etc on the local neighbourhood (such as nuisance, crime and antisocial behaviour).

Looking holistically at town planning, the new [London Plan 2021](#) highlights concerns around betting shops and suggests that the concentration and proliferation of these uses should be carefully managed through development plans and decisions to supporting the vitality and viability of the borough's centres. The ability to adopt a restrictive approach to harmful uses can help to achieve these objectives.

Worrying recent trend

Enfield currently licences 71 betting shops, 5 bingo premises and 3 adult gaming centres. Since March 2020 (i.e. the first covid lockdown), one betting shop licence has been surrendered, yet three new bingo premises licences and two new adult gaming centres have applied for licences. Prior to covid, there were relatively few new applications. It is of great concern to us that gambling premises intensifies further at a time when the Council is seeking to support the recovery of our high streets which have been hit hard by the pandemic.

In addition, we have noticed a worrying new trend developing with bingo premises licences, in that the bingo relates to online machine play rather than the 'traditional' bingo halls but still having a premises (presence) on the high street. The default position in the Gambling Act for online machine play for bingo is to permit this activity 24 hours per day. This means that whilst bingo on the premises is required to cease at midnight, in reality

the premises can continue to be open to allow bingo machine play online 24/7. There are no restrictions in the Gambling Act on the opening hours of these premises. Our communities find it incomprehensible that a Council have to 'allow' 24 hour online bingo machines.

GamCare is the leading provider of information, advice and support for anyone affected by gambling harms. [GamCare's annual review in 2019/20](#) reported that 69% of problem gamblers use online gambling and 38% use bookmakers. Gamcare also reported receiving more calls to their helpline and treating more clients with gambling problems than the previous year. The greatest number of calls from problem gamblers to their national helpline came from London. GamCare also reported that within bookmakers, gaming machines were the most common form of gambling (53%).

We recognise that problem gambling can affect all genders, all age groups and ethnicities. Enfield has a very diverse population of 22 different ethnic groups. It is noteworthy that the GamCare report (2019/20) identified that compared to White gamblers, those who identified as Black or Black British were more likely to use betting shops (54% compared to 37%), and those that identified as Asian or Asian British were also more likely to use betting shops (49%) than White clients.

All these Gamcare findings are directly relevant to Enfield's population:

- Greater use of online gambling,
- Higher numbers of problem gamblers seeking help from London,
- The greater use of betting shops by persons identifying as Black/Black British or Asian/Asian British

Response to some of the specific questions in the Review:

The Gambling Commission's powers and resources

Q19: Is there evidence on whether the Gambling Commission has sufficient investigation, enforcement and sanctioning powers to effect change in operator behaviour and raise standards?

A19: During the last 2 years, when enforcement officers share intelligence with the Gambling Commission, the response has been that there are insufficient resources to pursue matters. Up until 2019, this authority conducted regular successful joint operations with the Gambling Commission. Without this support and expertise, the licensing authority have not been able to maintain the same level of operations.

Q21: What evidence is there on the potential benefits of changing the fee system to give the Gambling Commission more flexibility to adjust its fees, or potentially create financial incentives to compliance for operators?

A21: This question relates to Gambling Commission fees, but it is important to comment here that the fees set by Licensing Authorities for Gambling Act applications are also capped and have not changed since 2005. The Gambling Act fees should also be reviewed to allow licensing authorities the ability to set fees to reflect local costs, or at the very least be increased nationally.

Land based gambling

Q43: Is there evidence on whether licensing and local authorities have enough powers to fulfil their responsibilities in respect of premises licenses?

A43: No - licensing and local authorities do not have sufficient powers to control gambling in their boroughs. Please see all the comments earlier in this response.

63% of Enfield's betting shops are located in the most deprived wards in the borough where the highest number of incidences of crime associated with betting shops occur. 20% of the betting shops within the borough are located in the three of wards (Edmonton Green, Upper and Lower Edmonton), that are amongst the 10% of most deprived wards nationally.

Neither the licensing nor the planning framework provides Councils with effective powers to limit the number of gambling premises in their areas, and many gambling premises, particularly betting shops were established long before the Gambling Act 2005.

The Gambling regime in particular legally requires Councils to 'aim to permit' gambling premises, and so is a fundamental obstacle in refusing applications where gambling is not welcomed, and/or does not meet wider regeneration plans for local areas.

There is also no ability under the Gambling Act to control the concentration of gambling premises (i.e. 'clustering' of betting shops) as there is with a 'cumulative impact' policy for alcohol licensed premises under the Licensing Act in which you can take into account the impact of nearby pubs etc on the local neighbourhood (such as nuisance, crime and antisocial behaviour).

Introducing powers to limit the number of gambling premises within a defined area would be a very welcomed tool to address local concerns more effectively.

All the new applications we have received during the Covid-19 pandemic (mentioned above) have been granted, four by delegated authorisation due to no outstanding representations, and one application was determined at a hearing by the Licensing Sub-Committee due to objections from a local resident group.

Following the grant of these new applications, residents have since become aware of the applications and reported their concerns and object to the application process and the

licence being granted. Residents comment that they have been complying with Government guidelines to “stay at home”, therefore the opportunity for residents to observe the application site notice displayed on a premises was severely reduced, and the newspaper article advertising requirement cannot guarantee it reaches the potentially affected audience.

The licensing authority can confirm that the advertising requirements were met for these applications but can also understand the public perception that the process is unfair as a result of no amendment to the legislation covering advertising during lockdowns and the pandemic. A Government direction regarding advertising of licence applications to reflect the lockdown and pandemic circumstances would have been welcomed to ensure fairness and openness was achieved.

Conclusion

The current gambling and planning legislation provide Councils with insufficient powers to respond to the concerns raised by local residents, which appear to be greater in voice and numbers than those who appear to benefit from the gambling premises.

Councils need greater powers to control clustering and proliferation of gambling premises (such as a cumulative impact policy in the Licensing Act 2003). The fees also need to be increased or set locally. We also call on the Government to remove the ‘aim to permit’ requirement in the Gambling Act which stifles local decision making.

Yours sincerely



Cllr Nesil Caliskan
Leader of the Council



Cllr George Savva
Cabinet Member for Licensing & Regulatory Services

Review of the Gambling Act 2005 Terms of Reference and Call for Evidence - LGA response

March 2021

About the Local Government Association (LGA)

- The Local Government Association (LGA) is the national voice of local government. We work with councils to support, promote and improve local government.
- We are a politically-led, cross party organisation which works on behalf of councils to ensure local government has a strong, credible voice with national government. We aim to influence and set the political agenda on the issues that matter to councils so they are able to deliver local solutions to national problems.

Key messages

- The LGA welcomes the review of the Gambling Act 2005 (the Act) given the significant changes to the gambling landscape since the Act was first introduced, most notably with the shift to online or remote gambling from more traditional land-based operations such as high street betting shops.
- Since the Act came into force there have also been changing trends in the physical presence of gambling in local areas. Betting shop clustering has been a significant concern for councils and the public. Our view is that councils should have greater powers under the Act to determine whether it is appropriate for new gambling premises of any type to open in their areas.
- Although online gambling is outside the scope of councils' regulatory role in gambling, it is an issue that councillors and the LGA are concerned about. The LGA would support the introduction of measures to reduce the volume of gambling advertising, particularly where it is seen by children, for example the advertising of sports betting during live sport, as well as greater controls around sponsorship. Past experience has shown that it is possible for sports which are heavily reliant on tobacco sponsorship to continue to thrive without this income, and we believe the same outcome is possible for sporting activity currently closely linked to the gambling industry.
- Harmful gambling is another issue that many local authorities have concerns about. Whilst councils do not have a direct role in treatment, this is a local public health issue and there are several ways in which councils can try to support those individuals and families who are experiencing harm from gambling. The LGA has been supporting councils to develop a better understanding of gambling related harm and the role councils can play to identify and support residents who are affected by it.
- The LGA has called for the Government to introduce a mandatory levy on the gambling industry to fund research, education and treatment. This view is supported by other organisations, including GambleAware, the charity responsible for minimising gambling-related harm.

Submission

18 Smith Square London SW1P 3HZ
 020 7664 3000 info@local.gov.uk www.local.gov.uk
 Local Government Association company number 11177145
 Improvement and Development Agency for Local Government company number 03675577

Detailed Response

Online protections - players and products

Since the Act was introduced technological developments mean that significant numbers of people now gamble remotely, so it is right that a key focus of the review is on the protection of online gamblers.

Although online gambling is outside the scope of councils' regulatory role in gambling, it is an issue that a number of LGA members have expressed concern about.

We share concerns that the current system of online protections is not sufficiently effective at preventing gambling harm. There is evidence of gamblers being able to spend very large sums of money which they cannot afford in short spaces of time without effective operator intervention, leading to devastating effects for individuals and their families.

It is apparent that these large losses generate a large proportion of profits for online gambling businesses. Recent research [conducted by the National Centre for Social Research \(NatCen\) commissioned by GambleAware](#) revealed that the five per cent of online accounts with the highest losses generated a minimum of 70 per cent of Gross Gambling Yield (GGY) in each of betting, virtual casinos, live casinos, and slots.

It is incumbent on the gambling industry to ensure that the wide availability of online gambling is offered in a fair and responsible way. Account based play offers remote operators a firm basis for identifying harmful patterns of play and losses, and therefore to step in and help address it. Recent fines levied by the Gambling Commission indicate that the remote industry is failing to fulfil its obligations in this regard. For example, [an assessment of an online gambling operator](#) as part of the Gambling Commission's ongoing compliance work earlier this year revealed failures in social responsibility procedures meant one customer was able to lose £50,000 in just six hours and another lost £85,000 in just over one hour.

Unlike in land based premises, there are currently no stake limits online and so the review should consider whether stake limits should apply consistently across games played on all gambling platforms, including remote gambling, rather than simply to non-remote gambling premises.

There is also the need for gambling regulation to be flexible enough to respond to emerging technology and new forms of online gambling. There is growing concern that children and young people are being exposed to gambling in new ways, for example through in-game purchases and lootboxes which currently fall outside regulation. We are aware that government has consulted on the experience of video game players and the functioning and potential harm of loot boxes and in-game purchases following a recommendation by the DCMS Select Committee that these products should be regulated. However, there needs to be a mechanism for regulation to quickly respond to new types of gambling in order to protect children from harm. With this first review of the Gambling Act taking place some fifteen years after the Act was first passed, it is not clear that we have mechanisms in place to respond as quickly as needed.

We support the new regulatory requirement for all online gambling operators to participate in the multi-operator self-exclusion scheme and Government should commit to reviewing progress in this area once GambleAware's evaluation of the impact of this has concluded.

We also support the use of the Gambling Commission's Licensing Conditions and Codes of Practice to establish mandatory standards in this area, and encourage the Commission to keep a close eye on the use of promotional offers which can draw people into online gambling.

Advertising, sponsorship and branding

As with online gambling, while gambling advertising is outside councils' regulatory role, the volume of gambling advertising is nevertheless an issue that a number of councils feel strongly about.

The LGA has previously called on Government to take steps to restrict the volume of gambling advertising, particularly where it can be seen by children – for example, during televised or live sport as well for greater control on sponsorship.

While we recognise that there has been a reduction in the number of gambling advert impacts since 2013, the number of gambling advert impacts on children in 2016 remained almost twice as high as in 2007 (when the Gambling Act came into force), and for adults, more than three times as high.

There has also been a shift in focus to advertising online and via social media. Analysis commissioned by GambleAware estimated that in 2017, the gambling industry spent £1.5bn on advertising and marketing, around 80 per cent of which was through online channels.

In terms of the impact of advertising on vulnerable groups, GambleAware recently commissioned research to look at the impact of gambling advertising and marketing on children, young people and vulnerable adults. The findings of the research were published in March 2020 and showed that gambling is now seen as part of everyday life for these groups. The research also revealed a link between exposure to gambling advertising and attitudes towards the prevalence and acceptability of gambling which increase the likelihood that a child, young person or vulnerable adult will gamble in the future. The research also found that children are regularly exposed to gambling advertising on social media platforms.

We welcome the measures around advertising on social media which require operators to comply with the Advertising Codes, administered by the Advertising Standards Authority (ASA) however further evidence about the impact of online advertising on children, young people and those vulnerable to problem gambling should be commissioned and the review should explore how exposure to online advertising, including on social media can be tackled. Our view is that more should be done beyond the promotion of responsible gambling messages.

Sponsorship is also a significant channel for gambling brand marketing. Betting companies sponsor sports teams and events, including shirt sponsorship and have forged deals with sports bodies and individual clubs. In 2020 half of Premier League clubs and 17 of 24 Championship clubs were sponsored by bookmakers. These commercial arrangements are a significant source of income for British sports and teams, particularly horse racing and football teams.

Whilst we welcome the 'whistle-to-whistle' ban on gambling advertising from five minutes before to five minutes after a match, this is of limited use when viewers, including children, are exposed to gambling advertising on shirts and on perimeter hoardings. The LGA would support consideration of a ban on gambling sponsorship

of sports club shirts and sporting events, similar to the previous introduction of a ban on tobacco sponsorship.

We also urge Government, in relation to both online gambling and online advertising, to look at ways of ensuring that technology and content providers build safeguards into their products to prevent children and young people viewing gambling advertising and accessing gambling sites and apps.

The Gambling Commission's powers and resources

Councils work in partnership with Gambling Commission to regulate gambling and have close relationships including through the Commission's regional compliance officers, a role which has recently been removed as part of the ongoing restructure.

Compliance officers gave advice and support to councils with the development of local statements of gambling policy, inspections of gambling premises as well as with training. This support was valued by council officers and the Commission must have the resources to continue to support councils in this way.

Consumer Redress

Government should engage with Trading Standards to discuss any potential changes to consumer redress arrangements.

Age limits and verification

We have limited evidence about the effectiveness of age controls, protections for young adults, and the age limit for society lotteries. However, the LGA was concerned by widespread evidence of failure to prevent under-18s from playing on category C gaming machines in pubs following a piece of work by the Gambling Commission. This is a marked contrast to the test-purchase pass rate for alcohol and the sector needs to ensure responsibilities for age verification for gaming machines are taken as seriously as for alcohol sales.

Robust measures to prevent illegal underage gambling online are vital. We welcome new requirements introduced by the Gambling Commission for online gambling operators to verify the age and identity of their customers before players can deposit money and access any free to play games which took effect from May 2019. However, the review should look at evidence for how effective these new controls are in preventing young people from accessing age restricted content.

Land based gambling

Betting shop clustering has been a significant concern for councils and the public and the LGA has called for additional powers to restrict the opening of new betting shops in areas where there are already clusters.

The statutory aim to permit within the Act has allowed for the clustering of betting shops which has had an adverse impact on the communities and areas in which they are clustered. [Evidence shows](#) that clusters are typically located in more deprived areas, where the harm from problem gambling may be exacerbated: *'areas close to betting shops tend towards higher levels of crime events, resident deprivation, unemployment, and ethnic diversity...[and] players overall tend to live in neighbourhoods with higher levels of resident unemployment, multiple deprivation and economic inactivity.'*

Currently licensing authorities have a contradictory mix of powers under the Gambling Act, with the ability to prevent the opening of local casinos, but because of the statutory aim to permit no real power to prevent the opening of other premises even if they feel that they are already saturated with them.

The LGA's view is that councils do not have the full powers that they need to effectively manage local gambling premises. There should be more local flexibility within the Act for democratically elected councillors to make decisions about the number of local gambling premises if such decisions can be shown to be in the interests of the local economy and community. We would support the ability for councils to control the numbers of premises in a given area, for example in the same way as cumulative impact areas work for the Licensing Act 2003. This would prevent the proliferation of any single type of gambling premises in an area - such as betting shops, Adult Gaming Centres (AGCs) or bingo halls.

Whether through a cumulative impact assessment or other tool, the review should consider a new legal power that in specific circumstances can act as a break on the statutory aim to permit to tackle existing clusters of premises. Local statements of principles are a helpful tool to manage local gambling premises, but do not provide this.

The profitability of Fixed Odds Betting Terminals (FOBTs) and restriction to four machines per shop has helped to drive betting shop clustering in some areas. Whilst stake reductions have helped reduce the issue of clustering there is some evidence that councils have seen an increase in the number of new applications for Adult Gaming Centres (AGCs) and bingo premises which are seeking to take over betting shops.

Rules that link the permitted number of B3 and B4 gaming machines sited on an AGC or bingo premises to 20 per cent of the total number of gaming machines made available for use has meant that in practise these premises can have a much larger number of higher stakes machines than a betting shop could. For example, a recent application for a bingo premises licence in a deprived area of Leeds was made for a bingo hall alongside 38 gaming machines, as well as electronic bingo. Whilst the traditional bingo hall operation would be welcomed as a supervised social outlet the council was concerned about the number of machines on offer but under current legislation were not able to control the number of machines offered or the type of bingo variant on offer. The review should look at whether a proportionate approach to machines in these types of venues is appropriate and whether these should be replaced by specific limits, or limits which councils can determine locally.

We do not agree that the threshold at which local authorities need to individually authorise the number of category D and C gaming machines in alcohol licensed premises should be increased. Children are not permitted to play Category C gaming machines in pubs and staff are expected to stop children playing on the machines however tests on a sample of pubs in England in 2018 indicated that almost 90 per cent failed to prevent children accessing 18+ gaming machines.

Problem gambling

Whilst councils do not have a direct role in the provision of treatment for gambling related harm, it is increasingly seen as an issue that requires a public health approach and is something that many of our Members have concerns about. Problem gambling can impact on individuals and their families' physical, mental and emotional health and wellbeing as well as having a wider impact on society through crime and disorder.

The Health Survey statistics indicate that in 2016, 0.7 per cent of people in England (approximately 300,000 people) identified as problem gamblers, with 3.6 per cent (approximately 1,610,000 people; 6.6 per cent of gamblers) at low or moderate risk based on their gambling. Due to limitations in how this data is collated, it is likely these estimates are conservative, and may not capture some vulnerable population groups such as homeless people and students.

Previous research by Leeds Beckett University for Leeds City Council has concluded that gambling behaviour and problem gambling are not equally distributed across England and that certain areas - such as large urban metropolitan areas - experience higher rates of problem gambling.

The Gambling with Lives charity has also highlighted the link between gambling and suicide, although there is currently a lack of clear evidence to support this.

We are aware that Public Health England (PHE) has been commissioned to undertake a review of evidence on gambling related harm in England including the prevalence, determinants, and harms associated with gambling, and the social and economic burden of gambling-related harms. Evidence from this review should be used to inform government action on gambling related harms. Councils should also have access to data about problem gambling at the local level to inform decision making.

Whilst councils are not responsible for treating gambling addiction, there are several ways in which councils can try to support those individuals and families who are experiencing harm from gambling without taking on responsibility for treatment. This is in addition to their statutory licensing responsibility to try to prevent local gambling premises causing harm through gambling.

The LGA has developed guidance for councils on developing a 'whole council' approach to tackling gambling related harm which sets out where councils might be coming into contact with people impacted by problem gambling through a range of services, including housing and homelessness, financial inclusion, children's services and addiction services. The guidance also explores how councils can work with local partners and build links with support organisations to help develop specific local referral routes and ensure these can be accessed from across the full range of local services.

Councils should ensure that frontline staff are given training, so they recognise potential cases and direct residents to the national treatment network via the National Gambling Helpline. As frontline awareness and identification of harmful gambling develops, councils can develop a better understanding of the extent of the problem, its impacts, and associated costs.

Public health teams can play a role in ensuring that this data, and related data about at-risk groups, is collected and shared. They can also work with local partners and through health and wellbeing boards and clinical commissioning groups to develop a coherent approach to harmful gambling, including focused preventative work.

The LGA supports the introduction of a mandatory levy on gambling firms, to help fund a significant expansion of treatment and support for those experiencing gambling related harm throughout the country. This would help to ensure continuity and security in the funding for these services which would in turn enable planning for the provision of treatment and services. This should be based on the 'polluter pays' principle, so those companies and sectors of the market causing the greatest harm

should pay the most. While the commitment from a small number of large operators to increase contributions to one per cent is welcome this should be put on a statutory footing. This view is supported by other organisations, including GambleAware, the charity responsible for minimising gambling-related harm.

Contact

Rebecca Johnson

Adviser (Regulation)

Mobile: 07887 568807

Email: rebecca.johnson@local.gov.uk

14th April 2021

Dear Enfield Licencing Authorities

Re: Application for a review of the premises Licence granted to Merkur Slots

- └ We write in support of Cllr Nesil Caliskan's application for a review of the gambling premises Licence granted to Merkur Slots at 292-292A Green Lanes, Palmers Green, N13 5TW.

This gambling venue is inappropriate to Palmers Green at a time when we want to rebuild our local high street and economy. We want Palmers Green to be safe and healthy - not a place where people are encouraged to get into debt.

We are concerned that increased gambling in Palmers Green with the opening of Merkur Slots will be a possible source of crime. Our Safer Neighbourhood team already have a tough enough job.

Palmers Green is a busy transport hub with children and young adults travelling to and from Green Lanes on their way to local schools or back home. We believe that children and vulnerable adults need protection from being influenced, harmed, or exploited by gambling.

We welcome and support the local campaign which has highlighted just how unwelcome and inappropriate Merkur Slots is to Palmers Green. A view shared with us by many of our ward residents though their letters, emails and social media.

We look forward to an early review of this wholly inappropriate licence.

Yours sincerely



Cllr Mary Maguire



Cllr Tim Leaver



Cllr Ahmet Oyken

24 February 2021



Letter from Leader of Enfield Council on proposed gaming centre on Palmers Green High Street

Cllr Nesil Caliskan, Leader of Enfield Council
cldr.nesil.caliskan@enfield.gov.uk

Dear Palmers Green and Winchmore Hill residents,

I am writing to you regarding the proposed **Merkur Slots gaming centre** on Palmers Green High Street. Many local residents have written to me and their ward councillors to express their concerns about the impact of this gambling venue.

I share their concerns and I am completely opposed to any new betting shops or gambling venues opening in Enfield.

Betting shops and gambling venues are a blight on our town centres. They encourage behaviour that has a negative impact on individuals, families and our communities. I want our local high streets to be safe and healthy, not places where people are encouraged to get into debt.

We want to rebuild our local economy after the devastating impact of COVID-19 and to help businesses and residents to thrive. I don't believe that allowing such gambling venues is the right way to re-open our high streets and town centres, nor are they a healthy option when so many families are under significant financial strain.

On 30 November 2020, Enfield Council received an application from a company for a premises licence for gambling at 292/292A Green Lanes. **This company already has an operating licence from the Gambling Commission. The Gambling Commission is the national body responsible for granting licences for gambling companies to operate premises.**

Once a company has an operating licence, it can obtain a premises licence provided they meet the mandatory legal conditions. This licence is governed by the Gambling Act 2005. This requires local authorities to 'aim to permit' gambling premises licences. In practice it is difficult for a local authority to object to such an application because if the application meets the conditions set out in the law, it must be granted. This is deeply frustrating to me and councillors who oppose betting shops and gambling venues.

The consultation period for this licence application ran until 27 December 2020. During this period objections could be made and all responsible authorities were notified as well as ward councillors.

The Metropolitan Police wanted alterations and additional conditions attached to the licence, including CCTV to be installed inside and outside the premises, and for the business to keep an incident logbook to be made available to the police when requested. The applicants subsequently agreed to those conditions.

Enfield Council's Licensing Team was able to initially object to the application on the basis that they were not satisfied with the risk assessment completed by the business. The risk assessment was subsequently resubmitted by the applicant.

While the Licensing Team initially raised objections, the law prevented them from being able to refuse the application. However, utilising the limited powers we do have, Enfield Council

attached additional conditions, including regular training for staff and making sure they follow the Challenge 25 policy to prevent under-age gambling.

Enfield Council can only refuse a gambling premises licence if the applicant does not meet the following objectives:

- a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- b) ensuring that gambling is conducted in a fair and open way, and
- c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

Due to national law, councils do not have effective powers to limit the number of gambling premises in the area. Enfield Council's Licensing and Planning Team has tried to exercise as much control as legally possible in regard to granting licenses to betting shops, within the constraints of the legislation.

In the last few days, I have discussed with officers what steps would be required to initiate a review of the licence. Additional substantive evidence would be required to demonstrate the objectives listed above are not met.

I can confirm that I am working with your ward councillors to collate such evidence. I am supportive of any options for reviewing this licence and oppose the proposed gaming centre.

I would like the licence to be reconsidered and for council officers to refer the application to the Licensing Committee. I would like members of the committee to fully consider the harm associated with betting shops and gambling venues when assessing the licence. As Leader of the Council I have no involvement in the regulatory decisions taken by the quasi-judicial Licensing sub-committee (or function). However, I will provide an update on this in due course.

Enfield Council, as with many local authorities, is extremely frustrated with its inability to prevent the development of clusters of gambling premises and betting shops in their areas. It is not just Palmers Green which is facing this problem. Other areas in Enfield are also facing the same challenge of too many betting shops on their local high street. **This is unacceptable. We will do all we can to oppose them in all parts of Enfield, but we believe that there should be a change in the law to enable us to more effectively control the gambling that is doing such harm to our communities. I would encourage you to join us in writing to the Secretary of State for Justice the Rt Hon Robert Buckland MP at robert.buckland.mp@parliament.uk to ask the Government to change the law.**

If there is any other matter you would like to raise with me, please feel free to contact me anytime.

Yours faithfully



**Cllr Nesil Caliskan
Leader of Enfield Council**

14 April 2021

Addendum from local resident campaign against Merkur Slots

Background

In February 2021, a group of north London residents formed the campaign group Stop Palmers Green Merkur Slots, in response to Enfield Council's decision to grant a gambling licence for a 24 hour Adult Bingo and Gaming Centre, to Merkur Slots, to operate in Palmers Green on Green Lanes. Merkur Slots are a subsidiary of the German gambling and gaming company Gauselmann Group.

With thousands of empty shop units on the British high street - a problem that has been exacerbated by the pandemic - Merkur Slots have seized the opportunity to buy up dozens of former William Hill sites to convert quickly without having to apply for a change of use, to convert them into 24 Hour Adult Gaming Centres. Many communities around the UK have opposed these applications, fearful of the impact these gaming centres could have on children and vulnerable people and the risk of encouraging antisocial behaviour. Concerns have already been raised in Blackburn, Newbury, Huntingdon and Southport.

Planning permission and the licence application was opened on 27th November 2020 with a deadline for objections of 27th December 2020. The licence was approved on 4th January and planning permission granted on 29th January 2021.

Lack of Consultation

This 24 hour licence was granted by the council during a period of exceptional circumstances when London was being subjected to considerable restrictions with the expectation and instructions that people stay at home. The residents of Palmers Green, for these reasons, had no knowledge of the applications for planning and licence and only one objection was raised during the consultation window. This denied local people and businesses the opportunity to have their views represented and the licence was agreed without taking this evidence into an account and without going to committee for discussion, so constituting a serious failure of local accountability and democracy.

Furthermore, local ward counsellors did not alert their constituents to the application – even though many have gone on the record to say they are entirely against the development.

When residents became aware of the development, a petition was started on change.org and has now gathered 4305 signatures; more than a quarter of all Palmers Green residents have now signed.

<http://www.change.org/stopPGmerkurslots>.

Residents clearly do not want Merkur slots because it brings no benefit to the High St or to the local economy. They are a big company from Germany that essentially work for their shareholders.

A high concentration of betting shops has a detrimental effect on surrounding businesses and drives down the value of the high street as other potential shop tenants don't want to be located near them. So, by definition they can never be part

14 April 2021

of a regeneration of the area.

This business risks the survival of the existing hospitality businesses.

Another, unwelcome gambling venue spells the death of the High Street. This in no way benefits any locals and does nothing but attract undesirable people to the area.

It is unsuitable for a residential area and undermines the community. Residents have also questioned why it has to open so late and it is not necessary for them to be granted a 24-hour licence in a family-oriented area. There is no established 24hr night-time economy in Palmers Green.

Alongside the thousands of signatures, hundreds of members of the community wrote to their respective local councillors, the Leader of Enfield Council Nesil Caliskan and local MP Bambos Charalambous (Labour).

This is overwhelming evidence of the strength of local feeling about this issue. The licence was granted without local concerns and objections being taken into account and should be reviewed to enable this deficit to be rectified.

These concerns are shared by our MP. On 23rd February, Bambos Charalambous replied to his constituents by email stating:

‘...I share these concerns and agree that a 24 hour Adult Gaming Centre arcade would

be a very unwelcome addition to the night time economy of Palmers Green and would

have a negative impact on efforts to improve and regenerate the high street in Palmers Green.’

Bambos Charalambous has written to Enfield Council to raise serious questions about

the licencing process and followed up with a letter to Culture Secretary, Oliver Dowden MP,

Secretary of State for Digital, Culture, Media and Sport:

I have raised concerns ...about the adequacy of the usual notification requirements during a period of Covid 19 restrictions. I have expressed my concern that the exceptional circumstances should not facilitate an application which is clearly unwelcomed by many and in relation to which many local residents do wish to make representations. The normal notification methods, even if they were compliant with the regulations do not appear to be adequate as a means of notifying the public when access to the high street is limited and the circulation of a small local newspaper even more restricted.

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This issue has also received extensive local Press Coverage:

<https://enfielddispatch.co.uk/thousands-oppose-new-palmers-green-gambling-venue/>

<https://www.enfieldindependent.co.uk/news/19144903.campaign-fifth-gambling-venue-enfield-suburb/r>

<https://www.pgweb.uk/tags/betting-shops>

From the local resident led campaign

From:
To: [Cllr Nesil Caliskan](#)
Subject: Cashino Gaming Ltd, Palmers Green High St.
Date: 20 February 2021 10:51:41

Dear Cllr Caliskan,

I have just become aware that Cashino Gaming Ltd. were granted a licence on 29/1/2021, by Enfield Council to convert the ground floor of an existing betting shop to a 24-hour 'adult gaming centre' in the middle of Palmers Green High Street.

Here is the report link:

https://planningandbuildingcontrol.enfield.gov.uk/online-applications/files/1FB39E6FAC5777599641596BF7809AE4/pdf/20_03849_FUL-Report-2407234.pdf

This unit which was formerly Store 21, as I am sure you are aware has been an eyesore for years and left dilapidated by the current landlord who seems to take no interest in what is best for the community and the high street. I am now writing on behalf of myself and my family and a number of very upset neighbours and local friends, to ask for your immediate assistance in appealing this decision in the light of the improper method of notice of the application during a period of exceptional circumstances.

The majority of local people are still unaware that Palmers Green shopping centre will be subjected to a 24-hour slot machine arcade with bright neon signs on the outside, under the guise of an application for 'Bingo', which is highly misleading and inappropriate for the community we have here of young families.

The full planning application for this gambling centre was submitted by Cashino Gaming Ltd, trading as Merkur Slots on 27 November 2020, a few weeks before Christmas, with a cut-off date of 27/12/20 for objections and representations concerning this application. We understand there was only one objection, as the majority of local residents were completely unaware of the application.

Enfield guidance for notice of application for new premises states that information must be displayed on the outside of the property in question on pale blue paper in a font equal or larger than 16. It should be convenient to read from the exterior of the premises 24 hours a day. We would argue that few people would have seen the white laminated A4 notice on the property which was in an extremely small font and on white paper.

This consultation period, as well as coinciding with Christmas, occurred during exceptional circumstances when COVID 19 was at a peak and people were preoccupied with the pandemic, their safety and in fact were being instructed to 'stay at home' by the Government as supported by Enfield council.

There are already four betting shops on our small high street; (two Ladbrokes, Paddy Power, and Betfred). This is more than enough! With unemployment and youth disengagement at the highest level it has been for years, it is irresponsible for Enfield Council to give its approval to a 24-hour gambling centre. This is likely to profit at the expense of those in society who least can afford it, whilst increasing the likelihood of antisocial behaviour and problem gambling. Moreover, with primary schools only a few minutes walk away from the site, this decision by the planning department is deeply disappointing.

As part of the 'New Local Plan,' Enfield was tasked with supporting the community in regenerating our shopping area with innovative and creative ideas, not allow our once thriving High Street to deteriorate into a string of betting shops and amusement arcades. This kind of establishment signals the decline of an area, not regeneration. It will be detrimental to the plans to re-imagine Palmers Green and make it an attractive place to shop and spend leisure time.

We would appreciate your immediate assistance and advice in how best to challenge the license decision for this unwanted development. As far as we can see there has not been due process; the development has not been advertised in line with LBE's own policy or allowed for the extenuating circumstances we have all been living under. We plead with you to find a way to begin the consultation process again so that residents are given a fair chance to respond.

Regards,

From:

Sent: 19 February 2021 19:05

To: Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>

Subject: Objection to Merkur Slots in Palmers Green

Dear Nesil,

As a longstanding resident of Palmers Green, I am shocked, saddened and dismayed to hear the news that Enfield Council has granted a license to open a Merkur Slots gaming centre in the heart of the Palmers Green High Street. This kind of establishment does not belong in a family focused sub-urban area.

Without doubt a slot machine arcade with a 24 hour license will be detrimental to the area and will undo a lot of the positive work that local community groups have been doing to regenerate the high street and make it an appealing place for families to shop and access local amenities.

Furthermore, I think this is a highly irresponsible decision Enfield Council have made. Any benefit such an establishment may bring to the local community would be far outweighed by disadvantages. It will encourage gambling and addiction and given that unemployment levels are on the rise and expect to increase further, I cannot see how such a decision was reached. What kind of example will we be setting the younger generations? This is actually morally wrong.

The planning and licensing application was made in December 2020 during a festive period that fell in the middle of a global pandemic. Residents were rightfully following government advice to stay at home and this drastically reduced opportunities for the community to be properly informed as the notices would not have had the amount of exposure expected in normal circumstances.

Consequently, very few people would have been aware of the application for a 24 hour gambling license and plans for illuminated signage in the short time allowed. Something of this nature, which will have a huge detrimental effect to the residents, culture and ethos of Palmers Green, should have been clearly communicated to residents and residents should have been properly consulted. Residents were not properly consulted or given a chance to raise objections due to the extreme circumstances of the pandemic.

We are proud of our local area and strongly object to yet another gambling establish that is not wanted or needed.

If Enfield Council do proceed with going ahead with this application despite the backlash it is now facing from local residents, they are no more than signalling that they have in fact given up on any regeneration of Palmers Green, and will instead be nailing its degeneration and neglect. I call on Enfield Council to revoke this license and associated planning application with immediate effect.

From:

Sent: 20 February 2021 16:13

To: Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>

Subject: Proposed casino in Palmers Green

Dear Councillor Caliskan,

I have just become aware that Cashino Gaming Ltd. were granted a licence on 29/1/2021, by Enfield Council to convert the ground floor of an existing betting shop to a 24-hour 'adult gaming centre' in the middle of Palmers Green High Street.

Here is the report link:

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This unit which was formerly Store 21, as I am sure you are aware has been an eyesore for years and left dilapidated by the current landlord who seems to take no interest in what is best for the community and the high street. I am now writing on behalf of myself and my family and a number of very upset neighbours and local friends, to ask for your immediate assistance in appealing this decision in the light of the improper method of notice of the application during a period of exceptional circumstances.

The majority of local people are still unaware that Palmers Green shopping centre will be subjected to a 24-hour slot machine arcade with bright neon signs on the outside, under the guise of an application for 'Bingo', which is highly misleading and inappropriate for the community we have here of young families.

The full planning application for this gambling centre was submitted by Cashino Gaming Ltd, trading as Merkur Slots on 27 November 2020, a few weeks before Christmas, with a cut-off date of 27/12/20 for objections and representations concerning this application. We understand there was only one objection, as the majority of local residents were completely unaware of the application.

Enfield guidance for notice of application for new premises states that information must be displayed on the outside of the property in question on pale blue paper in a font equal or larger than 16. It should be convenient to read from the exterior of the premises 24 hours a day. We would argue that few people would have seen the white laminated A4 notice on the property which was in an extremely small font and on white paper. This consultation period, as well as coinciding with Christmas, occurred during exceptional circumstances when COVID 19 was at a peak and people were preoccupied with the pandemic, their safety and in fact were being instructed to 'stay at home' by the Government as supported by Enfield council.

There are already four betting shops on our small high street; (two Ladbrokes, Paddy Power, and Betfred). This is more than enough! With unemployment and youth disengagement at the highest level it has been for years, it is irresponsible for Enfield Council to give its approval to a 24-hour gambling centre. This is likely to profit at the expense of those in society who least can afford it, whilst increasing the likelihood of antisocial behaviour and problem gambling. Moreover, with primary schools only a few minutes walk away from the site, this decision by the planning department is deeply disappointing.

As part of the 'New Local Plan,' Enfield was tasked with supporting the community in regenerating our shopping area with innovative and creative ideas, not allow our once thriving High Street to deteriorate into a string of betting shops and amusement arcades. This kind of establishment signals the decline of an area, not regeneration. It will be detrimental to the plans to re-imagine Palmers Green and make it an attractive place to shop and spend leisure time.

I would appreciate your immediate assistance and advice in how best to challenge the licence decision for this

unwanted development. As far as we can see there has not been due process; the development has not been advertised in line with LBE's own policy or allowed for the extenuating circumstances we have all been living under. We plead with you to find a way to begin the consultation process again so that residents are given a fair chance to respond.

Yours faithfully

From:
To: [Cllr Nesil Caliskan](#)
Subject: Merkur Development Green Lanes
Date: 20 February 2021 12:49:21

Dear Cllr Caliskan

I am writing to voice my opposition to the above development in Green Lanes.

I think that this is irresponsible business to be allowing on our high street in times when people are very financially vulnerable. There are so many groups and traders working hard to make our high street a better place for local people to shop and spend their leisure time in. This business will actively deter people coming to the high street which without doubt is in need of regeneration.

I and my neighbours were unaware of the licencing / change of usage application made. In times of Covid this has perhaps fallen under the radar but I strongly urge you to reconsider.

Kind regards

From:
To: clfr.nesil.caliskan@enfield.gov.uk <clfr.nesil.caliskan@enfield.gov.uk>
Subject: Merkur Slots- controversial casino application- 292 Green Lanes
Date: 25 February 2021 15:22:45
Attachments: [premises.license.inq](#)

Dear Sir/ Madam,

I am writing to you in relation to the baffling decision to grant permission for a Casino, owned by *Merkur Slots*, to operate on 292 Green Lanes in Palmer's Green. I am sure that you are aware of the strength of feeling in the local community regarding this issue.

There was very limited opportunity for any serious public consultation on this proposal. At the time there was a nationwide stay at home order in place, preventing people from engaging in the decision making process. Having spoken to a number of my neighbours along Hazelwood Lane, many have said they would have engaged if they had been given the opportunity. The fact that we were unable to leave our homes meant that we couldn't see the licence application notice, and as such were not given an opportunity to voice our concerns. Putting something as controversial as a 24 hour licensed casino into a residential area during a global pandemic is underhand and sneaky at best. At worst this is morally repugnant and a deliberate attempt from *Merkur Slots* to avoid democratic scrutiny.

I am not a legal expert, but my understanding is that a *Notice of application for a premises licence* needs to fulfil three criteria- Be at least A4 in size, pale blue in colour and printed in a font of at least, size 16. I believe that the screen-shot attached (which I took on 22/02/21) doesn't meet two of these criteria. It doesn't appear to be pale blue and equally I don't think the box, which the text is housed within, is of A4 size.

You may be aware of a petition that has been launched regarding this issue. After only 6 days, **3100** people have signed this petition through Change.org. **3100** people equates to **20% of the population of Palmer's Green**. (The total population of the ward was estimated at 15,837 in 2019) Presumably this is over a quarter of the people on the electoral role for the area meaning that, by this measure, more than one in four people strongly object to this proposal, after less than a week. I'm sure that these numbers will rise in the following days but this does provide a strong sense of the disbelief and anger from local residents. Here is the link to the petition; <https://www.change.org/p/to-the-leader-of-enfield-borough-council-no-to-merkur-slots-in-palmers-green?recruiter=477981914&utm_source=share_petition&utm_medium=twitter&utm_campaign=psf_combo_share_initial&utm_term=psf_combo_share_initial&recruited_by_id=10ca6900-c61d-11e5-93fe-d95df53c6b75>

There are two schools within a 0.2 mile radius. (St Anne's Catholic Girls School and Hazelwood Junior School) and the proposed site is almost located directly behind a bus stop that school children regularly use. Gambling establishments of this nature are nearly always detrimental to the local area in terms of anti-social behaviour and the associated activities that accompany them. I myself have been verbally abused outside of Paddy Power, so I shudder when I think of the potential ramifications for parents and school children in what is a family area. Large numbers of impressionable young children regularly congregate outside of McDonald's which is only a few shops along from the proposed site. This, combined with the fact that there are already a high number of gambling shops operating on Green Lanes is something that is very concerning for residents at a time when we are looking to rejuvenate our High Street.

My colleagues have raised the fact that a number of similar schemes have been overturned by pressure from the local community, specifically Thornton Heath Council, which in February 2019 overturned an application from Luxury Leisure after 1000 residents voiced their disapproval. Equally Harringey council refused an application from Merkur slots over similar concerns.

I am asking that Enfield Council reconsider this controversial decision. At the very least there should be a further period of consultation with the local community. I look forward to hearing your response on this matter.

Kind Regards

From:
To: [Cllr Nesil Caliskan](#)
Subject: Merkur Slots PG Green Lanes
Date: 19 February 2021 21:37:52

Hello Cllr Caliskan,

I hope you are well.

I am writing to express my dismay at hearing about the permission granted by Enfield Council for a gaming premises in the old Store 21 unit on PG Green Lanes.

I have been so encouraged lately by the good work of PG Action Team and the way in which the Council have supported their work to raise the profile of the area. I find it impossible to reconcile this activity with granting permission for more neon signs and an unwelcome business of this nature.

I have a small family and don't want to have walk my children past this kind of business on the way to shops and to the post office. It's wholly depressing and isn't part of the environment we should be creating for ourselves or our children. If the council are supportive of these kind of businesses then perhaps you could suggest more appropriate premises in an out of town / non-residential area.

At best, we'll be dealing with more neon signs and a business which won't be relevant to 99% of the population of PG and at worse, we'll be increasing vulnerabilities locally (especially in light of the prevailing situation) and inviting associated issues, like day-time drinking, to our high street.

You won't need me to point out that we already have betting shops. I have never heard anyone one in our local community asking for more venues in which to gamble.

I think it is a huge mistake for the Council to allow more gambling locally in an aim to avoid empty units. For most of the community this unit may as well be empty as it doesn't enhance our lives in any way, shape or form.

If you listen to local residents, I am sure you will hear this view from many others.

I would please ask that you take action to review the permission granted to this business, and that you also set out a clear strategy for the future of Palmers Green High Street, so this kind of thing can't happen again.

Thanks in advance.
Best wishes,

From:

Sent: 01 March 2021 09:36

To: robert.buckland.mp@parliament.uk; Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>;

Subject: gambling

Dear Mr. Buckland,

This is to ask you to think seriously about the laws on gambling and do your best to change the current laws. As i am sure you know, it is the poorest people in this country who have suffered most from the proliferation of gambling premises in the last few years.

I live in Enfield, where there is currently the danger of another betting shop being opened in Palmers Green. Our council is doing its best to oppose this but they have liimited powers. In my view the legalisation of many betting shops some years ago did much to hasten the increasing gap between rich and poor in this country.

Yours sincerely,

From:

Sent: 28 February 2021 13: 23

To: Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>

Subject: Proposal to open a branch of Merkur Slots in Palmers Green

Dear Nesil,

I am writing to ask a question about the proposal to open a branch of Merkur Slots in Palmers Green.

There has been a lot of debate about the subject on Next Door social media and it was stated that the council are 'powerless' to do anything about the proposal.

[Redacted - personal data]

Personally I don't think places like this add anything beneficial to an area. There are 179 branches of the company in the UK and they already have sites in Tottenham and Edmonton so you can see where they are going with this expansion.

If anything they make areas worse and are well known for being centres where drug dealing and anti-social behaviour take place plus they often keep very long opening hours (or will do when lockdown is lifted) In fact they are usually open much longer hours than betting shops.

Anyway, I hope you will intervene and prevent this proposal going ahead.

Kind regards,

From:

Sent: 01 March 2021 10:28

To: Cllr Nesil Caliskan <Cllr.Nesil.Caliskan@Enfield.gov.uk>

Subject: RE: Proposed Gaming Centre on Palmers Green High Street

Dear Cllr Nesil Caliskan,

I recently received your letter regarding this proposed gaming centre. Like you, I strongly oppose this and I think that these establishments are amoral and a blight on the community. I read your letter, and am shocked and appalled at the ease of which businesses like these are allowed to subvert any challenges to their proposals.

I am also disappointed to learn that it looks very much like this will go ahead. That said, I would like to write to the Rt Hon Robert Buckland MP as outlined in your letter, but I was wondering if you would be so kind as to provide a template or similar, so that I know I am writing it correctly and not missing any points.

I also noted that within the objectives the licenses must meet is: *'preventing gambling from being a source of crime or disorder, being associated with crime or disorder to being used to support crime'*. I feel like this is a particularly mild caveat as it could be argued this cannot be proven until the premises is in operation? And I personally believe that it is inevitable; gambling shops are an easy way for criminals to 'launder' money - a quick google search of this brings this news article from 2013 :

<https://www.theguardian.com/uk-news/2013/nov/08/gambling-machines-drug-money-laundering-bookies>

Further to this, I personally witnessed drug deals quite brazenly taking place at/outside the Paddy Power in Turnpike Lane whilst waiting for the bus there, around 2018 or 19. I can only assume that the choice of location was so that the money could be immediately 'cleaned' (I reported this to the police at the time).

I appreciate your concern for the community, and would like to do what I can to help challenge this awful proposal.

From:

Date: Fri, 5 Mar 2021 at 23:36

Subject: Gambling and Community in 2021

To: Robert.buckland.mp@parliament.uk <Robert.buckland.mp@parliament.uk>

Cc: cllr.nesil.caliskan@enfield.gov <cllr.nesil.caliskan@enfield.gov>

Dear Rt Hon Robert Buckland MP,

Thank you for taking the time to read my email.

I am writing as a resident of Winchmore Hill, London Borough of Enfield. I am 17 years old and am passionate about the place I have grown up in and how best to ensure that key places such as Palmers Green High Street remain spaces to foster growth and development. Palmers Green High Street has so much potential: community and family areas such as the library, sewing shops and charity shops already provide opportunity for positivity. The downside of the High Street is that in recent years many gambling shops have been springing up in vacant spaces, which is at odds with the potential of the street to be a positive community space. There are already at least three gambling shops (two Ladbrokes and a Paddy Power), which actively encourage individuals to risk gambling away money and getting into debt. I feel that in these times of economic insecurity and desperation for many, it is a duty of those in power to ensure that opportunities for gambling are reduced as much as possible. In the short and long term less gambling means less families broken apart and less spirals of deprivation.

However, due to the current law 'Gambling Act 2005', councils do not have effective powers to limit the number of gambling premises in an area and in fact local authorities are required to 'aim to permit' gambling premises licenses. This poses a particular problem at the moment as 'Mercur Slots Gaming Centre' has been proposed to open on Palmers Green High street soon. Enfield Council have been trying to prevent its opening, but are struggling in the face of this Law.

I understand that there must be practical difficulties and inconveniences to changing this law from 2005, but I really do believe that a focus on this law could result in a tangible difference to many people's lives. If the law was altered, less families would be broken apart and high streets could become all the more places for community growth, not destruction.

Thank you for taking the time to read my words and for your consideration.

I look forward to hearing from you,

Annex 5



LICENSING AUTHORITY REPRESENTATION

This representation is made by Enfield's Licensing Enforcement Team and is made in consultation with and on behalf of the Trading Standards Service (inspectors of Weights & Measures), Planning authority, Health & Safety authority, Environmental Health authority and the Child Protection Board.

I confirm I am authorised to speak at any hearing on behalf of the Licensing authority, Trading Standards Service (inspectors of Weights & Measures), Planning authority, Health & Safety authority, Environmental Health authority, and Child Protection Board).

Name and address of premises: Merkur Slots
292 Green Lanes
London
N13 5TW

Type of Application: Review of a Bingo Premises Licence

Background

This is a review application for a Bingo Premises Licence.

The application is to revoke the premises licence and is based on the following licence objectives:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
2. Protecting children and other vulnerable persons from being harmed or exploited by Gambling.

The premises licence was granted on 4th January 2021. The premises is under construction and is expected to open in July 2021.

This premises was previously a William Hill Betting Shop. Merkur Slots has replaced one type of gambling premises with another although the hours each type of premises can trade differ greatly. Betting shops are permitted to trade from 07:00 – 22:00 hours. Bingo facilities in bingo premises may not be offered between the hours of midnight and 9am. However, there are no restrictions on access to gaming machines in bingo premises so the premises could remain open 24 hours a day.

The Premises Licence Holder also holds a premises licence for Cashino in Edmonton. Historically that premises has been the subject of complaints from local residents in relation to street drinkers loitering outside the premises causing noise late at night and during the early hours of the morning. However, matters have always been resolved informally by the Licensing Enforcement Team, Police Licensing Team and Head

Office Managers. No formal action has been required. It is believed that a security guard is employed at that premises.

Location

The premises is located on Green Lanes approximately 200-300m from the junction with Aldermans Hill.

The premises is located close to the Alfred Herring Public House which is one of the largest public houses in the area. The Alfred Herring opens 07:00 until 00:30 hours daily with alcohol sales 09:00 until 00:00 hours.

Systems should be in place to ensure those who have left this and other nearby premises under the influence of alcohol do not enter Merkur Slots.

On page 10 of the Local Area Risk Assessment it states:

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

Children

There is a bus stop directly outside the premises and the area becomes busy just before the school day starts and when it ends with large numbers of children waiting for buses and passing by. The increase in under 18s in the immediate location during these times should have a bearing on staffing levels at these times.

Children and young people are legally allowed into bingo premises; however, they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. Social Responsibility code 3.2.5(3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling.

In both the Operational Standards document and the Local Area Risk Assessment submitted with the Premises Licence Application it states that Merkur Slots will not permit anyone under the age of 18 years to enter the premises. To reassure residents that this policy will not change and that children will not be subjected to gambling this could be turned into an additional licence condition.

In the Local Area Risk Assessment it also states:

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.

This could also be turned into a licence condition.

Bingo

Having looked at the plan attached to the premises licence it is not clear where customers will play bingo as there is no allocated seating area for them. The only

seating is in front of the gaming machines. The Licensing Authority would welcome a response from the premises licence holder explaining where customers would play bingo if all the gaming machines were in use.

The Gambling Commission Guidance to Local Authorities states:

'18.26 The LCCP requires (Social Responsibility Code Provision 9) that gaming machines are only made available in combination with the named non-remote activity of the operating licence. So, unless a bingo premises operator offers substantive facilities for non-remote bingo it should not make gaming machines available for use on the premises in question. To contain the unavoidable risk to the licensing objectives associated with gaming machines, premises which offer machines must be appropriately supervised.

Licensing authorities are not being asked to impose a 'one size fits all' view of how a bingo premises should look and function. Rather they are ensuring that a premises licensed for the purposes of providing facilities for bingo is operating as such and is not merely a vehicle to offer higher stake and prize gaming machines.'

The gaming machines are remote and so are the tablets. It may be more pertinent for the Gambling Commission to raise this question with the holder of the Operator's Licence but it is not clear to the Licensing Authority what 'substantive facilities for non-remote bingo' will be offered at the premises. The Licensing Authority would welcome this information.

Conclusion

As the premises has not started to trade yet the Licensing Authority has no evidence as to whether the operation of the premises is undermining the Licensing objectives. However, the Licensing Authority does appreciate the applicant's and local resident's concerns about a 24 hour gambling premises opening up and how this could potentially impact the local area.

Having reviewed the Local Area Risk Assessment and Operational Standards documents again the Licensing Authority believes that there are many good business practices referred to in those documents which could be turned into licence conditions to ensure that these business practices and policies do not suddenly change.

The Licensing Authority believes that the following additional conditions would help prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime and also to protect children and other vulnerable persons from being harmed or exploited by gambling.

1. The premises shall only open between the hours of 07:00 and 00:00 Monday and Sunday.
2. A magnetic locking device, commonly referred to as a Maglock shall be installed and maintained on the main entrance/exit to the premises which shall be operated by staff.
3. Between the hours of 22:00 and closing the entrance will be locked with admittance to the premises only by video and buzzer using the maglock.

4. The licensee shall refuse entry to customers who appear to be under the influence of alcohol or drugs.
5. Only refreshment purchases or supplied on the premises may be consumed on the premises.
6. The door of the toilets shall be lockable by key and the key shall be available at the discretion of staff.
7. There shall be two or more members of staff on the shop floor between 15:00 and 17:00 hours Monday to Friday and between 20:00 hours and closing Monday to Sunday.
8. Customers shall not be permitted to leave bags or other belongings at the premises.
9. No-one under the age of 18 years shall be permitted inside the premises at any time. Notices to this effect shall be displayed at the entrance of the premises.
10. Third party testing on age restricted sales systems shall be carried out on the premises a minimum of 3 times a year.

If the Licensing Sub Committee is not minded to reduce the hours of the premises then the wording of condition 3 and 7 above will need to be amended. The Licensing Authority would then also invite the Licensing Sub Committee to consider whether a condition requiring security staff such as the one set out below would be appropriate:

11. At least one SIA registered Door Supervisor shall be employed at the premises every day from 22:00 – 07:00.

If these additional conditions were accepted by the Premises Licence Holder, I would withdraw my representation.

I reserve the right to provide further information to support this representation.

Duly Authorised: Charlotte Palmer, Senior Licensing Enforcement Officer

Contact: charlotte.palmer@enfield.gov.uk

Signed: CPALMER

Date: 17/05/2021

Interested Party Representations**IP1 Representation**

I wish to express my concern regarding the granting of a 24 hour gambling licence to Merkur Slots on Green Lanes in Palmers Green.

Firstly, residents had little opportunity to appeal against the application initially as it was posted during lockdown and in the run up to Christmas so giving little chance for it to be seen. In addition to that it was a very small notice, so likely to be missed at the best of times.

Secondly, Palmers Green does not need any more gambling/betting shops (we have two Labrokes, one Betfred and one Paddy Power), especially one so close to two pubs, as this seems to attract additional trouble. I have observed on several occasions a group of inebriated men venturing from the nearby Wetherspoons pub (the Alfred Herring), to the Paddy Power betting shop next door, and I am positive that gambling whilst drunk is unsafe, so if a 24 hour gambling arcade opens a few doors down that would be even more of a temptation. There is also the Wishing Well pub a few minutes walk away from the proposed site with drinkers who too could be tempted by a gambling arcade. Gambling addiction has become a big problem in recent years and such places will only make it worse.

The arcade could also attract young people because of the bright lights and machines, and while the establishment is meant to be for those over 18, many of them can probably get around the age requirements by producing fake ID as they do when they enter pubs (I know first hand that this happens on a regular basis). The arcade is also likely to be very attractive to vulnerable adults who may have difficulty in controlling their expenses.

One final point is the effect it will have on the area in general; like many other high streets, Palmers Green has suffered with many shops being shut down even before the pandemic hit, so I strongly feel that the opening of a 24 hour gambling arcade will bring down the appearance of the area further still. It could also increase poverty amongst people who have lost money or their business as a result of the pandemic, and who could be tempted by the arcade as a way of making some money.

I sincerely hope you agree that such an establishment is totally undesirable, and will only add to the decline of the area plus the number of jobs it would generate is likely to be negligible.

IP2 to IP45 Representation (Identical representation submitted)

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW As a local

resident, I feel strongly that the license granted in January this year was morally irresponsible and should be revoked immediately. I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

2) protecting children and other vulnerable persons from being harmed or exploited by gambling This type of venue is totally unsuitable in this area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue.

3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to thrive.

IP46 & IP47 Representation

I strongly object to the granting of a licence to Merkur Slots for a 24-hour Adult Gaming Centre at 292-292A Green Lanes.

I live just off the high street and shop there frequently, but was unaware of the licence application due to the Covid restrictions which were in place at the time it was advertised.

My objections are as follows:

Gambling can be a source of crime and antisocial behaviour. Palmers Green is a family-oriented community and great efforts are being made to regenerate and improve the busy high street. A 24-hour gambling centre would be highly detrimental in this context and would devalue rather than enhance the high street.

There would be a damaging impact on vulnerable adults, children and young people. The risks to these groups include addiction, mental health issues and suicide, domestic violence and family breakup, homelessness, and severe financial hardship. In the same area there are already several betting shops and a pawn shop, the presence of the latter indicating that there are already people suffering hardship in this community. A 24-hour gambling centre risks preying on these groups and worsening their situation.

The proposed premises is opposite a central bus stop, close to McDonald's and local schools. The area is always busy with young people at the end of the schoolday, who should not be exposed or introduced to a gambling environment.

I do not believe that the local population has been consulted adequately, due to the pandemic. The application was advertised at a time when people were being urged to stay at home and shops were closed.

Thank you for listening to my concerns.

IP48 Representation

I am writing to you in relation to the baffling decision by Enfield Council to grant permission for a Casino, owned by *Merkur Slots*, to operate on 292 Green Lanes in Palmer's Green. I am sure that you are aware of the strength of feeling in the local community regarding this issue.

There was very limited opportunity for any serious public consultation on this proposal. At the time there was a nationwide stay at home order in place, preventing people from engaging in the decision making process. Having spoken to a number of my neighbours along Hazelwood Lane, many have said they would have engaged if they had been given the opportunity. The fact that we were unable to leave our homes meant that we couldn't see the licence application notice, and as such were

not given an opportunity to voice our concerns. Putting something as controversial as a 24 hour licensed casino into a residential area during a global pandemic is underhand and sneaky at best. At worst this is morally repugnant and a deliberate attempt from *Merkur Slots* to avoid democratic scrutiny.

You may be aware of a petition that was been launched regarding this issue. After only 6 days, **3100** people have signed this petition through [Change.org](https://www.change.org). **3100** people equates to **20% of the population of Palmer's Green**. (The total population of the ward was estimated at 15,837 in 2019) Presumably this is over a quarter of the people on the electoral role for the area meaning that, by this measure, more than one in four people strongly object to this proposal, after less than a week. I'm sure that these numbers will rise in the following days but this does provide a strong sense of the disbelief and anger from local residents. Here is the link to the petition; <https://www.change.org/p/to-the-leader-of-enfield-borough-council-no-to-merkur-slots-in-palmers-green?recruiter=477981914&utm_source=share_petition&utm_medium=twitter&utm_campaign=psf_combo_share_initial&utm_term=psf_combo_share_initial&recruited_by_id=10ca6900-c61d-11e5-93fe-d95df53c6b75>;

There are two schools within a 0.2 mile radius. (St Anne's Catholic Girls School and Hazelwood Junior School) and the proposed site is almost located directly behind a bus stop that school children regularly use. Gambling establishments of this nature are nearly always detrimental to the local area in terms of anti-social behaviour and the associated activities that accompany them. I myself have been verbally abused outside of Paddy Power, so I shudder when I think of the potential ramifications for parents and school children in what is a family area. Large numbers of impressionable young children regularly congregate outside of McDonald's which is only a few shops along from the proposed site. This, combined with the fact that there are already a high number of gambling shops operating on Green Lanes is something that is very concerning for residents at a time when we are looking to rejuvenate our High Street.

My colleagues have raised the fact that a number of similar schemes have been overturned by pressure from the local community, specifically Thornton Heath Council, which in February 2019 overturned an application from Luxury Leisure after 1000 residents voiced their disapproval. Equally Harringey council refused an application from Merkur slots over similar concerns.

I am asking that Enfield Council reconsider this controversial decision. At the very least there should be a further period of consultation with the local community. I look forward to hearing your response on this matter.

IP49 Representation

I am writing to object to a 24 hr Adult Gaming Centre to be opened by Merkur Slots in Palmers Green High Street.

As a local resident I object on the ground of 1) preventing gambling from being a source of crime/disorder, being associated with crime or disorder or being used to support crime.

We do not need another gambling centre given there are already four other betting shops in close proximity. There are concerns about money laundering/criminality / anti social behaviour.

I object on the ground of 2) protecting children and other vulnerable persons from being harmed or exploited by gambling This type of venue is totally unsuitable in an area where two schools are in close proximity and a school bus-stop is outside the proposed venue. A McDonalds is also close by where school children already congregate.

I object on the ground of 3) Public Health dangers Gambling is related to serious mental health issues with an increase in NHS gambling clinics for 13-25 yr olds who are suffering from addiction. A gambling arcade on the High Street can only exacerbate this problem for local families.

The local community has worked hard with both businesses and Enfield council to help rejuvenate our High Street. A Gaming Centre would not contribute in any way to achieving this goal.

I am therefore asking that these objections are taken into account when reviewing this Licence and that it is revoked on the above grounds.

IP50 Representation

I am writing to object to the twenty-four hour gaming centre being open by Merkur Slots on Green Lanes Palmers Green.

As a local resident I feel strongly that this gaming centre would be very detrimental to the area and the license should be revoked.

I object on the grounds of:

1) Sufficient notice not given to the local residents about this gambling centre.

An A4 notice on the proposed premises is definitely insufficient notice. During world wide pandemic the country was under

a strict lockdown. Law abiding citizens were following the government advice to stay at home and many were working from home.

It would be very unlikely that any people would see this notice. The local paper is not delivered to homes any longer. So the licence was

literally given without public consultation. It is unethical that during a pandemic Merkur Slots used this tragic time to get a licence to 24 hour

gambling centre. They must have been aware with proper consultation there would have been a public outcry.

2) At a time when the high is really suffering and local businesses are struggling Enfield council needs to encourage shoppers to the high street.

A gambling a centre like this would definitely discourage most people from visiting the high street, causing more hardship for local businesses.

3) Palmers Green is an area with large number of growing families and there are two schools nearby (Hazelwood and St Annes) and there

is a McDonalds nearby where families and young adults congregate. It is a real concern that the children will be exposed to gambling and see it as a normal part of life.

4) Gambling would lead to an increase of crime in the area. Needless to say gambling can be addictive which can lead to petty crime, serious mental health issues, suicide, debts, domestic violence and can destroy families.

IP51 Representation

I am writing to express my sincere concern at the prospect of Merkur Slots being given permission to open a Slot Arcade in Palmers Green High Street.

In the last three years, local residents have gone to great lengths to improve the ambience of the High Street by regular litter and clean up campaigns, removing stickers from shop walls, providing planters and trees for the outside of shops, the maintenance and planting of flower beds, commissioning wall art for the community to enjoy and encouraging new retailers to our High Street.

In fact the Leader of Enfield Council addressed a meeting attended by many local residents expressing her and the Council's interest in reviving Palmers Green High Street a couple of years ago. My husband and I both attended.

The addition of a 24 hour Slot Arcade is completely at odds with these aims and would add no benefits to the community - in fact quite the opposite.

There are two local schools very close to the premises and the students would be exposed daily to the negative impact this would have on the High Street.

It is well documented that gambling is a source of crime and disorder and the combination of an arcade very close to a Public House, namely Wetherspoons Alfred Herring, cannot be a positive combination. Gambling can have negative effects on the lives of children, families and vulnerable individuals often leading to mental health issues and financial worries.

The opportunity to object to this application is welcomed as COVID restrictions prevented us from being aware of it. Such lack of consultation due to the pandemic cynically enabled Merkur Slots to slip this in under the radar.

As soon as I became aware of this in the early weeks of 2021, I wrote to Carolyn Harris and to our local MP Bambos Charalambous to outline my concerns.

It is worth noting that the Leader of the Council, our MP and local councillors are strongly opposed to this application.

I urge you to withdraw the permission earlier granted and thus prevent what can only be a millstone around the neck of the community of Palmers Green.

IP52 Representation

This is to express my opposition to the opening of another gambling premise in Palmers Green.

Such venues encourage behaviour that has a negative effect on individuals, families and communities. It's well known that gambling is a source of crime/disorder and I am concerned about the 24-hour element of the licence, which will make it difficult to prevent a trend and behaviour damaging the society, well being and image of our high street.

Important also to note that the Merkur Slots are close to two schools and a heavily used bus stop.

IP53 Representation

Merkur slots will be no addition to Palmers Green High Street. The possibility of it being open 24hrs is truly shocking. Gambling preys on the most vulnerable in society with school children walking past as there are at least two schools just off the high street. We want to improve the high street. Who will it bring to the neighbourhood, hardly the high rollers of Vegas. More likely frustrated customers committing petty crime kicking in shop fronts as the camera /electronics shop reported to me when the previous gambling shop was there.

There are lots of gambling premises already and not really a night time economy I object to the licensing of merkur slots

IP54 Representation

I feel strongly that such a premises will be extremely detrimental to the community.

1. **Impact on crime and disorder in the area:** Presence of gambling premises can lead to an increase in crime in the area. A report by the commission on crime and problem gambling, published by the Howard Leage for Penal

Reform in 2020 (<https://howardleague.org/wp-content/uploads/2020/05/Crime-and-problem-gambling-research-landscape.pdf>) shows evidence from across the globe that a high percentage of criminals have issues with gambling. I quote from the executive summary:

"There is a clear relationship between disordered gambling and crime, with high prevalence rates of crimes being committed by people in order to fund their gambling (Williams et al, 2005)

- A wide variety of crimes are committed as a result of gambling addiction; not just 'white collar' crimes such as theft and fraud, but also crimes that occur in public spaces such as street robbery. There is significant evidence of domestic abuse and child neglect linked to problem and pathological gambling (Breen et al, 2013; Cuadrado and Lieberman, 2011)
- There is a complex interplay of causes of crime linked with the causes of disordered gambling. Cross-addictions, mental disorders, impulse control disorders and difficult life events all may play an additional role in the causation of crime – and inhibit treatment (See for example: Lahn, 2005; Sundqvist and Rosendahl, 2019; Templer et al, 1993; Turner et al 2007)
- Certain demographics are more likely to commit crimes, in addition to having increased vulnerability to gambling addiction (Perrone et al, 2013; Turner et al, 2017)
- The more complex, prolonged and persistent the gambling problem, the more likely that a crime will be committed and, indeed, that many crimes may result (Turner et al, 2009; Perrone et al, 2013)
- There has been a growing understanding that gambling addiction is a behavioural disorder, however, little of this has been translated to sentencing; problem gambling is not considered to be a mitigating factor in sentencing in the way mental health problems or drug and alcohol addiction are (Folino and Abait, 2009)
- Whilst not always imprisoned as a direct result of problem gambling, there are extremely high rates of gambling addiction amongst prisoners.

The research suggests that prisons only offer limited treatment in any of the jurisdictions covered. Research suggests that the rate of problem gambling is higher among male and female prisoners in prison, compared to the general population. Problem gambling is markedly higher amongst women than in the general population (as reported in Finnish research by Lind and Kääriäinen, 2018 and Australian research by Perrone et al, 2013)"

This evidence makes it clear that offering extended opportunities to gamble is likely to increase opportunities for gamblers to develop problem habits, and increase the likelihood of crimes being committed.

2. **Impact on Children and Vulnerable Adults:** Palmers Green is a residential area, with housing and two schools located in very close proximity to the site. Many school children also travel by bus to and from other local schools, disembarking at the bus stops close to the proposed site. These children are at risk of being victims of crime, carried out by customers of the proposed establishment. They are also at risk of seeing gambling as a normal behaviour - why else would there be shops on the high street offering gambling? As I am sure you are aware, homelessness and begging are increasing in Palmers Green. It seems likely that the provision of a 24 hour establishment, which is warm will be attractive to homeless and other vulnerable people - increasing the likelihood of them becoming problem gamblers.

3. **Lack of Adequate Consultation:** Public consultation on this application was advertised via a sign on the high street, during a period of lockdown when we were not supposed to leave our homes for unnecessary purposes. Like most of our community, my family and I stayed at home and did not go to the high street, instead we used online shopping. I believe there was also a notice in a free local paper - which has not been distributed to houses in this area for several years. It may have been available in local shops - however see my point that most people were obeying government and local authority guidance and not leaving home to see it in shops. It seems clear that this was not adequate public consultation - I cannot believe that the panel would claim it was.

I understand the above points are the only official elements you can consider in this licensing review. However I would ask that you try and also consider the general character of Palmers Green High St. The quality of the street is deteriorating as many shops close. Community groups are doing everything they can to improve the

high street, through planting, family events and more. Several pleasant cafes have opened.

However we need more attractive shops and cafes and community spaces to be available, so that local people will be encouraged to visit the high street. More and more of us will be working from home in future, so there is an opportunity to facilitate businesses that will serve these home workers, and be attractive to them. The council could have an opportunity to invest in facilities that will encourage people to visit - consider a hub for start up businesses, a food market for local crafters and food producers, a community and performance space for groups who can no longer use the Intimate Theatre or the Dugdale Centre. There are lots of possibilities. If the high street is given over to more gambling shops - as if you approve this one, then more may try to open, then it will not be attractive for the local residents to visit, and the opportunity to improve our local high street will be gone.

Thank you for reading.

IP55 Representation

I would like to submit to your attention my representation against the Gambling Premises Licence for 292-292a Green Lanes requested by Merkur.

I would like to raise 3 points.

1. I am very concerned that opening a new gaming centre, especially of the type proposed by Merkur, may attract more people who behave antisocially to Palmers Green. The premises are near a bus stop, which makes it very accessible to all sorts of people from the surrounding neighbourhoods. Palmers Green is already plagued by a significant amount of antisocial behaviour (statistics [here](#)), and violent crime is on the rise. We all know that there is a significant relationship between gambling and antisocial behaviour. Yet, Palmers Green is a residential area, with a lot of schools and families around.
2. The premises will be near a park, and near McDonalds, just on the high street. It is a prime spot, which may attract children and other vulnerable people into gambling. Gambling is an addiction and should be treated as such, like smoking, rather than being encouraged. Definitely the opening of a gambling centre in the middle of a residential area, on the route to schools and close to meeting points for young people should be opposed on the grounds of morality and public decency.
3. Opening this type of activity in Palmers Green would worsen the feel of the area, negatively affecting property values.
4. I was shocked when I was made aware that Merkur applied for a licence. The notice of public consultation was a nearly invisible leaflet near the premises, hung there just in the middle of the last lockdown. No publicity was made on social media or anything. I found out about it through campaigners on social media. The

consultation was definitely inadequate, and one would think suspiciously timed to coincide with the lockdown.

I hope you take my remarks into positive consideration, and I look forward to hearing about the results of the review.

IP57 & IP58 Representation

We are writing regarding the above proposed licence and wish to let you know our objections in this respect.

We have a number of concerns relating to this, namely:

- premises such as this, which we understand will be open 24 hours daily, are likely to attract those who are unlikely to have the interests of the community at heart and may well include criminal elements.
- Palmers Green already has a surfeit of betting shops and any more such gambling establishments is clearly excessive and damaging to the wellbeing of the local population. These venues breed anti social behaviour, which may well be exacerbated after pub closing time.
- Children and young people might be lured in by the seeming attraction of these types of machine. Despite age admission rules, it would not be surprising to find that a blind eye is turned to entry of those under the legal age.
- The site of these premises, having a bus stop immediately outside, will provide an obvious visible temptation not only to adults but to school children alighting from buses after school hours.
- It is clear from many reports that people who gamble find it difficult to restrain themselves from spending money resulting in debt and deprivation to home life. Many of these people may well be vulnerable in several ways finding themselves susceptible to potential addiction and exploitation.
- Public notices were displayed by the Council during a combination of Covid lockdown and restrictions. This limited the opportunity for the public at large to take note and to raise subsequent objections.

We hope that you will take the above comments into account and refuse this licence.

IP58 Representation

I wish to express, in the strongest terms, my objections to the granting of a licence to Merkur Slots in Palmers Green. In general terms, I feel that there are already too many gambling premises in Palmers Green and I feel that a slots arcade will attract a younger clientele. Many of them will be people who can barely afford to gamble, and it may well be the start of a lifelong addiction. Without wishing to catastrophise it, I also feel that there is a distinct possibility of an increase in theft and robbery if they run out of cash to spend.

Another concern I have is that the children from the local secondary school wait for their buses nearby and may well be tempted to get involved.

If older people are put off shopping there, it will be the end of the remaining businesses in Palmers Green. There is a centre for older people (Ruth Winston Centre) nearby and it would be terrible if, just as we start life again after Covid, they were too afraid to pass through Palmers Green for fear of antisocial behaviour. One thing is sure: the arrival of Merkur slots will not improve the quality of life for Palmers Green residents. There will be a knock-on effect in many areas.

The lack of consultation is another area which needs to be looked at. I feel the application notices were put up deliberately during a time when people had to stay at home. This is underhand and should not be allowed. The council needs to protect the rights and interests of those who pay their council tax.

IP59 Representation

I would like to formally object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW.

I feel very strongly that the original license, granted in January 2021, was authorised in an extremely irresponsible manner, is morally objectionable and should be revoked immediately. Specifically, I object on the ground of:

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

Palmers Green already has a number of betting shops within a short distance to each other. We do not need another gambling centre in the area. There is a concentration of four betting shops in close proximity to the proposed new gambling premises. It is well-known that the risk of money laundering & criminality increases when such locations are in place. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

I believe it is important to note that just up the road from the premises is a council/NHS centre to house individuals with problems relating to addiction. It is not uncommon to see such individuals in the area. Offering them 24h betting opportunities seems to logically go against housing them in such a location, as it is surely a negative factor in their treatment/rehabilitation.

2) protecting children and other vulnerable persons from being harmed or exploited by gambling

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue. There are family run shops along the high street trying to attract customers from the area.

There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. Gambling should not be normalised for children, and yet with this shop children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops. It should not be 'normal' to see gambling taking place (or the option to do so) whilst on the walk to or from school.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. After the COVID pandemic, there are now even more people struggling financially, making them more vulnerable to such a venue.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

3) Consultation period

I believe that the consultation period that took place for this licence was during a national lockdown, when it was **illegal** to leave your house unless for the small number of permitted activities. This is totally unacceptable and feels very much like the licence was 'smuggled' out in a deliberate manner. The whole point of the consultation period is to give the local resident's their say and thus completing the process when residents were unlikely to be passing the venue or seeing notices is completely unacceptable. This error needs to be rectified by considering the voice of the local area.

Please note, this is not about being 100% against gambling, per se, but this is about how much the council wish to actively promote such activities, over more healthy options. If people wish to gamble, then there are already sufficient options for them to do so. The local residents have made their voices heard, in that they do not want this new establishment to be opened. We want shops and entertainment, of course. Increasing the number of gambling shops will have a negative effect on our high

street and surrounding area and make it harder to bring in more desired new business.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to thrive.

IP60 Representation

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW

As a local resident, I feel strongly that the license granted in January this year was morally irresponsible and should be revoked immediately. I object on the ground of:

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

Gambling needs to be stopped because it attracts money laundering on its premises and criminality: People who lose money gambling are likely to fill their empty pockets by taking possession of purses found in the handbags of passers-by (mugging).

I am very concerned about walking down my high street late at night when gamblers will be going in and out of the premises and their possible anti-social behaviour, e.g. dealing with anger after having lost their money or drug taking.

2) protecting children and other vulnerable persons from being harmed or exploited by gambling

There is a school bus stop right outside this venue and the school children might be tempted to spend their pocket money in a gambling place. Who is policing them?

Easy access to gambling might make children think gambling is a normal activity in our high street. They are vulnerable because they will not be accompanied by an adult. Who will be there to guard and advise them and inform them of the dangers of gambling:

Depression, suicide, impoverishment, family disputes and break-ups and most of all addiction.

The Council has a care of duty towards their residents and needs to protect them from danger, but there are not enough police available to do so.

The Palmers Green ward is one of the top 40% of most deprived wards in the country and cannot afford the cost of more broken lives. There is already enough homelessness and begging in our area. Since the Pandemic there are now many more people struggling financially, who are vulnerable enough to attend such a venue out of desperation or for escapism.

Medical authorities have established that gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. We need good community relationships, gambling destroys this.

The local community is doing its best to make the local economy thrive and safe day AND night. The opening of a 24-hour Adult Gaming Centre in a prime spot in our high street would be highly detrimental to those efforts. It will bring our area down and get a reputation for betting (there are already 4 betting shops here) and gambling.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence to allow our local community to make Palmers Green safe and pleasant to all.

IP61 Representation

As a resident of Palmers Green, I am writing to ask that your review of Merkur Slots Gaming Centre being granted a licence (to join the four other betting shops on the high street), conclude me that this gambling house has no proper place on high street.

As you are already aware a petition against the new gaming centre rapidly gained over 4,000 signatures.

Gambling houses are not a vital service. They do not contribute to community. They allow vulnerable people be taken advantage of. They encourage congregation that leads to other anti-social activity from the petty such as littering all the way up to drug dealing. There is no justification of their existence and should only be allowed to be conducted online or in retail parks and away from community centres.

The existing betting shops on the high street are already known sites of drug dealing, which the local police are aware of but have not been able to prevent. We can expect this venue to be the same.

The location of the venue is opposite the main bus stop on the high street used by children for both Hazelwood Primary and St Anne's High School. The viability and location of this venue advertises gambling to youths who may also be affected by the antisocial activities that it will attract. Further the current licence appears to grant access to under 18s where food is served

IP62 Representation

This submission is regarding the review of the application for Bingo Premises- Merkur Slots 292-292A Green Lanes.

From what I understand Merkur Slots gained license to set up premises on Green Lanes, effectively utilising a lack of adequate consultation stemming from the recent lockdowns that were caused by the ongoing Covid pandemic. The ethics of this move are beyond questionable, but then we are talking about a gambling business, a place exclusively designed to foster addictive behaviour.

Something like this should not have a place in our community at the best of times, let alone during a pandemic that already put so many people under significant financial strain.

Not to mention that these businesses are a fantastic breeding ground for antisocial behaviour and crime, be that through addicted problem gamblers getting more and more desperate to be able to pay for their thrills or simply money laundering.

Speaking of addiction: just as the cigarette industry wants to “get them while they’re young”, the premises for the business are opposite a central bus stop, close to a McDonald’s and local schools. A perfect place to create “future business” by advertising to children. Like the next generation won’t have enough problems as it is. The problems created by mental health issues associated with (and fostered by) gambling come in all shapes and sizes: from addiction, families breaking up, domestic violence and homelessness to suicide.

If the issue wasn’t so serious, it would be hilarious in its immense absurdity: how, as a community, can we allow such a corrosive type of business on our high street (which already has a smorgasbord of similar businesses expediting exactly those problems) causing future problems for children and other vulnerable people (which we now have in abundance thanks to the traumatic events of the last year)?

I am speaking from experience here as my own family broke up due to my father’s gambling addiction, with my mother desperately safeguarding her money in order to not be pushed into financial ruin. These businesses contribute no value to the community in any way and cause nothing but harm. There should be less of them, not more and we, as a community need to stop them from spreading.

Thank you and have a lovely day.

IP63 Representation

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW

As a local resident I feel that the license granted to this venue in January this year was totally irresponsible and must be revoked. I object on the ground of: 1) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime. 2) A venue of this kind going against the principles of creating healthy and welcoming places for the resident community promoting antisocial and addictive behaviour.

I live in Palmers green and I have two small children who are 5 and 2. We live close to the highstreet and I feel worried about the negative impact this will have in the area. I don’t feel another gambling centre and certainly one of this size improves the area, it makes me feel unsafe, unwelcomed a pushed me away from shopping

locally and supporting other businesses. I am Sad that my children will witness gambling and addiction in front of them every day as they go to childcare and school.

People have been through a pandemic and an economically fragile period and one of the things that has been most important to us is a focus on people's well being, economically and their mental health. It is irresponsible in an age when ethics and sustainability are so important, to promote businesses like this in an area that is deprived and where many people struggle. The people of Palmers Green have worked hard to improve our high street and make it a family friendly and a peaceful place and your decision is at odds with this. It doesn't include the community and doesn't bring anything positive to it. The high street should encourage the local community to create businesses rather than bringing businesses that attract crime, unemployment and take advantage of vulnerable people.

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, drug dealing and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

3) protecting children and other vulnerable persons from being harmed or exploited by gambling

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue.

There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. This is not a matter of a new business ticking boxes in an application form. This is about the long term impact in the area and the community. I insist the Council has the moral imperative and responsibility to revoke Merkur's licence and allow our local community to thrive.

IP64 & IP65 Representation

We wish to voice our opposition to a licence being granted for the above premises.

Notwithstanding that it is socially irresponsible to encourage gambling, the operation of slot machines in this form, rather than, say online, offers no control over amounts gambled. There is already ample provision of betting facilities in Palmers Green and the presence of betting premises with 24-hour opening hours can only encourage crime and misbehaviour on Green Lanes. The fact that the projected site is right by a bus stop where children alight should have rung alarm bells for those considering this application. The impact on the children of the area cannot be overstated. If there is to be any regeneration of Palmers Green high street then this is the last thing that is needed.

IP66 Representation

The reasons I object to this planning application are as follows:

There is huge evidence that gambling can be a source of crime and disorder in many areas where numbers of young people congregate; with a central bus stop opposite, a McDonalds close by and a route home for a number of schools this is an inappropriate application.

This could have an enormous impact on children and young people and vulnerable adults, particularly as we come out of Covid infections

The unfairness of putting this application forward at a time when most shops were closed in Palmers Green High Street and there were very few people around to see the small notice on the shop. It was totally inadequate in informing people of the application.

There are people trying to improve Palmers Green as a shopping high Street. This application does not support the process at all.

IP67 & IP68 Representation

I am a resident of Palmers Green and a local business owner and object strongly to the 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The Palmers Green Action Group has recently raised enough funding, for example, to start to re-green Palmers Green High Street with larger trees in pots. The local community is certainly keen to see the local day and night-time economy thrive, but the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

The license granted in January this year was morally irresponsible and should be revoked immediately. The notifications about the change of use of these premises seem to have been deliberately advertised just before Christmas at a time when footfall on the High Street was limited because of Covid, and being Christmas, our minds were on trying to salvage some of the celebrations.

I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises, only recently reduced down to this number. There is a well-known risk that these venues attract money laundering and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

2) protecting children and other vulnerable persons from being harmed or exploited by gambling

This type of venue is totally unsuitable in this area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue.

There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that

children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to such a venue.

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to thrive.

IP69 Representation

This email is to make a formal complaint about the licensing of Merkur slots gambling centre.

I have to object to this as I do not believe such a business on Palmers Green high street can be of any benefit to local residents.

Apart from the fact that we already have numerous betting shops on the High Street I really do not feel that another gambling centre is appropriate.

The UK is already dealing with a gambling epidemic which in itself causes hardship mental health issues which often result in suicides.

These gambling centres are a magnet for crime and anti social behaviour which impacts on the local police force as they are the ones who are called in the event of a disturbance not to mention local residents who want to go about their daily business unhindered.

We have many schools in this area that use the bus stops outside the intended site of gambling centre exposing them to gambling on a daily basis which is totally unscrupulous.

Furthermore I must also object to the lack of consultation with the local community that was carried out and I would like to see some evidence of notifications either in newspapers or online that was carried out by LBEnfield prior to assuming that locals would not object to this centre. Last year many people have not been conducting normal daily activities and as such this application has been able to slip through the net.

I therefore have to reiterate that I strongly oppose this application for a gambling centre in Palmers Green.

IP70 & IP71 Representation

We are writing to strongly object to the proposed Gambling Arcade in Palmers Green N 13.

Due to Covid restrictions the local community were completely unaware of this proposal and we bitterly resent this underhand was to bring in something no one wants .

The proposed site is in a busy family high street currently attempting regeneration. It is very near many primary and secondary schools where many children pass daily. It will attract crime , disorder in a peaceful area and also attract vulnerable young people to the site who do not need this either.

How can Enfield on the one hand encourage regeneration efforts eg Palmers Green Action Group and then propose to install a major gambling centre which everyone is objecting to?

Please reconsider immediately .

IP72 Representation

I am writing to object to a 24 hour adult gaming centre being opened by Merkur slots in Palmers green, high street, 292-292a Green lanes, N13 5TW.

as a local resident i feel strongly that the licence granted in January this year was morally irresponsible and should be revoked immediately on the grounds of:

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

- already 4 gambling centres on the small high street

- well known risk that these venues attract money laundering and other crimes

- people will leave pubs at closing time and move to the nearby gaming arcade to start gambling. Link between gambling and alcohol. The venue will attract anti-social behaviour which is a concern for local residents

2) protecting children and other vulnerable persons from being harmed or exploited by gambling

- totally unsuitable for the area with a large number of growing families and elderly.

- lots of schools nearby and mcdonalds where there are young people. we dont want children to see gambling as normal in our community

- palmers green is one of the top 40% of most deprived wards in the country.

3)public health dangers

- gambling related to serious mental health issues, and rising amongst teh younger age group

please do not open this premises. The council has a responsibility to the residents of palmers green.

IP73 Representation

I and many others in Palmers Green are very concerned about this gambling arcade in Green Lanes for the following reasons:

1. YOUNG PEOPLE AND VULNERABLE ADULTS

It will attract children and vulnerable young adults in a gambling environment which could lead to crime and antisocial behaviour. The site is near a primary school in Hazelwood Lane and a high school in Oakthorpe Road. The bus stop outside is used by schoolchildren. We have witnessed drug dealing in the area and you can be sure that these people will target any young people who may attend Merkur slots. There is a branch of Macdonalds and other venues nearby that attract younger people.

2. PROBLEMS WITH GAMBLING

Palmers Green is littered with betting shops and gambling leads to many social, mental, physical and other problems. A spiral that can lead to suicide, family breakup, addiction leading to severe financial hardship. A gambling arcade will reinforce and normalise this behaviour in young people and vulnerable adults.

3. LACK OF CONSULTATION IN A PANDEMIC

The lack of consultation over this development which should have been publicised more widely. Over 4,000 people have signed a petition to oppose this licence most of whom weren't aware of the licence. You don't need me to remind you that politically this could rebound on the council if this goes ahead. What if this arcade does open and there are protests, and this gets into the local papers TV?

4. NEED FOR A VARIETY OF SHOPS

Palmers Green used to be a thriving secondary shopping centre with a variety of shops, pubs, services. It seems to be converting into several strands now, forcing people to travel by car for certain items, increasing pollution, despite the cycle lanes. On that particular site in the past, we used to have a branch of Tesco's and latterly a clothes shop, something of use to the community. What good is another gambling site? If there is not much commercial interest, I would like it to be used for a centre for art, music, or crafts, supported by the council. Whilst not an advocate of more cars you could advertise the car parking behind Macdonalds. I am pretty sure many are not aware of this.

5. MAKE PALMERS GREEN A GREAT PLACE TO LIVE Let's try to improve Enfield and be positive to attract people to live here. If people see what the area is becoming then they will shun it and Palmers Green will sink further. Close all the betting shops, these I think will go anyway with the advent of online gaming. Eventually, in the long term, you'll have a poor neighbourhood where people get behind with council tax, crime will increase etc. It's a short term gain for greedy landlords who don't care what misery they cause as long as they get paid.

LET'S MAKE LIFE BETTER!

IP74 Representation

Please do not authorise this company to set up a 24-hour Bingo premises in Palmers Green. We have a number of primary and secondary school locally, and it promotes the idea to pupils that all-night gambling is normal and totally acceptable, without any restraint. There may be an age limit, but who is going to enforce it 24/7? We also have a number of people with various needs in the area, some who have problems with alcohol, who are often begging, and the idea that a place is open 24 hours a day may well encourage them and others to come into the area in order to try and gain overnight shelter. I would also suggest that some may be very interested in gambling their benefit money in the hope of making more to get alcohol, and Merkur Slots would be in easy walking distance from the Post Office. It is just putting temptation in their path.

Please do not grant Merkur Slots their premises application.

IP75 & IP76 Representation

I am writing to object to a 24hour adult gaming centre being opened by Merkur Slots in Palmers Green 292-292A Green Lanes N13 5TW.

As local residents, with an interest in the local area, we feel that the licence granted in January this year was morally irresponsible and should be revoked immediately.

I object on the grounds of

1) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

There is already a concentration of 4 betting shops in the immediate vicinity of the proposed Merkur Slots and we do not need another gambling centre in the area. There is a well-known risk that these centres attract money laundering and criminality. These venues encourage behaviour that has a negative impact on communities. After pub closing times, people can go on to the 24-hour gaming centre to start gambling. This will no doubt attract anti-social behaviour to the area; *on our street WhatsApp Group this month alone we've been informed already about several house burglaries this month, several attempted car break-in's and also antisocial behaviour directed at people who live on our street. Encouraging further anti-social behaviour particularly when the police are so under-resourced is irresponsible and really worrying for those that live in the area.*

I object on the grounds of

2) Protecting children and other vulnerable persons from being harmed or exploited by gambling

This venue is totally unsuitable for a community with many families and children, many of whom are attending local schools that are very near to the centre in question. There is a school bus stop right outside this venue. Neon lights and an alluring 'open all hours' shopfront will attract teenage/young adult's attention. *I have*

concerns our teenagers (and my own teenager even) will become normalised to gambling on the high street. Children will be exposed to gamblers on the way to school, to the park, playgrounds and local shops. Palmers Green Ward is in the top 40% of the most deprived wards in the country. Local shops and communities are trying to improve the area. We should not as a community be encouraging people to waste money and get into debt, and cause damage to their lives and their families. Since Covid there are also many more people struggling financially who should not be encouraged to gamble.

I object on the grounds of

3) Public Health Dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25year olds who are suffering from addiction. *It is well documented that gambling addiction can result in homelessness, suicide, domestic violence and family break ups.*

Local residents have worked hard together with businesses to try to improve and support the high street, to make it an attractive place to go as a local community, at a time when high streets are facing huge challenges. It would be very depressing to allow this to open, further bringing the area down when people are trying really hard to improve it for the benefit of all the community that lives here. The opening of a 24-hour Adult Gaming Centre, in a prime high-street location, is hugely detrimental to the hard work that has gone in to trying to improve the local area.

I object on the Grounds of

4) Local residents were not given the correct opportunity to review the licence at the time it was granted

Enfield council must listen to the residents' concerns and revoke Merkur's licence. *The licence was granted at a time when no local residents were aware of the plans, and due to Covid restrictions, were not given the correct opportunity to object at the time, as they should have been.* We have heard that the notice attached to the empty shop did not meet the specifications laid down by the council; also the period during which objections could be lodged was at a time when Covid-19 cases were particularly high and people were staying at home on government advice (prior to vaccines and with schools shut, and only essential visits to food shops etc advised).

Please do not allow the Adult Gambling Centre to be opened here; the council must review all the evidence and revoke the licence. The licence should be revoked for the above reasons and our local high street should be given a chance to thrive and make it a pleasant place for the local community to visit.

IP77 Representation

I wish to express in the strongest possible terms my opposition to Merkur Slots being granted a license to operate a gambling concern at 292-292A Green Lanes.

The stretch of Green Lanes including 292-292A is the main local shopping hub for Palmers Green and serves a large residential area. The local community, residents and business owners have worked hard to enhance the area, improving safety and local facilities and so encourage it's development as a family friendly area.

The opening of the proposed gambling establishment would undermine what the local people have been striving to achieve. I doubt if such an establishment would bring anything good to the area whereas I can foresee numerous disadvantages.

1. It will encourage people to hang around outside which in turn is likely to increase the risk of incidents and unruly behaviour on the pavement.
2. At night it is likely to lead to noise and disturbance for the local residents, which include children, in the flats above the shops.
3. The premises are within a few minutes walk of both primary and secondary schools and in addition there are bus stops for routes to other nearby schools outside the premises so school age children would have to walk by or wait outside.
4. There are a number of vulnerable people evident in Palmers Green including homeless men and women who would be put at further risk by this proposed development.
5. There is residential provision for vulnerable people within a few minutes walk of 292-292A. I know of provision for people with mental health needs and further provision for people with learning disabilities and I'm pretty sure there is further specialist provision that I'm not aware of. These people should be able to participate safely in the local community and this development would threaten their right to be able to do that.
6. For those people who maintain that everyone should have the right to enjoy gambling, there are already numerous betting shops along Green Lanes for those who wish to do so.
7. Conversely, for those struggling with a gambling addiction this development would make their lives and the lives of their families much more difficult.

In light of all the concern expressed by numerous people I hope you will refuse to grant Merkur Slots the license.

IP78 Representation

As a local resident, I do not believe that the licence should be permitted to continue.

I object on the grounds of:

1) preventing gambling from being a source of crime or disorder, being associated with crime or

disorder or being used to support crime.

There is already a concentration of four betting shops close to the proposed new gambling premises. Crime can be caused by many things but sourcing money to feed an addiction is certainly one cause. Crime can also be caused by people not coping with modern society and there is a link between gambling and poor mental health - see link to article from the BMJ:

[10.1136/bmj.39182.424965.AD](https://doi.org/10.1136/bmj.39182.424965.AD)

Giving people an additional and different form of gambling on a 24 hour basis means those who are already vulnerable will be able to or enticed to. This is particularly true as Merkur Slots will be open once the pubs which are very close by close and will offer complimentary food and drink. If the only place to go when the pubs close is Merkur Slots then people will go there at the point when they are least able to resist temptation and control their behaviour. The resulting gambling will have a negative effect on individuals, families and communities.

Running out of money to continue gambling will lead to customers looking to get money - that may be through robbing others in the high street or taking it from people's homes and cars. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises for fear of their mood and need for cash.

2) protecting children and other vulnerable persons from being harmed or exploited by gambling.

This type of venue is totally unsuitable in this area with a large number of growing families and elderly.

Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where young people as well as families with young children congregate. Neon lights and an alluring shop front will attract a child/young adult's attention even if they are not allowed to go inside, maybe especially because they are not allowed inside. I am concerned that children will consider that it is normal to gamble on the high street 24 hours a day - which it is not.

Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmer's Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging on the high street every day. Beggars live in our community and spend time approaching people on the street as well as those sitting at cafes, waiting by ATMs or outside supermarkets and also sitting on the pavement. You see those same people drinking outside the Alfred Herring or ST Food and Wine once they have managed to get some money.

Also shoplifting is a daily issue. The now closed Co-op just down from where Merkur Slots is opening had to introduce security guards as they were losing so much money and ultimately losses due to shoplifting was one of the reasons for their closure. Those who shoplift are well known and are likely to see gambling as a good way of increasing the money they have - when of course the opposite is true. But those people deserve protection from the temptation.

Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many

more people now struggling financially, making them more vulnerable to such a venue.

3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups. Palmers Green high street already has strong evidence of people who are struggling and they will be exposed to temptation right next to where they get off the bus or visit the chemist.

Local residents in Palmers Green have worked with businesses to improve and support the high street trying to make it a more pleasant environment for the community at a time when local high streets are facing huge challenges. Landlords do not need to let to gambling companies - there are plenty of other viable, interesting tenants. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts just at the point of re-opening after Covid.

Please do not allow this venue to open here. Please use the powers which other local authorities have used to restrict casinos and the impact on the large numbers of children and vulnerable people who use the high street.

I have previously written about my objections about how the licence was granted taking into account the impact of coronavirus and lockdown on the fairness and administration of the process. I appreciate very much that the licence is being reviewed in light of those objections.

IP79 Representation

I am a resident of Palmers Green, together with my husband and our two primary-school aged children. I am writing to express my deep concern regarding the application by Cashino Gambling Ltd (trading as Merkur Slots) in relation to a planned 24 hour adult gaming centre at 292-292A Green Lanes (Planning Application 20/03849/FUL). I urge you to prioritise the safety and well-being of minor children, vulnerable adults and other residents of Palmers Green by not granting the requested licence.

Palmers Green is a family community. The gambling premises in question is located only a few minutes walk away from local primary schools. It is in the middle of our community high street. A 24 hour gambling/gaming premises is not only wholly inapposite to the character of this community but represents a real danger to the area and its residents. It has been empirically proven that the prevalence of problem gambling is at its highest in the vicinity of gambling premises. Availability and convenience are strongly associated with problem gambling. In its 2006 "Research on the Social Impacts of Gambling", the University of Glasgow confirmed that electronic gaming machines (such as those that would be installed at the proposed

gaming centre) *“can encourage impulsive gambling and are associated with the highest rates of problem gambling worldwide”*.

There is a wealth of other significant empirical research worldwide that confirms the negative impact of gambling on both communities generally and individuals within those communities. These negative consequences, which will inevitably result if the proposed 24 hour gambling centre is allowed to open in Palmers Green, include, for example:

- Increase in anti-social behaviour due to the kind of patrons that these establishments attract, particularly when they are open 24 hours. Research shows that co-morbidities such as alcohol and substance abuse, and the tendency to violence and criminal behaviour, are extremely commonly present in habitual gamblers.
- Increased crime and public disorder, in terms of both antisocial behaviour such as damage to property and crimes committed in order to obtain money for gambling. Local residents have well-founded fears that the Palmers Green area will be less safe, particularly at night, if Merkur Slots are permitted to establish a presence here.
- Negative effect on young and vulnerable residents of Palmers Green. Not only will their home area be less safe, so that their persons and property are at risk, but they will be exposed to undesirable behaviours. This includes being exposed not only to gambling itself and the anti-social behaviours that go hand in hand with it, but also to the co-morbidities linked to gambling discussed above, such as alcohol and substance abuse. The risk of normalisation of such behaviours by encouraging gambling establishments of the type proposed, and the potential ramifications of that normalisation (not least children and vulnerable adults being harmed and exploited), cannot be overestimated.
- There is an impact not only on the residents of areas where gambling is encouraged, but also on the patrons of gaming centres. Empirical research confirms statistically significant rates of debt, bankruptcy, depression, suicide, domestic violence, criminal offending, lost productivity, job loss, poverty, homelessness, low education levels, familial distress, violence and both mental and physical illness amongst gamblers as compared to the general population.
- Increased public costs to deal with the impact of gambling generally, such as policing costs and the cost of maintaining regulatory oversight, and the impact on gamblers, such as the cost of unemployment, treatment costs, and other social services and payments related to gambling addiction.

In short, there are no legitimate benefits to allowing gambling centres (particularly 24 hour establishments) to operate in communities. Even if any supposed benefits could be cited, there is no doubt these are completely outweighed by the public harm they cause. The financial interest of Merkur Slots in this application is grossly disproportionate to the social harm that the granting of their application will bring to Palmers Green and its residents. It is, moreover, notable there are already a number of betting shops on that stretch of Green Lanes. To encourage even more crime, disorder and harm to children and vulnerable residents by approving yet another gaming establishment (and this time a 24 hour one with electronic gaming machines) would be wholly irresponsible.

I also note the irregularities in the original application by Merkur Slots. The “consultation” of the local community did not meet the required standards. The full planning application was submitted by Merkur Slots on 27 November 2020, with the cut off date of 27 December 2020 for objections to be made to the application – i.e. the consultation period ran over the Christmas holiday period and also during the exceptional circumstances of the COVID-19 pandemic, when residents were urged by the Government to stay at home. The sole notice posted on the premises at 292-292A Green Lanes did not conform to requirements: it was an A4 notice on white paper and in extremely small font. I am not aware that the legal requirement for a notice of the application to be advertised in a locally circulating newspaper was complied with, either. The lack of visibility and readability of the notice, and lack of advertising of the application, combined with the fact that residents were advised not to go out of their homes meant that the vast majority of local residents were simply unaware of the proposal to damage the well-being of our community.

The strength of the objections of Palmers Green residents and business owners cannot be understated. I ask you once again to safeguard the public health, public safety, business, and social interests of our local, thriving, family-friendly community by rejecting Merkur Slots’ application

IP80 & IP81 Representation

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW

As a local resident, I feel strongly that the license granted in January this year was morally irresponsible and should be revoked immediately. I object on the grounds of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering, and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under-resourced. **I am also concerned about walking down the high**

street late at night when gamblers will be going in and out of the premises, particularly as a young woman.

I should not be made to feel vulnerable on my own high street in my own community.

2) Protecting children and other vulnerable persons from being harmed or exploited by gambling

This type of venue is totally unsuitable in this area with a large number of growing young families and elderly. **Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue. My two sons primary school, Hazelwood School, and preschool are 3 minutes walk from the site in question.**

There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adults attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers - and to the risks of antisocial behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially due to the impact of Covid, making them more vulnerable to such a venue.

3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local residents and community group including Palmers Green Action Team (which I am a committee member of)

in Palmers Green have worked tirelessly with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the

opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke

Merkur's licence and allow our local community to thrive. **We have the support of our local MP, now the council, licencing committee and**

councillors should be listening to the voices of local people and acting in their best interests. The granting of this licence is not in

the best interests of Palmers Green community

IP82 Representation

I am Scout Leader at two local scout groups - [REDACTED]

and [REDACTED].

Between the two groups I have over 50 young people aged 10-14 years attending scouts meetings every week and also weekend events. All young people are local to Palmers Green.

Apart from the issue of going home safely - while most of my scouts are collected by parents, some come and go home alone, particularly in the summer months - we do some activities in Palmers Green itself.

Among others, we have a Palmers Green Area Exploration activity, which, with the purposes of increasing familiarity with and the feeling of having roots in the locality of their home area, training observational skills, and enhancing independence (scouts do the activity in groups of 3-5 individuals with supervision, i.e., within sight of adults), is in my view an essential part of the programme.

Furthermore, twice a year (at least in non-COVID-19 times) [REDACTED] Scouts runs a "famous" jumble sale and young people deliver leaflets to houses all around the area to announce it, and the way we do this is also likely to be adversely impacted by increased concerns for child safety.

It is hard to see that a gambling facility is likely to attract the kind of people who will make my scouts feel safe while coming to and going home from scouts meetings and when taking part in activities in Palmers Green, which would have the result in the case of the familiarisation quiz that we would have to have groups accompanied by adults and not under supervision from a distance.

If the gambling site opens it is likely that I will take the exploration activity out of Palmers Green and run it somewhere else, though this will inevitably contribute to a long-term degradation of the soul of the area.

I would therefore like to object to the application on the basis of potential harm to children.

IP83 and IP84 Representation

We are writing in relation to the above review application and wish to register our objections to a licence being granted.

We are residents of Broomfield Avenue in the locality of the proposed Bingo Premises. We also have our 19year old daughter living with us at the above address, who uses the high street frequently. I (xxxxx) am a teacher in North London and in this capacity have grave concerns about the proximity of a Bingo Premises to 3 local schools-Hazelwood, St Anne's and Broomfield.

We understand that under the Gambling Act 2005, the licensing objectives are, inter alia,

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

The dangers of gambling and addiction are now well known and understood and much misery results from this activity. All efforts need to be made to support children in not getting involved in this type of activity especially now when gambling is offered online too. The positioning of a 24hour slot machine venue in a family high street where many children pass by daily is misguided and legitimises the idea of gambling. It also provides a temptation to engage in these activities.

We are also concerned for the vulnerable people in our community who may drift into an establishment of this type -how can these individuals be realistically safeguarded and protected from being exploited by gambling and finding themselves in debt.

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

A 24hour venue of this nature will attract undesirable activity in an area where gang violence is already of concern. We have particular worries for the safety of our 19year old daughter walking down the high street in the evenings past an establishment which would attract groups of men particularly.

We have spoken to many people about Merkur Slots and have found no one in favour of this business. The strength of feeling about needing to protect our children from being harmed by gambling and preventing crime in this community is very high and the wishes of our community need to be respected.

IP85 Representation

I am writing to oppose the license for Mercur slot machines in Palmers Green High Street.

Firstly, I find that the way that this has been applied for has been very dishonest.

A tiny paper was sellotaped to the premises while we were in lockdown and told not to go out unless absolutely necessary. Therefore, these people were hoping no one would see their plan and once it was known it would be too late. They know that the local people would have opposed it. The council should have notified us (it often puts letters through our doors for other things. So this is possible) You have failed us.

To have a betting activity in close proximity to a bus stop where children wait for buses is completely irresponsible !! In fact, any type of endorsement of a betting activity is totally irresponsible. Especially at this time when people do not have much money, may have lost their jobs because of the pandemic (or not). There has been an increase of suicides with the pandemic, so how can a council stand by and support a betting shop/ games arcade opening knowing full well the impact of debt on mental health !!

I implore you to do what you can to block the license of this future shop.

Apart from the damage it will do to the people using it, and the kids waiting outside, it will bring even more crime into the area. It will be a hot bed of dealing all sorts of substances and maybe alcoholism.

Please please block this.

IP86 Representation

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green High Street, 292-292A Green Lanes, N13 5TW.

As a local resident, I feel strongly that the license granted in January this year was morally irresponsible and should be revoked immediately. I object on the following grounds:

1. preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well known risk that these venues attract money laundering and criminality. These venues encourage behaviour that has a negative effect on individuals, families and communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will attract after hours is a concern, especially when the police are under resourced. I am also concerned about walking down the high street late at night when gamblers will be going in and out of the premises.

2. protecting children and other vulnerable persons from being harmed or exploited by gambling

This type of venue is totally unsuitable in this sub-urban area with a large number of growing families and elderly. Two schools sandwich the part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop front will attract a child/young adult's attention. I am concerned that children will become normalised to gambling on the high street. Children will be exposed to gamblers- and to the risks of anti-social behaviour linked to betting 24/7- while en route to school, to the nearby park, playgrounds and local shops.

The Palmers Green ward is one of the top 40% deprived wards in the country. We witness homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt. causing damage to their lives and to their families. Only the other day a homeless person was found dead by the bins at the end of Devonshire Road.

There are many more people now struggling financially, making them more vulnerable to such a venue. To allow such a venue in Palmers Green, would be completely irresponsible and immoral.

3. public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25 year olds, who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local residents in Palmers Green have worked tirelessly with local businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. I insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to thrive.

IP87 Representation

I am writing to object to a 24-hour Adult Gaming Centre being opened by Merkur Slots in Palmers Green. High Street.

292-292A Green Lanes. N13 5TW

As a local resident, I feel strongly that the licence granted in January this year was morally irresponsible and should be revoked immediately.

I object on the ground of:

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

We do not need another gambling centre in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering and criminality. These venues encourage behaviour that has a negative effect on individuals, families and

communities. People will be able to leave the local pubs at closing time and move to the nearby gaming arcade to start gambling. The anti-social behaviour that this venue will attract after normal hours is a concern, especially when the police are under-resourced. I am also concerned about walking down the High Street late at night when gamblers will be going in and out of the premises.

I object on the ground of:

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

This type of venue is totally unsuitable in this area with a large number of growing families and elderly residents. Two schools sandwich that part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where youths congregate. Neon lights and an alluring shop-front will attract a child/young adult's attention. I am concerned that children will become exposed to gambling on the high street. Children will be exposed to gamblers - and to the risks of anti-social behaviour linked to betting 24/7 - while en route to school, to the nearby park, playgrounds and local shops.

Palmers Green ward is one of the top 40% of most deprived wards in the country. We witness homelessness and begging in the High Street.

Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are many more people now struggling financially, making them more vulnerable to the risks that such a venue poses.

I object on the ground of:

(3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13- to 25-year-olds who are suffering from addiction. Gambling addiction can result in homelessness, suicide, domestic violence and family break-ups.

A House of Lords report titled "Gambling Harm – Time for Action" published in July 2020 found that half the adults in the UK gamble at least once a month. A third of a million of UK citizens are "problem" or "disordered" gamblers. It is estimated that for each problem gambler, six other people – a total of two million – are harmed by the breakup of families, crime, loss of employment, loss of homes and, ultimately, loss of life.

The summary of this report begins with this astonishing statement:

"One third of a million of us are problem gamblers. On average, one problem gambler commits suicide every day.

The young are most at risk:

- 55,000 problem gamblers are aged 11–16;
- for girls aged 11–16, the rate of problem gambling is twice that of any other female age group;
- for boys, the rate is three times the rate for adults;
- for all of them, gambling is illegal, yet such efforts as the industry makes to prevent it are altogether unsuccessful"

This is such an alarming finding that Councils should bear these startling statistics in mind when considering granting permission for another gambling venue.

Such high street establishments will naturally be interesting and inviting for some and will most likely encourage impulse gambling

which might lead to addiction. The consequences could be devastating and detrimental to individuals and their families.

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more

pleasant and safe environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. The Council has the moral imperative to revoke Merkur's licence

and allow the local community to thrive rather than be at risk of serious harm.

IP88 Representation

I attach a letter I have sent to the Gambling Commission for inclusion in your review. Please study it in detail and I hope it has a positive impact on the situation.

Gambling Act Review
Paragraph 67
Question 43

Submission by xxxxx

I was extremely upset to find out that the Government has given permission to MERKUR Gaming to open a 24 hour Slots emporium in my High Street (Green Lanes, London N13) without consulting the populace. I was even more upset to find out that our Local Enfield Council had incredibly few opportunities or options to object to this on our behalf.

In view of this I strongly request that the Review pay considered and concentrated attention to this objection.

I would wish that our Local Council had more powers to refuse such an unsuitable company to set up business in our close-knit community.

POINTS TO CONSIDER

- 1) Noise nuisance.
- 2) The place will be a magnet for drifters, vagrants and petty criminals.
- 3) It will lead to more incidents of theft, muggings, intimidation of elderly, the vulnerable and shoppers. There have already been incidents of stealing lunch money from schoolchildren so that gamblers can return with what they have stolen to the betting shops.
- 4) Gambling in the Fox public house led directly to murder in Fox Lane.
- 5) Gambling addiction by local shopkeeper of the xxxxx shop (in Green Lanes near the Post Office) led to the loss of the business and homelessness and humiliation endured by both him and his wife and children.
- 6) In an area already devastated by Covid, gambling emporiums are just the coup de grace needed to ensure utter poverty and dereliction--therefore far from a good idea!
- 7) This is a family area, a residential, close-knit and friendly community. There are four schools and as many churches locally. This ambience should not be jeopardised by the presence of such a venue as proposed by the Merkur Slots Gaming DEN!!
- 8) The inevitable increase in criminality and nuisance will put an intolerable burden on the police at a time when it's the last thing they need. Gradually the area will become undesirable, leading to loss of investment and a council (and government) even more strapped for cash. This will not improve our community or the nation in the long term.

As a result of this review I sincerely hope our Local Council will be given wider powers to prevent such an unsuitable business from opening up in our High Street.

IP89 Representation

To the Enfield Council Licensing Committee,

SUBJECT: Review Application for Bingo Premises – Merkur Slots 292-292A Green Lanes

I am writing to object to a 24hr Adult Gaming Centre being opened by Merkur Slots in Palmers Green, High Street, 292-292A Green Lanes, N13 5TW.

I feel strongly that the license granted in January this year was passed at a time in pandemic circumstances that did not allow the voice of local residents such as myself to be properly taken into account. Granting it was morally irresponsible and the license should clearly be cancelled. I object on the grounds of:

1) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;

Since there are already four betting shops very closely situated to the proposed new gambling premises, the last thing we need is another gambling centre in the area. The risk that these venues attract criminality is well-documented, whether of a low-level anti-social nature or as an opportunity for money laundering. These venues foster behaviour that has a negative effect on individuals, families and communities.; their effect is potentially corrosive and destructive for everyone concerned.

On leaving local pubs at closing time, people who have been drinking will be tempted to move on to the nearby gaming arcade to start gambling. The anti-social behaviour this venue will subsequently attract after hours is therefore a very valid concern. Under-resourced police cannot be expected to solve this totally unnecessary addition to their workload. As an older female ratepayer, I have no idea why the Council would expect me to have to walk down the high street late at night when gamblers will be going in and out of the premises. I daresay I will no doubt also have to negotiate my way past groups of smokers assembling on the pavement outside - or even worse, individuals taking the opportunity afforded to deal drugs.

2) Protecting children and other vulnerable persons from being harmed or exploited by gambling;

This type of venue is totally unsuitable in this area with its large number of growing families and elderly. Two schools exist in close proximity to the part of our high street in question and there is a school bus stop right outside this venue. There is also a McDonalds very close by where youths already congregate. Neon lights and an alluring shop front no doubt will attract a child/young adult's attention. It is inevitable that even very young children will become normalized to gambling if such a venue is accepted as a visible presence on the high street. Children will be exposed to gamblers in person not just online, and to the risks of grooming and other antisocial

behaviour linked to betting 24/7 while they are enroute to school, to the nearby park, playgrounds and local shops.

Gambling must be taken seriously as a factor contributing to serious mental health issues. We have seen a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. We know that gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

I believe that Palmers Green ward is one of the top 40% of most deprived wards in the country, already prone to a degree of homelessness and begging. Town centres should not be places where people are encouraged to waste money and get into debt, causing damage to their lives and to their families. There are more people struggling financially than ever after this pandemic, making them even more vulnerable to such a venue.

How can the Council be complicit in facilitating this potential disease?

3) Safeguarding the future wellbeing of the high street;

Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. I urge the Council to fulfil its moral duty to revoke Merkur's license and allow our local community to thrive.

IP90 Representation

To the Enfield Council Licensing Committee,

Re : Review of the Application for Bingo Premises – Merkur Slots 292-292A Green Lanes

Dear Sir/Madam

I am writing as I would like to strongly object to a 24-hour Adult Gaming Centre being opened by Merkur Slots in Palmers Green High Street 292-292A Green Lanes, N13 5TW

I am a local resident and I feel very strongly that the license that was granted in January this year was morally irresponsible and should be revoked immediately.

The reasons I object are:

1) Protecting children and other vulnerable people from being harmed or exploited by gambling.

This type of venue is totally unsuitable in the Palmers Green Area as there are a large number of young and growing families as well as the elderly. There are two large local schools serving many young families, which sandwich the part of Green lanes close to the proposed venue. I myself have a family of two young teenage boys who go to school in this area. Many school children including my son catch the bus from the bus stop which stops directly outside the proposed venue. I am extremely concerned about the impact of this venue on my 2 sons as well as the many young people living in the area. There is also a McDonalds very close to the proposed venue where young people gather in friendship groups. Neon lights and alluring shop frontage will attract the young peoples attention. It concerns me that children and young people will become normalized to gambling on the high street and that they will be exposed to gamblers and the risks of antisocial behavior linked to betting 24/7. My son will see this every day on his way to school or when riding his bike to the park or playground. This concerns me greatly.

2) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

We do not need another gambling center in the area. There is already a concentration of four betting shops in close proximity to the proposed new gambling premises. There is a well-known risk that these venues attract money laundering and criminality. These venues encourage behavior that has a negative effect of individuals, families, and communities. I am extremely concerned about the anti-social behavior this venue will attract late at night or early evening when my teenage boys may be walking to or from friends' houses.

I myself as a single mother am also concerned about walking down the high street on my own from work in the evening.

3) Public health dangers

Gambling is related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25 yr. old's who are suffering from addiction. My young sons are within this age group and I am concerned about the impact of a 24-hour gambling venue on their young impressionable minds from a mental health point of view.

Gambling addiction can result in homelessness, suicide, domestic violence and family breakups.

Local resident in Palmer Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges. The local community are keen to see the local day and night-time economy thrive and the opening of a 24-hour Adult Gaming Center in a prime spot in the high street would be severely detrimental to those efforts.

I have lived in Palmers Green for more than 20 years and have always felt that Palmers Green was a warm family centered community and was pleased that I decided to bring up my young family here. The granting of a license to a 24-hour Adult Gaming Center has severely made me question that decision and deeply saddens me. I implore you to re-consider your decision. This community and its wellbeing is incredibly important to me and my family.

Please do not allow this venue to open here. I insist the council has the moral imperative to revoke Merkur's license and allow our local community and young people to thrive.

IP91 & IP92 Representation

As Palmers Green residents we are writing to lodge our objection to the proposed award of a 24-hr licence to Merkur Slots for the installation of bingo and gambling machines at premises located in the centre of Palmers Green High Street.

It is regrettable that local residents have only recently become aware of Enfield council's decision to approve the licence for both this and (rumour has it) a similar application for a Merkur venue on Southbury Rd, Enfield. These decisions appear to have been made at a time when council actions were less open to public scrutiny because of the pandemic lockdown. We are, therefore, pleased to note that the council leader, Nesil Caliskan, and one of our local councillors, Tim Leaver, appear to have put their weight behind an attempt to reverse the original ratification. Similarly, we are pleased to note that our local member of parliament, Bambos Charalambous, has taken note of complaints from local residents and agreed to take up their appeal while also expressing disapproval of the current application.

As Mr Charalambous says, the proposed site "will be close to existing betting shops already in the local high street" (Paddy Power and Ladbrokes) "and would be a very unwelcome addition to the night-time and day-time economy of Palmers Green as well as pose a risk to young and vulnerable residents" and that "recent efforts by local residents to improve and help regenerate the high street would be negatively impacted by this arcade right in the centre of the main shopping area" and, he might have added, adjacent to a large Wetherspoons public house, "The Alfred Herring".

Mr Charalambous goes on to point out that the council is "restricted by law in its ability to limit the number of gambling premises and the type of representation which it can take into account when determining an application to open gambling premises". However, it seems that the national body which regulates gambling and issues licenses can only give "guidance" to Local Authorities with "an aim to permit" gambling premises and that a Local Authority "should not comment on whether there is a demand" for such premises. This seems to be a strange interpretation of what merely amounts to "guidance" and how a Local Authority can determine whether there is a local demand for gambling premises without some sort of referendum is manifestly unclear. The only demand any council can be sure of is that of the licence applicant, supported by the Gambling Commission. If this happens to be the law as it stands, then it makes little sense.

Referring to the July 2020 House of Lords Committee on gambling harm, Mr Charalambous expresses his support for the Lords' recommendation "to increase the powers of Local Authorities to limit the growth of gambling premises in an area, for example on the basis of objections from the local community and considerations of the character of the locality" and that this "would be in line with the process for licensing premises for the sale of alcohol". We sincerely hope that the council will take these views on board as part of their reconsideration of the Merkur licence grant.

We recognise that this is ostensibly a licence for adult gambling and that the premises will be stewarded and, one hopes, subject to regular police oversight. Nevertheless, the prospect of a venue open for twenty-four hours a day will inevitably lead to breaches of any nominal protocol and will tend increasingly to attract an under-age clientele as well as inebriated gamblers, plus the inevitable drug dealers, pickpockets and other small-time crooks, not to mention the unwanted noise disturbance to residents living in flats either above those shops which are adjacent to or nearby the proposed site. The last thing the tenants will want to hear is late-night or early morning hubbub in both the venue itself and outside on the pavement where punters are likely to gather.

It will also be situated on a high street frequented by children from two local schools –Hazelwood Junior and St Anne’s Catholic Girls’ School - and, especially on dark winter evenings, will seem like an enticing attraction. We all know that gambling addiction can begin at an early age and can result in homelessness, suicide, domestic violence and mental breakdown. Palmers Green ward is, apparently, already one of the top 40% of the most deprived wards in the country and further deprivation needs to be opposed at all costs.

Our High Street is badly in need of regeneration in the wake of lockdown resulting from the recent pandemic. What it does not need is the degeneration which the award of a licence to Merkur Slots is likely to produce.



FOX LANE & DISTRICT RESIDENTS' ASSOCIATION

www.foxlane.net

IP93 Representation

FLDRA
211 Fox Lane
London
N13 4BB

By email to:

licensing@enfield.gov.uk
bambos.charalambous.mp@parliament.uk

fldracttee@gmail.com

9 May 2021

Dear Sir/Madam

RE: Review of Application for an Adult Gaming Centre – Merkur Slots

We write to object to the opening of Merkur Slots, a 24 hour Adult Gaming Centre to be located at Palmers Green High Street, 292-292A Green Lanes, N13 5TW.

As the local Residents' Association, we feel strongly that the licence granted in January 2021 was morally irresponsible and should be revoked immediately. We list our reasons to object on the following grounds:-

1. 24 hour gambling will contribute to a source of crime and anti social behaviour; It will more than likely make the area a "no-go-zone" for women, particularly at night".

It is evidential that we do not need another gambling centre within the area. There are already four betting shops in close proximity to the proposed new gambling premises. Such venues attract money laundering, criminality and anti-social behaviour. Such behaviours have a negative impact on individuals, families and destroy communities. Due to this venue being 24 hours, the anti-social behaviour at all hours of the night and early mornings it will attract is a cause for concern. We are already aware of the disruptive behaviour pubs bring without adding the addition of a 24 hour gambling centre. Consideration must be given to our police forces who are already overworked and under resourced.

2. Our duty in protecting children and other vulnerable persons from being harmed or exploited by gambling.

A 24 hour gambling centre is totally unsuitable to this area, due to the large number of families, growing families and elderly residents. There are two schools situated at either side of our high street making the location of the venue questionable. In addition, located directly outside the venue is a school bus stop/bus stop. We know only too well that many youths congregate at McDonalds which is only a stones throw away. The venue's neon lights will make the shop front alluring and will inevitably attract young children. We are concerned that this may become appealing to children, resulting in it being normalised, which it should not. This appealing nature will be unavoidable to our youth and will expose them to gamblers and gambling whilst en route to school, libraries, playgrounds and parks as well as their local shops. We have already mentioned the concern surrounding anti-social behaviour above.

3. The need to improve our already deprived Ward

Palmers Green Ward falls within the top 40% most deprived Wards in the Country. We witness homelessness and begging on a daily basis, which should tell us there is major room for improvement. Town centres and high streets should not be places where people are encouraged to get into debt, causing damage to their lives and to their families. There are many people more-so than before, struggling financially making them more vulnerable and extra sensitive to such a venue.

Gambling has been related to serious mental health issues with a sharp increase in the number of NHS gambling clinics for 13-25-year-olds who are suffering from addiction. Gambling addiction can result in severe financial hardship, homelessness, suicide, domestic violence and family breakups to name a few. Local residents in Palmers Green have worked with businesses to improve and support the high street, making it a more pleasant environment for the community at a time when local high streets are facing huge challenges.

The local community are keen to see the local day and night-time economy thrive, and the opening of a 24-hour Adult Gaming Centre in a prime spot in the high street would be highly detrimental to those efforts.

Please do not allow this venue to open here. We insist the Council has the moral imperative to revoke Merkur's licence and allow our local community to have a chance to thrive.

Bambos - we send to you in hope of your support.

We look forward to receiving your response.

Kind regards

Philip Sheffield, Chair
Sabrina O'Reilly, Planning

BAMBOS CHARALAMBOUS MP
ENFIELD SOUTHGATE



HOUSE OF COMMONS
London SW1A 0AA

Our Ref: BC25464

BY EMAIL ONLY TO: licensing@enfield.gov.uk

12 May 2021

Dear Enfield Licensing

REVIEW APPLICATION FOR BINGO PREMISES – MERKUR SLOTS 292-292A GREEN LANES

I write as an interested party representing my constituents in Enfield Southgate to support the review of the gambling premises licence granted to Merkur Slots for 292-292a Green Lanes, N13 5TW.

I have been contacted by over 100 local residents who are unanimous in their opposition to this establishment opening in the local shopping area of Palmers Green. The Fox Lane & District Residents' Association, representing a large area adjacent to Green Lanes, have also informed me of their concerns. And I am aware that Enfield Council's Leader and the Palmers Green Ward Councillors also oppose this licence.

I share the concerns of local residents and strongly oppose this gambling premises licence. I urge the Licensing Sub-Committee to carefully consider the comprehensive evidence provided by Enfield Council Leader, Cllr Nesil Caliskan in her review application letter of 14 April 2021. I will not repeat that evidence which I believe clearly demonstrates that this 24 hour gambling establishment does not meet the objectives of the Gambling Act 2005 particularly when considering the following grounds:

- Preventing gambling being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;
- Preventing children and other vulnerable persons being harmed or exploited by gambling.

I am very concerned that the evidence shows that there is a serious risk to a further increase in crime and anti social behaviour in the Palmers Green high street area.

I would also highlight the following factors relating to children and vulnerable persons:

- Palmers Green was in the top 40% deprived wards in England in 2019 and 2020, along with the neighbouring wards of Bowes and Southgate Green;
- There is an NHS Recovery House, supporting adults in crisis or experiencing mental health issues, in close proximity;
- The location is next to a bus stop, used by local school children. There are two local schools within a short distance and the bus stop is on the route used by many secondary school age children travelling to and from other schools in Enfield. It is also close to a McDonalds frequented by many young people. Children and young people will be exposed to gambling on a daily basis as a result.



- There are two pubs very close, as well as several cafes and restaurants. The location at the centre of the high street is passed not only by those shopping and using the eateries, but also by those using the railway station, those using the nearby soft play area and Broomfield Park.

Local residents in Palmers Green have worked with businesses to improve and support the local high street and to make it a more pleasant environment for the community. As the country emerges from the current lockdown with high street businesses having suffered so much and facing many challenges in the near future, I would like to see everything possible being done to encourage a thriving local economy for both retail and hospitality. There is already a cluster of four existing betting shops near 292-292a Green Lanes. I have no doubt that the opening of a 24 hour gambling centre in the heart of the high street will be highly detrimental to the local economy, and will have an adverse impact on the local community and economy.

My concern about this gambling premises licence has caused me to raise this issue in Parliament.

I presented a petition of the residents of Enfield Southgate to the House of Commons calling on the Government to urgently revise the legislation on the application notice requirements for a gambling premises licence on basis that the current provisions are wholly inadequate. I have also asked for a review of gambling premises licences granted during the lockdown period on the basis there were no additional provisions to notify the public of applications during a time when the public were legally required to go out only for essential purposes. I am awaiting the response of the Department for Digital, Culture, Media and Sport.

I am also concerned about the limited powers Local Authorities and Licensing Authorities have to refuse gambling premises licences even where there is substantial local opposition or where there is already a clustering of gambling establishments. I made a submission to the Gambling Act Review which concluded in March 2021 expressing my support for local Licensing Committees being able to consider and refuse an application taking in account the benefit to the local community, strength of objections from the local community, clustering of gambling premises and the general character of the locality.

I trust the Licensing Sub-Committee will consider all the evidence submitted very carefully, included representations made by the local community, and will revoke this gambling premises licence.

Yours faithfully

A handwritten signature in blue ink that reads "Bambos".

Bambos Charalambous MP

Enfield Licensing
licensing@enfield.gov.uk
(By Email)

Joanne McCartney AM
City Hall
The Queen's Walk
London
SE1 2AA
Switchboard: 020 7983 4000
Minicom: 020 7983 4458
Web: www.london.gov.uk

Our ref: JM/JP
Date: 14 May 2021

Dear Licensing,

RE: Merkur Slots, 292 – 292A Green Lanes, Palmers Green, London, N13 5TW

I am writing to you as I have received a number of complaints regarding the proposed application for an adult gaming centre at 292/292a Green Lanes N13 5TW made by Merkur Slots.

I welcome this opportunity to comment on this application. I am aware that local residents were concerned that given the timing of the consultation, they were unaware of this application and therefore the first many heard of the application was when it had been granted.

I would like to object to his application for the following reasons:

- There is already a concentration of existing betting shops on the local high street, no more are needed or wanted
- There is a great deal of strength of opposition in the local community which has come together to oppose this application
- This is a local high street where many secondary school pupils gather at the end of the school day and who might be attracted to such a venue
- We need to make sure that our local high streets thrive, especially in recovering from the Covid-19 Pandemic, a gambling venue will detract from this aim
- There is real concern that these premises will attract anti-social behaviour, increase debt issues amongst vulnerable people and will blight the area.

Thank you for the opportunity to respond to this review of the application and I hope the points I have raised will be considered.

Yours sincerely,



Joanne McCartney AM
London Assembly Member for Enfield and Haringey

IP96 Representation

Submission for review of the Bingo Licence - Merkur Slots from the Stop PG Merkur Slots Campaign

We are a group of local residents who formed the campaign group, 'Stop PG Merkur Slots, to oppose the license granted to Merkur Slots to open a bingo and slots premises at 292-292A Green Lanes. This is a very unwelcome addition to the Palmers Green neighbourhood and will have a negative impact on efforts to improve and regenerate the high street.

We are submitting the following objections for consideration by the Licensing Committee:

Protecting Children and other Vulnerable Persons from being harmed or exploited by gambling

LOCATION

The location of the proposed Bingo/Gaming premises is in the heart of the Palmers Green shopping area. Footfall here is predominately families and local residents. This area is particularly popular with children and young people. The bus stop immediately outside the proposed premises is very busy, and used by children attending the local schools and those attending Palmers Green High School, Highlands, Southgate School and Southgate College. It is especially busy at beginning and end of the school day. There are also a number of local schools nearby: Oakthorpe Primary School, Hazelwood Primary School and St Ann's Catholic Secondary School. The position of the Merkur premises is also on a major thoroughfare for children and young adults going to Palmers Green Station, Broomfield Park and the library. There is also a children's soft play and events venue minutes away in the Lodge Drive car park and the Explore Learning Centre. The Job centre, Alfred Herring and McDonalds are also close by and attract young people and vulnerable adults. Groups of young people particular congregate around McDonalds. Young people will be waiting for buses and a gambling premise will inevitably attract their attention and curiosity. They will also be mixing with those using the premises gathering outside to meet up or smoke. This will reinforce the notion that gambling is a normal, legitimate part of everyday life as well as making it appear alluring and exciting and not the harmful or addictive activity it has been proved to be.

We note the intention to restrict access to those aged over 18, but would point out that a significant proportion of young people turn 18 in their final year at school. Although it will be claimed that the business operates an over 18's only policy, it remains a bad example to young people in the heart of our community.

We are very concerned about this gambling premises 'normalising' gambling for children and young people. They will be exposed to it on a daily basis and we submit that this particular location is completely unsuitable because of the harm to our vulnerable and young people.



Schools surrounding Merkur Slots venue in Palmers Green

We note that this concern is highlighted in the Report from the Gambling Related Harm All Party Parliamentary Group, June 2020:

' 1.7% of 11-16 year olds are classified as problem gamblers and 2.7% as 'at risk' gamblers⁴⁷. That 1.7% equates to approximately 55,000 11-16 year olds in England, Scotland and Wales and for boys in

particular the prevalence of problem gambling is three times that of the population at large. Many of the measures outlined in this report would better protect children, young people and vulnerable adults from harm. These include greater restrictions on advertising including via social media, a crackdown on the ‘normalisation of gambling’, the relationship between sports and gambling firms and better identity, age and verification checks

Given the risks to young people from gambling we very much welcomed the inclusion of gambling related harm in the NHS Long-Term Plan and the announcement on 24 June 2019 that the NHS is to open its first gambling clinic for children and young people. The new clinic for young people will open this year in London as part of an expansion of NHS services across England. Fourteen other clinics for adult gambling addicts are set to open.’



Merkus Slots will be positioned by the most central bus stop used by children and young people on the way to school

Evidence supporting the concern about normalising gambling for young people.

<https://care.org.uk/news/2018/06/new-report-highlights-gambling-is-being-normalised-for-young-people>

<https://www.bbc.co.uk/news/business-46286945>

<https://www.theguardian.com/society/2020/mar/27/children-more-likely-to-become-gamblers-due-to-high-volume-of-betting-ads>

<http://www.gamblingcommission.gov.uk/PDF/RGSB-Gambling-and-children-and-young-people-2018.pdf>

MENTAL HEALTH

There is a mental health resource, Recovery House Enfield, nearby at 449-451 Green Lanes, [<http://www.beh-mht.nhs.uk/services/recovery-house-enfield/212>] offering short term support for people in crisis, including people with addiction issues. We note that this was not mentioned in Merkur Slots Local Area Risk Assessment. The Priory Hospital, Grovelands House, The Bourne is also located in the neighbourhood and is a centre for treating addictions, including gambling.

The proximity of the Merkur premises presents a serious risk to the vulnerable people they are supporting. The addictive nature of gambling is well documented. This bingo/slots premises will also encourage the vulnerable in our area and persistent gamblers to gamble putting themselves at risk. It is not, as Merkur portrays, a social, fun, inclusive activity.

We would emphasise these concerns about gambling related harm and the impact on mental health by highlighting the following extracts from the Report from the 2020 Gambling Related Harm All Party Parliamentary Group, June.

Scale of gambling related harm

‘We agree with the proposition that problem gambling in the UK should be treated as a public health issue. New research from YouGov, commissioned by the charity GambleAware, estimates that up to 2.7% of adults in Great Britain, or nearly 1.4 million people, are ‘problem gamblers’. While caution has been voiced over these figures and some suggest that the true addiction rate is likely to be closer to the health survey figures of 0.7% cited by the Gambling Commission, the findings still indicate that the number of problem gamblers may be

significantly above current estimates. The report also found that as many as 7% of adults, or 3.6 million people, report having been negatively affected by someone else's gambling problem. Overall, the research suggests that nearly 5 million British people have experienced harm linked to gambling, even accounting for the overlap between problem gamblers and those they affect.

In an article in the British Medical Journal²⁵ the widely respected academic who specialises in the field of treating gambling addiction, Dr Henrietta Bowden-Jones OBE, Director of the National Gambling Clinic, stated that "pathological gambling is a serious public health problem. Around half a million people are pathological gamblers but an estimated two million are at risk of developing the illness, defined as repeated gambling that causes significant negative financial, social, and personal consequences. As with other addictions, genetic vulnerability interacts with environmental factors and people whose parents gambled when they were young are at higher risk of becoming pathological gamblers.

.... At the clinic in London run by Dr. Bowden Jones, which the APPG has visited, to help those with gambling addiction, the average patient has lost over £150,000, half have lost a partner, and 84 per cent of them have committed some illegal act to support their gambling. Other leading clinicians in the field such as Dr. Matt Gaskell identify this as 'gambling disorder.' [pp 23 -24]

....Dr Matt Gaskell, Consultant Psychologist & Clinical Lead at the NHS Northern Gambling Service has advised that when looking at online gambling harm, it is instructive to look at the top three most prevalent products that addiction patients use:

- 1) In-Play Sports Betting*
- 2) Slot Machines (online and land-based)*
- 3) Roulette (principally digital roulette)*

These games, he says, have harmful characteristics in common, and they are

associated with the largest gambling losses and problem gambling. He has noted to us that these games:

"Are immersive, keep gamblers in continual play betting frequently, provide

frequent reinforcement, lead to excessive play without the time to reflect,

cloud their judgement and decision making, & confuse them about their

probability (known as gambler's fallacy) of winning and ability to influence

this (known as the illusion of control). They undermine the concept of 'responsible gambling'.

My patients tell me they are immersed in continual play, usually at high

speed, with highly frequent opportunities to bet, getting a quick result,

motivating them to bet again with no time to reflect. [p32]

Gambling and suicide

'Problem gamblers are significantly more likely to attempt suicide, according to a study commissioned by GambleAware, which found that problem gamblers were six times more likely to have suicidal thoughts or try to take their own life and could be 15 times more likely to do so.' [p29]

<http://www.grh-appg.com/Online-Report>

We would also like to highlight the following by Ben Chapman who has written extensively in The Independent about gambling related harm, particularly the addictive nature of slot machines.

'Some academics argue that slots games are even more addictive than electronic roulette. They are certainly lucrative, now accounting for around 40 per cent of bookies' gambling machine revenue, and growing.

What's the big deal you might argue? With stakes at just a couple of quid, there's no harm. It's pocket change; a bit of fun.

A fair point on the face of it, but consider this: at £2 a spin, the average slot machine game takes a gambler's money at roughly the same rate as playing electronic roulette (aka an FOBT) at £50 a spin.

These very same slot machines, complete with rapid spins, flashing lights, repetitive music and cartoons are also available in 1,800 gambling arcades and more than 100 casinos, 24 hours a day, seven days a week.

Slot machine games let you bet eight times as rapidly and take about three times as much of each bet as roulette.

When it comes to cutting FOBT stakes to £2, addicted gamblers won't need to find a workaround as they will still be able to lose money rapidly on the same machines in bookmakers.

While the public may be under the impression that "crack cocaine" betting machines have in effect been turned into much less harmful fruit machines, this is not the case.

FOBT machines run two types of games only one of which is affected by the new stake limit. That category, known as B2, typically takes the form of roulette.

But the same machines are also allowed to run slot machine-style games – category B3. The latter category lets players bet eight times faster and jackpots are just as high as £500. It also takes a much bigger cut of their winnings.

Slot machine games will still be available in bookmakers and casinos

Gamblers lose money on slot machine games at £2 stakes just as quickly as on FOBT games at £50 stakes, raising questions as to why only one type of game was targeted.

A third of the total lost on FOBTs is already lost on slot machine games which will be completely unaffected by the new policy, DCMS [Department for Digital, Culture and Media] concedes.

Given the availability of these games on the same machines, the amount lost on slots seems likely to rise when stakes on roulette are drastically cut.

The Gambling Commission said it had advised the government that slot machine games at low stakes were equally as harmful as roulette at high stakes but DCMS decided to focus exclusively on one type.

Last month, the Gambling Commission rushed out a call to evidence on the harm from other types of machines but it has no indication of when any findings will be published or any action taken.

A commission spokesperson said: “Our advice to the government’s gambling review was based on the best available evidence and focused on reducing the risk of gambling-related harm.

“Our recent call for evidence builds on our advice that a stake cut for B2 gaming machines does not address the risk of harm presented by other categories of gaming machines.

<https://www.independent.co.uk/voices/fixed-odds-betting-terminals-betting-gambling-slot-machines-mps-a8635796.html>

BEING A SOURCE OF CRIME AND DISORDER, BEING ASSOCIATED WITH CRIME AND DISORDER OR BEING USED TO SUPPORT CRIME AND DISORDER

We are also concerned that opening a gambling premises is likely to exacerbate crime in the area especially robbery, shoplifting and vehicle crime as people seek to source funds.

The nearby MacDonald’s is already an area where people congregate and is associated with anti-social behaviour. The Merkur Bingo premises is so close to this location and will draw more people to hang around in this area and exacerbate the existing problems.

People gathering outside the premises to smoke and meet up, as well as those possibly coming from the nearby Wetherspoons when it closes, will cause congestion in an area where there is already the bus stop and the cycle lane. This could make older, vulnerable people, women and those with children feel uncomfortable and later at night, possibly intimidated. It is not clear how many staff will usually be on the premises as Merkur slots can operate with single staffing. We do not feel a single member of staff can adequately oversee what is going on inside and outside the premises as well vetting ages and monitoring for problem gamblers. The recently published report by the House of Lords: *Gambling Harm - Time for Action* has raised a number of concerns about lone working which have been highlighted in Cllr Caliskan’s submission.

<https://publications.parliament.uk/pa/ld5801/ldselect/ldgamb/79/79.pdf>

We would also draw the committee’s attention to a concern, raised in the 2020 report by the Gambling Related Harm All Party Parliamentary Group, about the underfunding and lack of resources for The Gambling

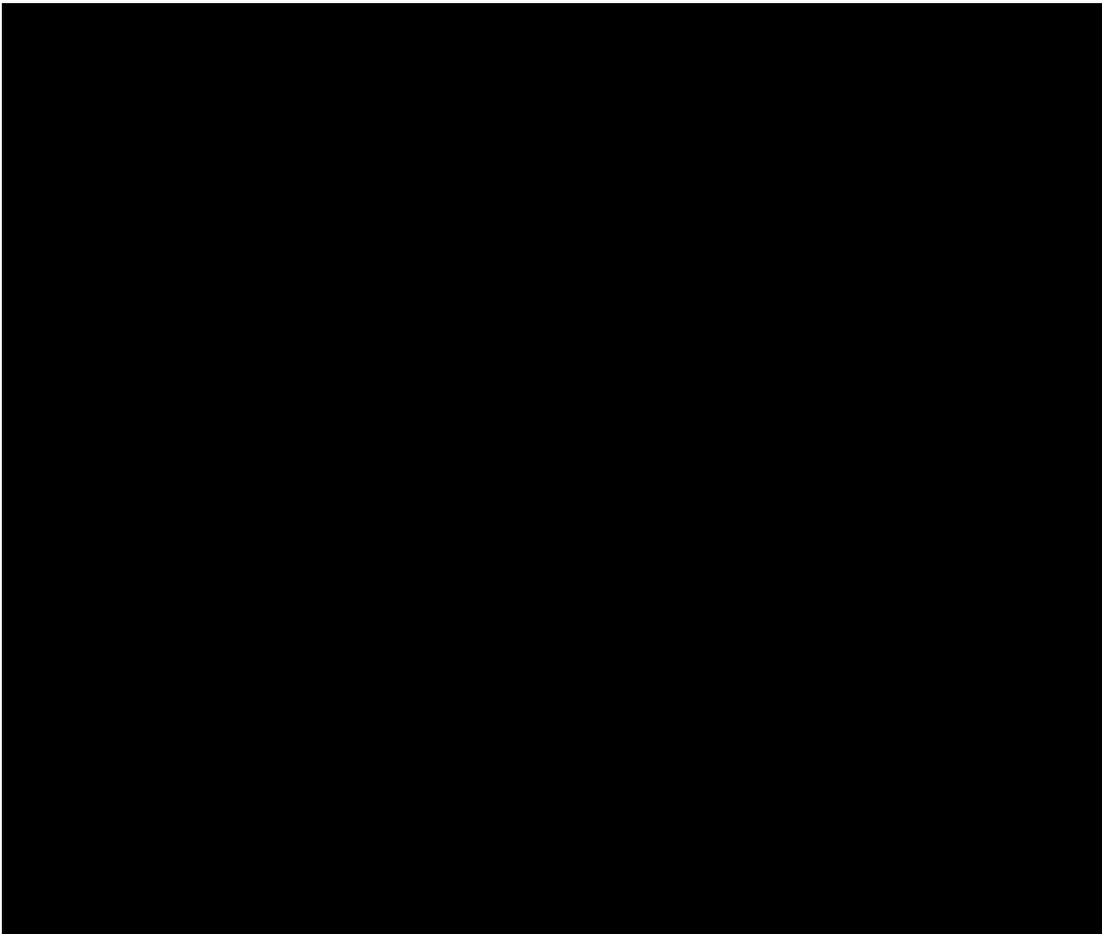
Commission. This would also apply to the Local Authority and must impact on capacity to monitor and inspect premises.

Meanwhile, the regulator itself, the Gambling Commission, has also come under increasing scrutiny in recent months. It was heavily criticised in an unusual intervention by the National Audit Office (NAO), the Government's own Auditor in its recent report. The NAO noted that the Gambling Commission is effectively being outrun by betting companies and warned that the Gambling Commission is struggling to protect people from gambling-related harm.....

The report also notes that there is insufficient funding for Gambling Commission, which has an annual budget of £19m but is expected to regulate an industry that took £11.3bn from gamblers last year. [p16]

<http://www.grh-appg.com/Online-Report>

This evidence is submitted on behalf of the Campaign Group, Stop PG Merkur Slots by:



MERKUR SLOTS, 292-292A GREEN LANES, PALMERS GREEN, LONDON, N135TW**LICENSING SUB-COMMITTEE HEARING****16TH JUNE 2021****REMOTE HEARING – BUNDLE INDEX**

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Skeleton Argument of Philip Kolvin QQC

ENFIELD LICENSING SUB-COMMITTEE

16TH JUNE 2021

IN THE MATTER OF 292 GREEN LANES LONDON N13 5TW

SUBMISSIONS OF CASHINO GAMING LIMITED

INTRODUCTION

1. This is a unique case, in which an application for review of a gambling premises has been made before the premises has even been opened. Nor is there (or could there be) any submission or suggestion that Cashino Gaming Limited (“the licensee”) will fail to comply with its legal obligations pursuant to the licence.
2. The licensee will submit:
 - a. That it would be illegal, contrary to the scheme of the Gambling Act and/or irrational to interfere with the licence at this stage (see paragraphs 37-44 below).
 - b. That in any case, there should be no interference with the licence having regard to the Gambling Act and Gambling Commission Guidance (see paragraphs 45-74 below).
3. It is right to point out that the licensee operates in excess of 180 premises. It has been granted a premises licence in every premises in which it has applied, including in deprived areas. Not one has ever been subject to a review. This is due both to the nature of the product which tends to cause fewer issues than betting offices and the licensee’s high operational standards.

4. In the light of the history, in these submissions the licensee will explain why, with respect, this application is legally misconceived and why the facts clearly do not justify any interference with the licence.

THE HISTORY

The licence

5. The premises is a former licensed betting office, having been granted planning permission in 2003 and trading until 2019.
6. On 27th November 2020 the licensee applied for a bingo premises licence.
7. The application was made in accordance with section 159 of the Gambling Act 2005, in the prescribed form, containing the prescribed information, and accompanied by the correct fee.
8. Section 160 of the Act permits the Secretary of State to make regulations regarding notice of the application. The relevant regulations are the Gambling Act 2005 (Premises Licences) Regulations 2007. The licensee complied with the requirements by:
 - Notifying the responsible authorities of the application, including the licensing authority itself, the Gambling Commission, the police, the fire and rescue authority, the local planning authority, the environmental health authority, the child protection authority and HMRC
 - Advertising the application in a local newspaper.
 - Advertising the application on the window of the premises.
9. The licensing authority initially made a representation, but withdrew it on agreement of conditions. Furthermore, the licensee discussed and agreed conditions with the Police. No other authority or interested person made representations.
10. Accordingly, on 4th January 2021, the Council granted a bingo premises licence, subject to mandatory conditions and 10 individual conditions which had been agreed with licensing and the Police.

The planning permission

11. Meanwhile, on 27th November 2020, the licensee applied for planning permission to change the use of the premises to adult gaming centre, which is the correct use in the case of high street bingo premises.
12. 27 neighbouring properties were notified. Only one representation was received from a member of the public. Apart from a minor comment from traffic and transport, no other authority made a representation.
13. However, due to the fact that the application was for a 24 hour use the planning officer consulted environmental health whose officer reported that there was a lack of residential units within direct proximity and:

“... the proposed scheme would have negligible impact upon surrounding residential amenity due to appropriate distancing between the adult gaming centre and other nearby facilities.”

14. So far as a suggestion that ASB may result, the planning officer reported:

“... it has been considered that the proposed would maintain the status quo, due to little difference in the use itself. This has been weighed against the benefits and the change has been considered beneficial to the area economically and visually through presenting a used unit as opposed to a continuous façade of vacant spaces.”

15. Accordingly, planning permission was granted on 21st January 2021.

The lease

16. In reliance on the bingo premises licence and the planning permission, and therefore in the legitimate expectation of being able to operate the premises commercially as a

bingo premises, the licensee entered into a lease of the premises, with property costs over a 5 year period of approximately £1m.

The application for review

17. Three months after grant of planning permission and the licence, this application for review was submitted.
18. The licensee's letter of support dated 14th April 2021 makes it clear that she is opposed to gambling premises as a matter of principle, stating:

"I am completely opposed to any new betting shops or gambling premises opening in Enfield...."

And

"Betting shops and gambling venues are a blight on our town centres."

19. As the Sub-Committee will be aware, regardless of who holds that opinion, it is irrelevant to the Gambling Act jurisdiction.
20. Furthermore, the applicant correctly acknowledges that:

"... the local authority does not have the power to prevent the concentration of betting shops and other gambling venues."
21. She also states that the Council has asked the Government to give them greater powers to prevent gambling premises of any type to open in the area.
22. The applicant also makes some points regarding the long-since granted licence application, and about the area, which may have been relevant had they been made as an objection to the application in 2020, and which would have been responded to by the licensee during the application process.

THE LAW

23. The scheme of the legislation is as follows.

Grant of applications

24. Following a duly made application, the application may and, if there are representations which have not been withdrawn, shall be placed before a Licensing Sub-Committee.

25. As the Sub-Committee will be aware, each piece of licensing legislation sets out a different approach to the question of grant. The approach relevant to gambling, which applies whether or not there have been representations, is in section 153(1) 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

(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)).”

26. 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, whether a gambling premises contributes to regeneration etc.
- iii. Moral or ethical objections to gambling.
- iv. The demand / need 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).

27. In very short, where the application is compliant with (a)-(d) in section 153(1) of the Act, the aim is to grant.

Duration of licence

28. A licence is granted in perpetuity. There is no system of annual renewal.

29. There are provisions for surrender, revocation for failure to pay the fee or lapse (e.g. on insolvency), as well as revocation following review (see below). However, the clear intention is that licences are granted without limitation in point of time, which enables licensees to plan their operation and incur long term liabilities, safe in the knowledge that unless a supervening event occurs, such as insolvency, breach or demonstrated harm to the licensing objectives, their licence is secure.

Appeals

30. Those who made representations in relation to the application, and of course the licensee itself, may appeal against a decision under section 206 of the Act.

Reviews

31. Under section 197, responsible authorities and interested parties (as defined by section 158) may apply for a review of a licence. The review is then advertised and representations may be made.

32. It then falls to the Licensing Sub-Committee to decide whether or not to take action including revocation, suspension or amendment of conditions: section 202. In making its decision, it must of course take into account the application for review and the representations. The test, however, is that set out above in section 153(1) of the Act: section 201(5).

33. As the Gambling Commission's Guidance says:

10.3 Licensing authorities are expected to act in a manner that is in accordance with the powers set out under the Act. This means that licensing authority actions, including reviews, should be in pursuit of the principles set out in s.153 of the Act or underpinned by reasonable concerns, such as changes to the local environment or resident complaints.

34. In exercising its review functions, the Licensing Sub-Committee must also have regard to the Human Rights Act. As its gambling policy says:

1.1.5 The Human Rights Act 1998 incorporates the European Convention on Human Rights and makes it unlawful for a local authority to act in a way that is incompatible with such a right. The council will have regard to the Human Rights Act when considering any licensing issues, and particularly in respect of the way in which applications are considered and enforcement activities are carried out.

35. A licence is a possession for the purposes of Article 1 First Protocol of the European Convention: Tre Traktorer v Sweden (1989) 13 EHRR 309 and is therefore protected.

36. Article 1 of the Convention states:

"1. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law. 2. The preceding provisions shall not, however, in any way impair the right of a State to enforce such laws as it deems necessary to control the use of property in accordance with the general interest or to secure the payment of taxes or other contributions or penalties."

LEGAL SUBMISSIONS

37. The licensee is the holder of a licence which was granted entirely properly and in accordance with all the requisite procedures in the Gambling Act 2005.
38. The licence was granted in perpetuity and, unless brought to an end by one of the terminating events, it is open-ended.
39. Any attempt to interfere with, let alone take back, a licence before it has even traded is unlawful:

- (1) It is contrary to the scheme of the legislation. In Padfield v MAFF [1968] A.C. 997 @ 1030, Lord Reid said “*Parliament must have conferred the discretion with the intention that it should be used to promote the policy and objects of the Act, the policy and objects of the Act must be determined by construing the Act as a whole...*”

Clearly, a review cannot be used to appeal against a grant of a licence. A review can of course be entertained once the premises’ impact on the licensing objectives is evidenced. But it is not a means of second-guessing the duly made decision of the licensing authority made a matter of weeks earlier;

- (2) It would amount to a breach of the rights of the licensee under Article 1 Protocol 1. It would amount to removal of the licensee’s right to trade, without compensation, in circumstances in which no harm had been demonstrated. There is clearly no necessity¹ to do so, since the licensing authority retains the right to review, or accept an application for review, for good reason once the premises are trading and the presence or absence of harm is in evidence. Further, as was stated by

¹ The necessity test was expressed by Lord Mance in Recovery of Medical Costs for Asbestos Diseases (Wales) Bill: Reference by the Counsel General for Wales [2015] UKSC 3 as follows: “It is settled law that a justification is to be assessed by reference to a four-stage test: (i) whether there is a legitimate aim which could justify a restriction, (ii) whether the measure adopted is rationally connected to that aim, (iii) whether the aim could have been achieved by a less intrusive measure and (iv) whether, on a fair balance, the benefits of achieving the aim by the measure outweigh the disbenefits resulting from the restriction.”

the European Court of Human Rights in James v UK (1986) 8 EHRR 123, ECtHR, at para 54: “*the taking of property in the public interest without payment of compensation is treated as justifiable only in exceptional circumstances.*”

(3) It breaches the legitimate expectation of the licensee that its licence would not be withdrawn arbitrarily and in a way which amount to an abuse of power by the licensing authority (see explanation of legitimate expectation by Lord Carswell in Gokool v Ministry of Health [2008] UKPC 54 @ [21]. In this case, it will be recalled, the licensee entered into onerous leasehold obligations on the strength of the licence which was granted.

40. As stated above, the premises has not traded. There has been no breach of condition, no demonstrated harm to the licensing objectives, no change in the character of the area. As such, this is effectively an appeal against the grant of the premises licence. It is an attack on the principle of the licence. This is an ill-conceived use of the review process. A review should not be used as an effective appeal against the grant of a licence. A review is a process which arises from the actual operation of the premises and their demonstrated impact on the licensing objectives.

41. If a review could be brought in such circumstances, it would have the effect of placing every licence in jeopardy, whether or not they are harming the licensing objectives. This is not consistent with the scheme of the Act, which allows compliant premises to trade on while potentially bringing in for review premises which are not compliant and/or which have harmed the licensing objectives.

42. As the licensing authority states in its representation:

“As the premises has not started to trade yet the Licensing Authority has no evidence as to whether the operation of the premises is undermining the Licensing objectives.”

43. In such circumstances, there is no basis for interference with the licence.

44. For these reasons alone, this application should be dismissed and no action taken.

FACTUAL SUBMISSIONS

45. Without prejudice to the legal submissions, the licensee wishes to assure the Sub-Committee that it will in fact trade in compliance with section 153(1)(a)-(d), so that no interference with the licence is warranted in any event.
46. The licensee 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, and also through paper-based versions of the tablet games.
47. As one would expect, the licensee 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.
48. Bingo premises are subject to a high degree of regulation in order to support the licensing objectives, including the following:
 - Premises and their management and operation are subject to the Gambling Commission's extensive Licence Conditions and Codes of Practice applicable to non-remote bingo operating licences.
 - Premises licences are subject to mandatory and default conditions set by the Secretary of State with the approval of Parliament.
 - The number of machines, the way they operate and their stake and prize limits, are strictly regulated through the Gambling Act 2005 (by Parliament), regulations (by the Secretary of State) and technical standards (by the Gambling Commission). For example, at least 80% of the machines in bingo premises have the same stake and prize limits as pub fruit machines, with 20% governed by the same limits as other high street gambling establishment (AGCs and betting offices).

- In addition, this licence is subject to a raft of individual licence conditions as mentioned above, which were agreed with the licensing authority and police on grant of the licence.

The nature of high street bingo premises

49. 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 (7,315 v 642²). As to impact, betting offices can bring with them social issues, including street drinking and disorder and loitering outside. 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.
50. In fact, high street bingo premises in general and the licensee's in particular are different from betting offices in terms of local impact. It is therefore important to convey why the licensee's premises trade without regulatory concern.
51. *On arrival.* It is noticeable that groups of customers 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.
 - 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.

² Gambling Commission industry statistics.

- 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.
52. The effect on the streetscape is important. Those walking past high street bingo premises do not generally find groups of customers loitering outside. Consistent and authoritative evidence on this topic is given by company witnesses and also Stuart Jenkins, an independent witness who has visited many of the licensee's London premises.
53. *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 Committee of Advertising Practice Codes of Practice which are administered by the Advertising Standards Authority and 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.
54. *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.

55. *Appearance.* Like the exterior, the interiors of premises are clean, well-lit, comfortable and carpeted. Toilet facilities are provided. Responsible gambling messaging is prominently displayed throughout the premises and on the machines. Customer information leaflets are similarly prominently displayed, explaining where and how to obtain help with problem gambling.

56. *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.

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

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

58. To elaborate slightly, GB regulation of gambling premises places great focus on customer interaction, which the licensee takes extremely seriously. If a customer is

showing signs of problem gambling, a trained staff member will interact with the customer. This may lead to a number of outcomes, including: customer opting to cease playing; self-referral to a care provider; self-exclusion; customer signing up for the licensee's Play Right app, or the customer being banned. Outcomes are recorded on staff tablets (along with other relevant events) which are then reviewed at national level to ensure that the conduct of individual staff members is correct. Interaction data is supplied to the Gambling Commission to ensure that the obligation is being met across the company. The licensee's approach to protecting vulnerable people is approved by the Gambling Commission through the operating licence and is also internationally accredited.

59. The company's extensive training incorporates Gamcare approved social responsibility and customer interaction tools. It has also engaged the services of YGAM (Young Gamers & Gamblers Education Trust), which will work in partnership with another charity, Betknowmore, to develop and provide additional training and resources for venue and area managers, and will be City and Guilds accredited.

60. *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 licensee'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 licensee'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.

61. 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 Cashino 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 and/or near to schools, but this has not proved problematic.

62. *Security.* As stated above, the licensee 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 licensee to prevent it:

- Staffing levels are set following a security risk assessment, as they will be here. The risk assessment is of course revisited from time to time.
- 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.
- The licensee maintains good liaison with local Police.
- It will also join any available Betwatch scheme.

THE REGULATORY RECORD OF THE LICENSEE

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

64. **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.³**
- **It has never experienced a licence review, until now.**

65. This is despite the range of areas in which the licensee operates, including some with much higher social deprivation and other social issues. Its systems, staff training,

³ For completeness, there was one refusal in Blackpool but this was granted on re-application three months later following submission of further information.

compliance monitoring and audit have proved sufficient to ensure that the licensing objectives are promoted.

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

CONCLUSIONS

67. If this were an application for a licence, the licensee would point out that it has satisfied all the criteria in section 153. Indeed, that must have been the conclusion of the licensing authority when it granted the licence in January 2021. It would also point out that the application which was granted was effectively to swap one gambling use for another gambling use which tends to cause little if any local environmental impact.

68. In addition, had this been a licence application, the licensee would also have reminded the Sub-Committee of the following Guidance from the Gambling Commission:

5.34 Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

69. In this case, while fears have been expressed, there is nothing which demonstrates that the licensing objectives are unlikely to be met.
70. Moreover, this is not an application for a licence, but an application to undo a recently granted licence before it has even been traded. This is extremely unusual if not unique.

71. For the reasons given above, there is no legal or rational justification for interference with this recently granted licence. Such interference would breach three separate principles of substantive law, as previously described.
72. But, in any case, on a review application, the authority must of course apply the principles in section 153. Normally, as the Commission advises in paragraph 10.3 of its Guidance, there would normally be a trading history or a change in the nature of the locality to underpin the evidence on review. Here, however, the premises has not opened and the timing of the application has precluded any possible proof of actual harm.
73. For these reasons, applying the aim to permit in section 153 and the Commission's Guidance, this application should be refused.
74. If, however, concerns were to arise after opening, the Commission's Guidance is that the licensing authority should discuss such concerns in a constructive manner with the licensee, which may result in a revision to the risk assessment (see para 10.4). The licensee wishes to assure the Sub-Committee that it takes the question of public protection seriously, and will always respond promptly and properly to any issues which arise.

PHILIP KOLVIN QC
7TH June 2021

11 KBW
Temple EC4

**Witness statement from Amanda
Kiernan, Head of Compliance at
Cashino Gaming Limited**

LICENSING SUB - COMMITTEE HEARING – 16TH 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 Praesepe organization.
2. On 7th April 2021 Cashino Gaming Limited, the premises licence holder, formally changed its name to Merkur Slots UK Limited ("Merkur"). Merkur is a group company of Praesepe Limited.
3. Merkur operates a national estate of over 190 licensed bingo, adult gaming centre and family entertainment centre premises.
4. 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, as we did when applying for the premises licence in Palmer's Green.
5. 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.
6. Until the current application, Merkur had never had a review of a bingo premises licence, which evidences the high standard of operation applied across the licensed estate.
7. 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.
8. 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.
9. 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.
10. 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.
 11. 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.

Original Bingo premises Licence Application

12. We submitted the new premises licence application on 27th November in full compliance with the Gambling Act 2005 and subordinate legislation. A public notice was displayed at the premises throughout the consultation period and a copy of the notice was published in the Enfield & Haringey Independent on the 2nd December 2020. Furthermore, all of the responsible authorities were duly notified as required by the legislation. These included the licensing authority itself, the Police and child protection authority.
13. The licensing process provides the legal framework across the hospitality and gaming industry. Due legal process is designed to provide certainty of operation for all businesses seeking regulatory approval and we note that Parliament has not sought to amend the legislative framework for applications and the consultation process during this time.
14. Through the lockdown period, Merkur Sots UK Limited has attended 21 Licensing Sub-Committee hearings across the country in respect of new premises licence applications, which received representations from Interested Parties. All applications were successfully resolved and premises licences granted.
15. In this case, save for a representation by the licensing authority which was resolved as set out below, there were no representations by responsible authorities or interested parties and the application for a premise licence was granted.
16. In addition, Merkur applied for a grant of a planning permission for a change of use from the previous use as a betting office. I note that 27 neighbouring properties were specifically consulted, and only one objected. There was also internal consultation following the planning authority's usual procedures. This application was also granted.
17. Following the successful grant of the new premises licence under the Gambling Act 2005 for the Palmers Green premises and approval from the local planning authority for change of use, the Company completed the lease for the property, committing to a 5 year minimum period lease with associated costs of ~£600,000 over that time. Site development costs are in the region of £400,000 to prepare the premises for operation, providing a total financial commitment of ~£1 million.
18. Whilst we do not wish to minimise the concerns raised by the Interested Parties who have taken time to engage with the current review process, the premises have not yet commenced trading. No evidence has been, or realistically could be, provided as to how the operation of the premises will fail to be at least reasonably consistent with the Licensing

Objectives or how our national operation throughout the country is not in accordance with the Gambling Commission's Licence Conditions and Codes of Practice.

19. I will add that our high standard of operation and the effective implementation of our safeguards to promote responsible gaming are evidenced by the fact that none of our operational venues have ever been subject to licence review proceedings. It is therefore disappointing to be the subject of a review application before we have even opened. The legal implications of this will be dealt with by Counsel, rather than in this witness statement.

Relationship with the Responsible Authorities and Interested Parties

20. 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.
21. For the purposes of the original bingo premises licence application, the local Metropolitan Police Licensing Team were approached on 24th August 2020.
22. Following submission of the new premises licence application, we discussed the proposed operation with Matthew Fitzpatrick, Licensing Officer for Haringey Police. The licensing officer did not identify any concerns with the proposed activities nor did he raise any concerns regarding an association of local licensed gambling premises with crime, disorder or local nuisance. However, the police did request that appropriate safeguards be conditioned on any future premises licence. As a result, a number of licence conditions were agreed and attached to the new licence following grant.
23. During the licence application consultation, the Licensing Authority did submit a representation and whilst the Senior Licensing Enforcement Officer confirmed that the Authority did not object to the proposed activities, further licensing safeguards were requested. Following further discussion, a number of additional licence conditions were attached to the premises licence upon grant.
24. None of the remaining Responsible Authorities under the Gambling Act 2005, those of most relevance being the Gambling Commission, Environmental Health and Child Protection teams, raised any specific concerns regarding Merkur's bingo premises licence proposals and none objected to the application.
25. 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.
26. 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 does suffer with general crime and disorder 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, due to our different clientele, product, layout and management. 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.
27. We have identified local providers of vulnerability support services within the local area risk assessment and we have contacted 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 and effectively addressed.

28. Our partnership approach was evidenced by our engagement with the Licensing Authority regarding concerns raised about individuals causing nuisance in the vicinity of our premises at Edmonton Green Shopping Centre in 2018 and 2019. Following thorough investigation, it transpired that some individuals were congregating in the vicinity of our premise due to the location of a nearby smoking bin and were causing concern. Review of CCTV footage identified that those individuals were not customers of our premises. We engaged with the Licensing Authority, the Police and the Shopping Centre's Management team and arranged for the smoking bin to be relocated. To assist with local area management we have also appointed door staff during specific times to assist with control and supervision of the area.
29. In response to the review application we met with the Applicant on 14th May to discuss the concerns raised regarding the potential risk of premises operation and we remain committed to working in partnership with all local authorities following opening of the premises. Specifically, we are required to keep our local area risk assessment under review, and implement appropriate measures to respond to risks, including any emergent risks, identified.

Merkur Compliance – Protection of Children and Vulnerable

30. 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.
31. 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'.
32. 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.
33. 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.

34. 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.
35. 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.
36. 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.
37. Examples of some of Merkur's responsible gambling information have been provided in the supporting documents.
38. 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 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.
39. 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.
40. 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. Test purchase records for the 2019-2020 period, prior to National lockdown in march 2020, identifies a 100% pass rated for our operational venues in Wood Green, Wembley, Waltham cross, Neasden, Holloway, Edmonton Green, East Ham and Barking.
41. A copy of Merkur Slots Social Responsibility, Operational Compliance and Training Documents have been included within our hearing documentation, which highlight the priority given to responsible gambling and the provision of responsible gambling information to our customers and staff members.

Site location

42. The premises is a former William Hill bookmakers.

43. An updated local area risk assessment has been submitted for this hearing designed in consideration of the London Borough of Enfield's Gambling Statement of Licensing principles, Gambling Local Area Profile, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
44. 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.
45. 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 working in 30 local authority areas, which are more deprived than the premises at Green Lanes. A table of operational venues within the London Boroughs has also been provided for comparison.
46. 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.
47. 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

48. 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.
49. 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 none of our 90 high street bingo premises have sought to obtain a licence under the Licensing Act 2003.
50. 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.
51. Merkur Slots customer demographics are up to 50% female with an average age over 30.
52. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
53. To ensure the effectiveness of the Company's Think 25 policy, venues regularly undergo test purchasing and details can be provided to local authorities upon request.

Crime and Vulnerability

54. Merkur have considered local police crime statistics, the premises location, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
55. 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.
56. Merkur operates premises within other areas of the country with high crime statistics and manage their premises effectively and incidents relating to crime and disorder are rare. Merkur are experienced operators with a proven history of operating premises in challenging areas.
57. 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.
58. 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.
59. 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'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.
60. 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

61. The representations received from the Review Applicant and 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 not revoke the current premises licence or impose strict operational limitations.
62. 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.
63. 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.

64. 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.
65. 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 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..
66. 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. Palmers Green will be no exception.
67. 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: numbers are almost always in single digits. Customers leaving rarely cause concern to our local neighbours.

Premises Operation

68. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the Licensing Objectives and a copy our Policies and Procedures has been provided as part of our hearing bundle.
69. 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.
70. 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.
71. 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.
72. 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.
73. 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

74. The business of Merkur is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and welcome in Merkur Slots premises. This principle is fundamental to Company management strategy from head office to premises level. It is a principle which as a company we have achieved in all of our venues, which provide safe, welcoming and congenial environments for our customers.
75. In the rare case that issues do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, Merkur does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.
76. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
77. 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.
78. Merkur continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

Ms Amanda Kiernan, Head of Compliance, Merkur

Date: 1st June 2021

**Witness statement from Steve
Ambrose, Operations Director at
Cashino Gaming Limited**

LICENSING SUB - COMMITTEE HEARING – 16TH 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. 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 Cashino Gaming 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. Cashino Gaming Limited 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. 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, Cashino Gaming Limited

Date: 1s June 2021

**Witness statement from Andy Tipple,
Head of Product at Cashino Gaming
Limited**

**LICENSING SUB-COMMITTEE HEARING – 16 JUNE 2021
SUPPLEMENTAL STATEMENT - AND 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 49 gaming machines, which include 12 category B and 29 category C, which will be available for use on the premises
10. I note that a question has been raised as to whether the gambling provided is remote or non-remote. I can confirm we offer both.
11. 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. Electronic bingo may be both remote and non-remote.
12. The non-remote game functionality, as permitted by the bingo premises licence, operates games with content contained within the tablets and gaming functionality does not require remote communication through an electronic link, such as through a server or by means of a

WiFi connection. Additionally a more traditional style of non-remote bingo can be played with the Customer purchasing a paper bingo tickets and marking numbers called.

13. Merkur Slots UK Limited holds an ancillary remote bingo operating licence, which enables bingo games to operate via remote communication, in order to link games of bingo across several premises with players at multiple locations. It is this element, which permits bingo terminals to link to internal and external servers, communicating remotely, providing remote gaming.
14. Gaming machines, whilst electronic, are not remote gaming under the Gambling Act 2005 and operate self-contained functionality within the machine, which does not use remote communication to operate.

Mr Andy Tipple, Head of Product, Cashino Gaming Limited

Date: 1st June 2021

**Independent Observation
Reports Leveche Associates
Limited**



Independent Observation Report

Mr Nicholas Mason – Consultant

Leveche Associates Limited

Merkur Slots

292 Green Lanes, Palmers Green, London N13 5TW

Introduction

1. I have been asked to conduct independent research and observations on premises situated at 292 Green Lanes, Palmers Green, London N13 5TW - the premises.
2. This report seeks to provide information relevant to the review of the Bingo Premises Licence issued under Section 159 of the Gambling Act 2005 in January 2021 to Merkur Slots.
3. The premises come under the jurisdiction of Palmers Green Ward of Enfield Borough Council.
4. I am informed that some local residents oppose the licensing of these premises and this underlying opposition is recorded on the petition platform known as 'Change.org'. The objections raised include:
 - i. The premises will be detrimental to the area and will have a negative impact upon the regeneration of the local high street;
 - ii. The presence of a Merkur Slots premises will increase Anti-Social Behaviour and pose a risk to children and vulnerable adults.

5. I have paid due regard to the Enfield Council Licensing Policy in carrying out its licensing functions supporting the Licensing Objectives under the Gambling Act 2005 namely:
 - i. preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
 - ii. public safety;
 - iii. the prevention of public nuisance;
 - iv. protecting children and other vulnerable persons from being harmed or exploited by gambling.

Personal Summary – Nicholas Mason

6. 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.
7. 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.
8. 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.
9. 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.
10. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
11. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
12. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.
13. As a company, Leveche Associates Ltd is currently involved in a professional development qualification through 'Secured by Design', a National Police Crime prevention initiative aimed at reducing crime through the principles of good design and appropriate physical security.

Site Observations

14. I attended the location of the premises on Thursday 27th May 2021 from 13:30hrs to 22:45hrs and on Friday 28th May 2021 between 06:15hrs and 10:45hrs. I observed the premises and the surrounding area from Oakthorpe Road to the south and Bourne Hill, near St John the Evangelist Church to the north.
15. The premises were previously a William Hill Bookmakers but this has ceased trading, the premises are closed, vacant and protected by a steel shutter.
16. Displayed at the front of the premises and visible from the street is the Notice of Application for a review of a Bingo Premises Licence under the Gambling Act 2005.
17. Approximately 30 metres south of the premises is a McDonalds restaurant and Lodge Drive, a residential street, one of many that run off Green Lanes.
18. Immediately to the south and next door to the premises is another commercial venue, G & S Jewellers (290 Green Lanes) which was trading in normal business hours. On the other side of the premises is what appears to be a now closed camera shop (294 Green Lanes). It was not trading at the time of my observations and it too was protected by metal security shutters.
19. The numerous other commercial venues continue north and south of the premises
20. The premises are situated on the A124 Green Lanes, a busy main road running generally north to south, with two-way vehicular traffic passing the venue.
21. 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 visits.
22. The area of observations appears to be thriving following the lifting of the UK Government Covid-19 restrictions. There are many Coffee shops with open frontage and similar style restaurant premises. Additionally, there are retail outlets, Banks, Building Societies, Bookmakers, Hairdressers, Estate Agents, Chemists, a Public House and fast food premises.
23. The area has a diverse community and demographic make-up. There is a mixture of privately owned and rental accommodation with flats situated above retail premises and houses in adjoining residential roads.
24. The area is well served with public transport facilities with bus routes along Green Lanes itself and Palmers Green Mainline rail station 5 minutes walk south of the premises in Aldermans Hill. There is a bus stop located on the pavement immediately outside the premises.

25. 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.
26. I observed four traditional betting shops in the immediate vicinity of the premises with Paddy Power on the same side of the road and Ladbrokes and Betfred on the opposite side all within 100m. The fourth, another Ladbrokes was approximately 400m north on the same side of the road near the junction with Windsor Road.
27. Next to the Paddy Power Bookmakers and north of the premises is The Alfred Herring Public House, part of the Wetherspoons franchise. During observations on Thursday 27th May 2021 the premises had a steady flow of customers but was not overly busy.
28. In Aldermans Hill, near to Palmers Green Rail Station on the corner of Devonshire Road is a Pawnbrokers called 'Cashpoint'.
29. The area was busy with people shopping and using the numerous caf premises. Heavy traffic of cars and buses passed the location throughout the period of observations though this was lighter during the evening.
30. During the period of observations there was no evidence of street drinking or anti-social behaviour. I did not see any groups of youths or other persons gathering.
31. During observations on Thursday at 15.04hrs I observed what appeared to be a homeless male seated on the pavement directly opposite the premises begging. This male left at 15.15hrs but subsequently returned at 16:00hrs, remaining for another hour then leaving.
32. On Thursday, between 15:00hrs and 16:00hrs I observed approximately eight different school children walk past the premises. These children were wearing the school uniform from the local Hazelwood Lane School and all were aged around 6-8 years and accompanied by adults.
33. On Friday 28th May 2021 I conducted observations earlier in the day to establish the footfall of young people / school children. As with my previous observations, young people were passing through the area apparently on route to school but at no time were there any gatherings of youths or anti-social behaviour and there was no obvious threat to these young people.
34. On Friday morning I observed The Alfred Herring Public House. The premises opened for business at 08:00hrs, I saw no more than 4 people in the premises at that time up to 10:30hrs just prior to my leaving the area.
35. During observations on Friday at 10:11hrs I observed a different male seated on the pavement begging outside 305-313 Green Lanes and 150m south of the premises. He remained there until I left the area at 10:45hrs.

36. Additionally, at this time I observed teenage children wearing the Winchmore School Uniform, though this school is situated some 2 km from the premises. There were other teenage children from St Annes Catholic School situated in Oakthorpe Road, approximately 500m south of the premises. They were not in great numbers and appeared to be passing through the area.
37. Some of the young people in the area were waiting at the bus stop situated outside the premises but never more than 3 together.
38. During observations I paid additional attention to the McDonalds restaurant that is situated approximately 100m south of the premises as I expected to see young people gathering here as a focal point. However, for the entire period of my observations it was quiet with few customers.
39. In the road outside the McDonalds, 'Deliveroo' motorcyclists were waiting. I also observed that the area was policed by a number of different traffic enforcement officers. This was supported by a Mobile CCTV enforcement camera that patrolled the area.
40. There was little night-time economy in the area. Some restaurants were trading but were not busy, The Alfred Herring Public House had some trade but again, was not busy. McDonalds restaurant had a steady but minimal flow of customers. There was no anti-social behaviour and no groups of youths gathering. All local Bookmakers were closed by 22:00hrs and, as with the other premises in this area, they were not busy.
41. Photographic images of what was seen during the observations on Thursday 27th May 2021 were obtained to support my findings. These images are documented in Appendix A.
42. Photographic images of what was seen during the observations on Friday 28th May 2021 were obtained to support my findings. These images are documented in Appendix B.

Summary of observations

43. This concludes the results of my observations carried out in relation to the premises identified above. I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing or groups of youths. I witnessed two incidents of begging as I have described but there were no disturbances or evidence of police responding to incidents in the area.
44. In relation to concerns for young people in the area, I witnessed a number of young people passing through, clearly travelling to and from their schools. Some were using the public transport but this was not in great numbers and I did not witness anything that could be considered a threat to a young person.

Crime Reporting

45. I have been asked to review local crime data relevant to the premises situated at 292-292A, Green Lanes, Palmers Green, N13 5TW and 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 and risk to children and vulnerable adults.
46. Drawing on my experience with the management of crime reporting within the MPS I would say the following.
47. When dealing with the reporting of crime the MPS has 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.
48. 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.
49. 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.
50. 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.
51. 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.

52. 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

53. As previously detailed the local authority covering the premises at 292-292A, Green Lanes, N13 5TW is Enfield under the ward of Palmers Green.

54. The following graph shows the change in the overall crime rate for the period April 2020 to March 2021 for the ward of Palmers Green, an area where Merkur Slots have not been trading. From this it can be seen that the Green Lanes area maintains a steady average, with no marked spike in reported crime. (Source - data.police.uk).



55. From published Police data, breaking down the crime types and using March 2021 as an example the following offence types were reported and provides a base line for analysis:

- Anti-social behaviour - 58 offences
- Vehicle crime - 39 offences
- Violence and sexual offences - 25
- Other theft - 39
- Total - 161 offences

56. As part of the project work I am preparing with 'Secured by Design' I have analysed the impact on crime trends when a Merkur Slots premises has opened at a number of different locations and have observed the following.

57. 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



58. 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.



59. Additionally, I looked at Merkur Slots premises in an area of higher reported crime specifically those at 15 Market Place, Selby, Yorkshire YO8 4PB. This area is located under Selby Ward of Selby Local District Council. The premises commenced trading on 10th August 2020 and at the same time there was a slight increase of reported crime which subsequently took a downward trend with crime levels falling lower than before the Merkur premises were opened as follows:

Month	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21
Reported crimes	622	662	676	653	533	596	520	607



60. It is important to recognise the impact of the UK Government Covid-19 restrictions on this crime data. Generally, it is correct to say in the majority of offences there are minor or – changes, the one exception being in anti-social behaviour with a rise in reported offences at the time of easing restrictions in most places across England.

Summary

61. 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.
62. This case raises important concerns regarding criminality in the area. However, the facts concerning crime trends, from the information I have identified and reviewed do not support these concerns.
63. 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.
64. The 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
30th May 2021

Appendi A

292 Green Lanes, Palmers Green, London N13 5TW

27th May 2021 13 30hrs – 22 45hrs

Image A1

292 Green Lanes, Palmers Green, N13 5TW - 13:51hrs



Image A2

Notice of Application for a review of a Bingo Premises Licence under Section 159 of the Gambling Act 2005 displayed on front door of premises - 13:51hrs

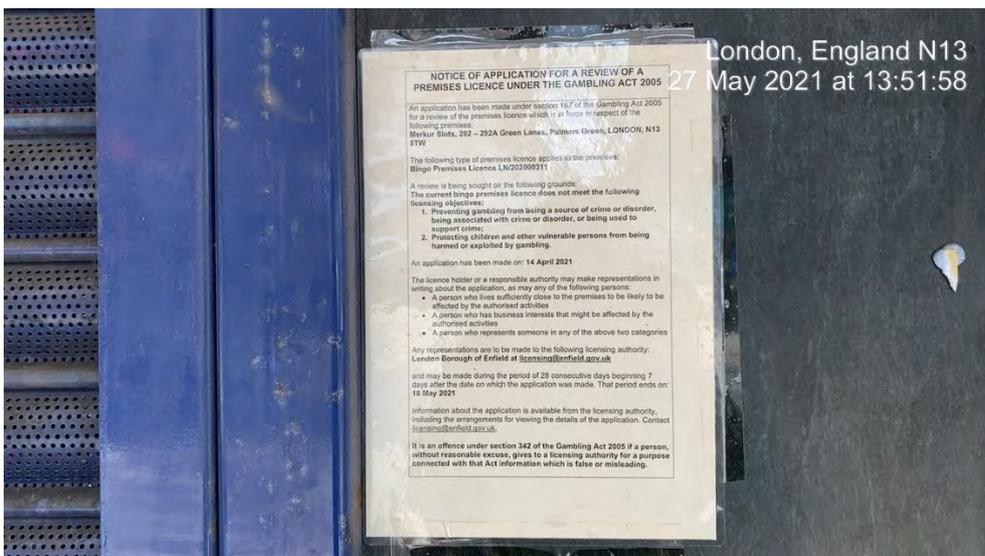


Image A3

View of premises from centre of Green Lanes - 13:52hrs



Image A4

View from outside premises looking North - 13:53hrs

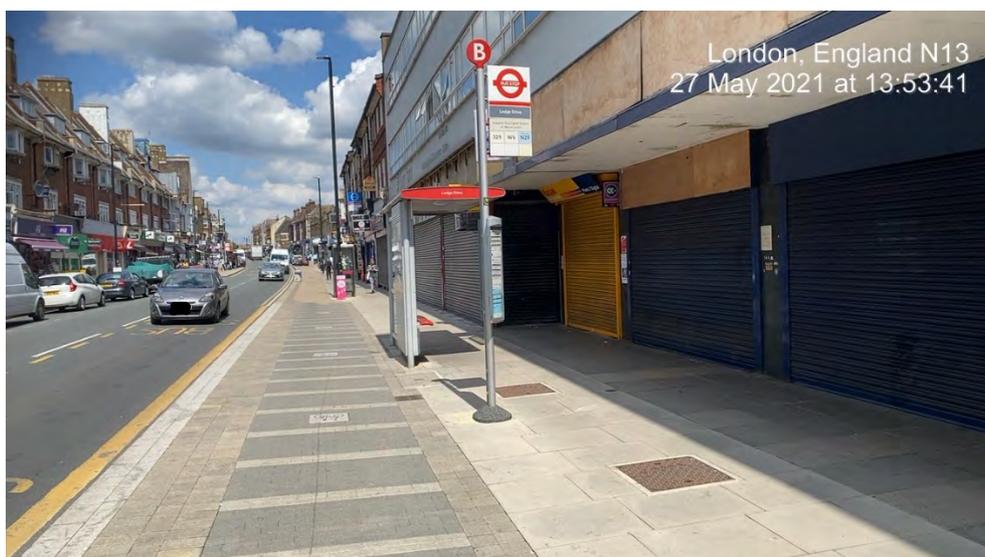


Image A5
Bus stop outside premises - 13:53hrs



Image A6
Looking south towards premises and bus stop - 13:54hrs



Image A7

View from front of premises looking across Green Lanes -13:54hrs



Image A8

View of premises from centre of Green Lanes - 13:55hrs

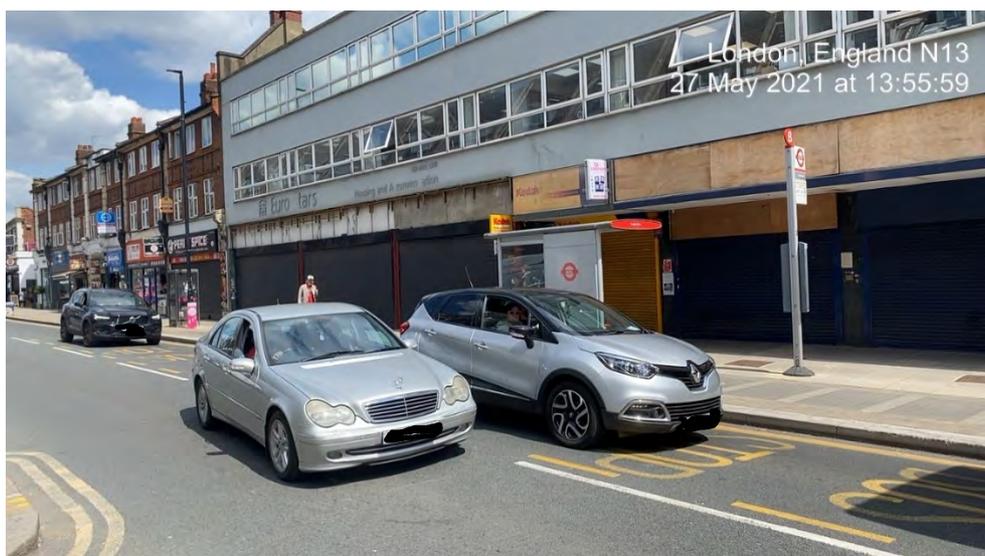


Image A9

View North towards Paddy Power Bookmakers and The Alfred Herring Public House - 13:57hrs



Image A10

Ladbrokes Bookmakers 400m north of premises - 14:00hrs



Image A11

St John the Evangelist Church north of premises at Bourne Hill - 14:04hrs



Image A12

Looking north towards St Johns Church, a mixture of commercial and residential premises - 14:07hrs.



Appendix A - 292 Green Lanes, Palmers Green, London N13 5TW

Image A13

One Fox Lane, 413 Green Lanes, development of prestigious apartments -14:09hrs



Image A14

Ladbrokes Bookmakers, opposite side of Green Lanes to the premises -14:11hrs



Appendix A - 292 Green Lanes, Palmers Green, London N13 5TW

Image A15
Looking South from front of premises - 14:12hrs



Image A16
McDonalds Restaurant south of the premises -14:13hrs



Image A17

South along Green Lanes towards Aldermans Hill - 14:14hrs



Image A18

Green Lanes south towards Oakthorpe Road -14:15hrs



Image A19

Green Lanes junction with Oakthorpe Road south of the premises - 14:17hrs



Image A20

St Annes's Sixth Form School, Oakthorpe Road - 14:19hrs



Image A21

Looking north from Oakthorpe Road towards the premises, a mixture of residential and commercial premises - 14:20hrs



Image A22

Looking into Aldermans Hill from Green Lanes - 14:22hrs



Appendix A - 292 Green Lanes, Palmers Green, London N13 5TW

Image A23

'Cashpoint' Pawn Brokers Aldermans Hill - 14:23hrs



Image A24

Palmers Green Mainline Rail Station, Aldermans Hill - 14:24hrs



Image A25

Betfred Bookmakers south of premises - 14:26hrs



Image A26

Green Lanes looking north towards premises - 14:26hrs

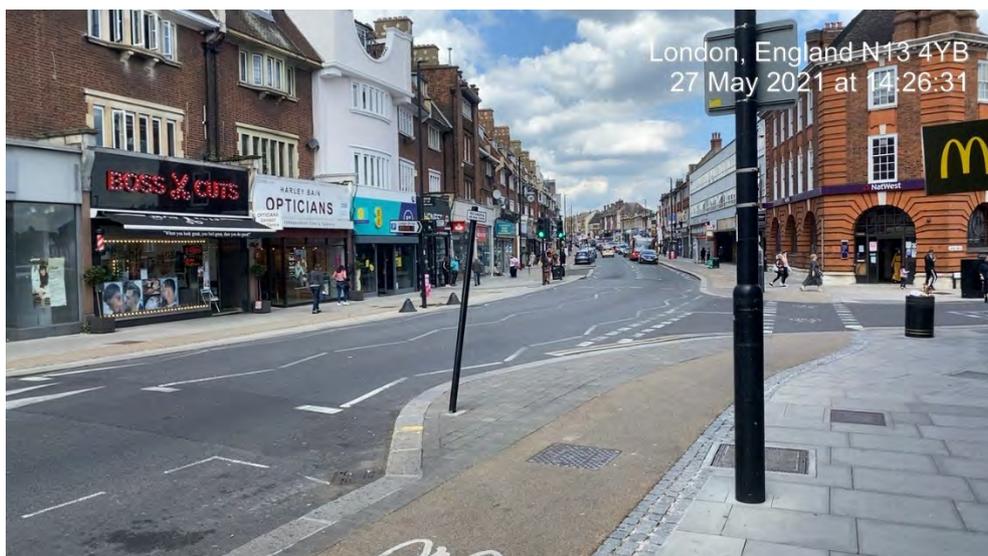


Image A27

'Deliveroo' delivery riders, McDonalds, Green Lanes Junction Lodge Drive - 15:14hrs



Image A28

Male begging in Green Lanes opposite premises - 16:09hrs



Appendix A - 292 Green Lanes, Palmers Green, London N13 5TW

Image A29
McDonalds Green Lanes - 16:10hrs



Image A30
Premises - 16:21hrs



Image A31

Greens Lanes looking north towards premises - 18:49hrs



Image A32

The Alfred Herring PH north of premises - 18:52hrs



Image A33

McDonalds restaurant south of premises - 20:27hrs



Image A34

Green Lanes looking north towards the premises - 20:27hrs



Image A35

Paddy Power Bookmakers north of premises - 20:28hrs



Image A36

Green Lanes looking north towards premises - 20:59hrs



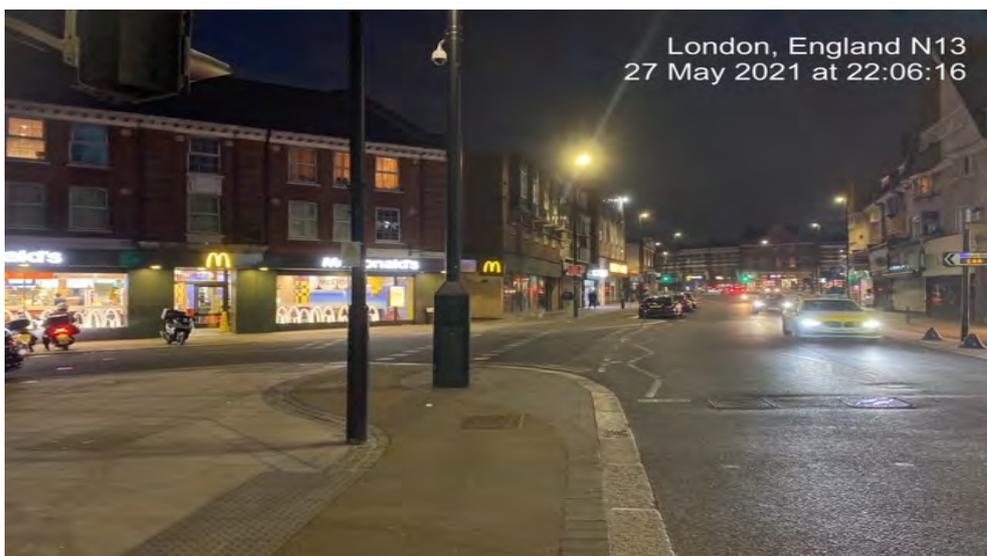
Image A37

Green Lanes north towards premises - 22:06hrs



Image A38

Green Lanes looking south towards McDonalds Restaurant - 22:06hrs



Appendix A - 292 Green Lanes, Palmers Green, London N13 5TW

Image A39

Green Lanes looking north from Aldermans Hill - 22:08hrs



Image A40

The Alfred Herring PH north of premises - 22:13hrs



Image A41

Looking south towards the premises - 22:14hrs



Image A42

Looking north towards the premises - 22:33hrs



Appendi B

292 Green Lanes, Palmers Green, London N13 5TW

28th May 2021 06 15hrs – 10 45hrs

Image B1

Green Lanes looking north towards premises - 06:29hrs



Image B2

Green Lanes looking north opposite premises - 06:29hrs



Appendix B – 292 Green Lanes, Palmers Green, London N13 5TW

Image B3 -
Green Lanes looking south opposite premises - 06:29hrs



Image B4
McDonalds Restaurant south of the premises - 06:30hrs



Image B5

Greens Lanes looking north towards premises - 07:45hrs



Image B6

Green Lanes at McDonalds restaurant looking north towards premises - 07:52hrs



Image B7

The Alfred Herring PH Green Lanes looking south - 08:57hrs



Image B8

Bus stop outside the premises - 08:59hrs



Image B9

Looking north along Green Lanes opposite the premises - 08:59hrs



Image B10

Green Lanes looking north towards premises - 10:05hrs



Image B11

The Alfred Herring PH Green Lanes looking south - 10:07hrs



Image B12

Green Lanes looking north towards the premises - 10:10hrs



Image B13

Male begging in Green Lanes approximately 150m south of premises - 10:11hrs



Image B14

McDonalds Green Lanes - 10:34hrs





Independent Observations Report

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

**Merkur Slots
292 Green Lanes, Palmers Green, London N13 5TW**

Introduction

1. I have been instructed to conduct independent observations on the venue at Merkur Slots, 292 Green Lanes, Palmers Green, London N13 5TW and the area around these premises.
2. Merkur Slots, 292 Green Lanes, N13 5TW has a Bingo Premises Licence under Section 159 of the Gambling Act 2005 (LN/202000311) issued by the London Borough of Enfield.
3. The premises are a former William Hills Bookmakers. It is currently closed and not trading.
4. Although the premises has yet to open the bingo premises licence is being reviewed under Section 197 of the Gambling Act 2005 on the grounds that the current licence does not meet the following licensing objectives:-
 - i) Preventing gambling from being a source of crime and disorder, being associated with crime and disorder or being used to support crime.
 - ii) Protecting children and other vulnerable persons from being harmed or exploited by gambling.

Merkur Slots 292 Green Lanes London N13 5TW

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 Saturday 29th May 2021 I conducted observation on 292 Green Lanes, N13 5TW and surrounding area at various times throughout the day and night. My observations took place between 14:45 hours on Saturday 29th May to 01:15 hours on Sunday 30th May.
11. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
12. The premises are retail premises with dark blue shutters. On the wall between the shutters was the Review Application Notice issued by Enfield Borough Council to Merkur Slots, 292 – 292A Green Lanes, Palmers Green, London N13 5TW.
13. Next door and to the south of the premises is G & S Jewellers at 290A Green Lanes and on the north side of the premises was a Kodak Shop at 294 Green Lanes. Both shops were open during the hours of business. Next to G & S Jewellers was a restaurant / late licensed bar called Gossips Restaurant which remained open the entire time I was in the area.
14. There is a McDonalds Restaurant on Green Lanes at junction with Lodge Drive which is one of many residential streets leading off Green Lanes. It is a busy

and vibrant street with various other commercial venues to the north and the south of the premises.

15. The A124 Green Lanes itself is a busy main road running north to south carrying two-way vehicular traffic that passes directly by the premises.
16. At the time of my visit the area was well lit with natural sunlight during the day and well lit and illuminated from street lighting and shop front lights during the evening and night-time. I had clear and unobstructed views throughout my observations. The weather was dry and warm on the day of my visit.
17. There is a bus stop located on the pavement immediately outside the premises. The area is well served by public transport with bus routes along Green Lanes itself and Palmers Green Rail Station five minutes walk from premises in Aldermans Hill.
18. I saw that there were four traditional style betting shops in the vicinity of the premises with Paddy Power at 314 Green Lanes on the same side of the road and Ladbrokes at 363 - 365 Green Lanes and Betfred at 319 Green Lanes on the opposite side all within 100 metres of each other. There was another Ladbrokes at 402 Green Lanes which was about 400 metres north of the premises near the junction with Windsor Road.
19. At short distance from the Paddy Power Bookmakers was a Wetherspoons Pub called The Alfred Herring Public House that was open throughout the day and night of my visit.
20. The area is densely populated with a large number of retail premises which include supermarkets, mini supermarkets, betting shops, coffee shops, pubs, late licensed bars, hairdressers, restaurants, banks, building societies, estate agents and fast-food restaurants.
21. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

Observations

22. On Saturday 29th May 2021 from 14:45 hours to 01:15 hours on Sunday 30th May 2021 I observed 292 Green Lanes, Palmers Green and the surrounding area.
23. During the observations vehicular and pedestrian traffic was varied throughout the day. There was heavy pedestrian and vehicular traffic during the daytime and normal trading hours which eased off during the evening into the early hours of the morning. The lifting of COVID-19 pandemic restrictions clearly had a positive impact on customers visiting the retail outlets.
24. The area felt safe with members of the public who were going about their business, working, shopping and socialising.

25. At 15:36 hours on Green Lanes I observed a male outside Poundland and Santander engaged in begging - Image C1. The male stayed there until around 16:25 hours and moved away from the area before returning to continue to engage in begging outside the same premises.
26. During the course of my observations I saw children being accompanied by their parents moving up and down Green Lanes and in and out of the shops. I saw no evidence of groups of youths hanging around the streets or outside betting shops or licensed premises. Looking through the windows of Ladbrokes and Betfred I could clearly see into the premises and watch people inside playing the gaming machines and engaged in betting. Paddy Power is more difficult to see in from the street due to the obscured glass used in the shop front.
27. The McDonalds Restaurant was busy throughout the day with customers and Deliveroo drivers waiting for and collecting takeaway orders. In the late evening numbers fell dramatically. In the mid-afternoon Police attended McDonalds in response to an incident however there was no obvious indication as to what the incident was.
28. In the evening SIA door staff wearing high-vis jackets were deployed on the front entrance to The Alfred Herring Pub. They remained on the premises entrance until it closed.
29. The images taken on this day in support of my observations are shown in Appendix C.

Research

30. As part of my research into Cashino Gaming Limited Premises and its operation I carried out two covert visits to their premises in Tooting High Street, SW17 and Neasden Lane, NW10.
31. 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 0SP. 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.
32. 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.

33. 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.
34. 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.
35. 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.
36. 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.
37. 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.
38. 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.
39. Once I had finished using the fruit machine, I left the premises.

Summary

40. During the visits to 292 Green Lanes, London N13 5TW 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 two occasions where I saw an individual engaged in begging in Green Lanes.
41. I have also visited Merkur Slots Premises in 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.
42. 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.
43. 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.
44. 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.
45. From my observations I cannot see any evidence to support the concerns raised in the objections at this time.

Recommendations

Conditions

46. To ensure the safety of customers and the general public and provide reassurance to the Police and the Licensing Authority I would recommend the existing conditions remain on the licence namely:
 - i The premises shall install and maintain a comprehensive CCTV system. All entry and exit points must be covered enabling frontal identification of every person entering in a light condition including customer facing areas. The CCTV system shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Subject to data protection legislation, recordings shall be made available upon the request of Police or authorised officer of the Licensing Authority.

- ii A staff member from the premises who is conversant with the operation of the CCTV system shall be in the premises at all times when the premises is open.
- iii Notices shall be prominently displayed within the premises stating that CCTV is in operation.
- iv An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:
 - (a) all crimes reported to the venue.
 - (b) all ejections of patrons.
 - (c) any complaints received concerning crime and disorder.
 - (d) any incidents of disorder.
 - (e) all seizures of drugs or offensive weapons.
 - (f) any visit by a relevant authority or emergency service.
 - (g) any attempts by children and young persons to gain access to the premises to gamble.
 - (h) any Challenge 25 Refusals.
- v A Think 25 proof of age scheme shall be operated at the premises where Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
- vi A record of refusals shall be kept on the premises and completed when necessary. This record shall contain the date and time of the refusal, a description of the customer, the name of the staff member who made the refusal and the reason for the refusal. This record shall be made available to Police and/or the Local Authority upon request and shall be kept for at least one year from the date of the last entry.
- vii The licensee shall provide induction training to all staff on the specific local risks to the licensing objectives that have been identified for these premises.
- viii Refresher training shall take place at least every six months on the specific local risks to the licensing objectives.
- i All training shall be documented and records kept at the premises. These records shall be made available to the Police and/or Local Authority upon request and shall be kept for at least one year. Staff shall have a clear view of the entrance from the sales desk and shall circulate the premises to enable good visibility and supervision of the machines and premises.

47. 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
02 06 2021

Appendix C

292 Green Lanes, Palmers Green, London N13 5TW

29th May 2021 14 45hrs – 01 15hrs

Image C1

Male begging in Green Lanes opposite premises - 15:36hrs



Image C2

View of premises from centre of Green Lanes - 15:39hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C3

Notice of Application for a Review of a Bingo Premises Licence under Section 159 of the Gambling Act 2005 displayed on the front of premises - 15:40hrs

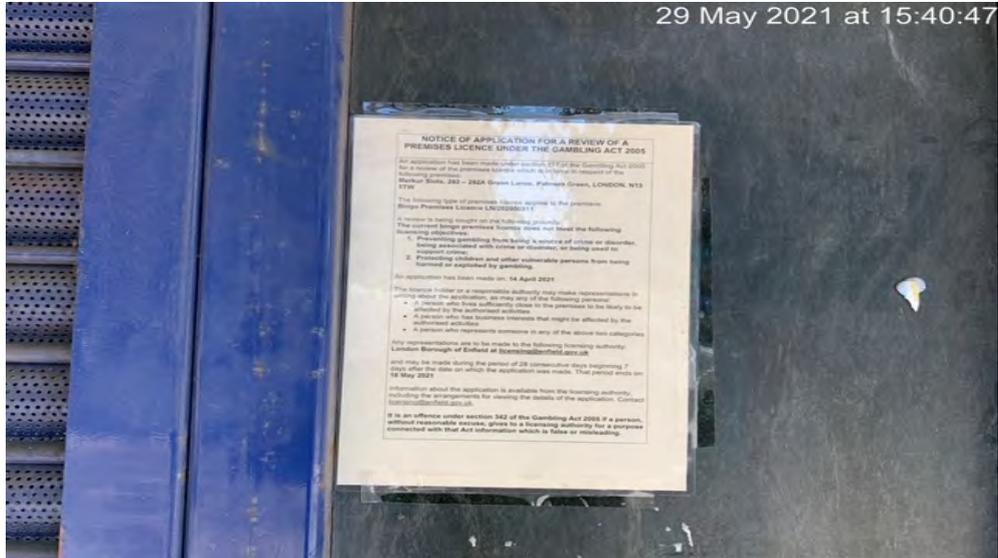


Image C4

Looking north from bus stop outside premises - 15:41hrs



Image C5

Looking south from bus stop outside premises - 15:41hrs



Image C6

Ladbrokes Bookmakers, 400m north of premises at junction Windsor Road -16:21hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C7

One Fox Lane 413 Green Lanes, development of prestigious apartments -16:23hrs



Image C8

Green Lanes near Fox Lane looking south towards premises - 16:24hrs



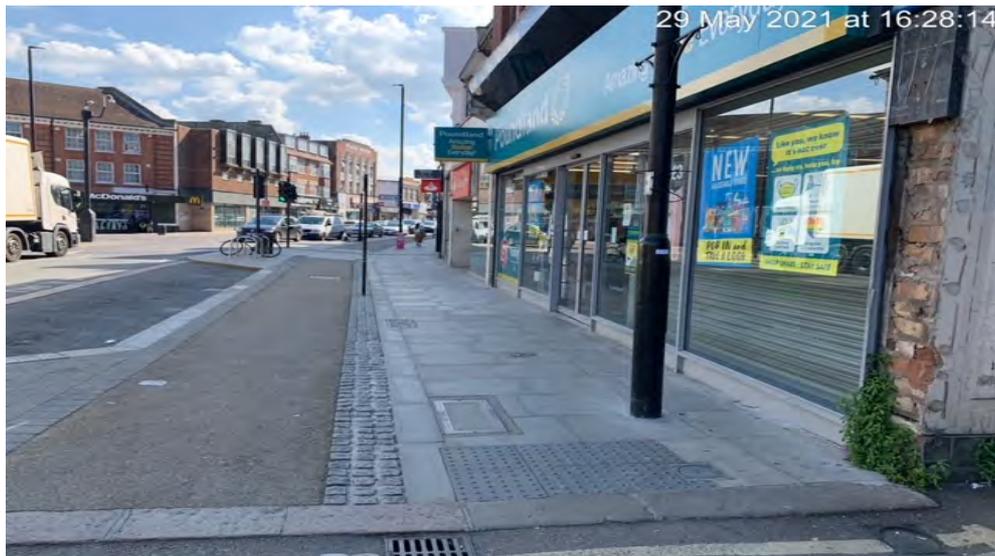
Image C9

Ladbrokes Bookmakers, opposite side of Green Lanes to the premises - 16:27hrs



Image C10

Looking south along Green Lanes towards Aldermans Hill - 16:28hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C11

Green Lanes looking north towards premises - 16:30hrs



Image C12

Betfred Bookmakers south of premises - 16:30hrs



Image C13

Looking into Aldermans Hill from Green Lanes - 16:31hrs



Image C14

Looking north towards Aldermans Hill - 16:32hrs



Image C15

Aldermans Hill towards Palmers Green Rail Station -16:37hrs



Image C16

Aldermans Hill towards Green Lanes - 16:37hrs

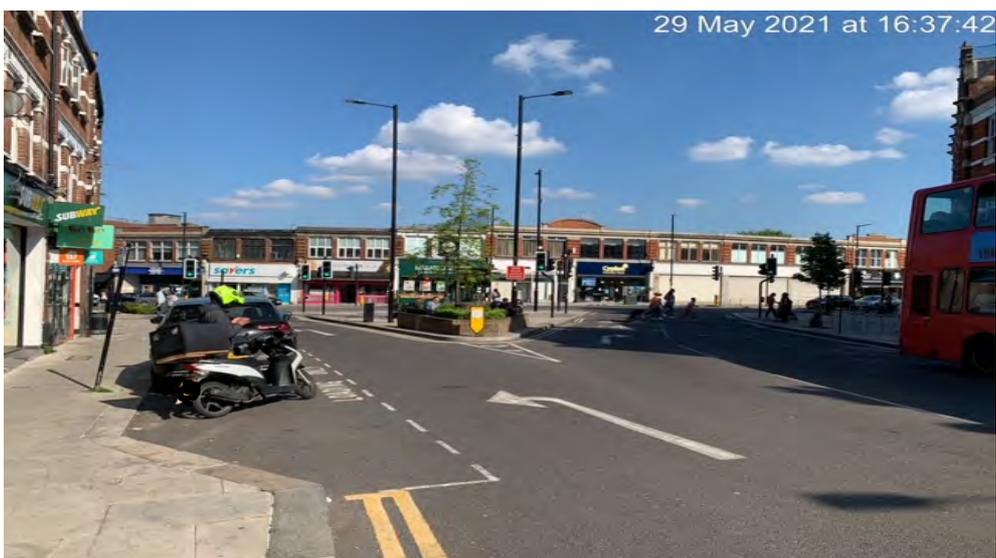


Image C17

View of premises from opposite side of Green Lanes– 16:40hrs



Image C18

The Alfred Herring PH north of premises - 17:07hrs



Image C19

Green Lanes looking south towards premises - 17:08hrs



Image C20

Premises from opposite side of Green Lanes - 17:54hrs



Image C21
Premises - 20:43hrs



Image C22
McDonalds restaurant south of premises - 20:43hrs



Image C23

Looking south along Green Lanes towards Aldermans Hill - 20:45hrs



Image C24

Greens Lanes looking north towards premises - 20:45hrs



Image C25

Betfred Bookmakers South of premises - 20:46hrs



Image C26

Ladbrokes Bookmakers, opposite side of Green Lanes to the premises - 20:48hrs



Image C27

Looking south towards Paddy Power Bookmakers and premises - 20:49hrs



Image C28

The Alfred Herring PH north of premises - 20:50hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C29

Ladbrokes Bookmakers 400m north of premises at junction Windsor Road -20:54hrs



Image C30

Green Lanes near Fox Lane, looking south - 20:54hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C31

Looking south towards the premises - 21:36hrs



Image C32

Green Lanes looking south towards Fox Lane - 23:43hrs



Image C33
Green Lanes looking North - 23:43hrs



Image C34
The Alfred Herring PH north of premises - 23:45hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C35

Paddy Power Green Lanes north of premises - 23:45hrs



Image C36

Ladbrokes Bookmakers, opposite side of Green Lanes to the premises -23:46hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C37

Green Lanes, looking south towards premises - 23:47hrs



Image C38

Premises from opposite side of Green Lanes - 23:48hrs



Image C39

McDonalds Restaurant south of the premises - 23:49hrs

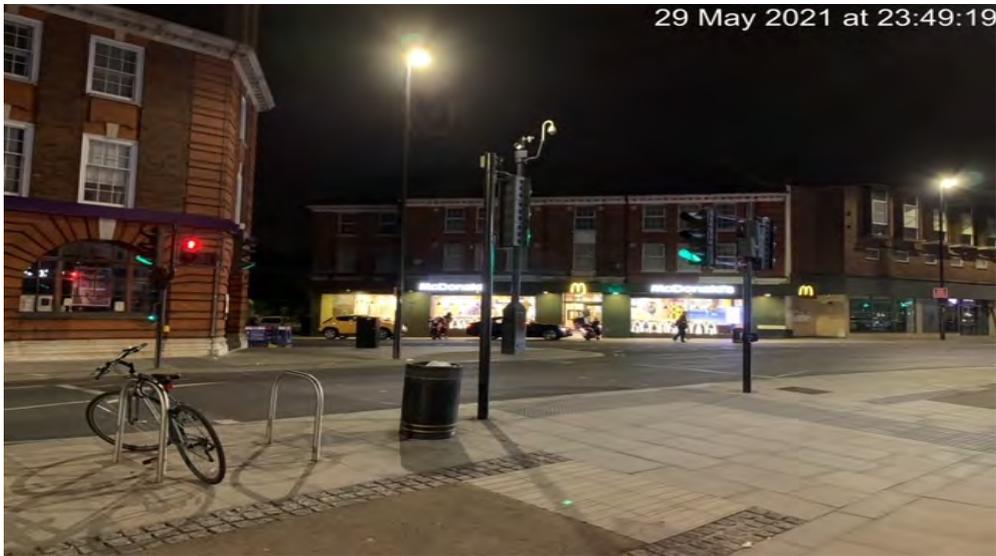
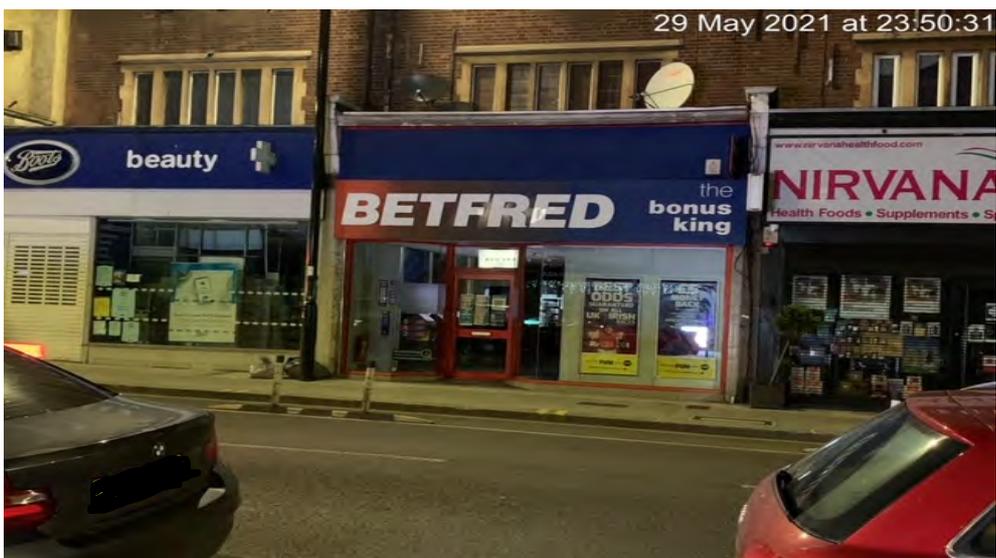


Image C40

Betfred Bookmakers South of premises - 23:50hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C41

Green Lanes junction Aldermans Hill looking south - 23:54hrs

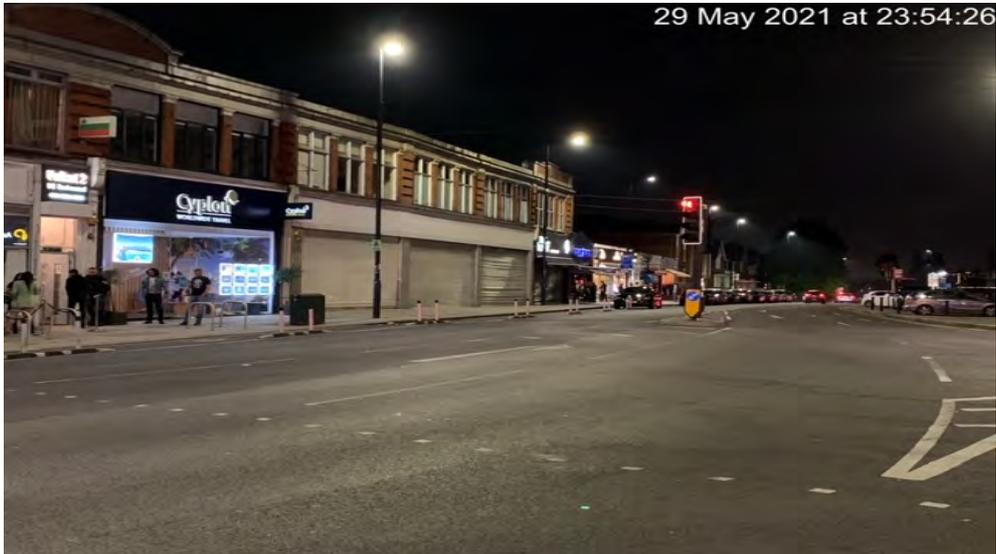


Image C42

Premises from opposite side of Green Lanes - 23:57hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C43

Ladbrokes Bookmakers 400m north of premises at junction Windsor Road -00:07hrs



Image C44

Green Lanes looking south towards The Alfred Herring PH and Paddy Power, north of premises - 01:02hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C45

Green Lanes looking north - 01:03hrs

30 May 2021 at 01:03:17



Image C46

Green Lanes north towards premises - 01:05hrs

30 May 2021 at 01:05:45



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C47

Green Lanes looking south towards McDonalds Restaurant - 01:06hrs



Image C48

Ladbrokes Bookmakers, opposite side of Green Lanes to the premises -01:07hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

Image C49

View North towards Paddy Power Bookmakers and The Alfred Herring Public House
- 01:07hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.



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

Merkur Slots - 91 High Road, Wood Green, London N22 6BB

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

Merkur Slots - 91 High Road, Wood Green, London N22 6BB

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

**4403-405, 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.

Merkur Slots, 403-405, Green Street, Upton Park, E13 9AU

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

Merkur Slots, 403-405, Green Street, Upton Park, E13 9AU

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

Merkur Slots, 403-405, Green Street, Upton Park, E13 9AU

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

4456, 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

Merkur Slots - 456, Holloway Road, London N7 6QA

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.

Merkur Slots - 456, Holloway Road, London N7 6QA

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

Merkur Slots - 456, Holloway Road, London N7 6QA

Leveche Associates Limited
06 06 2021

Merkur Slots - 456, Holloway Road, London N7 6QA



Independent Covert Licensing Visit Report

Nicholas Mason – Consultant

Leveche Associates Limited

Merkur Slots

1577, 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.

Merkur Slots, 157, High Street North, East Ham E6 1JB

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

Merkur Slots, 157, High Street North, East Ham E6 1JB

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 8EEQQ

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.

Merkur Slots– 62, East Street, Barking IG11 8EQ

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.

Merkur Slots– 62, East Street, Barking IG11 8EQ

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
Merkur Slots– 62, East Street, Barking IG11 8EQ

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

Introduction

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

Personal – Stuart Jenkins

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

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

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.

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

- 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
478478 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.

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

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.

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

- 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

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

06 06 2021



Independent Covert Licensing Visit Report

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

**Merkur Cashino Slots
3044 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.

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

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.

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

- 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 0TQQ**

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.

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

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.

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

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

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

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.

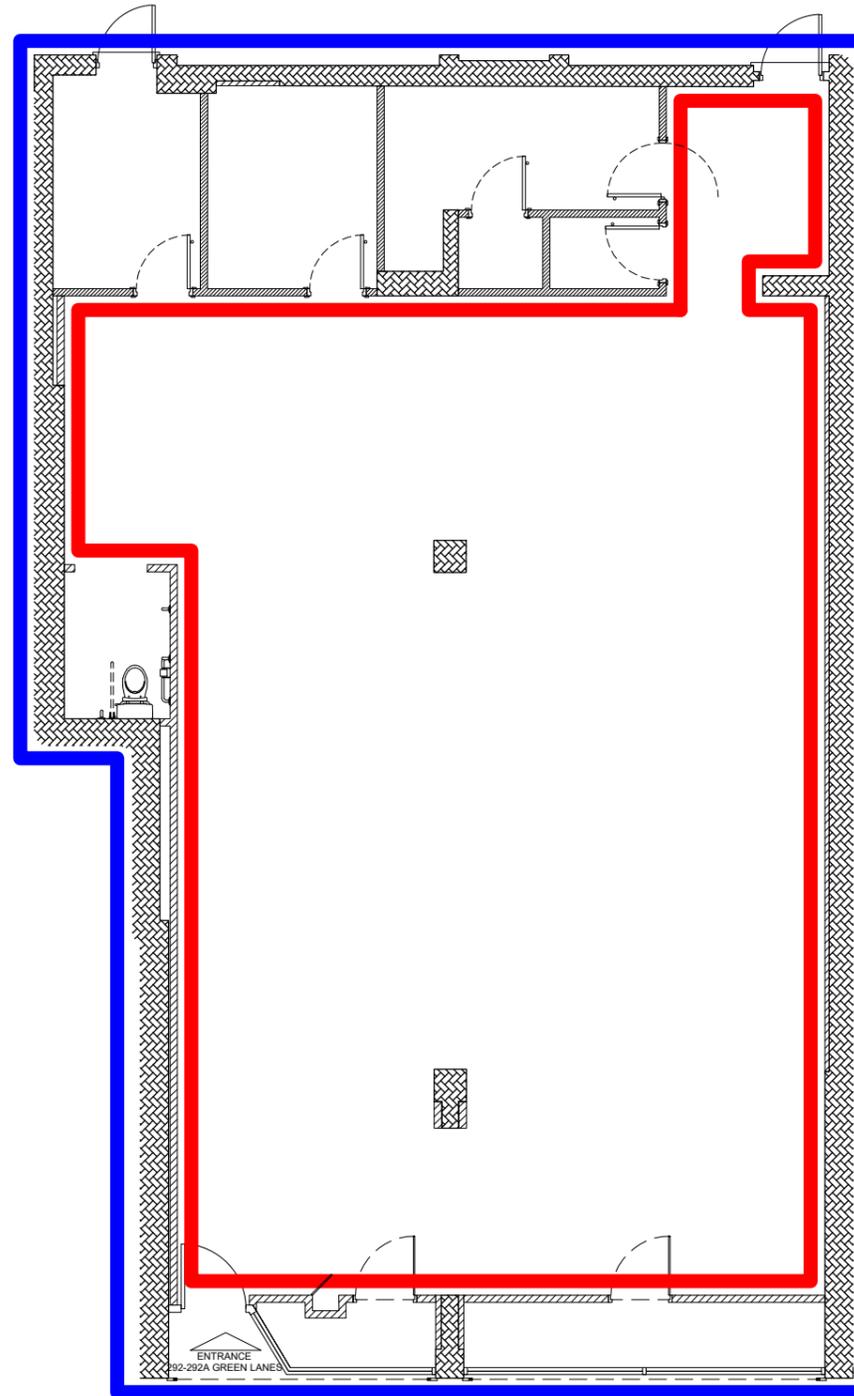
Merkur Cashino (Slots), 19 The Concourse, Edmonton Shopping Centre,
London N9 0TQ

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

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

Copy of Licensing plan of the premises



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

REVISIONS

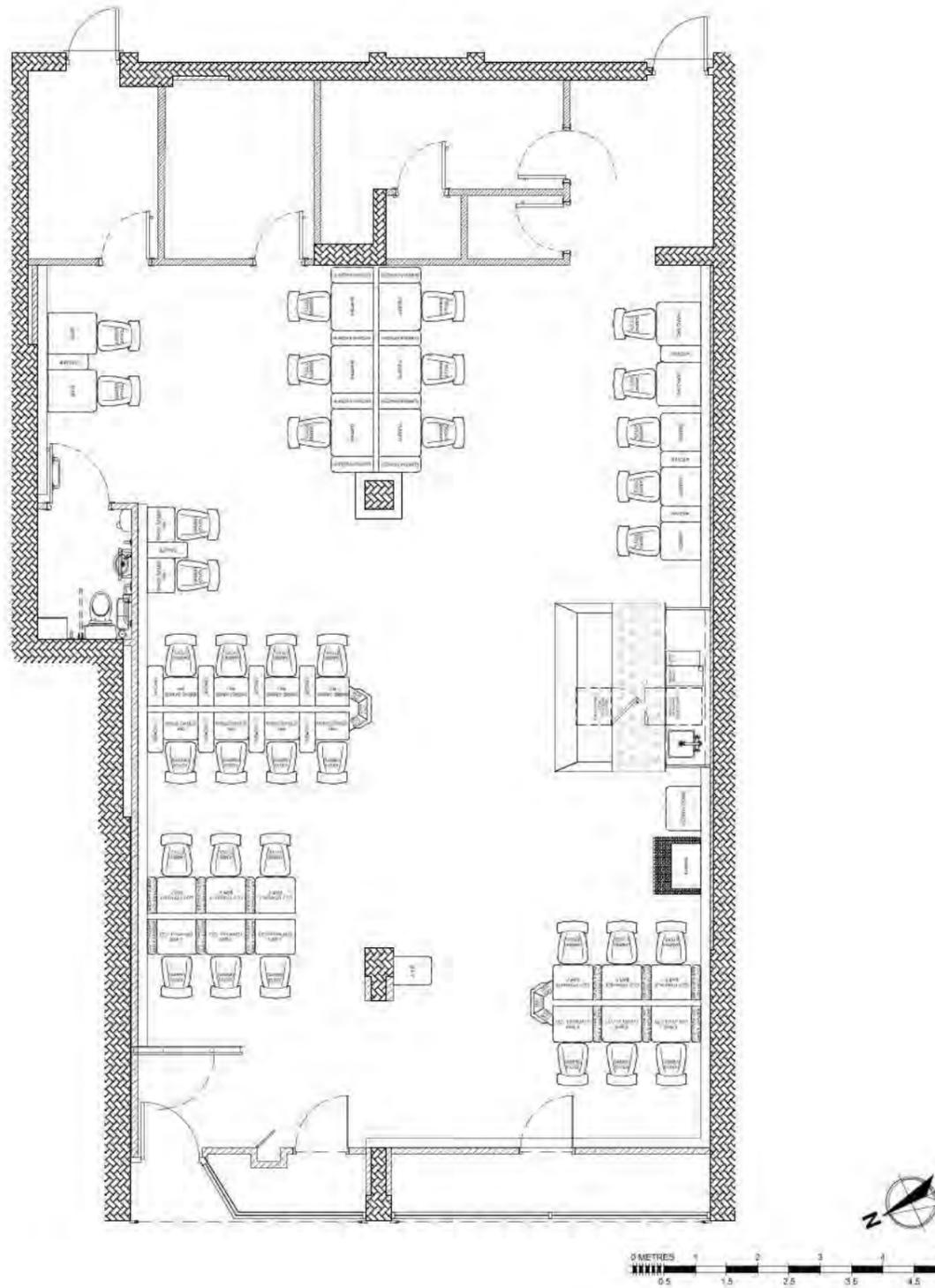
FIT OUT TYPE MERKUR SLOTS
PROJECT MERKUR SLOTS 292-292A GREEN LANES PALMERS GREEN LONDON N13 5TW
DESCRIPTION PROPOSED LICENSE PLAN

REFERENCE DRAWINGS	
SCALE 1:50	
DRAWN BY MG	
DATE 19/11/20	
DRAWING No. 999-PR-07	REVISION 03



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Copy of Illustrative plan of the premises



REVISIONS

FIT OUT TYPE
MERKUR SLOTS

PROJECT
MERKUR SLOTS
 292-292A GREEN LANES
 PALMERS GREEN
 N13 5TW

DESCRIPTION
PROPOSED MACHINE PLAN

REFERENCE DRAWINGS

SCALE
 1:50

DRAWN BY
 LC

DATE
 23/11/20

DRAWING No.
999-PR-05

REVISION
03



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Copy of the Local Area Risk Assessment

Merkur Slots, 292/292A Green Lanes, Palmers Green, London, N13 5TW

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	292/292A Green Lanes, Palmers Green, London, N13 5TW
Local Authority:	London Borough of Enfield
Premise Licence No:	LN/202000311
Operator Licence No:	000-003266-N-103444-027 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK Limited, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
Name and Title of Assessor:	Agnieszka Szczerkowska and Iwona Grynzel (Internal Compliance Auditors). Amanda Kiernan (Head of Compliance)
Date of Assessment:	26/08/2020 and 23/11/2020 – updated 11/12/2020 and 01/06/2021
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots Palmers Green is located on Green Lanes in Enfield in the London region of England. Green Lanes, Palmers Green is a busy high street with a variety of typical high street businesses. The premises on the road include coffee shops, restaurants, takeaways, banks, supermarkets, hair and beauty salons, betting shops, pawnbrokers, jewellery shops, charity shops, solicitors and accountants' offices. The venue is a former betting shop (William Hill). Lodge Drive bus stop is situated right outside Merkur Slots Palmers Green premises, there is also a bus stop that services school routes N29, W6 and 329 immediately outside the premise, where children will congregate during pick up and drop off school times. McDonalds restaurant is located on the corner of Lodge Drive, approx. 160ft away where young persons may frequent and congregate outside. There is a canopy outside the premise where people may congregate during poor weather whilst waiting for buses.
Establishments of note:	There are 4 bookmakers on Green Lanes, Palmers Green in close vicinity – Betfred, Ladbrokes x2 and Paddy Power. Two doors away from Merkur Slots Palmers Green is Gossip restaurant, 160ft away is McDonalds restaurant with Co-op supermarket right next to it. 466ft away is Explore Learning – tuition centre for kids 4-14 years old. KB02 Venue Hire, popular location for children's parties is close by, only 0.1miles away. There is Palmers Green train station 0.2 miles away and Palmers Green Public Library 0.3 miles away. In the close vicinity is NHS Crisis Prevention House, 449-251 Green Lanes (approx. 5 minute walk), this service provides short term residential support for people with mental health problems or in crisis to aid their recovery, situated in a residential street providing a home from home environment with communal kitchens and lounges as well as quiet rooms and small gardens. Medstar Domiciliary Residential Care Limited located at 200 Green Lanes (approx. 7 minute walk) this service supports vulnerable adults in local area providing specialist person-centred day and night services, including supported living, that are geared to promote and develop individuals' needs and aspirations of people with learning disabilities, autistic spectrum disorder and mental health issues, mainly around independence and achieving their outcomes.
Adjoining premises:	Merkur Slots Palmers Green premises is located between Kodak Express on the left and Mantella Jewellers shop on the right. There are offices above all named premises which are accessed from Lodge Drive.
Crime statistics:	Green Lanes, Enfield, London, N13 5TW is within the Palmers Green policing neighbourhood, under the Metropolitan Police Service force area. Crime rates in this area are high and have been rising in the past 3 years. Most commonly reported crimes in the past 12 months include anti-social behaviour, vehicle crime, violence and sexual offences, burglary, shoplifting and other theft. In April 2021, there were 150 incidents of crime reported within half a mile from Merkur Slots Palmers Green postcode predominantly consisting of anti-social behaviour (34), violence and sexual offences (29) and vehicle crime (25). 3 out of all 150 incidents occurred directly on Green Lanes (1 burglary and 2 violence and sexual offence incident).
Population:	Palmers Green area, where Merkur Slots is located, has a population of 15,837 people. This area is popular with younger population. Dominating age groups are 30-44, 20-24 and 25-29. 15% of all local residents are underage. People living here are predominantly single -56.6% compared with 34% UK average. 32% of local population is degree educated and 19% has no qualification, which does not show a significant deviation from the average figures for the UK.
Culture:	Green Lanes, Palmers Green can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 86% white, with only 62% of residents in this area being white. Other sizable ethnic groups are Pakistani (7.7%), Mixed Ethnicity (7.2%), Black African and Caribbean (9.8%), Chinese (3.5%), Indian (1.4%) and other ethnic groups (8.4%). The area surrounding Merkur Slots Palmers Green has a high concentration of immigrants from European countries (including European Union), around 30% of all residents. Majority of local population is Christian (51.4%) compared with 59.3% UK average, 28% claim to have no religion or did not state their religious views, 18.5% identify themselves as Muslim and 1.2% Hindu.
Unemployment:	Unemployment rate in Green Lanes, Palmers Green area was 7% (Census 2011). This is higher than national average of 4%. This address has a higher than average concentration of student residents - 17% of the resident population. Majority of people (33.5%) are in full-time employment, 14% is working part-time and 12.6% is self-employed. 33% of residents economically active are semi-skilled, unskilled and lowest grade workers and 32% works in supervisory, clerical, and junior managerial, administrative and professional roles. Main source of employment in this area are wholesale and retail trades, followed by food and accommodation, health (including social work) and construction.

Deprivation:	Palmers Green area is within the 40% most deprived areas of the Enfield Borough and within the most deprived half of English districts. On almost all indicators Enfield is one of the most highly deprived Outer London boroughs. In a Greater London context Enfield fares better than many inner London Boroughs, and is therefore ranked as the 14th most deprived London Borough, out of 32. Nationally, Enfield is ranked 64th most deprived out of the 326 local authority areas in England. Indices of deprivation which are better here than in other parts of UK include: health – 80% better, education skills and training – 70% better, employment – 60% better and income deprivation – 50% better than other neighbourhoods. Indices of deprivation which require improvements are living environment, income deprivation affecting older people and crime deprivation (within 20% most deprived areas in UK).
Local Police:	Green Lanes, Enfield, London, N13 5TW is within the Palmers Green policing neighbourhood, under the Metropolitan Police Constabulary.

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 account London Borough of Enfield local authority Statement of Gambling Principles, reference Section 2, paragraph 2.13 Bingo Centres, Enfield Borough Profile 2011 and Palmers Green Ward Profile 2020.

Environmental Factors

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

Licensing Objectives	Local Risks	Control Measures
<p>Protecting children and other vulnerable people from being harmed or exploited by gambling</p>	<p>Unemployment Unemployment rate in Green Lanes, Palmers Green area was 7% (Census 2011). This is higher than national average of 4%. This address has a higher than average concentration of student residents - 17% of the resident population. Majority of people (33.5%) are in full- time employment, 14% is working part-time and 12.6% is self- employed. 33% of residents economically active are semi-skilled, unskilled and lowest grade workers and 32% works in supervisory, clerical, and junior managerial, administrative and professional roles. Main source of employment in this area are wholesale and retail trades, followed by food and accommodation, health (including social work) and construction.</p> <p>Deprivation Merkur Slots Palmers Green area is within the 40% most deprived areas of the Enfield Borough and within the most deprived half of English districts. On almost all indicators Enfield is one of the most highly deprived Outer London boroughs. In a Greater London context Enfield fares better than many inner London Boroughs, and is therefore ranked as the 14th most deprived London Borough, out of 32. Nationally, Enfield is ranked 64th most deprived out of the 326 local authority areas in England. According to Index of Multiple Deprivation 2019. It has improved since 2015 when it was measured previously. Indices of deprivation which are better here than in other parts of UK include: health – 80% better, education skills and training – 70% better, employment – 60% better and income deprivation – 50% better than</p>	<p>Age Verification <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Palmers Green 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>other neighbourhoods. Indices of deprivation which require improvements are living environment, income deprivation affecting older people and crime deprivation (within 20% most deprived areas in UK).</p> <p>Schools and Education Hazelwood School, 63 Hazelwood Ln, N13 5HE Barnet and Southgate College, 340 Green Lanes, N13 5TS Tottenham Infant School, Tottenham Rd, N13 6HX Bright Horizons Palmers Green Day Nursery and Preschool, 3 Old Park Rd, N13 4RG St. Anne's Catholic High School for Girls, Upper Site, 6 Oakthorpe Rd, N13 5TY St Michael at Bowes Church of England Junior School, Tottenham Rd, N13 6JB St. John's Nursery, St. John's Church Hall, 1 Bourne Hill, N13 4DA Leading Strings PreSchool, St John's Church Hall, 1 Bourne Hill, N13 4DA Burford Pre-School Playgroup, Fox Ln, N13 4AL Hazelwood Children's Centre, Riverway, N13 5JU Aplomb Day Nursery, 32 Bourne Hill, N13 4LY Palmers Green High School, 104 Hoppers Rd, N21 3LJ Shiny Star Nursery, 109 N Circular Rd, N13 5EL Bright Stars Pre-School, Scout and Guide HQ, Cannon Rd, N14 7HE St Monica's Catholic Primary School, Cannon Rd, N14 7HE Highfield Primary School, Highfield Rd, Winchmore Hill, N21 3HE Brown Bears Nursery, Trinity-at-Bowes Church, Palmerston Rd, N22 8RA</p> <p>Community Centres and Youth Centres Darji Mitra Mandal of the UK Community Centre, 26 Oakthorpe Rd, N13 5JL TaB Centre Plus Community Centre, Palmerston Rd, N22 8RA AEK Youth Football Club, Hazelwood Recreation Ground, Hedge Ln, N13 5ST</p> <p>Parks, play grounds and sports/leisure facilities Tatem Park Recreation Ground, 263 Hedge Ln, N13 5DE Hazelwood Recreation Ground, N13 5BS (AEK Youth Football Club) Broomfield Playground, Broomfield Ln, N13 4HB Urbs Gardens, 46 Tottenham Rd, N13 6HX</p>	<p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p>
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	<p>Vulnerable and addiction support services Medstar Domiciliary Residential Care Limited located at 200 Green Lanes (approx. 7 minute walk) this service supports vulnerable adults in local area providing specialist person-centred day and night services, including supported living, that are geared to promote and develop individuals' needs and aspirations of people with learning disabilities, autistic spectrum disorder and mental health issues, mainly around independence and achieving their outcomes.</p> <p>NHS Crisis Prevention House, 449-251 Green Lanes (approx. 5 minute walk), this service provides short term residential support for people with mental health problems or in crisis to aid their recovery, situated in a residential street providing a home from home environment with communal kitchens and lounges as well as quiet rooms and small gardens.</p> <p>Pawnbrokers and Loan Shops Cashpoint Pawnbrokers, 12 Aldermans Hill, N13 4PJ G Mantella Ltd. Jewellers Since 1982, 290A Green Lanes, N13 5TW</p> <p>Medical Centres, Care Homes and Mental Health facilities Grovelands Medical Centre, 1 Grovelands Rd, N13 4RJ North London Health Centre, N13 4JJ Dr D Gill - Park Lodge Medical Centre, Park Lodge, 122 Aldermans Hill, N13 4RG The Acupuncture & Tui Na Clinic, 316-322 Green Lanes, N13 5TT Grenoble Gardens Surgery, 1 Grenoble Gardens, N13 6JE Clinic, 265 Green Lanes, N13 4XE Acupuncture Massage Centre, 373 Green Lanes, N13 4JG Medicspot Clinic, 38 - 40 Aldermans Hill, N13 4PN Dr Howard Daitz, Broomfield Ave, N13 4JJ Arcadian Gardens NHS Medical Centre, 1 Arcadian Gardens, N22 5AB Gillan House Surgery, 457 Green Lanes, N13 4BS Hazelwood Dental Practice, 1e Hazelwood La/Palmers Green, N13 5EU Specsavers Opticians and Audiologists, 359 Green Lanes, N13 4JG Green Lanes Clinic, 551a Green Lanes, N13 4DR Woodlands Residential Care Home, 33-35 Fox Ln, N13 4AB Abbeydale Care Home, 51-53 Fox Ln, N13 4AJ Roland Residential Care Homes, 231 N Circular Rd, N13 5JF The Hollies, 9-11 Fox Ln, Palmers Green, N13 4AB Palm Tree Lodge Care Home, 36 Sidney Ave, N13 4UY Barchester - Southgate Beaumont Care Home, Southgate House, 15 Cannon Hill, N14 7DJ</p>	<p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <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 Palmers Green if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees.</p>
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	<p>Saivi House, 39 Doveridge Gardens, N13 5BJ</p> <p>Gambling premises Ladbroke's, 363-365 Green Lanes, N13 4JG Betfred, 319 Green Lanes, N13 4TY Ladbroke's, 402 Green Lanes, N13 5PD Ladbroke's, 65 Green Lanes, N13 4TD Ladbroke's, 10 Green Lanes, N13 6JR Coral, 40 Cannon Hill, N14 6LG Paddy Power, 314 Green Lanes, N13 5TT Buzz Bingo and The Slots Room, Dearsley Rd, Enfield EN1 3FB</p> <p>Residential Areas The area containing Green Lanes, Palmers Green in London consists predominantly of flats – 54% of all housing spaces. There is also high percentage of residences in commercial buildings – 35%. This area contains a higher than average level of rented housing (excluding social housing) - 78% of household spaces, which contrasts with the national average of just over 16%. Most of households are occupied by multiple residents.</p> <p>Bus stops and other Transport links Lodge Drive Bus Stop, N13 5TT Palmers Green Station, Aldermans Hill, N13 4PN</p> <p>Locally Identified Premises Palmers Green Library, Broomfield Ln, N13 4EY</p> <p>Public Houses and Alcohol Licensed Premise The Alfred Herring, 316-322 Green Lanes, N13 5TT The Wishing Well, 9 Aldermans Hill, N13 4YD The Woodman, 128 Bourne Hill, N13 4BD The Occasional Half, 67-77 Green Lanes, N13 4TD Club Planet, 30-32 Green Lanes, N13 6HT The Bird Lounge, 100 Tottenham Rd, N13 6DG Aksular Restaurant, 232, 234 Green Lanes, N13 5UD</p> <p>On 10 November 2004, the Enfield Licensing Committee granted the ninth and tenth order within the London Borough of Enfield, designating Green Lanes and Winchmore Hill Green as a Drinking Control Area, which became effective on 1 July 2005.</p>	<p>They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector.</p> <p>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</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>
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<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 Green Lanes, Enfield, London, N13 5TW is within the Palmers Green policing neighbourhood, under the Metropolitan Police Service force area. Crime rates in this area are high and have been rising in the past 3 years. Most commonly reported crimes in the past 12 months include anti-social behaviour, vehicle crime, violence and sexual offences, burglary, shoplifting and other theft. In April 2021, there were 150 incidents of crime reported within half a mile from Merkur Slots Palmers Green postcode predominantly consisting of anti-social behaviour (34), violence and sexual offences (29) and vehicle crime (25). 3 out of all 150 incidents occurred directly on Green Lanes (1 burglary and 2 violence and sexual offence incident).</p> <p>Local Police Green Lanes, Enfield, London, N13 5TW is within the Palmers Green policing neighbourhood, under the Metropolitan Police Constabulary. The Police have been consulted with regarding the application and to date have raised no concerns.</p> <p>Public Houses and Alcohol Licensed Premise The Alfred Herring, 316-322 Green Lanes, N13 5TT The Wishing Well, 9 Aldermans Hill, N13 4YD The Woodman, 128 Bourne Hill, N13 4BD The Occasional Half, 67-77 Green Lanes, N13 4TD Club Planet, 30-32 Green Lanes, N13 6HT The Bird Lounge, 100 Tottenham Rd, N13 6DG Aksular Restaurant, 232, 234 Green Lanes, N13 5UD</p> <p>Pawnbrokers and Loan Shops Cashpoint Pawnbrokers, 12 Aldermans Hill, N13 4PJ G Mantella Ltd. Jewellers Since 1982, 290A Green Lanes, N13 5TW</p> <p>Gambling premises Ladbrokes, 363-365 Green Lanes, N13 4JG Betfred, 319 Green Lanes, N13 4TY Ladbrokes, 402 Green Lanes, N13 5PD Ladbrokes, 65 Green Lanes, N13 4TD Ladbrokes, 10 Green Lanes, N13 6JR Coral, 40 Cannon Hill, N14 6LG Buzz Bingo and The Slots Room, Dearsley Rd, Enfield EN1 3FB</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Palmers Green 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 Palmers Green 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 <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for Palmers Green policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with Kent Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p>
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	<p>Residential Areas (impacted by Anti-Social Behaviour) Crime rates in the area surrounding Merkur Slots premises are high and have been rising in the past 3 years. Anti-social behaviour is the most commonly reported crime and accounted for 38.3% of all incidents during last 12 months.</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 Palmers Green 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. Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p>Money Laundering <i>Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.</i></p> <p>Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.</p> <p>There are 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</p>
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		<p>association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.</p> <p>IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.</p> <p>Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.</p> <p>Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.</p> <p>Adequate staff will always be maintained and subject to regular review and risk assessment.</p> <p>Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 6am.</p> <p>In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.</p> <p>Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.</p> <p>Merkur Slots Palmers Green will operate TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</p> <p>As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.</p>
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Ensuring that gambling is conducted in a fair and open way

Bingo/Gaming Machine and Supervision

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

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

Customer Complaints

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

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

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

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

Marketing

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

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

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

<p>Other</p>	<p>Places of worship and Religious Buildings Palmers Green United Reformed Church, N13 4AL St John the Evangelist, St John's Church, 1 Bourne Hill, N13 4DA New Life Church, 211 Green Lanes, N13 4UH Saint Monica's Catholic Church, 1 Stonard Rd, N13 4DJ Southgate Christian Fellowship, 12 Caversham Ave, N13 4LN Riverside Community Church, 64 Russell Rd, N13 4RP National Spiritualist Christian Church, 101 Green Lanes, N13 4SP Christian Action Housing Association, 53 Palmerston Cres, N13 4UF Winchmore Hill Baptist Church, Compton Rd, N21 3PA Saint Michael-At-Bowes Church of England, 103 Palmerston Rd, N22 8QX Holy Trinity Winchmore Hill, Green Lanes, Winchmore Hill, N21 3RS Palmers Green Mosque, 30 Oakthorpe Rd, N13 5JL</p>	<p>Ethnicity and Local Area Demographic 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 Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p>
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		<p>COVID 19 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 Palmers Green Premise Layout

Premise level:	Merkur Slots Palmers Green is a ground floor premises.
Premise frontage:	Merkur Slots Palmers Green 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 Palmers Green 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 Palmers Green 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 Palmers Green 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 Palmers Green will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

Additional Comments

Merkur Slots UK have operated a Bingo licensed premise within the London Borough of Enfield Local Authority, Merkur Slots, 19 The Concourse, Edmonton Green Shopping Centre, N9 0TQ since 2010. This premise has never been subject to a local authority or Gambling Commission review. Merkur Slots UK hold a further Bingo premise licence at 1-2 Onge Parade, Southbury Road, Enfield, EN1 1UY which is due to open in 2021.

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

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

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

Assessors Name:	AMANDA KIERNAN
Signature:	
Date:	07/06/21

Merkur Slots, 292/292A Green Lanes, Palmers Green, London, N13 5TW



Srovelands Medical Centre

Nissi Takeaway

Venture Photography

Palmers Green

CeX Mobile Phone Shop

Morrisons Takeaway

KFC Palmers Green

Chalk

Boots Palmers Green

Barclays Bank

HSBC

Unikat-2 Bulgarian Takeaway • Delivery

Bain Harley Optician

Smokers Paradise Vaporiser Shop

Lloyds Bank

Khin Lee Chinese Takeaway • Delivery

Crown Nails

Sainsbury's Local

A105

JOJO & FLO LONDON

Roller Station

McDonald's Palmers Green Takeaway • Delivery

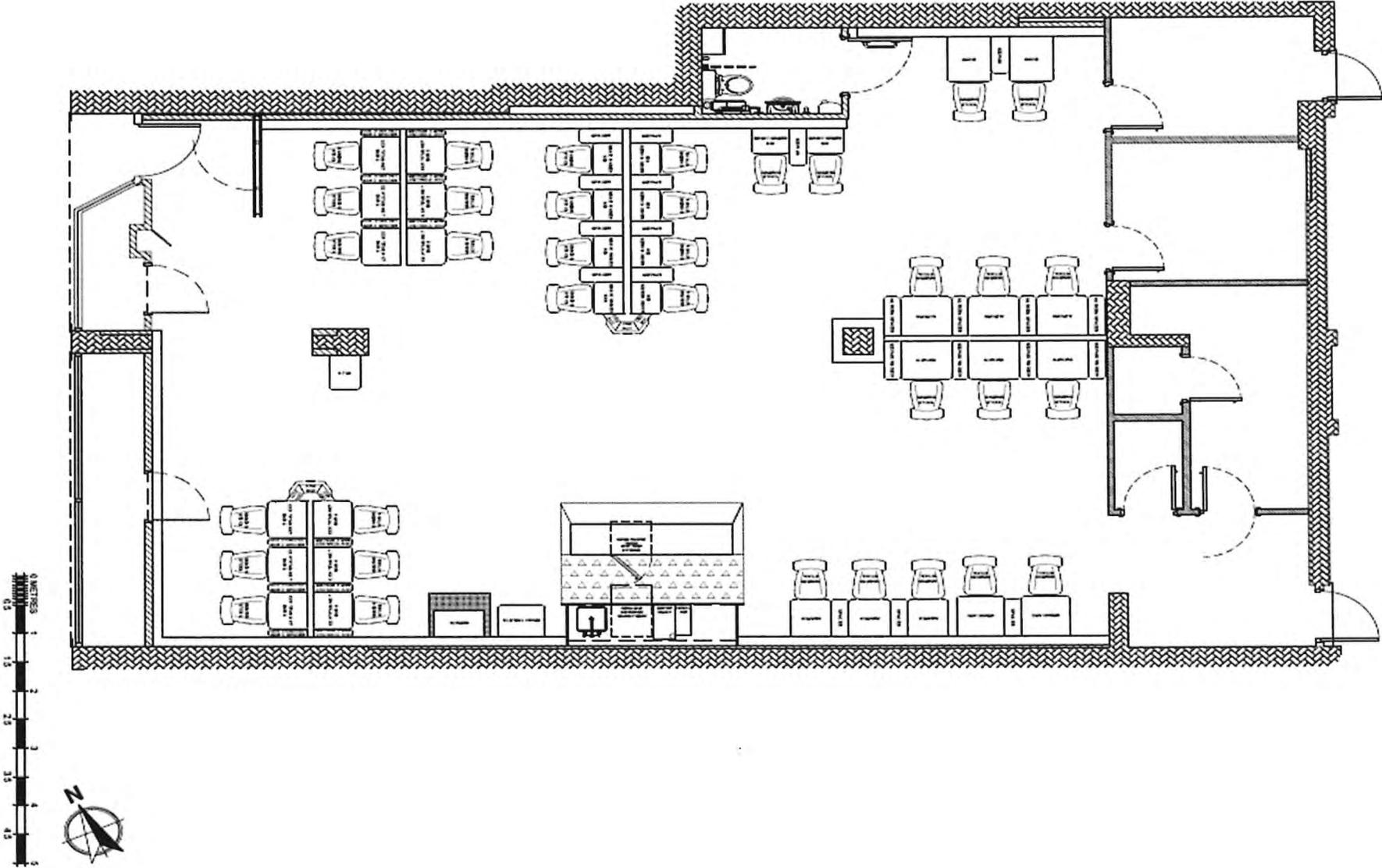
Explore Learning

The Alfred Herring

Palmers Green Post Office

Rimini Takeaway • Delivery

Merkur Slots, 292/292A Green Lanes, Palmers Green, London, N13 5TW



Merkur Slots, 292/292A Green Lanes, Palmers Green, N13 5TW – Shop front 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

The index of multiple deprivation shows that Green Lanes is in the 16,629th most deprived area in the country, lying in the 6th decile for deprivation, the 1st being the most deprived.

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
N13 5TW	Green Lanes	E01001498	Enfield 029B E01001498	16629	6

Merkur operational premises - London Boroughs and Neighbouring Councils

Postcode	Merkur Slots Venue	LSOA code	LSOA Name	Index of Multiple Deprivation Rank	Index of Multiple Deprivation Decile
KT3 4EU	New Malden	E01002930	Kingston upon Thames 007B E01002930	23273	8
SW15 1RR	Putney	E01004609	Wandsworth 010E E01004609	23061	8
DA16 3PY	Welling	E01000414	Bexley 016E E01000414	20333	7
W1T 2HA	Tottenham Court Road	E01000850	Camden 026A E01000850	19686	6
N12 8PT	North Finchley	E01000321	Barnet 012E E01000321	19535	6
HP1 1BB	Hemel Hempstead	E01023398	Dacorum 015D E01023398	19045	6
SW6 1NJ	Fulham	E01001881	Hammersmith and Fulham 017B E01001881	18973	6
SW17 7PG	Tooting Bec	E01004548	Wandsworth 029D E01004548	16560	6
SW2 4RD	Streatham	E01003131	Lambeth 026B E01003131	15900	5
SE5 8QZ	Camberwell	E01003913	Southwark 024A E01003913	15082	5
TW3 1EA	Hounslow 2	E01033083	Hounslow 018F E01033083	14649	5
TW3 1LR	Hounslow	E01033083	Hounslow 018F E01033083	14649	5
WD17 1LJ	Watford 3 (No. 59)	E01023861	Watford 009C E01023861	14182	5
NW5 2TJ	Kentish Town	E01000928	Camden 003E E01000928	14085	5
W13 9DA	Ealing Old	E01001389	Ealing 028F E01001389	13509	5
HA3 5BY	Harrow Wealdstone 2	E01002179	Harrow 013A E01002179	13474	5
SW17 OSP	Tooting	E01004525	Wandsworth 035A E01004525	13131	4
UB6 9AH	Greenford FV	E01001261	Ealing 012C E01001261	12265	4
UB6 8SG	Greenford	E01001261	Ealing 012C E01001261	12265	4
SW17 ORN	Tooting	E01004617	Wandsworth 034D E01004617	12245	4
W5 5JN	Ealing	E01001221	Ealing 020A E01001221	11345	4

SE17 2AL	Camberwell	E01003969	Southwark 017B E01003969	11322	4
EN8 7LA	Waltham Cross	E01023337	Broxbourne 013B E01023337	11162	4
N7 6QA	Holloway	E01002731	Islington 007B E01002731	11066	4
UB2 4DQ	Southall	E01001369	Ealing 038D E01001369	10823	4
E11 4QS	Leytonstone	E01004440	Waltham Forest 024D E01004440	10223	4
SM1 1DJ	Sutton	E01004142	Sutton 012D E01004142	10196	4
E6 1JB	East Ham	E01003520	Newham 018A E01003520	9784	3
SM4 5HT	Morden	E01003439	Merton 023C E01003439	9363	3
SE18 6JX	Woolwich	E01033735	Greenwich 004G E01033735	9152	3
W3 6LP	Acton	E01001351	Ealing 025E E01001351	9030	3
NW2 3DU	Cricklewood	E01000141	Barnet 039A E01000141	8601	3
NW1 7JN	Camden	E01000948	Camden 021D E01000948	8522	3
N16 0LH	Stoke Newington	E01001831	Hackney 009D E01001831	8414	3
SE1 7AE	Waterloo	E01032582	Lambeth 036E E01032582	8211	3
HA9 7BH	Wembley	E01000635	Brent 020D E01000635	8174	3
NW10 0AD	Neasden	E01000510	Brent 014C E01000510	7979	3
E2 0DJ	Bethnal Green	E01004211	Tower Hamlets 013D E01004211	7276	3
W12 8LR	Shepherds Bush 3	E01001943	Hammersmith and Fulham 004A E01001943	6650	3
N22 6BH	Wood Green	E01002031	Haringey 016D E01002031	6590	3
UB1 1PS	Southall 2	E01001361	Ealing 023E E01001361	6178	2
E13 9AU	Upton Park	E01003489	Newham 019B E01003489	6119	2
NW6 4JD	Kilburn	E01000931	Camden 013C E01000931	6050	2
SE15 5EX	Peckham	E01004067	Southwark 022E E01004067	5696	2
WD17 2DQ	Watford	E01023860	Watford 009B E01023860	5055	2
E1 7QX	Aldgate	E01004309	Tower Hamlets 015D E01004309	4749	2
W6 0QW	Hammersmith	E01001899	Hammersmith and Fulham 013D E01001899	3413	2
N9 0TQ	Edmonton Green	E01001429	Enfield 030D E01001429	2781	1

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

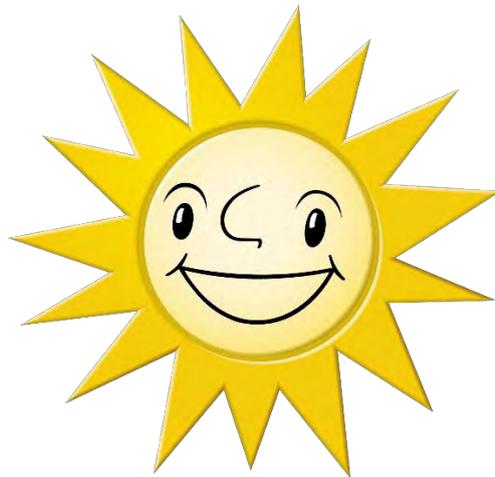
Local Authority District name (2019)	IMD - Average rank	IMD - Rank of average rank*	IMD - Average score	IMD - Rank of average score	IMD - Proportion of LSOAs in most deprived 10% nationally	IMD - Rank of proportion of LSOAs in most deprived 10% nationally	IMD 2019 - Extent	IMD 2019 - Rank of extent
Blackpool	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
Pendle	21934.23	36	30.723	33	0.3158	14	0.4077	29
Haringey	21887.62	37	27.956	49	0.0966	84	0.3210	52
Barnsley	21850.19	38	29.933	38	0.2177	35	0.3838	35
Halton	21746.16	39	32.325	23	0.3165	13	0.4678	22
St. Helens	21635.55	40	31.518	26	0.2437	28	0.4011	30
Doncaster	21613.33	41	30.289	37	0.2371	32	0.3984	31
Lambeth	21351.38	42	25.422	81	0.0000	195	0.1949	108
Southwark	21247.36	43	25.811	72	0.0301	147	0.2305	91
Barrow-in-Furness	21227.03	44	31.117	31	0.2449	27	0.3790	36
Waltham Forest	21186.64	45	25.209	82	0.0208	162	0.1783	115
Preston	21185.45	46	29.531	45	0.1860	46	0.4160	27
Bolton	21135.42	47	30.691	34	0.2373	31	0.4315	26
Torbay	21088.82	48	28.104	48	0.1573	58	0.2912	65
Brent	21083.02	49	25.558	79	0.0578	116	0.2074	101
Rotherham	21030.76	50	29.550	44	0.2156	36	0.3571	44
Fenland	20893.92	51	25.426	80	0.0727	103	0.2146	96
Luton	20864.04	52	25.908	70	0.0331	145	0.2710	72
Peterborough	20858.96	53	27.821	51	0.1429	65	0.3675	40
Gateshead	20831.18	54	28.217	47	0.1667	51	0.3397	48
Southampton	20786.70	55	26.876	61	0.1284	68	0.2836	69
Mansfield	20724.63	56	28.503	46	0.1493	61	0.3705	39
Portsmouth	20660.69	57	26.899	59	0.1200	72	0.2473	83

Bolsover	20440.76	58	25.047	84	0.0417	132	0.2165	95
Enfield	20418.65	59	25.781	74	0.0546	119	0.2942	61

*1 being the most deprived and 59 the least deprived.

Merkur Slots: Social Responsibility, Operational Compliance & Training Documents



MERKUR

SLOTS

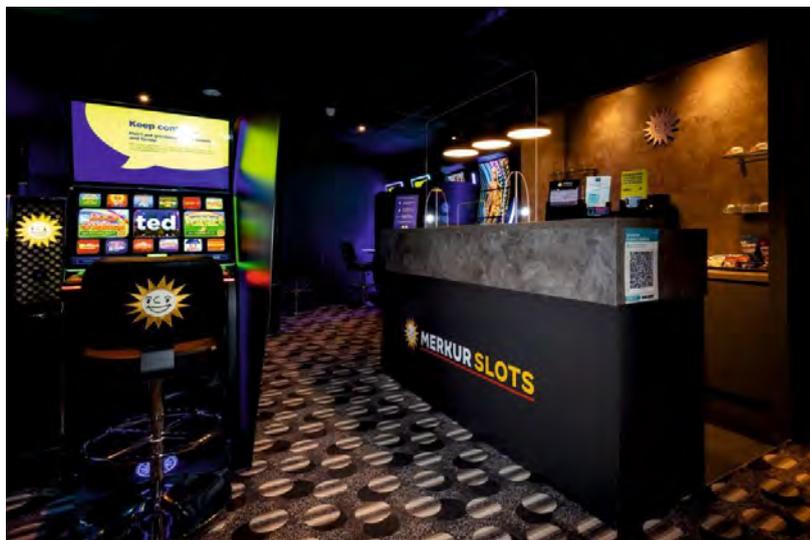
**Social Responsibility,
Operational Compliance
& Training Documents**

MERKUR SLOTS SOCIAL RESPONSIBILITY, OPERATIONAL COMPLIANCE & TRAINING DOCUMENTS TABLE			
1. INTRODUCTION		UPDATED	VERSION
1.1	THE 3 LICENSING OBJECTIVES & OUR VENUES	April 2021	V1.3
1.2	G TAB BINGO PRODUCT	March 2021	V1.1
1.3	SOCIAL RESPONSIBILITY - STATEMENT OF INTENT	March 2021	V1.4
1.4	POWERS OF THE GAMBLING COMMISSION	March 2021	V1.1
2. CRIME & DISORDER			
2.1	MONEY LAUNDERING AND CASH HANDLING	March 2021	V1.1
2.2	KEEPING ALCOHOL OUT	March 2021	V1.1
2.3	DEALING WITH AGGRESSIVE CUSTOMERS	March 2021	V1.1
3. FAIR AND OPEN			
3.1	COMPLAINTS PROCEDURE & COMPLAINTS LEAFLET	March 2021	V1.2
3.2	MARKETING AND PROMOTIONAL GUIDELINES	March 2021	V1.3
4. CHILDREN AND OTHER VULNERABLE PEOPLE			
4.1	ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS	March 2021	V1.2
4.2	EMPLOYMENT OF CHILDREN AND YOUNG PERSONS	March 2021	V1.2
4.3	CUSTOMER INTERACTION & GAMBLING COMMISSION GUIDANCE	March 2021	V1.4
4.4	SELF EXCLUSION	March 2021	V1.3
4.5	SELF EXCLUSION REVIEW FORM	March 2021	V1.1
5. RECORDING REQUIREMENTS			
5.1	MONTHLY LOG CHECK SUMMARY & PAPER PREMISES LOGS	March 2021	V1.1
6. POLICIES			
6.1	IHL TABLET & PREMISES LOG	May 2021	V1.3
6.2	MERKUR SLOTS OPERATIONAL STANDARDS	April 2021	V1.1
6.3	OPERATIONS MANUAL: COMPLIANCE POLICY	March 2021	V1.1
6.4	OPERATIONS MANUAL: CCTV POLICY	March 2021	V1.1
6.5	OPERATIONS MANUAL: MACHINE FRAUD POLICY	March 2021	V1.1
6.6	OPERATIONS MANUAL: MACHINE RATIO CHECK POLICY	March 2021	V1.1
6.7	OPERATIONS MANUAL: STAFF GUARD POLICY	March 2021	V1.1
6.8	OPERATIONS MANUAL: SMOKING/VAPING POLICY	March 2021	V1.1
6.9	PROOF OF AGE	March 2021	V1.1
7. TRAINING			
7.1	LEARNING AND DEVELOPMENT TRAINING STATEMENT	March 2021	V1.2
7.2	SAFEGUARDING AND RESPONSIBLE GAMBLING	April 2021	V1.1
7.3	TRAINING WORKBOOK	March 2021	V1.2
7.4	INDUSTRY ACRONYM & ABBREVIATIONS	March 2021	V1.2
8. LICENSING SUMMARY & LCCP			
8.1	LICENSING BROCHURE	April 2021	V1.1
8.2	LICENSING CONDITIONS AND CODES OF PRACTICE	April 2021	V1.1

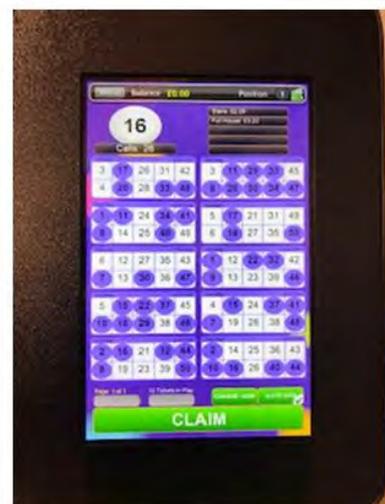
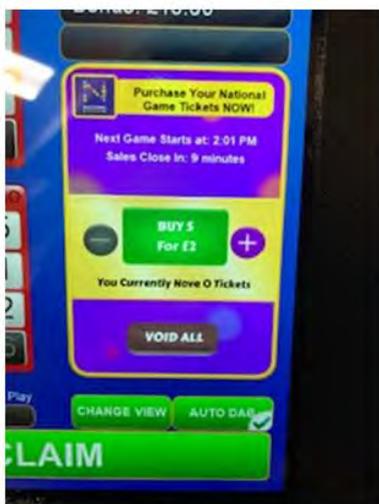
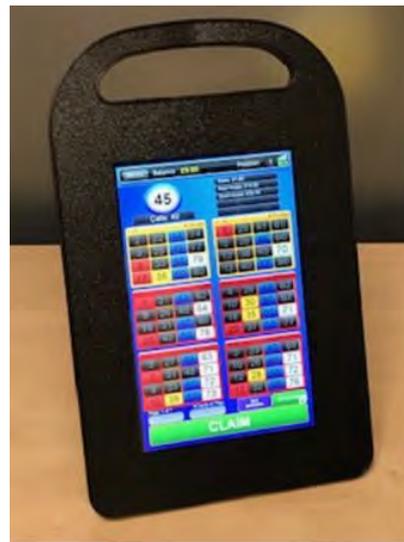
LICENSING OBJECTIVES



Image Library of a customer Journey in our Venues



LICENSING OBJECTIVES





SAFER GAMBLING

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



1. Keeping crime out of gambling

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



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



Dedicated Learning & Development Team and National training centres.



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



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



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



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



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



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



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

2. Ensuring gambling is conducted fairly and openly

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



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

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

Our leaflets clearly outline processes to support our customers

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

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



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



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



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

Bringing Traditional Bingo to the High Street



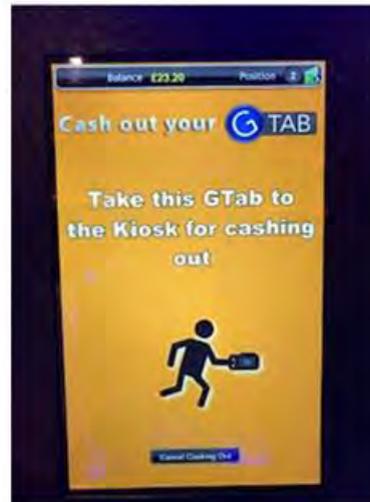
G-Tab is a multi-purpose gaming device offering live link Bingo Games, Bingo Variant Games and participation in the National Bingo Game which is played twice daily. Bingo tablets are bingo machines that provide games of both remote and non-remote bingo with remote bingo being the linked games operated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

Standalone Tablet Terminal

Bingo numbers announced and shown live on the top display



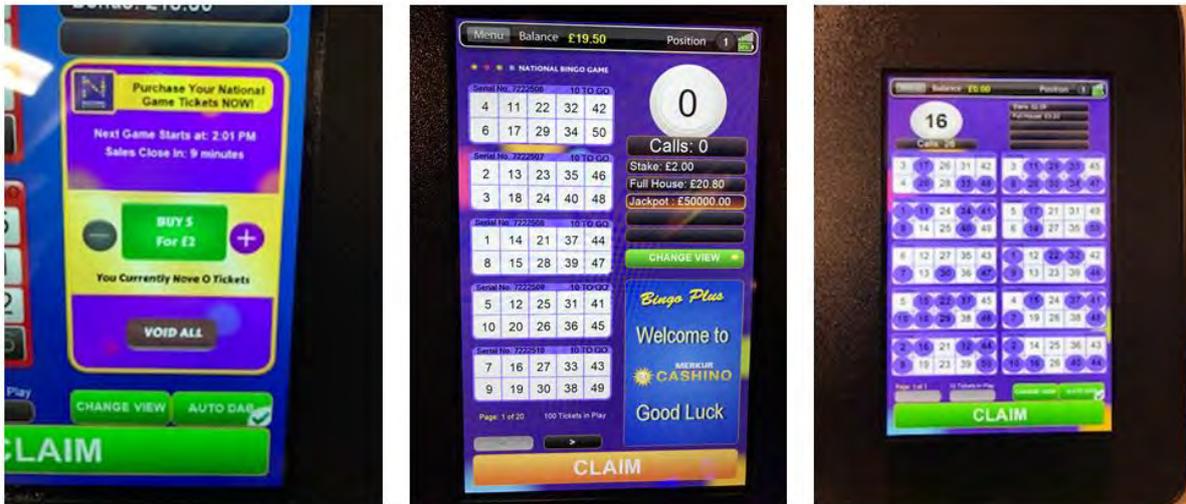
Charges to play clearly displayed



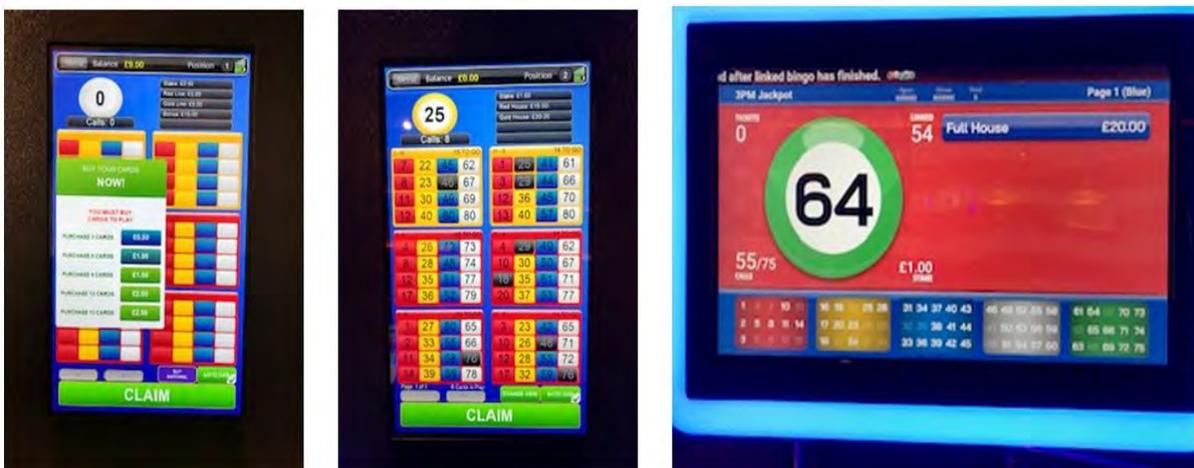
Customers cannot stake-up once game has commenced

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

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



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

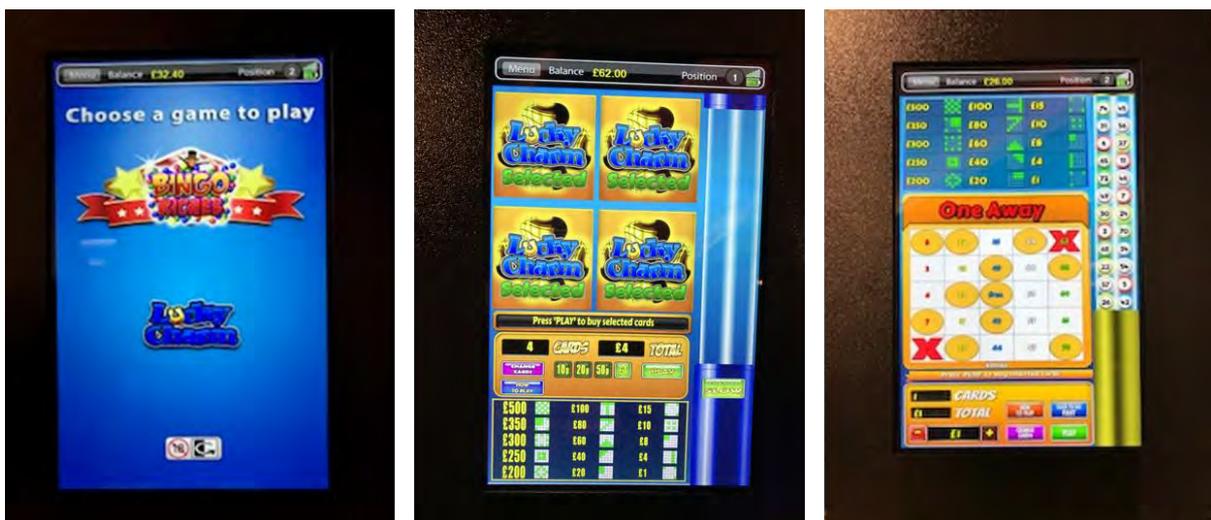


Bingo Variant (BV) Games are available 9:00 till midnight. The game of bingo stands alone on the tablet and does not connect via remote communication to a server or link to games across premises.

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



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



Low stake games:

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

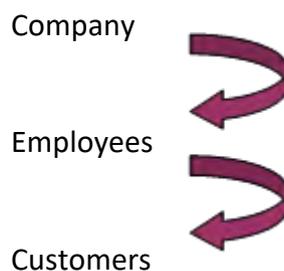
SOCIAL RESPONSIBILITY POLICY

STATEMENT OF INTENT

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

WHAT IS SOCIAL RESPONSIBILITY?

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



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

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

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

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

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

COMPANY

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

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

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

EMPLOYEES

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

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

The above documentation includes comprehensive coverage of the following: -

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

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

- Customer care
- Conflict management
- Social responsibility

In addition employees will receive refresher training every 6 months.

CUSTOMER

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

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

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

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

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



Stefan Bruns
Chief Executive Officer



Mark Schertle
Chief Operating Officer



Boris Lungen
Chief Financial Officer

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

STATEMENT

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

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

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

RIGHTS OF GAMBLING COMMISSION ENFORCEMENT OFFICERS

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

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

PROCEDURE

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

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

The Duty Manager must attend the Enforcement Officer without delay.

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

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

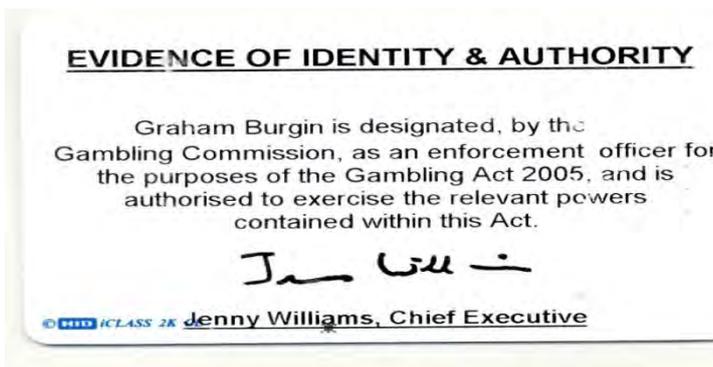
The Enforcement Officer may remove copies of documents as required.

Gambling Commission Sample ID



Front of card Contains the Following:

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



Back of card contains the following:

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

MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

1. Introduction

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

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

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

2. Money Laundering Definition

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

3. Policy

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

Merkur Casino UK has appointed a designated Money Laundering Officer (MLO), Mrs. Amanda Kiernan.

Email: amandakiernan@praesepeplc.com

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

4. Disclosure Procedure

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

All incidents should be reported to your line Manager.

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

5. Cash Handling

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

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

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

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

KEEPING ALCOHOL OUT

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

INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL ON ENTRY

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

Procedure

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

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

All incidents should be recorded fully on the premises log.

ALCOHOL CONSUMPTION ON SITE

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

Bingo Clubs

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

AGC's/High Street Bingo

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

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

EXCESSIVE CONSUMPTION

Procedure

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

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

DEALING WITH AN AGGRESSIVE CUSTOMER

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

WHAT CAUSES AGGRESSION AND VIOLENCE?

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

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

WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

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

IDENTIFYING AN AGGRESSIVE OR VIOLENT CUSTOMER

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

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

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

PROCEDURE

Quite simply whenever there is an incident you should: -

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

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

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

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

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

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

PREVENTING STAFF FROM BEING ABUSED

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

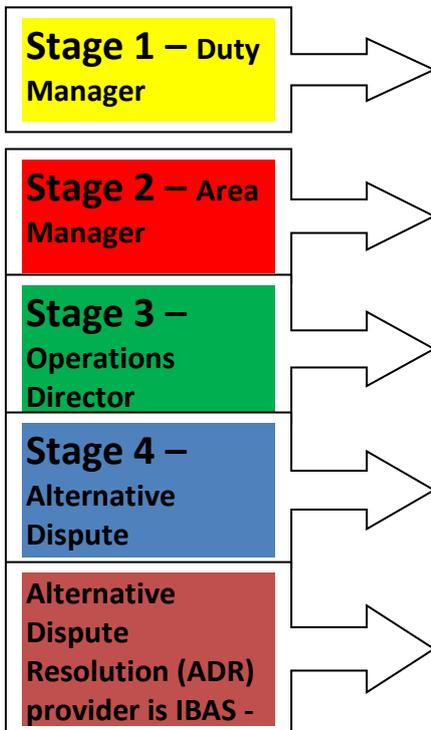
At no time should a member of staff intervene physically in the removal of an individual from a site.

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

COMPLAINTS PROCEDURE

The Company’s written complaints procedure is available as a separate leaflet. Cashino venues operate a 4 stage complaints procedure as below.

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



COMPLAINTS & DISPUTES POLICY

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

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

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

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

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



MERKUR SLOTS

18+ BeGambleAware.org PLAY SENSIBLY PLAY ENJOYABLY PLAY AFFORDABLY

MARKETING AND PROMOTIONAL GUIDELINES

POLICY

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

COMPLIANCE

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

We adopt the general principles that our advertising is:

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

Specifically we ensure that:

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

MARKETING CODE OF PRACTICE

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

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

LEGAL - DECENT - HONEST - TRUTHFUL

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

GUARANTEED JACKPOT WINS FOR EVERYONE! ❌

PLAY THIS AND DOUBLE YOUR MONEY! ❌

YOU WILL WIN A FORTUNE! NO TERMS AND CONDITIONS ❌

BEST BEFORE END ✔️

OVER 18 ONLY 18 ✔️

18 ✔️

THINK 25 ✔️

FREE TO ENTER? ✔️

PLAY LONGER WIN MORE ❌

✔️

LEGAL - DECENT - HONEST - TRUTHFUL

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

18+ BeGambleAware.org   

PLAY SENSIBLY

PLAY ENJOYABLY

PLAY AFFORDABLY



MARKETING AND PROMOTION

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

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

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

Procedure

All Marketing and Promotions must be compliant.

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

For Bingo Sites

- Operations Director
- General Manager
- Marketing Manager

For AGC's

- Operations Director
- Marketing Manager

ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

POLICY

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

PROCEDURE

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

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

EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

POLICY

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

COMPLIANCE

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

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

IT IS STRICT COMPANY POLICY THAT: -

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

CUSTOMER INTERACTION

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

POLICY

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

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

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

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

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

Procedure

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

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

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

The above 3 parts include the following;

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

SELF EXCLUSION

POLICY

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

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

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

Procedure - Using the SmartEXCLUSION Tablet

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

Self-exclusion is sector specific:-

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

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

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

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

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

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

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

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

Please note on the photo gallery,

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

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



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



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

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

First Name: **dummy**

Last Name: **test**

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

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

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

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

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

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

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

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

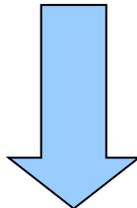
PLEASE NOTE: Self-exclusion social responsibility code provision 3.5.1 is a condition of our Licence Conditions and Codes of Practice – (LCCP)

SELF EXCLUSION PROCEDURE FLOWCHART

CUSTOMER: Requests to be excluded.

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

CUSTOMER AND AREA MANAGER/DUTY MANAGER/SUPERVISOR: Completes the customer exclusion request using the SmartEXCLUSION tablet and follows the on screen instructions.



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

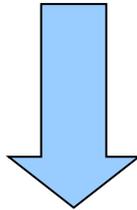
AREA MANAGER/DUTY MANAGER/SUPERVISOR: Explains to customer the exclusion is sector specific and applies to other similar operating premises in the locality within the default 0.25km – 1 km radius.

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

MANAGER:

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

MANAGER/DUTY STAFF



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

AFTER THE END OF THE EXCLUSION PERIOD:

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

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

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

SELF EXCLUSION REVIEW FORM

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

Company:

Site Name:

Site Address:

Post Code:

Customer Name:

Customer Date of Birth:

Customer Address:

Post Code:

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

Customer's Decision:
--

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

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

Signature: (Customer)

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

Signature: (Appointed Manager)

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

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

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

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

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

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

SOCIAL RESPONSIBILITY & CODES OF PRACTICE PREMISES LOGS

The Logbook contains the following:

- NEW:** **Venue Monthly Compliance Log Check Summary**

- LOG A:** **Attempts By Children And Young Persons To Access Adult Areas** – Recorded electronically using **Age Verification app** on IHL tablet

- LOG B: 1** **Customer Interaction - Gambling Related “At Risk” Customers** – Recorded electronically using the **SmartINTERACTION app** on IHL tablet.

- LOG B: 2** **Customer Incidents – Not Gambling Related** – Recorded electronically using **SmartINCIDENTS app** on IHL tablet.

- LOG C:** **Customer Complaints and Disputes** (paper Log)

- LOG D:** **Customer Incidents Requiring Police Assistance** – Recorded electronically using **SmartINCIDENT app** on IHL tablet.

- LOG E:** **Self-Exclusion Log** (Now Obsolete) - Was used for old paper Self Exclusions Forms which are not on the tablet and retained in Compliance Folder.

- LOG F:** **Incidents Relating To Aggressive Customers and Alcohol** – Recorded electronically using **SmartINCIDENT app** on IHL tablet.

- LOG G:** **Staff Training Summary** – paper log to be signed and dated every 6 months by **all staff**, when they complete “Essentials of Compliance” training module. **Venue Managers** to check the log is up to date at the end of the month and sign the Log Check Summary to verify the log is correct.
(this will remain as a paper Log and will not be on the tablet)

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

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

Venue Monthly: Compliance Log Check Summary

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

Document to be completed checked and signed monthly by Venue Manager or designated person at the end of each month.
Area Manager check and sign every 8 weeks.

Signed Venue Manager		Date	
Signed Area Manager		Date	Comments
Signed Auditor/Compliance Manager		Date	Comments

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

SITE ADDRESS and NUMBER:

LOG G: SUMMARY OF STAFF TRAINING – Page 1

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

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

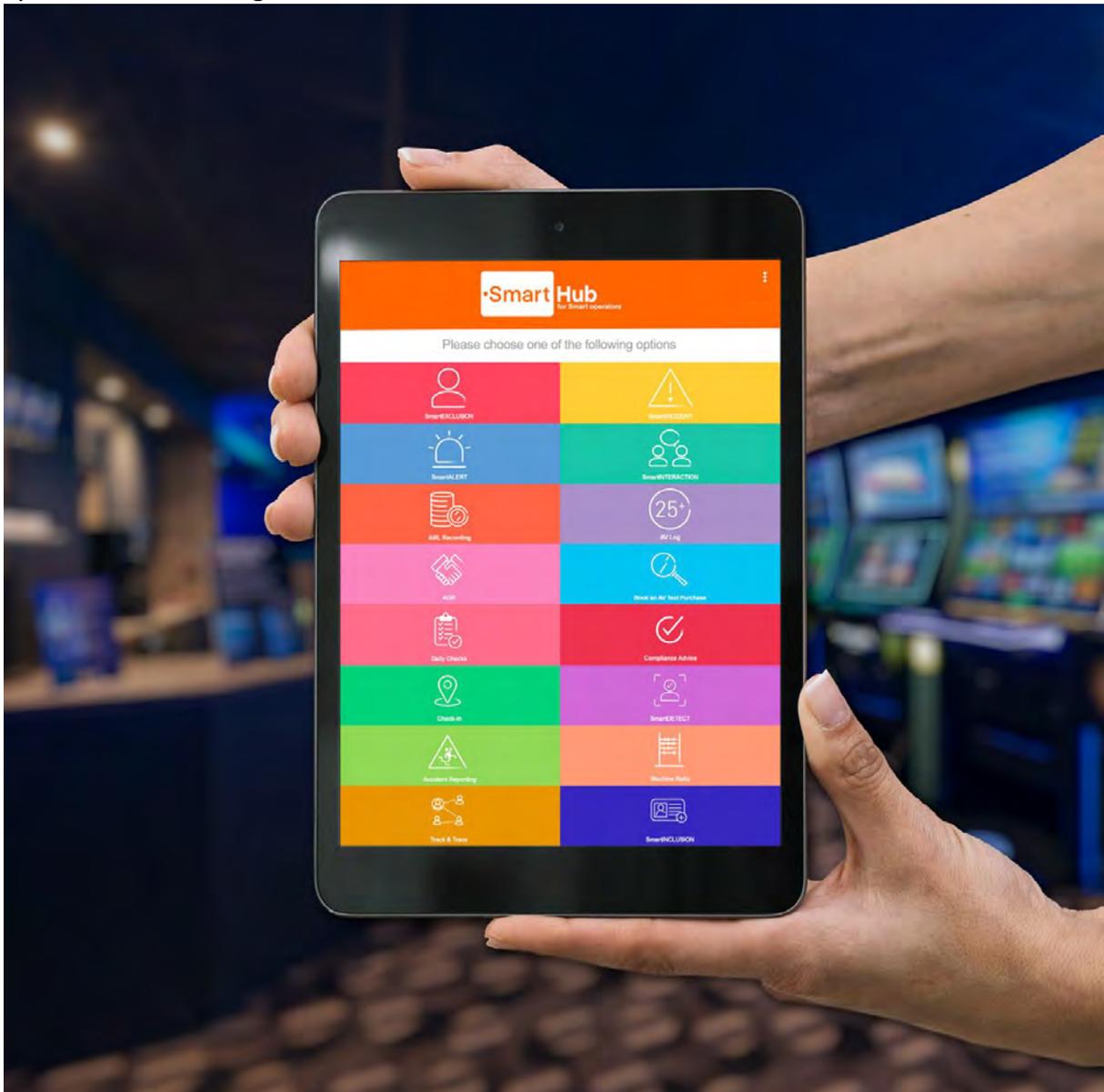
1. Access to Gambling by Children and Young Persons	6. Money laundering and Proceeds of Crime Act 2002
2. Access to Premises by the Gambling Commission’s Enforcement Officers	7. Self-Exclusion
3. Advertising Standards and Marketing	8. Customer Interaction for “At Risk” customers
4. Fair and Open Practice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

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

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

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



SOCIAL RESPONSIBILITY & CODES OF PRACTICE PREMISES LOGS



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



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

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



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

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

Incident Types:

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

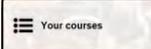
LOG E Self Exclusion (paper log) – you only need to complete this log if you have any customers who are still self-excluded on the old paper Self Exclusion Request Form. Be sure to find out if you still have any valid forms in your venue! (you may not have any, as it varies from venue to venue). Some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

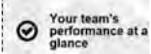


SmartEXCLUSION App (current method) on IHL tablet, to be completed if a customer wishes to self-exclude. Ensure all staff check the tablet daily at the start of each shift to familiarise themselves with any new photos which will appear in the top left hand corner of the photo carousel for new self-excluded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

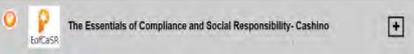
A copy of all User Guides for the tablet are available in your venue for reference purposes. You can also view and download these documents on Upskill > Knowledge Base > Categories > see IHL

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

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

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

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

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

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

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

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

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

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

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

THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

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

- Merkur Slots does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.
- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.

- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

Compliance Policy

Why:

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

Best Result:

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

Worst Result:

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

The 3 licensing objectives:

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



What:

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

When:

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

Who:

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

Related / supporting documents:

- The compliance and social responsibility folder.

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

- Lead Supervisor
- Cluster Manager
- Compliance Manager

CCTV Policy

Why:

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

Best Result:

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

Worst Result:

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

What:

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

When:

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

Who:

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

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

- Cluster Manager.
- Commercial Administrator

Machine Fraud Policy

Why:

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

Best Result:

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

Worst Result:

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

What:

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

When:

Fraud may be taking place when

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

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

Who:

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

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

- Lead Supervisor
- Cluster Manager
- Area Manager

How:

If you suspect that machine fraud is taking place either:

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

Or:

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

Following a fraud

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

Machine Ratio Check Policy

Why:

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

Best Result:

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

Worst Result:

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

What:

- MC105 should be completed
- Completed MC105 should be emailed to Incomeprotection@praesepeplc.com

When:

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

Who:

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

Related / supporting documents:

- MC105 Machine Ratio Check Record.

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

- Area Manager
- Income protection
- Gaming Machines.

How:

Complete the MC 105 Machine Ratio Check Record

MACHINE RATIO CHECK RECORD



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

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

This form must be emailed to IncomeProtection@praesepepla.com

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

Confirm action taken:

MC105-V1

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

Email Completed document

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

Staff Guard / P.A Policy / Staff Alarm

Why:

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

Best Result:

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

Worst Result:

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

What:

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

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

When:

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

Who:

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

Related / supporting documents:

- MC141 – Staff guard test record

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

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

How:**To operate the Staff Guard unit:**

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

IF YOU ARE IN IMMEDIATE DANGER SAY:

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

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

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

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

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

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



How to make a test call:

Once per week a test call must be made:

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

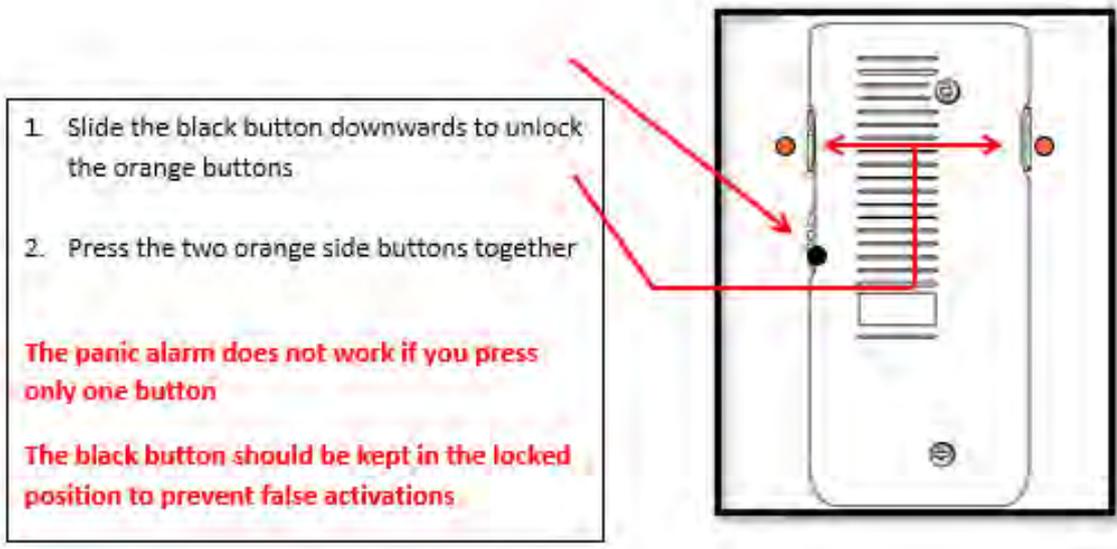
The password is your venue name and number.

2. They will confirm the test and end the call



MOBILE PANIC ALARMS (MPA)

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



HOW IT WORKS

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

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

EMERGENCY

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

Example of when to use;

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

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

COMPLAINTS

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

HOW TO TEST YOUR MPAs

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

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

WHAT TO DO AFTER WORKING AREA TEST/ACTIVATION

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

You will then need to reset your alarm control panel.

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

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

Smoking / Vaping Policy

Why:

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

Best Result:

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

Worst Result:

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

What:

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

When:

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



Who:

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

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

- Lead Supervisor
- Cluster manager
- Area manager



SMOKEFREE

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

MILITARY ID CARD



ANY IDENTIFICATION CARRYING THE 'PASS' LOGO



Driving License with photocard



Passport



The law states that licensees must only accept identification which:

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

MERKUR SLOTS TRAINING

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

Learning Methods

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

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

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

Training teams: Who is involved and timeframes

Prior to Venue Opening:

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

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

Opening the Venue & Post Opening:

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

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

Lockdown Changes:

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

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



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

Safeguarding Children & Vulnerable People

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

1. Introduction

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

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

2. What Is Safeguarding (Lesson 1)

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

The term actually means:

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

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

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

We Should:

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

Children (Lesson 2)

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

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

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

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

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

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

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

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

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

The Stages of Change (Lesson 4)

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

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

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

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

For example:



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

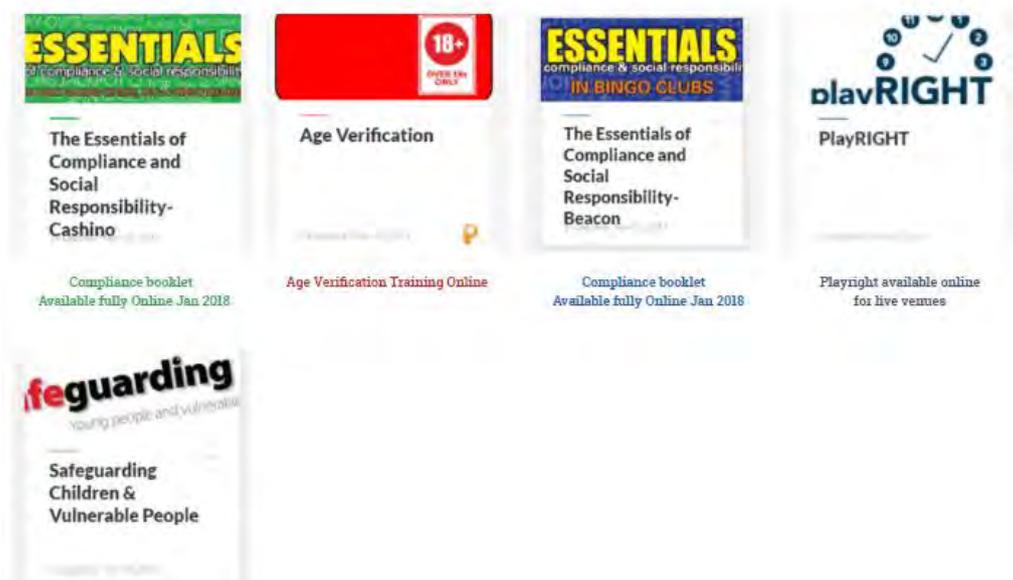
Ultimately we as a business have a responsibility to take action to safeguard vulnerable people so let's move to the next section and look at this next.

Taking Action (Lesson 5 / Observation module 6)

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

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

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



Dealing with Anger & Aggression (Lesson 7)

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

Things to avoid:

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

Advertising Responsibly (Lesson 8)

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

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

(click to enlarge):



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



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



Marketing Code of Practice 2018.pdf
441.8 KB



Gamcare / Support (Lesson 9)

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



Every Venue and Club has Staying in Control Leaflets

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

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

Behaviours Quiz (Lesson 10)

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

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



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

REMEMBER:

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

Let's all do our bit to be Socially Responsible

The image shows the cover of a manual titled 'Safeguarding Children & Vulnerable People'. The cover features the 'feguarding' logo in red and black, with the tagline 'young people and vulnerable'. The title is in a bold, sans-serif font.

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

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

Working in a Merkur Slots



My Training Plan

This workbook belongs to:

Merkur Slots Training Plan



Programme Welcome!

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

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

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

It's all about learning.....

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

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

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

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

Yours very truly, Casino MERKUR International

Stefan Bruns
MSI International MD

Mark Schertle
Chief Operating Officer

Merkur Slots Training Plan



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

Merkur Slots Training Plan



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

**Merkur Slots
Training Plan**



BEFORE

YOU CAN START TRAINING OR WORKING IN VENUE

YOU MUST COMPLETE

YOUR COMPLIANCE TRAINING

**LOG IN TO THE
INFORM PEOPLE
SYSTEM**



**SELECT THE
e-LEARNING TAB**



**Merkur Slots
Training Plan**



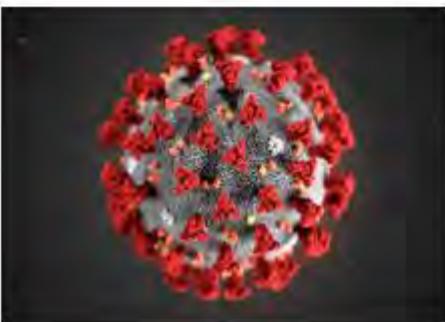
Complete these **four** courses:



**Essentials of
Compliance and
Social
Responsibility**



Age Verification



COVID-19



**Safeguarding Children
And Vulnerable People**

Merkur Slots Training Plan



e-Learning

You will have been introduced to Inform People and your e-learning on Inform People by your training manager first thing today. All your e-learning sits in your 'Virtual PA' and you access it through the e-learning tile as below:



EVERYONE who works in one of our venues, (Merkur Slots) must complete various training modules to ensure they understand our industry and area of compliance. You will already have completed the following courses:

Essentials of Compliance & Social Responsibility
Safeguarding of Children & Vulnerable People
Age Verification
Covid-19

You will have an element of e-learning and various modules to complete every day during your first two weeks of your induction.

We know this looks a lot, but you must understand the ethos of the Gaming Industry, that compliance is a legal requirement and how it is used day to day in your role and your venue.

Merkur Slots
Training Plan
e-learning Checklist



e-learning topic	Tick when complete
Merkur Slots Induction	
Essentials of Compliance & Social Responsibility	
Safeguarding the Vulnerable	
Age Verification	
Health & Safety Essentials (incl. COVID 19 video)	
Lone Working	
Playright	
Customer Service - Introduction Part 1	
Customer Service - Welcome Part 2	
Customer Service - Hosting Part 3	
Customer Service - Monitoring Part 4	
Customer Service - Excellence Part 5	
Equality Essentials	
Complaints Management	
Complaints Mgt. - Duty Manager	
Complaints Mgt. - Venue Manager	
Part 1 - Game Changers & Performance Review	
COVID	

Merkur Slots Training Plan



Uniforms & Appearance – Looking Part of the Team

You are a 'Brand Ambassador' for our Company

The company philosophy of providing services at the highest level is reflected in the appearance of all colleagues within the company.

Appearance of Employees

Customer Service Standards are not just how you look after our customers; it is how our customers also see you.

As a member of our Merkur slots team, a uniform will be provided for you to wear when you are on duty.

When considering your appearance, the correct fit and condition of the uniform must be considered, along with it being presented well. You will be quickly and safely recognizable as a member of the Merkur Slots team from a customer's point of view.

Name badges should be worn at work as part of your uniform. "Think 25" badge must be worn at all times. Name badges should be displayed on the right-hand side of your uniform, "Think 25" badge is to be positioned above the name badge.

- Well-groomed hair
- Pleasant body odour
- Perfectly cared hands (including fingernails)
- Minimal make up
- Minimal jewellery "less is more"
- Good oral hygiene
- It is preferred that tattoos are covered up, especially if it is explicit or may cause offence
- Standards of dress will be monitored regularly and should be adhered to at all times

**Merkur Slots
Training Plan**



Venue Tour

The first thing you will do with your Training Manager is a tour of the venue and get used to your surroundings. Below are some important areas you will need to know where they are located. You will complete one box for your training venue and complete the other box when you start in your Merkur Slots Venue.

Training Venue

What is the signing in and signing out process in the venue?

Where is the fire exit located?

Where should you gather in case of a fire?

Where are the toilets?

Where do I keep my personal belongings?

Where is the smoking area?

Where is the first aid kit kept?

My Venue

What is the signing in and signing out process in the venue?

Where is the fire exit located?

Where should you gather in case of a fire?

Where are the toilets?

Where do I keep my personal belongings?

Where is the smoking area?

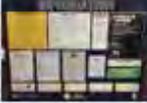
Where is the first aid kit kept?

Merkur Slots Training Plan



Finding Essential Items in Venue

So where is it in your venue? In this exercise, we want you to find out and confirm where the above items, procedures, or contact details are in your venue.

Item	Image	Location
Fire Exit and Procedures		
Fire Extinguishers		
First Aid/ Accident Book		
Compliance & Social Responsibility Folder and Self Exclusion Tablet		
Complaint Procedures/Log Tablet		
Information Board		
Risk Assessment Information		
Operations Manual		
Emergency Contacts		

**Merkur Slots
Training Plan**

The Cashino Team – Training Venue



**Merkur Slots
Training Plan**



The Merkur Slots Team – Your Venue



Merkur Slots Training Plan



Operations - Personal/Staff Safety

At Praesepe we take your safety and security very seriously. As a business, we operate to the needs of our customers and this can mean on occasions, you may be the only employee working in the venue or you may need to leave an employee alone on the floor. Thinking about the safety aspect is vitally important.

We do not need heroes – staff safety is the number one priority at all times. Looking at our policies and the lone working training module, answer the 'best practice' sections for each of the safety areas below:

AREA	WHY	BEST PRACTICE/RESULT
STAFFGUARD FOBS AND PANIC ALARMS	The security of employees is of the utmost importance; therefore personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.	
FLOOR COVER	We need to know who is working in the Venue and where they are – it is important to consider when we can leave people working alone on the floor and when there should be more than 1 employee.	
MANUAL HANDLING SAFETY	The health and safety of employees is of great importance. Policies and processes need to be in place to protect employees and customers from dangers that may occur in the workplace.	
VISITORS TO VENUE	No one except authorised personnel should be allowed into any non-public areas of the venue. Only employees and authorised personnel are allowed in other private areas of the site. Identification should be requested for all visitors to the venue.	



THINK

**NEVER PUT YOURSELF,
ANOTHER EMPLOYEE
AT RISK OR IN DANGER**



- ✓ Be aware
- ✓ Be safe
- ✓ Be Sensible
- X Don't be a Hero
- X Don't put yourself at RISK

**Merkur Slots
Training Plan
Specimen ID card**



As from 01/01/2020 no other form of ID will/should be accepted.

As the team at HO and field-based roles continue to expand, and more colleagues are visiting the venues, we have issued new company ID cards.

Incorporated into the new design to improve security, along with the photo and name, is the person's job title and specimen signature that can be verified against the visitor's book.



Merkur Slots Training Plan

Operations - Your Safety



Your safety is one of our greatest priorities and we have several procedures in place in venues to keep you safe and our customers safe.

Within the Gauselmann Group, the subject of security, in general, attracts special attention. Security does not only mean protecting machines, buildings, and money, but rather all precautions for maintaining a safe working environment for our employees and a trustworthy place of recreation for all our customers. For us, human beings are the centre of attention!

To prevent serious incidents in our venues, it is important to understand what we can and should do to help prevent them.

Remember the points below to help reduce the risk to yourself and other people in the Venue:

- **Ensure you greet everyone who enters the venue and briefly make eye contact**
- **Only remove money from machines when 2 members of staff are on duty**
- **Do not empty machines if there are strangers in the venue**
- **Empty only one machine at a time. If you have concerns and you have consulted your Area Manager first, then you may lock the door when emptying machines**
- **All monies must be kept in the safe and/or the Change/GeWeTe machine**
- **No unauthorized personnel should be allowed in the office or staff areas**
- **No more than £500 to be available in a non-Time Delay safe.**
- **GeWeTe and safe keys must be kept in the Time Delay safe at all times**
- **During the venue collection, please refer to the company collection procedures and adhere to these**
- **Test the StaffGuard™ system weekly in front of customers**
- **Be particularly attentive at the beginning and the end of opening hours.**

In case of an incident, try to remain calm and remember, we do not expect you to be a hero! To help you stay calm and deal with a serious incident remember the following:

- **Your safety and the safety of our customers is paramount**
- **Don't take any sudden action**
- **Keep calm and don't shout or scream**
- **Do as you are told and keep your hands in sight at all times**
- **Only activate the StaffGuard™/panic alarm if it is safe to do so**
- **Do not make eye contact with the offender(s)**
- **Try to remember things like scars, tattoos and unusual accents and clothing**
- **Write everything down as soon after the event as possible**

**Merkur Slots
Training Plan**



Operations - StaffGuard™ & Panic Alarm in my Venue

To ensure that you know where StaffGuard™ and Panic Alarm units are in your venue and to ensure you know how to use them and to keep safe complete the questions below.

Where are the StaffGuard™/Panic Alarm units in your venue?	
Where is the fob that you can use?	
What should you say if you require immediate assistance?	
What should you say if you want them to stay on the line and listen?	
What should you say if you no longer need StaffGuard™?	
If you just require operational advice who should you call?	
What does a blue light on the StaffGuard™ unit mean?	
What does a steady red light on the StaffGuard™ unit mean?	
Where should you record, that a weekly test is completed?	
Who is responsible for the weekly test call in your venue?	

Remember; StaffGuard™ is a security measure to be used when we are in danger. If you have any operational issues or concerns they should be directed to your Cluster/Area/Night Manager

**Merkur Slots
Training Plan**



Operations - Staffguard™ & Panic Alarms

Have a look inside and outside your venue and ask yourself:

1. What are the risks in your area/location/venue?

2. What should you be aware of?

Merkur Slots Training Plan



Cleaning Standards - within the Venue

Cleaning the venue is important not only for keeping up appearances, but it is also important for your safety, as well as providing a safe environment for our customers.

When opening/closing the Venue, or if you are a 24 hours Venue, we need to ensure the Venue is cleaned and prepared for the next day or shift change over.

Below are the areas that need to be cleaned before opening or before the morning shift changeover.

Exterior:

- Woodwork (window frames, doors, tiles) washed down with soapy water
- Door handles (push buttons/push bars) washed and disinfected
- Brass polished to acceptable standards (where applicable)
- External back area/Smoking area cleaned and presentable (ashtrays/bins emptied and cleaned, rubbish removed, any tables/chairs wiped down and disinfected)

Venue Machine floor:

- Walls/poster frames wiped down
- Venue floor vacuumed including behind and between machines
- All gaming machines, GEWETE and ATM wiped down and disinfected, GTAB stand wiped down and disinfected, each tablet wiped down and disinfected
- All machine infills/spacers wiped down and disinfected
- All money pots to be disinfected
- All chairs (seats and bottom plates) wiped down and disinfected
- Service counter (worktops, shelves, cupboards doors, outside drawers and handles, swing doors, dishwasher door) wiped down and disinfected
- Coffee machine cleaned following manufacturers guidelines
- Service trays disinfected
- CCTV monitor wiped and disinfected
- Any flasks/jugs to be washed up
- All doors cleaned top to bottom, disinfected with no sign of dirt or damage
- First Aid Box cleaned, stocked, and easily accessible
- Toilets:
- Toilet bowl and seat cleaned and disinfected
- The sink basin cleaned, the area around the sink cleaned, taps and soap dispenser cleaned and disinfected
- Hand dryer cleaned
- Mirrors, light switches, cupboards cleaned and disinfected
- Walls and tiles wiped down
- Doors/handles/keypads cleaned and disinfected
- Floor swept and mopped

Merkur Slots Training Plan



Cleaning Standards - within the Venue

Office and team areas:

- All doors and handles cleaned and disinfected
- All Working surfaces wiped down and disinfected
- All office equipment dusted and wiped with sanitiser (laptop, coin/note counters, telephones, safes, staff guard fobs, panic alarm fobs, walkie talkies)

Shared Equipment:

- All shared equipment will be sanitised before, during and after each shift or anytime the equipment is transferred to a new employee. This includes phones, computers and other communication devices, kitchen implements, panic buttons, office equipment, cleaning equipment and all other direct contact items used throughout the venues.
- If we think of the areas and equipment we share as a team, can you think of what areas or items the customers would be sharing?

Activity – In the box below, please write down what areas or items you think customers would share in the venue and how you can ensure they are kept clean;

What items or areas do you think customers share?

How can you ensure they are kept clean?

Merkur Slots Training Plan



Cleaning Standards - within the Venue

You are going to spend some time with the team and learn about the cleaning standards within the venue and look at the checklists that need to be completed throughout the day.

All cleaning within the venue is recorded on checklists, some of these are found within the venue. You will learn about the rest of the cleaning procedures and rotas for inside and outside the venue from your Training Manager.

Activity – whilst working in the Venue please complete the following questions within the box;

Where can you find the cleaning policy?

What products do you use to clean the Gaming Machines?

How often should you check the toilets?

When a customer leaves the venue, what should be cleaned so it is ready for the next customer?

Where can you find the venue cleaning checklists?

Where can you print the cleaning checklist off?

**Merkur Slots
Training Plan**



Cleaning Standards - within the Venue

It is our commitment to clean the machine and chair after each use. If there is a delay in cleaning the machine, it is recommended a hold card is added to stop any new customer from playing until it can be cleaned.

Our commitment to our colleagues and ourselves is to ensure that anything we use, or is shared needs to be cleaned. If there is a delay, please ensure you tell your colleagues before they or our customers use the equipment.

Remember we are working together to keep us all safe!



Merkur Slots Training Plan



Customer Service Introduction - Mystery Shopper

Service standards are the core of our business and is the area where we can differentiate from our competitors.

Compare us to a gaming arcade at a motorway service and the customer experience is much better – but how do we compare to the high street gaming venues?

To help us achieve industry-leading service standards; **mystery shopping visits** provide our business with a range of information on the level of service which is being provided at each of our venues. Currently, we use a company called Store Checkers to have mystery shoppers visit every venue twice per year.

The report which is completed by a mystery shopper provides a non-biased opinion on the service which is provided, and the level of satisfaction they were left with, following the visit to one of our venues. The report itself has specific scoring areas included within, which range from; the welcome received, to the offers which were made, through to the level of rapport which the staff attempted to build with the customer.

The first experience a customer has in your venue is KEY to whether they will make a return visit, therefore, it is important that we are making the Right approach and offers to these customers.

Merkur Slots
Training Plan



Service Standards – Mystery Shopper

The mystery shopper report is broken down into 8 sections. Find a copy of your venue's mystery shopper report and list what the 8 sections are:

1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	

Merkur Slots Training Plan



Customer Service Introduction – Mystery Shop

To be the best gaming business on the high street our aim is to score 100% in every venue. The only way we can achieve this is through our teams in the venue – it's you that makes all the difference.

While some of the areas within the mystery shopper report may not relate directly to the actions of staff serving the customer, i.e "Would you describe the brand sign above the venue to be clean and well maintained? everything included within the report relates to the overall experience the customer has and the product and service which we offer. Ultimately if the exterior is dirty, it is our team's responsibility to notify someone to do something about it. It is the team's responsibility to action what they see needs doing (if they can) rather than leave it to someone else.

The areas which staff can have the greatest impact during the visit to a new customer are: The arrival, staff interaction, staff service, and departure. This forms part of the customer's journey and experience in the venue.

To complete the following exercise there is an example of a good and poor mystery shop. Looking at the areas covered in the report; think about how you can personally contribute to a great (100%) score. Focus on the areas that scored less than 100% on your last report, but also think about how you can ensure we maintain any 100% areas. Make notes below and discuss these with your training manager.



**Merkur Slots
Training Plan**

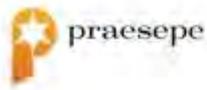


Area of Report	Our Score	What I can do to maintain/improve this

Merkur Slots Training Plan Mystery Shopper – Good Report



LOGO



AVERAGE (ENTIRE COMPANY) V YOUR SCORE (CURRENT)

Showing data for 11/11/16 - 11/12/16. Overall



83.00%
80/97

Entire Company



100%
101/101

Current

INFORMATION

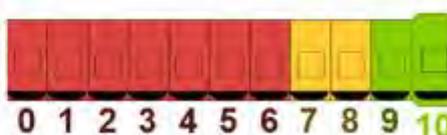
Company / Group: **praesepe: Customer Service Review**

Review Date: _____ Location: _____

Address: _____ Location: _____
United Kingdom

NET PROMOTER SCORE®

Would you recommend to family and friends, based on your experience? Please rate using a scale of 0-10, where 1 = "Not at all" and 10 = "Definitely"



0 1 2 3 4 5 6 7 8 9 10

SECTIONAL CHANGE

Showing data for 11/11/16 - 11/12/16. Overall

Section	This Evaluation Achieved	Score
Overall	101/101	100 %
External Image	9/9	100 %
Arrival	20/20	100 %
Machines & Environment	10/10	100 %
Staff Presentation	5/5	100 %
Staff Interaction & Service	45/45	100 %
Departure	2/2	100 %
Satisfaction	10/10	100 %

**Merkur Slots
Training Plan**



Mystery Shopper – Good Report



MYSTERY SHOPPING REPORT

QUESTION	SCORE	ANSWER
Location:		
Date of visit:		23/06/2020
Time of visit:		10:00
Photo of the cepoze (exterior) relating to this report:		
Day of visit:		Monday Tuesday Wednesday Thursday Friday Saturday <input checked="" type="checkbox"/> Sunday

Merkur Slots Training Plan



Mystery Shopper – Good Report

Questions	100%	100% (Dragon)
Number of staff present during your initial sweep:	2	
Number of customers present during your initial sweep:	17	
Give names/descriptions of all staff you came into contact with (in order of dealings):		
Detail the products/offers/services offered to you during the discussion with staff (i.e. membership/text scheme/promotions, drinks/snacks, etc)		
Offered assistance with changing my money into coins, Tea, coffee, cold soft drinks and water, Chocolate snacks, crisps and biscuits, Membership application form and the Cashio text match play offer.		
What did you spend in total?	£10	
Detail the games you played:		
Pots of Gold, Slots of Gold, Wines, Wish Upon a Jackpot, Kingdom of Wealth, Golden Pharaohs and Thai Princess		
Your age:	54	
Location/Target	100%	100% (Dragon)
Was the front of the venue clean and well maintained?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Achieved <input type="checkbox"/> Partially met <input type="checkbox"/> Not met
Would you describe the window display as clean and tidy, and the brasswork/aluminium polished?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Achieved <input type="checkbox"/> Partially met <input type="checkbox"/> Not met
Was there an over 10s notice clearly displayed on one of the entrance doors or in the front window area?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Achieved <input type="checkbox"/> Not met
Describe what was memorable about the window displays:		
The windows, although slightly misted up due to the inclement weather outside, were full of promotional material detailing slot machines and the venue's twenty-four hour opening times. The signs appeared interesting as I approached the venue due to the bright colours and bold text used.		
External image - please provide comments supporting your scoring for this section (both positive and negative)		
The promotional material promoting the slot machines on the left hand side of the double bay windows appealed to me as they appeared to display modern and new machines which I had previously played. This excited me and made me want to enter.		
Arrival	100%	100% (Dragon)
Based on the level of activity when you arrived, were you acknowledged quickly enough?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
When you entered the site, how were you acknowledged by the staff?	<input checked="" type="checkbox"/> Verbal welcome <input type="checkbox"/> Smile only <input type="checkbox"/> Eye contact only <input type="checkbox"/> No acknowledgement <input type="checkbox"/> N/A or All staff busy with customers	Offer of help <input type="checkbox"/> Verbal welcome <input type="checkbox"/> Smile only <input type="checkbox"/> Eye contact only <input type="checkbox"/> No acknowledgement <input type="checkbox"/> N/A or All staff busy with customers
When you entered the site and were first spoken to by a member of staff, were you asked for age-verification (where applicable)? N/A - If you took under 25, you should be asked to prove your age by means of identification	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Achieved - I was approached and asked for age-verification <input type="checkbox"/> Not Met - I was approached but not asked for ID and I am over 25 or under N/A - I am and took over 25
Minor Narrative		
Please provide a detailed narrative of everything that happened on the day - both positive and negative points - including playing, browsing and staff interactions.		
I was immediately welcomed by a smartly dressed member of staff as I browsed the numerous brightly lit slot machines with an offer of assistance together with a smile and a genuine kind attitude. I asked for help changing a ten pound note into ten one pound coins and received a detailed explanation of how the change machine worked while the staff member inserted my note into the machine. I was again asked if I required anything else before the staff member entered into a brief conversation with me by asking if I was new around this area as he had not seen me before. I replied I was on holiday and a brief conversation ensued about the town and surrounding countryside. He then proceeded to circulate around the venue asking other customers if they required assistance. He was being kept very busy as the venue had a lot of customers. Later the same staff member approached me and politely offered hot and cold drinks including tea, coffee, soft drinks and water. I thanked him and asked for a black coffee. He returned shortly afterwards with a coffee and a selection of crisps neatly arranged on an oval wicker tray. He spoke to me about completing a membership application form and entering my mobile telephone number into a match play text promotion. He was very knowledgeable and spoke in detail about the current offers and promotions. I was handed an application form to complete. During the visit I continued to browse and noticed one slot machine not working with an out of order sign attached. Later a different staff member approached me while I was playing the slot machines and asked if I required any hot drinks. She returned again with a tray of assorted chocolate offering them to myself and other customers. Both staff members appeared very attentive and were constantly interacting with the customers and myself, offering a brief and light hearted conversation, assistance and food and drinks. There was a buzz in the air with		

Merkur Slots Training Plan



Mystery Shopper – Good Report

Question	Score	Response
<p>The staff members creating a pleasant and joyful atmosphere. As I left a nearby staff member noticed me leaving and offered a genuine farewell and a polite thank you.</p>		
Machines & Environment (100% (14/14))		
Were all machines (all types of gaming) you saw during your visit clean?	100.00% 14/14	Yes <input checked="" type="checkbox"/> No
Was the price of play and jackpot amounts you could win clear on the machine?		Yes <input checked="" type="checkbox"/> No
Were all the machines (all types of gaming) switched on and working? (Score "Out of order card displayed" if any of the machines that are off have an "out of order" card displayed)	70.00% 10/14	Yes <input checked="" type="checkbox"/> "Out of order" card displayed <input type="checkbox"/> No
Was the centre generally clean and tidy?	100.00% 14/14	Yes <input checked="" type="checkbox"/> No
Was the centre generally in good repair? Information only - no score value		Yes <input checked="" type="checkbox"/> No
Was the carpet not worn in any places? Information only - no score value		Achieved <input type="checkbox"/> Not met
Was there no sign of anything that could cause health and safety issues? Information only - no score value		Achieved <input type="checkbox"/> Not met
Did you hear background music playing?	50.00% 7/14	Yes <input type="checkbox"/> No
Was the temperature of the centre acceptable, or too hot/too cold?	40.00% 6/14	Acceptable <input type="checkbox"/> Extreme
If there was a smoking area, was this well presented? Information only - no score value		Yes No N/A <input type="checkbox"/>
<p>Machines & Environment - please provide brief supporting comments: The atmosphere inside this venue was busy with customers and had a pleasant and enjoyable ambience. All the slot machines appeared clean, tidy and working apart from one slot machine which was not working but had an out of order card displayed on it. The interior was warm, brightly lit and had a clean and smart looking carpet. Overall the whole venue was clean and tidy and offered an exciting establishment with friendly and polite staff. There were no no-smoking areas inside this venue.</p>		
Staff Presentation (100% (5/5))		
Were all members of staff wearing uniforms?	100.00% 5/5	Yes <input checked="" type="checkbox"/> No
Were all of the staff that you came into contact with wearing name badges and Think 25 Badges (must wear both)?	100.00% 5/5	Yes, wearing both <input checked="" type="checkbox"/> Not wearing both
<p>Please list the names of staff you came into contact with who were wearing name badges/Think 25 badges, and provide a brief description of those who were not. Both Staff 1 and Staff 2 were both clearly wearing a name badge and an over 25 badge. They were noticeable as staff members due to their smart uniforms and prominently displayed name badges. Staff Presentation - please provide brief supporting comments: Both staff members came across as smart, professional and tidy. They were each wearing company uniforms which appeared new, ironed and freshly laundered.</p>		
Staff Interaction & Service (100% (4/4))		
When you requested change, did the member of staff give you the change you requested (where applicable)?	100.00% 4/4	Achieved <input type="checkbox"/> Not met N/A
Did a member of staff mention the Membership and/or Text scheme to you during your visit?	100.00% 4/4	Achieved <input type="checkbox"/> Not met
Were you offered a free drink of tea/coffee or a cold drink within the first 10 minutes of your arrival?	100.00% 4/4	Achieved <input type="checkbox"/> Not met
Were you offered a complimentary snack?		Offered <input type="checkbox"/> Not offered
If yes, at what time?		16:36
Please describe what you were offered:		I was offered crisps more drinks and chocolates.

Merkur Slots Training Plan



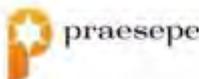
Mystery Shopper- Good Report

Question	Score	Answer
Were you aware of staff circulating (e.g. talking to customers/keeping the place tidy/etc, but not just standing around)?	100000	Achieved <input type="checkbox"/> Not met
Were there any staff members who exceeded your expectations? Information only - no score value		Yes <input type="checkbox"/> No
Whilst serving you, did the staff member seem genuinely interested and give you their full attention?	100000	Outstanding service <input type="checkbox"/> Very good service Sufficient service Could do better Weak/lack of interest
Was the staff member friendly and helpful whilst interacting with you?	100000	Extremely <input type="checkbox"/> Very Obliging Relatively Not at all
Was any unprompted "general" conversation attempted or any rapport built? E.g. "Have you played at Cashino before?", "How has your day been?", etc	100000	Met <input type="checkbox"/> Partially met Not met
Did you feel valued and appreciated as a customer?	100000	Extremely <input type="checkbox"/> Very On the whole Not really Definitely not
Departure 100% (12/12)		
Did the staff thank you for visiting Cashino and offer a genuine goodbye?	100000	Yes <input type="checkbox"/> No
What was said/what happened on your departure? A nearby staff member noticed me leaving and offered a warm farewell and a thank you		
Satisfaction 100% (10/10)		
Would you recommend to family and friends, based on your experience? Please rate using a scale of 0-10, where 1 = "Not at all" and 10 = "Definitely"	100000	0 1 2 3 4 5 6 7 8 9 10 <input type="checkbox"/>
Please support your "recommend" rating: I would want my friends and work colleagues to experience the same high standards of customer care as I was given during my visit. My friends would enjoy the hospitality which was offered to me and the delight of playing modern and up to date slot machines		
Feedback of Visit		
Was there anyone in the queue or in the doorway that appeared to be under the age of 18? Information only - no score		Yes No <input type="checkbox"/>
If yes, give details of what staff did (or did not do) to overcome this: There was no one loitering in the doorway during my visit.		
Is there anything that we could have done better/improved upon today? I noticed there were two deep steps in the middle of the venue which would limit a person with mobility issues from experiencing all the areas within this venue, however I understand this would be outside the control of the staff members.		
What did we do really well today? I enjoyed the attentive staff members who offered a friendly, attentive and helpful service to me during my visit. They were very generous with their offers of drinks and assorted snacks and I stayed longer in this venue playing the slot machines due to the attentiveness and friendliness of the staff members		

**Merkur Slots
Training Plan**



Mystery Shopper- Good Report

<p>LOGO</p> 	<p>AVERAGE (ENTIRE COMPANY) v YOUR SCORE (CURRENT)</p> <p>Showing data for 2/2019 - 3/2019 - Casino</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>83.00% 80/97</p> <p>Entire Company</p> </div> <div style="text-align: center;">  <p>45.00% 45/101</p> <p>Current</p> </div> </div>
---	---

<p>INFORMATION</p> <p>ID#</p> <p>Company / Survey Praesepe: Customer Service Review</p> <p>Phone / Email</p> <p>Location</p> <p>Address United Kingdom</p> <p>Location</p>	<p>NET PROMOTER SCORE®</p> <p>Would you recommend to family and friends, based on your experience? Please rate using a scale of 0-10, where 1 = "Not at all" and 10 = "Definitely"</p>  <p>0 1 2 3 4 5 6 7 8 9 10</p>
--	---

SECTIONAL CHANGE		
Section	This Evaluation n/total	Score
Overall	45/101	45 %
External Image	9/9	100 %
Arrival	15/20	75 %
Machines & Environment	10/10	100 %
Staff Presentation	5/5	100 %
Staff Interaction & Service	3/45	7 %
Departure	0/2	0 %
Satisfaction	3/10	30 %

**Merkur Slots
Training Plan**



Mystery Shopper – Poor Report



MYSTERY SHOPPING REPORT

Question	Score	Answer
Location:		
Date of visit:		23/06/2020
Time of visit:		10:00
Photo of the outside (exterior) relating to this report:		
Day of visit:		Monday Tuesday Wednesday Thursday Friday Saturday



Merkur Slots Training Plan Mystery Shopper – Poor Report

Task Area	Score	Comments
<p>Number of Staff present during your initial sweep: 2</p> <p>Number of Customers present during your initial sweep: 1</p> <p>Give names/Descriptions of all staff you came into contact with (in order of dealings):</p> <p>Detail the product(s)/other services offered to you during the discussion with staff (e.g. membership card (scheme)/redemption, drinks/snacks, etc.)</p> <p>I was not offered any services during this visit.</p> <p>What did you spend on/lose? £100</p> <p>Detail the games you played:</p> <p>Worms Hot Scatter Super Star Turns Toad Fowl Ultra Hot Multi Wild King Kong Cash</p> <p>Your age: 25</p>		
<p>External Image 100% (100)</p> <p>Was the front of the venue clean and well maintained? <input checked="" type="checkbox"/> Achieved <input type="checkbox"/> Partially met <input type="checkbox"/> Not met</p> <p>Would you describe the window display as clean and tidy, and the brasswork/aluminium polished? <input checked="" type="checkbox"/> Achieved <input type="checkbox"/> Partially met <input type="checkbox"/> Not met</p> <p>Was there an over 18s notice clearly displayed on one of the entrance doors or in the front window area? <input checked="" type="checkbox"/> Achieved <input type="checkbox"/> Not met</p> <p>Describe what was memorable about the window displays:</p> <p>There was nothing particularly memorable about the window display as nothing stood out from it when walking past.</p> <p>External image - please provide comments supporting your scoring for this section (both positive and negative):</p> <p>The exterior of the venue was clean, tidy and well maintained. There was some dust visible on the woodwork but this was acceptable given that this venue is currently being converted. The windows were free of any dirt and blemishes. There is an over 18s sign visible at the entrance to the venue.</p>		
<p>Arrival 75% (11/15)</p> <p>Based on the level of activity when you arrived, were you acknowledged quickly enough? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>When you entered the site, how were you acknowledged by the staff? <input checked="" type="checkbox"/> Offer of help <input type="checkbox"/> Verbal welcome <input type="checkbox"/> Smile only <input type="checkbox"/> Eye contact only <input type="checkbox"/> No acknowledgement <input type="checkbox"/> N/A or All staff busy with customers</p> <p>When you entered the site and were first spoken to by a member of staff, were you asked for age verification (where applicable)? <input checked="" type="checkbox"/> Achieved - I was approached and asked for age verification <input type="checkbox"/> Not Met - I was approached but not asked for ID and I am/look 25 or under <input type="checkbox"/> N/A - I am and look over 25</p> <p>N.B - If you look under 25 you should be asked to prove your age by means of identification</p>		
<p>Main Narrative</p> <p>Please provide a detailed narrative of everything that happened on the day - both positive and negative points - including playing, browsing and staff interactions.</p> <p>I proceeded to enter the venue. I immediately noticed that the venue was undergoing refurbishment to a future venue and that only half of the venue was being used. Staff 1 acknowledged me on entry non-verbally. As I walked towards the machines, she approached me and asked me for ID, which I provided. This was accepted and Staff 1 thanked me for providing this. For the majority of the visit, both Staff 1 and Staff 2 were stood at the counter talking to each other or to the engineer who also works for the company. I observed them speaking in a different language to each other over the course of my visit. I played on some machines for a few minutes. When I had finished playing, I approached the counter and spoke to Staff 2. I asked her for some change from a £5 note to which she pointed me to the GetTe and told me to use this. I proceeded to use the machine and obtain some change. I then continued to play on some machines for a few minutes. When I had finished playing on the machines, I approached Staff 1 at the counter and asked her if there was anywhere I could smoke in the venue to which she advised me there was not and that I had to go outside. I proceeded to exit the venue in front of both staff members and did not receive a farewell on exit.</p>		
<p>Recovery & Environment 100% (10/10)</p>		



Merkur Slots Training Plan

Mystery Shopper-Poor Report

Question	Score (%)	Response
Were all machines (all types of gaming) you saw during your visit clean?	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was the price of play and jackpot amounts you could win clear on the machine?	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Were all the machines (all types of gaming) switched on and working? (Score "Out of order card displayed" if any of the machines that are off have an "out of order" card displayed)	100%	Yes <input type="checkbox"/> "Out of order" card displayed <input type="checkbox"/> No <input type="checkbox"/>
Was the centre generally clean and tidy?	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was the centre generally in good repair? Information only - no score value	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was the carpet not worn in any places? Information only - no score value	100%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Was there no sign of anything that could cause health and safety issues? Information only - no score value	100%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Did you hear background music playing?	0%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was the temperature of the centre acceptable, or too hot/too cold?	100%	Acceptable <input type="checkbox"/> Extreme <input type="checkbox"/>
If there was a smoking area, was this well presented? Information only - no score value	100%	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Machines & Environment - please provide brief supporting comments:		
The venue did not have any background music playing, but as this may have been because of the refurbishment I have marked this positively. Due to it being refurbished, it did not have any carpet and had a solid stone floor. Given this fact, the machines were clean and tidy and also in good condition. All machines were in working order. The temperature was comfortable in the venue. The venue does not have a smoking area.		
Staff Presentation	100% (5/5)	
Were all members of staff wearing uniforms?	100%	Yes <input type="checkbox"/> No <input type="checkbox"/>
Were all of the staff that you came into contact with wearing name badges and Think 25 Badges (must wear both)?	100%	Yes, wearing both <input type="checkbox"/> Not wearing both <input type="checkbox"/>
Please list the names of staff you came into contact with who were wearing name badges/Think 25 badges, and provide a brief description of those who were not:		
Staff Presentation - please provide brief supporting comments:		
Both Staff 1 and Staff 2 were wearing the correct uniform with the relevant badges on and were well presented.		
Staff Interaction & Service	75% (3/4)	
When you requested change, did the member of staff give you the change you requested (where applicable)?	0%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/> N/A <input type="checkbox"/>
Did a member of staff mention the Membership and/or Text scheme to you during your visit?	0%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Were you offered a free drink of tea/coffee or a cold drink within the first 10 minutes of your arrival?	0%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Were you offered a complimentary snack?		Offered <input type="checkbox"/> Not offered <input type="checkbox"/>
If yes, at what time?		
Please describe what you were offered:		I was not offered any snacks during this visit.
Were you aware of staff circulating (e.g. talking to customers/keeping the place tidy/etc, but not just standing around)?	0%	Achieved <input type="checkbox"/> Not met <input type="checkbox"/>
Were there any staff members who exceeded your expectations?		Yes <input type="checkbox"/>

Merkur Slots Training Plan



Mystery Shopper-Poor Report

Questions	Score	Answer
Information only - no score value		
Whilst serving you, did the staff member seem genuinely interested and give you their full attention?	0/10 3.00%	No <input type="checkbox"/> Outstanding service Very good service Sufficient service Could do better Weak/lack of interest <input type="checkbox"/>
Was the staff member friendly and helpful whilst interacting with you?	0/10 0.00%	Extremely Very Obliging Relatively <input type="checkbox"/> Not at all
Was any unprompted "general" conversation attempted or any rapport built? E.g. "Have you played at Cashio before?", "How has your day been?", etc.	0/10 0.00%	Met Partially met Not met <input type="checkbox"/>
Did you feel valued and appreciated as a customer?	0/10 0.00%	Extremely Very On the whole Not really Definitely not <input type="checkbox"/>
Comments		
Did the staff thank you for visiting Cashio and offer genuine goodbye?	0/2 0.00%	Yes No <input type="checkbox"/>
What was said/what happened on your departure? I did not receive a farewell despite leaving the venue at the entrance opposite the counter where both Staff 1 and Staff 2 were situated.		
Satisfaction		
Would you recommend to family and friends, based on your experience? Please rate using a scale of 0-10, where 1 = "Not at all" and 10 = "Definitely"	3/10 30.00%	0 1 2 3 4 5 6 7 8 9 10
Please support your "recommend" rating: I would not recommend this venue. Both Staff 1 and Staff 2 showed no interest in wanting to proactively provide any services to me or establish a rapport during the visit and were observed talking to each other and the engineer for the majority of the visit. I did not feel valued as a customer and was left to it in that regard. Even when interacting with the staff members, they did not show much interest in wanting to help.		
Feedback of Visit		
Was there anyone in the centre or in the doorway that appeared to be under the age of 18? Information only - no score		Yes No <input type="checkbox"/>
If yes, give details of what staff did (or did not do) to overcome this: N/A		
Is there anything that we could have done better/improved upon today? A more proactive and positive approach to customer service is required to improve.		
What did we do really well today? Despite the venue's ongoing refurbishment, the venue was clean, tidy and generally well maintained.		

**Merkur Slots
Training Plan
Day 2**



Venue Operations & Compliance



Merkur Slots Training Plan



Operations Open & Close Venue

As part of your role, you may have the responsibility of opening and closing the venue as you will most likely hold keys. It is vitally important that you consider safety as the number one element. If you are a 24-hour site, it is still important that you understand and can refer back to this policy, as during the Christmas period we have to close the venue (it is the Law)

This was covered in your **Lone Working e-Learning** if for any reason you need to re-take this course; you can get the course reset by contacting: LearningandDevelopment@praesepeplc.com

We have clear procedures for opening and closing the venue. These can be found in the Operations Manual. Find the opening and closing procedures and answer the following questions:

Opening and Closing Procedures	
Question:	Answer:
Why do we have to follow the procedure?	
What should happen 10 minutes before we close?	
Why do we call a designated venue?	
Who is your designated venue?	
What happens with the alarm at open/close?	
What is the alarm contact number and code?	
What is the alarm fob? Where is it kept? How do you use it?	

**Merkur Slots
Training Plan**



Operations - Open & Close Venue

Looking at the Opening and Closing Policy – please list the steps for opening and closing as listed in the policy.

This can be referred to in the Merkur Slots Operations Manual.

STEPS TO OPEN THE VENUE	
1	
2	
3	
4	
5	
6	
7	

STEPS TO CLOSE THE VENUE	
1	
2	
3	
4	
5	
6	
7	
8	
9	

Merkur Slots Training Plan



Operations - Venue Safety

As well as our safety and security, the venue's security becomes our responsibility, especially if we are opening or closing the venue. Other areas to consider include those listed below. Each area has an explanation as to why it is important. Find out best practices and what is in the policy so you can deliver this in your role.

AREA	WHY	BEST PRACTICE/BEST RESULT:
CCTV	CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue are covered by CCTV at all times.	
MACHINE FRAUD	Machine fraud is a threat, which is present. Employees should be aware of how fraud can take place and what to do in the event of spotting a "customer" defrauding a machine.	
FIRE SAFETY	The health and safety of employees and customers is of great importance. Being aware of the dangers which a fire can bring is important, as is being prepared to deal with one. Most fires are preventable by taking responsibility for and adopting the right behaviours and procedures.	
OPEN/CLOSE THE VENUE	Several safety requirements must be adhered to when opening and closing the venue. Ensuring that policy and processes are followed reduces the chance of mistakes being made, which may negatively impact the security of the premises.	

Merkur Slots Training Plan



Compliance – Understanding the Different Logs

Work through the Compliance folder and the IHL Smart Tablet in the venue. For each log listed, please explain where it's found, what it is, what it is used for, and when the last entry was made in your venue.

Log Name	Where Found	Used For	Last Entry
Log A			
Log B (1)			
Log B (2)			
Log C			
Log D			
Log E			
Log F			
Log G			

Merkur Slots Training Plan



Compliance - Acronyms & Abbreviations

Understanding the language and terminology we speak is important in our business. You may be asked what things mean by customers, your Line Manager, or even a Gambling Commission Officer, should they visit your venue. You will find the full list of Acronyms/Abbreviation displayed within your venue.

This quick exercise below will help you learn and understand the terminology used. Match up the Abbreviation with the Meaning It's not a test by the way!

Acronym/ Abbreviation:	Match here:	Meaning
ADR		Independent Betting Adjudication Services
BCAP		Ticket in Ticket out
IBAS		Proceeds of Crime Act
TITO		Alternative Dispute Resolution
FEC		Broadcast Committee of Advertising Practice
AML		Committee of Advertising Practice
MOSES		Machines Administration Reporting System
AGC		Video Bingo Terminal
CAP		British Amusement Catering Trade Association
VBT		Anti-Money Laundering
MARS		License Conditions & Codes of Practice
BACTA		Adult Gaming Centre
LCCP		Multi-Operator Self Exclusion Scheme
POCA		Family Entertainment Centre

Merkur Slots Training Plan



Compliance – What we do to meet the licensing objectives

You need to understand what we do as a company to meet the three Licensing objectives and comply with the law.

Compliance	
Question:	Answer:
What policy do we have in place to protect the young?	
What information would you record for a customer interaction and where would you record this information?	
Where would you record a self-exclusion?	
What is Proceeds of Crime?	
What are the signs money laundering is happening in your Venue?	
Where would you record a money laundering incident?	
What are the three Licensing objectives?	

Merkur Slots Training Plan



Operations – Float Check & Customer Handover

When starting a shift or when there is a shift change over, this must be done with minimal disruption to the customer. Uniforms must remain worn whilst in view of the customers. You can refer to the Merkur Slots Operations Manual for customer service change over policy.

You are now going to carry out a float check with your training manager; you will be encouraged throughout the rest of your training to be involved carrying out floats checks daily.

The image shows a 'DAILY FLOAT CHECK RECORD' form. The title 'DAILY FLOAT CHECK RECORD' is circled in red. The form includes a header with the Merkur Casino logo and a grid for recording data. The grid has columns for 'DATE', 'TIME', 'LOCATION', 'CHECKED BY', and 'STATUS'. The 'DATE' column is currently empty, and the 'TIME' column contains the time '10:00'. The 'LOCATION' column contains 'FLOOR'. The 'CHECKED BY' column contains 'M. JONES'. The 'STATUS' column contains 'OK'. Below the grid, there are several rows of empty space for additional notes or observations.

Please make notes below, on the relating documents you need to complete a float check:

Merkur Slots Training Plan



Operations – Float Check & Customer Handover

Please note the **five** steps in the table below that you must be aware of when starting a shift/ changing of shift. You can refer to the Merkur Slots Operations Manual.

STEPS TO BE AWARE OF AT THE START/CHANGE OF SHIFT	
1	
2	
3	
4	
5	

Remember to be aware of your surroundings and do not count cash on your own. You need to ensure you adopt the four-eye approach for your safety, as well as keeping the money secure.

Merkur Slots
Training Plan

Day 3



Gaming Machines knowledge and Procedures



Merkur Slots Training Plan



Gaming Machines – Introduction

There are several different machines at each venue.

You should familiarise yourself with the different types of machines so you can advise customers, explain the workings and start to become an expert on machines – after all, they are our 'product'!

Did you know?

All Gaming establishments require a premises licence to run gambling activities. This will be located on the Information Board, near to the front entrance.

An AGC can comprise a mixture of the entire machine categories; however, the ratio of B3 cabinets to all the other categories cannot exceed **TWENTY PERCENT**. For example, an AGC operating with Ten B3 Cabinets must have 40 Cat C/and Ds to operate legally

The following notices are a requirement by law to be displayed on all Gaming Machines in the venue. This can be on the screen of the machine or displayed on a sticker affixed to the cabinet;

- **No under 18's to Play**
- **Gamble Responsibly (Gamcare UK Helpline 0800 8020 133)**
- **Minimum Percentage payout**
- **Machine Category – (either Legacy or Non-Legacy)**

MACHINE CATEGORY	MAX STAKE	MAX PRIZE	EXAMPLE MACHINE	MARS CATEGORY	CATEGORY STICKER
B3	£2	£500	AURORA CARBON PREMIUM	B3	B3
C	£1	£100	ALPHA STAR CCV	CAT C	C
CAT C LITE	20P	£10	CHASE THE ACE - NO LIMITS	CAT C LITE	C/D
D COMPLEX	10P	£5	TIMELESS SUPER LUCKY PAIRS	CAT D	D

Merkur Slots Training Plan



Gaming Machines Introduction

Activity

It is now time to go into the venue. Using the table below, find and note down the Maximum and Minimum stakes on the gaming machines;

Machine category	Maximum stake	Maximum Prize
B3		
Cat C		
D Complex		

Activity

Have a look at each machine in your venue and complete the activity below. Can you remember where to look to find the information about what type of machine it is?

Machine Category	Number of machines in my venue

Your Training Manager will now show you how to complete the MC 105 Machine Ratio Check.

When you are in your venue, complete the same activity as above, and check that your venue's machine ratio is correct. Machine ratios should be checked after any machine move and when any machine or tablet is reported as out of order and not repaired on the next visit by the service engineer.

Please refer to the Merkur Slots Operations Manual – Machine Ratio Check Policy, as a reference on how to complete the MC 105 Machine Ratio Check form, when you are working in your venue.

Merkur Slots Training Plan



Gaming Machines – Product and Brand Knowledge

As a member of the Merkur Slot team, having knowledge on Machine Manufacturers, Games offered and their features means you can use this information to;

- interact with customers effectively
- understand if we are ahead of the game with our competitors
- suggest if the machine is positioned correctly within the layout of the venue

Who Makes our Machines?

The manufacturer **Blueprint** is a sister company of Gauselmann, so encouraging customers to play these is a good thing.

Blueprint machines are identified by the Sun logo on the top of the machine cabinets. Other manufactures we use are Novomatic, Astra, SG/Barcrest, Project coin, Amatic and Electrocoin.

Activity 1

Have a look at each machine in your venue and complete the activity below. Different manufacturers put their company name in different places!

If you need help, ask your manager.

Machine Manufacturers	Number of machines in my venue

Merkur Slots Training Plan



Gaming Machines – Product & Knowledge

Some of the machines in venue have multiple games and they are referred to as game packs. It is good practice to understand which manufacturer produces what machines, what games are available, what the most popular games are, and what the main features of that game are. This will mean that you can, help new customers, promote new games that may be introduced and be confident if there are any issues during game play.

Activity: Half Hour Play

We are now going to ask you to spend 30 minutes in the venue, to either play a machine on demo mode and/or look at the help menu on the machines. This is going to allow you to get a feel for the different games and machines so that you can build your knowledge of what we offer and be able to promote games and features to our customers. The training manager will be available to guide you.

Make notes below about the games you like, the machine name and category, the manufacturer and the main feature of that game:

Machine & Category	Manufacturer	Game & Feature of Game

Merkur Slots Training Plan



Gaming Machines - Cleaning Gaming Machines

It is important that our gaming machines are always ready to play and presentable to our customers. Below are some key hints and tips to make sure your machines are always ready for play.

Machine Exterior	
Appearance	Throughout your shift, make a habit of having a good look at every machine. If you see anything that looks dirty make sure you clean it as soon as you can. If anything is broken either report to your Line Manager or record the fault in the Engineers Log on MARS
POP (Price of Play)	Do ensure that EVERY machine has the correct Price of Play. Price of Play is either displayed on a flag, on the exterior of the machine or can be displayed electronically on the digital screen, so familiarise yourself with each machine's location. When any new machines arrive this is equally important to check. Please also make sure that any new POP flags, where applicable, are attached at the same height level of all other POP flags displayed.
Buttons	If you see any broken buttons, record it in the Engineer's log on MARS
Stools	To encourage customers to enjoy a comfortable stay in your venue, ensure that stools are placed appropriately in front of the gaming machines. If a customer leaves, then make a point of putting the stool "straight" so it is not left in an untidy position.
Volume	It is important that our gaming machines can be heard by those playing them. If you notice that a machine has a very low volume to it, then report this to your Line Manager or record in the Engineers log on MARS.
Cleanliness	
Cabinet/Glass /LCD Screens	Are they clean and free of smears dirt and foreign articles?
Overall	Does the general level of machine cleanliness meet the required cleanliness standards?
Surrounding Area	The area around is all clean including the floor and stools.

Your Training Manager will now go through the Machines Presentation Policy in the Merkur Slots Operational Manual. You will be able to use this as a guide when you start at your Merkur Slots Venue.

Merkur Slots Training Plan Gaming Machines



Ticket in Ticket out Machine (TiTo)

Ticket in Ticket Out is a very simple concept and has been introduced throughout the Praesépe estate. This has now given us a system that provides full data retrieval and a cashless solution, which assists all departments in the day to day running of the business.

All manufacturers conform to the GBG (Gambling Business Group) ticketing protocol, which allows the player to transfer winnings from machine to machine easily and conveniently. In essence, TITO offers a simpler, efficient and impartial playing experience.

The real advantage from an operational perspective is the reduction of cash handling by automating the manual processes, such as hand pays and floating hoppers with cash. This in turn means more time freed up for customer service.

Whilst a lot of our estate uses Ticket in Ticket out (TiTo), we do still have machines that follow the manual processes. This means that the Gaming Machines will have an agreed float within them. The float will need to be topped up; this is called the refill process. During the collection process, this machine will need to be emptied of all cash, and then the agreed float put back into the machine. If these machines are within the venue you are training in, the training manager will go through this process with you.

Merkur Slots Training Plan



Operations - Manual/Procedures

You will already be familiar with some of the policies and procedures, however, there is a policy to cover all parts of the operation. They are there to help you carry out your role, so you remain compliant and understand the expectations when working as part of the Merkur Slots team.

This means reading and understanding the Merkur Slots Operations Manual (this can be found in venue and in the shared documents folder on the PC – ask your Line Manager if you are unsure.)

Make sure you read, understand and can implement the following policies;

Policy No.	Policy Name	Read ✓	My notes/tasks (how I will implement the policy)
CS3	Customer Service Changeover		
CS4	Holding Machines for Customers		
CS6	Customer Complaints		
CS7	Drink & Food Offering		
GP5	Venue Office Folder		
CC09	Key Management		
S03	Venue Visitors		
CC06	Cash Banking		
CS2	Mobile Phone		
CC7	Banking Collection		
CC11	Manual Ticket Redeem		
CC5	Collection		
CC4	Float Checks		

NB: You should also be familiar with the contents of all our Health & Safety Policies; however these are the Venue Management Teams' responsibility to manage/enforce but equally important that you are aware of them.

Merkur Slots Training Plan



Operations – Midweek Collection

The midweek empty process is integral to the successful operation of a venue. Midweeks are carried out in the main to ensure there is enough money in the GeWeTe. We collect the money from the gaming machines so we can minimise risk to the venue and ensure all monies are secure. This means there will be less cash deliveries to the venue, note acceptor cash boxes will not be full of notes and causing note jams and will ensure the GeWeTe is constantly full with money for customers to collect their winnings.

You are responsible for ensuring all policies and processes are followed, this will help to ensure all information is accurate and recorded in MARS correctly. This will reduce time correcting errors at a later date.

You will now spend time with your training manager observing a midweek collection. Please answer the questions within the box, using the information you have observed. You can also refer to the Merkur Slots Operations Manual as guidance.

In the venue what do you need to do to prepare for the midweek collection?	
How do you select the machines you need to empty for the collection?	
When should the midweek collection figures be entered on MARS?	
What document should you use to record the amount of notes you have collected?	
If a customer is playing a machine you need to collect what would you do?	
How do you avoid the midweek collection having a negative impact on the customers?	
Where would you find out the amounts of expected cash?	
If you made a mistake entering the wrong amount, what would you do?	
How many people must carry out the Midweek Collection?	

**Merkur Slots
Training Plan**



Day 4

Operating the GeWeTe, Know your High Street and Marketing



Merkur Slots Training Plan



Operations – GeWeTe Introduction

The GeWeTe's main purpose within the Venue, is to ensure the safety of the employees and company money. It will be part of your responsibility within your role to provide constant operation of the GeWeTe, so our customers can collect winnings/change as needed.

As the GeWeTe is where most of the Venue's Monies are stored, this in turn adds risk to the GeWeTe. The GeWeTe needs to be covered by CCTV. To add extra security measures to protect our teams, we have a GeWeTe SOS policy. Your training manager will show you how to carry out a GeWeTe SOS.

How often do you need to carry out a GeWeTe SOS?

Where do you record that you have done a GeWeTe SOS?

As it will be your responsibility to ensure the GeWeTe is constantly in operation and available to our customers, you will need to be able to refill the GeWeTe. This should be carried out with minimal disruption to the customers as possible; the GeWeTe refill is performed after you have carried out a midweek collection.

This process is hard to learn in a day and throughout the rest of your training, you will need to be involved in this process, so you can practice. Remember, if you do not understand anything ask your training manager and/or refer to the Merkur Slots Operations Manual.

You will now carry out a full midweek and GeWeTe Collection with your training manager.



Remember, we do have different models of GeWeTe and Change machines.

The Policies and procedures remain the same, and you will be trained in your Merkur Slots Venue if the Model is slightly different to your training venue.

Merkur Slots Training Plan



Operations – GeWeTe Refill

Now that you have completed a full Midweek and GeWeTe Collection, please answer the questions below within the box;

	QUESTION	WHAT I NEED TO DO:
GeWeTe	What card do you need to use to fill/refill GeWeTe?	
	What option should you select after you have entered your password?	
	Starting from the top menu, what are the next two options you need to select and why?	
	On the refill screen, what do you need to input and press to ensure the GeWeTe has accounted for the stock?	
	If this refill is done on a non – audit day, do you print the receipt with or without delete?	
	What information does the receipt from the GeWeTe give you?	
GeWeTe	What paperwork do you record the information that you have refilled the GeWeTe on?	
	What information do you record on the paperwork?	
	What Menu and options on MARS do you need to select, to enter the information of the GeWeTe Refill?	
	When do you need to record and update information on MARS, when do you complete a GeWeTe refill?	

Merkur Slots Training Plan



Know Your High Street

We aim to be the best in the high street gaming industry, but do you know who our competitors are and how well they treat their customers?

The next activity is designed to help you understand better what is happening in your area.

Activity

Working with the support of your Line Manager, answer the questions below. Where possible, go and visit your competitors and understand how they treat their customers. After spending your first week in venue, ask yourself – ‘do we do this better’?

Questions	Write your answers here
Who are your local competitors?	
What similarities are there to your venue?	
What did you see that your competitor(s) do well? (Think about the service they offered and their approach to customer service).	
From your observations, what do we do better already?	

Merkur Slots Training Plan



Merkur Slots Marketing

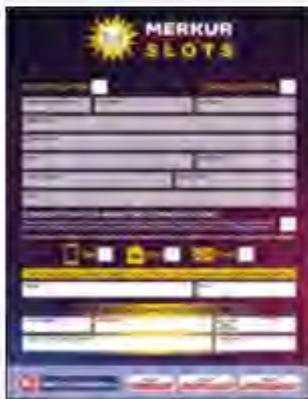
Merkur Slots is a new brand within our company, so we need to ensure that we are creating brand awareness.

So we can be competitive within our market place, we need to promote the brand. Most messages will come from the marketing team. They will communicate this via their marketing calendar, updates via the business bulletin, as well as venue visits.

What can you do in venue to promote the brand?

If you have any ideas, they need to be discussed with your line manager and agreed by your area manager.

Currently, in venue, we can sign them up to become a Merkur Slots Member and they will receive offers by their preferred communication method.



We also offer rewards via text message.

The Reward Scheme works by texting 'slots & venue number' to 82830, and then they will receive their rewards via text message.

If you need any help or support please contact marketing this email address;
marketing@praesepeplc.com

**Merkur Slots
Training Plan**



**Day 5
Collection, Venue Systems & Paperwork, Targets and
Shifts and Rotas**



Merkur Slots Training Plan



Collection – Operations

The collection process is the penultimate action before being able to bank income. It can become a lengthy process if mistakes are made and there is a large amount of cash handling throughout the process. Therefore, everyone must follow the collection policy using the correct guidance tools.

Please refer to MARS Manual, Cash & Banking Guide, and the collection policy in the Merkur Slots manual.

To enable the collection to run smoothly, you need to ensure that you are prepared for auditing and collecting the machines. Referring to the Operations Manual and your notes, please complete the following table;

Pre – Collection Procedures	
1	
2	
3	
4	
5	
6	
7	
8	
9	

Merkur Slots Training Plan



Collection - Operations

As you will be handling and collecting a large amount of money, you will need to ensure you are aware of your surroundings and what security measures will need to be followed. This is to prevent risk to you and your colleagues, as well as protecting our assets.

As you assist and observe a collection, please make notes on what you need to be aware of for security. Please refer to the Merkur Slots Operations Manual.

Collection Security	
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	

Merkur Slots Training Plan



Collection – Operations

The collection cannot be trained within a day and when problems occur, you will be quicker at solving them as you become experienced.

The collection policy is in place to help you complete a full collection. Most errors within the collection are caused by human error due to incorrect information being inputted into the MARS system.

Please answer the questions below:

1. What form do you use to record staff tasks/transactions on the GeWeTe?
2. From the Print out of the GeWeTe on collection day, what information do you use to check figures?
3. On MARS if you have an exception, how do you find the actual denominations of cash you may be looking for?
4. What supporting documents do you need to have to complete a collection?
5. What deductions do you need to check have been entered onto MARS before collection?
6. What needs to be connected to MARS correctly before you can start a collection?

Merkur Slots Training Plan



Venue Systems & Paperwork

Complete the following table. Think about what the task is, the frequency of the task, which menu and what paperwork do you use.

	WHAT IT DOES	HOW/WHEN WILL I USE IT
MARS		
SHOPWORKS		
INFORM PEOPLE/ E-LEARNING		

**Merkur Slots
Training Plan**



Venue Systems & Paperwork

MARS tracks all cash through the machines and provides financial reports. To help ensure finance is accurate, we need to know what tasks we should undertake to help keep the information accurate and up to date. This relates to cash handling tasks in your role. Using the table below think about your task and make notes about what you need to do. (We have given the core tasks – but ask what else is required in your venue).

	TASKS/HOW I WILL USE IT:	WHAT I NEED TO DO:
GeWeTe	Filling	
	£5 Recycling	
	Emptying	
	Counting Run	
ATM	Fill	
	End of Day	
MACHINE EMPTY	Security	
	Recording	
	Balancing	
	Entering on to MARS	
FLOAT CHECKS	Frequency	
	Information to include	
	Checking when there are errors	
	Shortages	

Merkur Slots Training Plan Shifts & Rotas



Rotas/Shifts are prepared by the Lead Supervisor/Cluster Manager. They are prepared on the in-house system **Shopworks**. You will be given your shift Pattern in your first week in venue, from the Lead Supervisor/Cluster Manager.

Shopworks is found on the Company's portal.

It is very rare that you will be asked to prepare rotas for your venue, however, there may be a time that you might be asked to amend one. Your Lead Supervisor/ Training Manager will show you how **Shopworks** is used during your induction.



Thinking about your rota, take some time to answer the questions below;

1. What is my shift pattern?
2. How will I find this information out, where do I find my rota?
3. How far in advance are rotas prepared?
4. What should I bear in mind in respect of rotas?

**Merkur Slots
Training Plan**



Review, feedback, and One Week Sign Off

Review

Today you will review the week's learning, exercises, the information in your workbook and discuss progress with your Training Manager. Take the time to check you have completed everything and are happy with your learning. Have questions or areas you would like more information on ready to discuss;

My Questions/Thoughts:

**Merkur Slots
Training Plan**



Week 1 Feedback & Sign Off

WEEK ONE MANAGER'S FEEDBACK:		
LIKES	CONCERNS	SUGGESTIONS

By signing below, I confirm that during my training, I have completed all that is listed above with my Training Manager:

Signature
Trainee

Signature
Training Manager

Congratulations - you have completed Week 1

**Merkur Slots
Training Plan**



Day 6

Customer Journey



Merkur Slots Training Plan



Welcome Back to Week Two

During this week we will be looking at the customer journey, we do, however, need to ensure that all our technical learning of the operation has not been forgotten.

At the start of each shift or during your shift, you need to ensure that you complete a shift change over float check and a midweek collection.

This will give you an opportunity to ensure that you keep the knowledge you have already gained and allow you to put it into practice in a live situation. This means that you will be responsible for ensuring that the paperwork is correct and that you can accurately input the required information onto our systems in the main MARS.

Be prepared to learn and to learn from your mistakes, in order to understand the impact everything has within the operation and how it is all linked.

Merkur Slots Training Plan



Customer Service

Customer service is the act of taking care of the customer's needs by providing and delivering professional, helpful, high-quality service and assistance, before, during and after the customer's requirements are met. So what does that actually mean?

Our customers choose to visit our venues, but they could choose to go to any of our competitors or indeed play online. The reason they come to us is based on their overall experience – not just the environment, the machines and respective games, but also our teams and the service we offer.

Great customer service in addition to great customer experiences is going to create customer satisfaction.

Customer Journey

In Merkur Slots, the customer journey doesn't just start at the front door of the venue. A customer decides to visit us by one of several methods...

- > Word of mouth – a recommendation from a friend
- > passing by – a spur of the moment decision
- > visiting the website – looking for the nearest venue or getting directions
- > telephoning the venue – checking opening times

At any of these points in time, the customer is coming into contact with our brand – Merkur Slots. These interactions could be positive or negative and are called Moments of Truth. They can be with the building, the surroundings and the team members.

For example, when 'visiting the website' a positive moment of truth could be, a user-friendly webpage that is easy to navigate. A negative moment of truth could be visiting the website and out of date information has been provided, i.e no update on the change in opening times.

Take a few minutes to think about the 4 different methods below and list one positive and one negative for each.

Moments of Truth

		Positive	Negative
Word of Mouth	+		
	-		
Passing By	+		
	-		
Visiting the Website	+		
	-		
Telephoning the venue	+		
	-		

Merkur Slots Training Plan



What is important to remember is that throughout the customer journey – from making that initial contact to entering the venue, visiting the toilets, playing at the machines, etc. there could be a series of positive and negative moments of truth.

We cannot ever totally get rid of the negatives, as things can go wrong in life, but we can certainly try to minimise them. Preparation is key. The key is to ensure the scales are weighted in the favour of the positives, so that is the lasting impression created in the mind of the customer.

POSITIVE



NEGATIVE

Merkur Slots Training Plan

Customer Needs



It can be easy to just group all our customers into one, but if you think about it, there are very many different types of customers – casual players, social players, regulars, higher stake players, etc. Each type has its own needs. Discuss with your trainer how you might recognise the behaviors and words used and then think about what their individual needs might be:

Type of Customer	Behavior's	Words you might hear	Individual Needs
Casual			
Social			
Regulars			
High Stakes			

Meeting needs & exceeding expectation

Having identified the customer needs, we can do our best to meet them by following not only our company procedures but also by thinking of how we can bring something of ourselves – our personality – into the interaction with the customer. These WOW moments can be very memorable for our customers. Can you think of a customer experience where someone made a real difference to your meal out, visit to the cinema, holiday, or shopping visit? It might only be small, but it meant a lot to you because of what they said or did.

The likelihood is that they showed empathy. **Empathy** is putting yourself into someone else's shoes and trying to see the situation from their point of view. By doing that, you can imagine what they might like and what will prove meaningful to them... give it a go!

There is no magic wand when it comes to delivering great Customer Service. It is all about making the customer experience fun and enjoyable. Many customers visit our venues because of you – the team member. So just be you – smile, be helpful, and make the difference to that customer!

**Merkur Slots
Training Plan**



DAY 7

Communication Skills



Merkur Slots Training Plan



Communication Skills

In the information age, we have to send, receive and process huge numbers of messages every day. Effective communication as a team leader is about more than just exchanging information; it's also about understanding the emotion behind the information. Effective communication can improve relationships at work and in social situations by building strong connections to others and improving teamwork, decision making and problem-solving.

It enables you to communicate even negative or difficult messages without creating conflict or destroying trust. Effective communication combines a set of skills including non-verbal communication, attentive listening, the ability to manage stress in the moment, and the capacity to recognise and understand your own emotions and those of the person you are communicating with.

Listening

Listening is one of the most important aspects of effective communication. Successful listening means not just understanding the words or the information being communicated, but also understanding how the speaker feels about what they're communicating. Effective listening can:

- Make the speaker feel heard and understood which can help build a stronger, deeper connection between you both.
- Create an environment where everyone feels safe to express ideas, opinions and feelings or plan and problem solve in creative ways.
- Save time by helping clarify information and avoid conflicts and misunderstandings.
- Relieve negative emotions. When emotions are running high, if the speaker feels that he or she has been truly heard, it can help to calm them down, relieve negative feelings and allow for real understanding or problem solving to begin.

Merkur Slots Training Plan



Communication Skills

Tips for effective listening

- ✓ **Focus fully on the speaker;** his or her body language and other non-verbal cues. If you are daydreaming, checking text messages, or doodling, you're almost certain to miss non-verbal cues in the conversation. If you find it hard to concentrate on some speakers, try repeating their words over in your head- it'll reinforce their message and help you stay focused.
- ✓ **Avoid interrupting** or trying to redirect the conversation to your concerns by saying something like, 'if you think that's bad, let me tell you what happened to me' This is NOT listening.
- ✓ **Listening** is not the same as waiting for your turn to talk. You don't concentrate on what someone's saying if you're thinking about what you're going to say next. Often, the speaker can read your facial expressions and know that your mind's elsewhere.
- ✓ **Avoid seeming judgmental.** To communicate effectively with someone, you don't have to like them or agree with their ideas, values, or opinions. However, you do need to set aside your judgement and withhold blame and criticism to fully understand a person. The most difficult communication, when successfully executed, can lead to the most unlikely and beneficial link to someone.
- ✓ **Show your interest in what's being said.** Nod occasionally, smile at the person and make sure your posture is open and inviting. Encourage the speaker to continue with small verbal comments like 'yes' or 'okay' or 'go on' etc...

Merkur Slots Training Plan

Communication Skills



Non-Verbal Communication

When we communicate things that we care about, we do so mainly using non-verbal signals. Wordless communication or body language, includes facial expressions, body movement and gestures, eye contact, posture, the tone of your voice and even your muscle tension and breathing. The way you look, listen, move and react to another person tells them more about how you're feeling than words alone ever can.

- ❖ You can enhance effective communication by using open body language – arms uncrossed, standing with an open stance or sitting on the edge of your seat and maintaining eye contact with the person you're talking to.
- ❖ You can also use body language to emphasise or enhance your verbal message – patting a friend on the back while complimenting him on his success for example, or standing up when you want to gain attention.

Put it into practice. Watch people at work in different situations (when it's really busy, when it's quiet, in a meeting, with a customer and so on). See what they do and make some notes:

Situation	What I heard	What I saw

Remember, be aware of individual differences. People from different countries and cultures tend to use different non-verbal communication gestures, so it's important to take age, culture, religion, gender and emotional state into account when reading body language signals

Merkur Slots Training Plan



Communication Skills

Stress Impacts Communication

In small doses, stress can help you perform under pressure. However, when stress becomes constant and overwhelming it can hamper effective communication by compromising your capacity to think clearly and/or act appropriately. When you're stressed you are more likely to misread other people, send confusing or off-putting non-verbal signals and lapse into unhealthy knee-jerk patterns of behaviour.

How many times have you felt stressed during a disagreement with your spouse, kids, boss, friends, or co-workers and then said or done something you later regretted? If you can quickly relieve stress and return to a calm state, you'll not only avoid such regrets but in many cases, you will also help to calm the other person as well. It's only when you are in a calm and relaxed state that you will be able to know whether the situation requires a response, or whether the other person signals indicate it would be better to remain silent.

To deal with stress during communication:

- Recognise when you are becoming stressed. Are your muscles or your stomach tight and/or sore? Are your hands clenched? Is your breath shallow? Are you "forgetting" to breathe?
- Take a moment to calm down before deciding to continue a conversation or postpone it.
- Take a few deep breaths, clenching and relaxing muscles. The best way to rapidly and reliably relieve stress is through the senses, sight, sound, touch, taste and smell. But each person responds differently to sensory input, so you need to find things that work for you.
- Be willing to compromise. Sometimes, if you can both bend a little you will be able to find a happy middle ground that reduces the stress levels for everyone concerned.
- Agree to disagree if necessary and take time away from the situation so everyone can calm down. Take a quick break and move away from the situation.

Think about what makes you stressed at work. Is it certain times of the day, certain people, or external pressures from outside of work? Identifying what stresses you have is the first step to not getting stressed.

Merkur Slots Training Plan



Communication Skills

If you know what stresses you, think about ways you can remain calm under that pressure. Note below your thoughts when something stresses you and see if there is a pattern.

The situation when I was stressed	Why I was stressed

Emotions Impact Communication

Emotions play an important role in the way we communicate. It is the way you feel, more than the way you think, that motivates you to communicate or to make decisions. The way you react to emotionally driven and non-verbal cues affects both how you understand other people and how they understand you.

When you don't address what's really bothering you, you often become embroiled in petty squabbles; this leads to conflict and disagreement and most often happens when a new team leader reverts to a 'tell' style rather than listening and loses sight of how to do things right.

You not only have to understand where you are coming from and find a way to explain it but as a team leader, you have to consider the other person too. It is your responsibility to help, then explain and to listen and understand.

Emotional awareness provides you with the tools needed for understanding both yourself and other people and the real messages they are communicating to you. If you are afraid of strong emotions or if you insist on communicating only in a rational or 'strictly business' way, it will impair your ability to fully understand others, creatively problem solve, resolve conflicts, or build a strong business connection with someone. Manage your emotions without fighting them.

Merkur Slots Training Plan

H.E.A.T



At some stage, you may encounter a conflict situation. There are many reasons why this conflict might occur. They could be provoked by events outside the venue, for example, a domestic issue, or some are provoked inside the venue, for example, an alleged machine fault. Some conflicts could also be with colleagues.

As a professional in your venue, you need to be able to take control of these situations and be able to resolve them in the best possible way.

You will know through reading your Operations Manual and completing Module 4 of your Customer Service training, one good way is to take the HEAT out of the situation. Let's remind ourselves what HEAT stands for.

H is for Hearing

We need to do more than hear. Hearing is a passive activity. We need to listen and we need to demonstrate that we are listening. One way is by using encouraging phrases such as "ah-hah", "I see", "yes". Another is to ask if you can take notes because you take their complaint very seriously. Try not to listen to just the complaint but go deeper and try to find the source of the complaint. Maybe the source of the complaint is linked to something else and the complaint is an expression of frustration.

E is for Empathy

As well as listening actively to the complainant, we need to demonstrate that we understand their grievance. That does not necessarily mean that we accept that they are right, but we do accept that they are upset. Showing compassion and kindness is one very good way of reducing tension. Lower your voice, speak in calm tones and keep speaking even if they do not respond. Use simple language and avoid direct eye contact. Don't give orders but make suggestions.

A is for Acknowledgement

Acknowledging that there is a problem using phrases like "I can understand that you are upset" or "I believe you when you say something is wrong" will help reduce the tension. Do not get into an argument, take the complaint personally, or promise instant fixes. However, do spend the time agreeing that there is a problem and that you will get to the bottom of it.

T is for Taking Action

Whatever the complaint, we need to be seen to be taking action. We also need to communicate that fact to the person making the complaint. If we can show we are listening, showing empathy and acknowledging the person's grievance (without necessarily accepting it) and we communicate the actions we are going to take, then not only can we reduce the tension, but we can also create a stronger bond with the customer as he or she knows that they are being taken seriously. Try to outline your actions in groups of three as three is a number people remember, for example, "first, I intend to do this___, then I will do this___, and thirdly I will do this.... to properly deal with your concern."

Always inform the Line Manager of the complaint and the action taken.

Merkur Slots Training Plan



Handling Conflict

Conflict is a natural part of human group interactions. Expect it, understand it and know how to **HANDLE IT!** We looked at H.E.A.T and the skills you need are the same at this working level. It's vitally important you understand our complaints procedure and can give Customers the right information and advice.

Where in your venue are the Complaints Procedure Leaflets?

Answer: _____

The Service with a Smile training covers handling difficult situations. Please ensure you have completed and understood this training fully. If you have done this and would like to revisit it, please contact the L&D Department to have the course reset.

Top tips for dealing with conflict

Accept conflict

Remember that conflict is natural and happens everywhere and for all different reasons. Accepting it makes your life easier!

Adjust your thinking/mindset

This means that you set aside any feelings/reactions you have that the situation is not your fault, or that the other person is wrong or misinformed, or that they are giving you personal/unfair criticism – accept it is how they feel and listen.

Listen

Allow angry customers/employees to talk and express their feelings until they release their frustration and calm down.

Don't react

Never respond to angry comments. Allow the other person to voice their opinion and only interject with helpful redirection when appropriate.

Be neutral

Do not offer your opinion or agree/disagree with the other person. Show empathy through courtesy, professionalism, respect and patience, work to solve their problems effectively. If you cannot resolve it – escalate to a Manager.

Use the correct tone

Don't smile, laugh or mock people who are angry/upset. Convey empathy with a soft tone and listening body language – focus on them as they speak.

**Merkur Slots
Training Plan**

Day 8



HR/People Responsibility, My Game Changers, Food & Beverage Offer and Stock & Deliveries



Merkur Slots Training Plan



HR / People Responsibility

As you step up to a new working level there comes an element of people responsibility. This means setting a good example and working as a mentor or buddy with Team Members. You should be an 'expert' in all elements of the Team Member role and be able to support new starters who are starting their Merkur Slot learning and development journey.

Whilst the Lead Supervisor or Cluster manager will complete most of the people/HR tasks and paperwork, you may need to support them and Team Members may come to you directly.

Use the table below to understand who does which tasks in your venue and make sure you get trained on any you may need to complete;

PEOPLE TASKS	
TASK	HOW
Be up to date and aware of all online training	
Note-taking (disciplinary/interview)	
Holiday Requests	
Rota Planning	
Absence Records	
Return to work interviews	
4,8 & 12 Week Reviews	
Performance Reviews	
Support Team member with L&D	
Role model/Buddy	

Merkur Slots Training Plan



Game Changers

At Merkur slots, our core competencies are called the 'Game Changers' also known as 'the way we do things around here'. They define the standards, behaviours and attitudes we adopt when at work.

So what are competencies?

If you consider someone doing their job, there are 2 elements to this – **WHAT** they do and **HOW** they go about doing it. Everyone is trained on the technical parts of their job, but how they do it is what can make a BIG difference.



Examples of competencies include communication, customer service, managing your time, planning, prioritizing and delegation, etc. They are often referred to as soft skills and are with you always. They go with you to another job or in your personal life when you are dealing with your children or communicating with a shop assistant.

Competencies are often grouped together – they include a title and a general definition and under that, there are several measurable or observable performance statements.

In Praesepe, we call this competency framework our "**Game Changers**." There are 6 of them which apply to all job roles – if we achieve/deliver them to a good standard/level, it impacts our business positively.

When delivered they will impact; people, profit, performance and productivity- a real **Game Changer** for the business as a whole.

Merkur Slots Training Plan



In our business, we have six key areas of competence across all job roles.....These are our 'Game Changers' for everyone in the business;



There are different expectations of a Team member versus a Manager and in its simplest terms, that's what our Game Changers are; the standards and expectations of personal performance at each job level in our business.

Each role is measured against a different level within the Game Changers.

Team Member – Game Changer Level 1

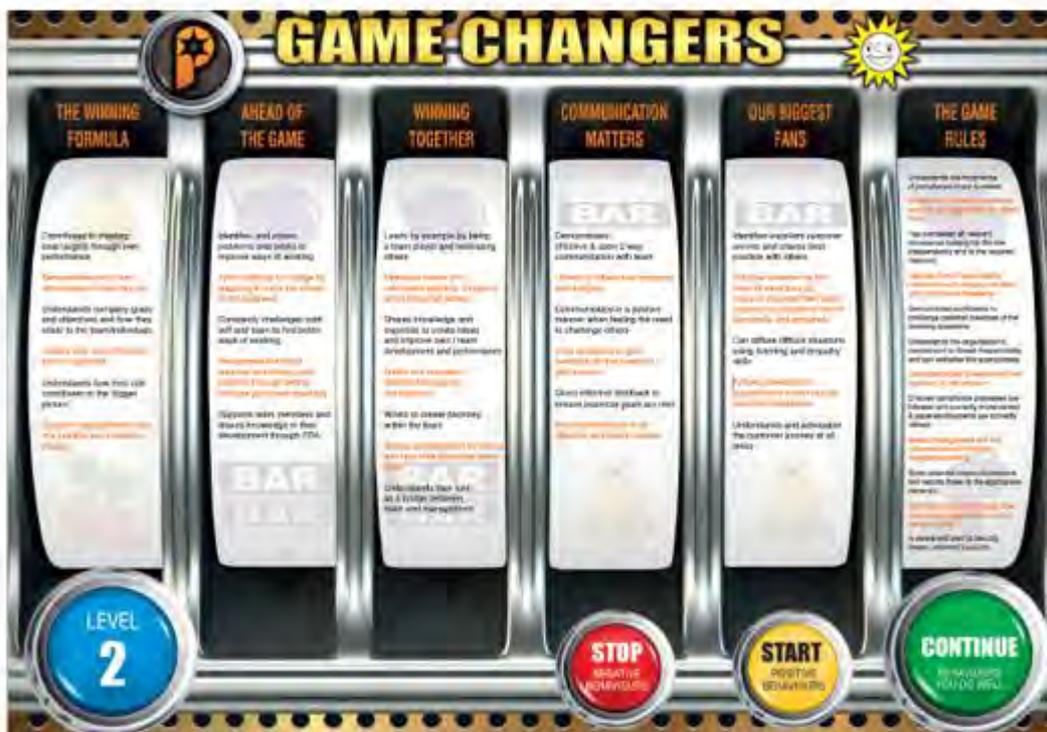
Supervisor – Game Changer Level 2

Lead Supervisor – Game Changer Level 3

Merkur Slots Training Plan



The performance statements listed below give examples of how an individual operating at a level 2, could demonstrate these competencies. The below highlights, what EFFECTIVE performance would look like.



How are Game Changers used?

As a business, we recruit new employees using the 6 Game Changers – we also train against them and measure performance against them during the reviews. They are an integral part of the business and so, everyone must understand what they are and how they are used. Feedback is much more effective if someone is told how they could have approached a task or situation to achieve a better result.

Game Changers make us think about **HOW** we do things and we should all reflect and consider what we do well, what we need to improve on, and what bad habits we may have.

By using the Game Changers as 'measures' of how to do things; we know we are doing it the right way. As a business, we have goals, targets, and KPI's to achieve, but what makes the difference between an OK performance and a great performance is **HOW** we deliver the goals.

Merkur Slots Training Plan



Game Changers – Understanding what do they mean?

Look at the game changer level for your role and your Job description, and give an example of what you need to do to achieve in each game-changer:

GAME CHANGER	Example What do you need to do?
The Winning Formula	
Ahead of the Game	
Winning Together	
Communication Matters	
Our Biggest Fans	
The Game Rules	

Merkur Slots Training Plan



Feedback

Feedback Tips:

<p>Critique the work done, but don't criticise the person e.g. "the colleague left feeling annoyed" NOT "You're so insensitive you always manage to rub people up the wrong way"</p>
<p>Personalise feedback, but don't make it personal: e.g. "I know you are capable of more, the paperwork had at least 5 mistakes" NOT "When will you ever learn to get the basics right?"</p>
<p>Give feedback in the right spirit – or not at all: e.g. "there's some valuable learning you can take in the way you handled that colleague/customer. Reflect on it and let's review it in 30 minutes or so as I'd value your thoughts" NOT (said with sarcasm) "You certainly know how to handle colleagues/Customers Fred!"</p>

REMEMBER:

**Do no harm. Poorly handled feedback is worse than no feedback at all.
Seek feedback from your team and encourage others to do the same.
Build feedback into everything you do – phone calls, meetings, presentations, negotiations etc.
Reinforce the right behaviours – reward them, celebrate them, champion them, let colleagues know when you spot them showing the right behavior.
Remember to think about the IMPACT of their behaviour, only give feedback if it impacts the workplace and performance and NOT just because it niggles YOU!**

I like the fact that you are chatting to customers and making them comfortable and welcome, my concern is that you are spending a long time with the regulars and missing new customers coming in. How can you ensure that your customer service skills get spread across the whole venue?

The underlined section is the impact of what they were doing. This is your area of CONCERN. This is good feedback because we have recognised what they were trying to achieve and acknowledged it, but also pointed out the impact and asked how we can change the behaviour in the future.

Think of an example in your team/venue where feedback would help. See if you can construct some feedback for this person and write it on the next page.

Merkur Slots Training Plan



Stock Ordering/Control

There are two main suppliers for ordering stock;

Office DEPOT

STATIONERY ONLY



All orders must be completed online and this will be in the form of a simple to use web-based ordering service fully supported by each supplier.

These services will be bespoke to Merkur Slots and will only carry authorised items for ordering by the venues. Anything outside of this will need to be authorised by your Area Manager after clearance from the Operations Director.

We have minimised the number of suppliers into venues to ensure that your entire focus is on Customer Service at all times, whilst ensuring that the products chosen are of the highest quality. Also in terms of Health & Safety, you are covered in all aspects by ordering food and drink items from authorised suppliers using the correct forms of transportation and storage throughout production and transit.

Both suppliers have provided guides for ordering online (which you can find in your venue).

Merkur Slots Training Plan



Task

COMPLETE THE NEXT VENUE ORDER WITH BOTH SUPPLIERS.

Make sure you use the supplier guides! Complete the table below and get the order checked by your Training Manager (they should date and sign the column below)

SUPPLIER	WHAT I ORDERED (USE BOTH COLUMNS TO LIST)	DATE OF ORDER	
OFFICE DEPOT			
BRAKES			
CHECKED BY	NAME:	SIGNATURE:	DATE:

**Merkur Slots
Training Plan**



Day 9

Gaming Machine Maintenance



Merkur Slots Training Plan



Gaming Machines – Maintenance

NV12 with printer roll

NV12 Note acceptor and TITO printer found in the following models:

Timeless Tic Tac Toe

Betcom Luck of the Irish 3 player

Betcom Super Nudge Wink

Only models where note acceptor and Printer are combined into the same model

How to replace the Printer Roll

Place paper roll on to the holder and clip on the top of the NV12. The Thermal side of the paper facing the inside of the printer.



Innovative Technology provides Reverse wound paper, this paper should be fed into the printer as shown below.



Merkur Slots Training Plan



Gaming Machines - Maintenance

Clearing/Cleaning the NV12

Do not use solvent-based cleaners such as alcohol, petrol, methylated spirits, white spirit, or PCB cleaner. Using these solvents can cause permanent damage to the unit; only use a mild detergent.

To open the NV9USB, push the clasp on the front of the NV9USB and open.

Ticket and Note jams will try and clear themselves; up to 30 seconds will pass as it tries to return the note/ticket. If this doesn't happen, this jam will need clearing manually.



**Merkur Slots
Training Plan**



Gaming Machines - Maintenance

UBA10NoteAcceptor – Astra/ Novomatic Machines



Blue Lever Splits
Acceptor. Clean runway
with Cloth. Pull Silver
lever to remove from
stacker.



Blueprint MD100 Note acceptor

Aurora Head Unit



Unjam/ Clearing procedure

- Same procedure as the NV200 procedures.
- Blue handle on the top will split the top and bottom of the acceptor.
- Push lever on underside front of acceptor to pull from the caddy

Merkur Slots Training Plan



Gaming Machines - Maintenance

Triple 7 Note Acceptor

Ardac Filter



Cleaning/Cleaning Instructions:

- Pulling the red handle under the note acceptor removes the head unit from the caddy.
- Push the 2 red lugs on each side of the ardac (at the same time) to split the note acceptor from unjamming / cleaning.

Gaming Machines - Maintenance

Merkur Slots Training Plan

NV200 Note acceptor



NV200 in ProjeuPoker



This lever will separate the note acceptor for access to the note runway.

This lever when pressed will allow the head unit to be pulled from the caddy.

NV200 in TB



Gaming Machines – Maintenance



Preventive Maintenance

RETRIEVING BANKNOTES

To retrieve Cash Box deposited Banknotes perform the following steps:

1. Release the Cash Box from the Frame and pull it forward.
2. Unlock the Cash Box with a User supplied Key.
3. Open the Cash Box Door and retrieve deposited Banknotes as illustrated in Figure 2-5.



Figure 2-5 Retrieving Banknote

CLEARING A BANKNOTE JAM

To retrieve a jammed Banknote jammed inside the Banknote Acceptor Head Part proceed as follows:

1. Open the Acceptor Unit's Upper Guide by pressing in on the two (2) Upper Guide Access Buttons (See Figure 2-6a Blue Arrows) located on each side of the Upper Guide, and lift the Acceptor top up and open and remove the jam.

2. Ensure the jammed Banknote. If the jammed Banknote is not found in the Acceptor Unit, then
3. Open the Transport Unit's Upper Guide by pressing in on the Upper Guide Access Lever (See Figure 2-6b single Blue Arrow) located in the center of the Upper Guide, and lift the Transport Section top and open and remove the jam.

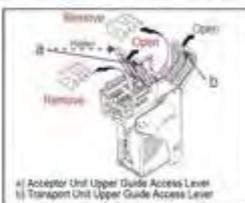


Figure 2-6 Open the Upper Guides

4. If the jammed Banknote is not found in the Upper Section, pull the Cash Box out of the Frame (See Figure 2-7 a). Check the rear side of the Frame and remove the jammed Banknote located there if any (See Figure 2-7 b).
5. A jammed Banknote may also be present on top of the Cash Box, remove it if present at this location (See Figure 2-7 c).

Astra / Novomatic VIP cabinets
JCM Vizion Note / ticket Acceptor

Merkur Slots Training Plan



Gaming Machines - Maintenance

SG Equinox

3 screen B3 Cabinet from Scientific Games

Unique Printer Roll set up to the cabinet

Located in lower part of cabinet

Soon to be installed across the Estate



SNBC Printer — Removing Paper Jam

Turn off the power to the printer.

Ensure that the print head is cool before touching that area.

Pull the printer forward on the runners, using the printer metalwork not the bezel.

To remove a paper jam release the head by pulling the printer bezel forward and drop down.

Press the green lever down and detach the platen roller from the head.

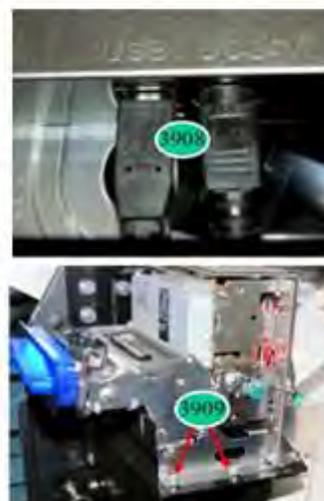
Check for paper Waste debris under the blade cutter and print head areas.

Replace the print head and bezel back into position.

SNBC Printer Replacement

To remove the printer for replacement, disconnect the USB and power connectors to the left of the printer.

Remove the two screws on the left and right hand side of the base and remove the printer,



Merkur Slots Training Plan

Gaming Machines – Maintenance

Equinox Printer Paper replacement



SNBC Printer – Paper Replacement Access

To access the printer for paper replacement, maintenance or paper jam removal release the pen plunger to the right hand side. (3701)

Withdraw the printer forward on the runners using the metalwork and not the printer bezel. (3702)

Remove the paper Roll Baffle.

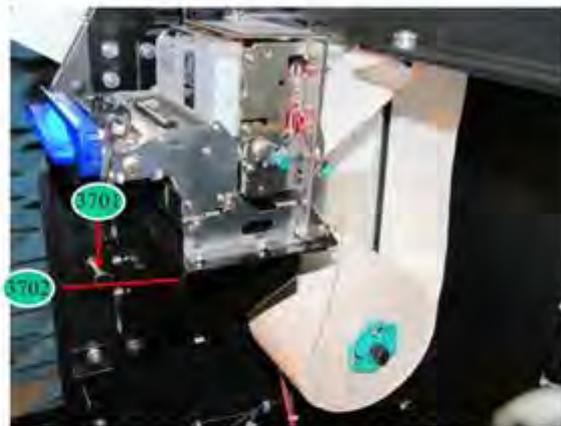
Remove the empty paper roll insert.

Remove two feet off the end of the new roll and square the end off.

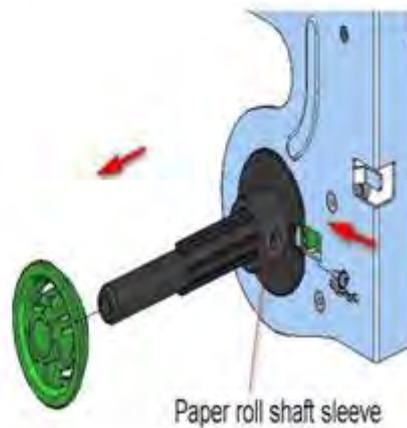
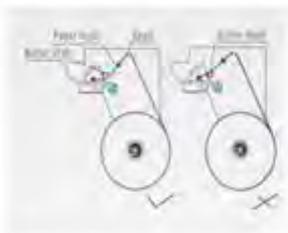
Place the paper roll onto the spindle followed by the baffle.

Feed the paper over the shaft and under the baffle shaft.

Turn the power on and feed the paper and the platen will start to turn and grip the paper. |



Equinox Printer Paper set up



If you have to change the printer roll on the Equinox, the diagram above shows how to release the roll and the correct insertion procedure. Remove the first 2ft of paper off the new role before using.

Merkur Slots Training Plan



Gaming Machines – Maintenance

Equinox Note Acceptor Removal

MEI SC Advance Note Box and Head Removal

1101. Open the top door followed by the bottom door.
1102. Insert the Green key into the note box door lock.
1103. Turn the Green key anti-clockwise.
1104. Withdraw the stacker using the yellow handle.
1105. If a lock is fitted unlock the note box and remove the notes.
1106. Close the note box and lock the note box.



Note Head Removal

1107. To remove the MEI SC Advance Note acceptor push the release bar up and withdraw from the front.
1108. To replace the acceptor, place the mech onto the top of the unit and slide back until the release bar clicks into place.



Merkur Slots Training Plan



Gaming Machines – Fault Reporting

At times machines break down and need to be repaired.

All repairs are logged in MARS for the Service Engineers attention.

To access the Engineers Log on the Home page, go to Service, then Engineers Log.

You will then see a popup window labelled **Raise a Job** (see below). On this screen there are several fields to complete from the drop-down options.

MACHINE	ID	Status	DATE/TIME LOG	PS
MAL281	111	Working	2019/04/11 10:00	PS
MAL282	112	Open	2019/04/11 10:00	PS

When logging a fault/repair, make sure you have as much information as possible when completing the report, so that the engineer is fully aware of the problem. Details to include in the report are:

- Equipment type – select **machine**
- Fault type – select **Failure** if it is a call on a machine
- Machine – this will give you a list of the sited assets, please select the relevant machine.
- Machine status – If the cabinet is out of order select **Total failure**, if it is working but just not fully (e.g. the cabinet doesn't take tokens) the select **Partial failure**
- Description – is for comments only

Once you have completed the report, **assign the call to your engineer**

- Select **Assignment to**
- Select your own engineer from the drop down list of **Available persons** and click on the arrow button to move their name to the **Selected Persons**
- Click on Save – your engineer will now be able to see this job assigned to him in his **My Tasks** list

The job will now show as **Open** in the Engineers Log

Closing a Job

During your engineer visits he will manage the status of the job and once it is closed it will show as **Done** in your Engineers Log.

Merkur Slots
Training Plan



MARS Training – Fault Reporting, Key Points & Notes

Key Points:

1) Who is your Service Engineer?

2) What is the Service Level Agreement (SLA) time for an Engineer?

3) If a machine has broken down, what happens to the machine whilst waiting for an Engineer?

Notes:

Merkur Slots
Training Plan
Day 10



Knowledge Check Sheet & 4 Week Action Point



Merkur Slots
Training Plan



Know My Job Role Checklist



Learn about your new role using ***The Know My Job Role Checklist*** on the following pages, ensuring you can explain each point to your Line Manager so that they can sign off that you have the required knowledge levels for your role.

The Checklist is in no particular order, so please don't panic if the information you learn does not follow the checklist, all will be covered within your 12 week induction period.

As you spend time in the venue and with your team, you are going to learn about additional tasks that may not be listed.

You can make note of these in the notes section provided.

Merkur Slots Training Plan



Know My Job Role Checklist

KNOWLEDGE		COMPLETED	SIGNED OFF BY:
Signing in and out of the venue			
Licenses? What they are and where they are displayed?			
Location of the visitor's book and how to use it (Visitors policy). Who is allowed access to the premises?			
Dealing with deliveries			
Answering the telephone in the venue			
Who are the key contacts – Area Manager/Head Office?			
Compliance – know this training inside out!			
ID Checking	The age limit for entering the venue and how to challenge (think 25). Which ID verification is accepted		
Self-Exclusion	Understand and Demonstrate the process		
IHL Tablet	Check for new Self Exclusions Record Self Exclusion breaches Incident Reporting		
Compliance Logs Paper Based	The Compliance folder – what's in it and how and when to use it		
PlayRight App	Understand the process		
Understand how to be vigilant and why this is so important.			
Customer Service Training – e-learning			
Welcoming Customers to the venue:			
Sign in a new customer	Promoting membership benefit to include the text service and membership app		
Promotions	Know and understand current promotions Know and understand current tournaments		
Venue			
Machines	What machines and types are in your venue?		
	Machine operation		
	Refill a machine from the front		
	Basic Machine repairs		
	Machine fault reporting on MARS		

Merkur Slots Training Plan



KNOWLEDGE		COMPLETED	SIGNED OFF BY:
G-Tab Bingo			
	G-Tab Collection and Accounting		
	G-Tab Game Knowledge		
	G-Tab connection to Machine Ratio		
	Explain how to Play the G-tab to Customer		
	G-Tab basic fault fixing		
Payouts	How are these managed?		
TITO Payments	How are these paid?		
Credit Notes	Why are they issued?		
Cleaning:			
Cleaning Rota	Where is this kept?		
External area of the Venue	What is cleaned and when, how often? What products are used to clean?		
Shop Entrance	What is cleaned and when, how often? What products are used to clean?		
Smoking Area	What is cleaned and when, how often? What products are used to clean?		
Bathrooms	What is cleaned and when, how often? What products are used to clean?		
Machines	What is cleaned and when, how often? What products are used to clean?		
Brass	What is cleaned and when, how often? What products are used to clean?		
Emptying Bins	How often are they emptied, where are they Emptied and how often are they collected?		
Cleaning Products COSHH/Data Sheets	Manage/Monitor stock levels Where are these stored? Where are the products stored and who has access to these?		
HR Processes:			
Personal Details	How to enter these onto InformPeople		
E-Learning	How to access the E-Learning, where courses appear, and what courses to complete and when?		
Knowledge Base	What is knowledge base, what can be found here?		

Merkur Slots Training Plan



Knowledge		COMPLETED	SIGNED OFF BY:
Shopworks:			
Rota's	Where do you find them?		
	How do you build?		
Leave Requests	Where to find and how to complete		
Contacts:	Know who is who in MK for:		
	Repairs		
	Air Conditioning		
	Payroll		
	Rubbish Collection order bags		
ATM:	Fill		
	End of day		
Property Issues:	Basic Security checks – check cameras, toilets		
	Switches/trips etc.		
	CCTV – know how to get a certain day and time		
Machine Empty:	Security		
	Recording		
	Balancing		
	Entering on to MARS		
Collection:	Attend and complete a mid-week collection		
	Attend and complete a full-week collection		
	Complete collection on MARS		
	Check for any exceptions and complete re-audit		
Float Checks:	Frequency		
	Information to include		
	What to check if there's an error		
	Responsibility for shortages		

Merkur Slots Training Plan



Game Changer – Goals; Next 4 Weeks

Think about some goals you can set yourself in your new role against your game-changers shown on page 87. Think about ways of working and things you can do to be the best in your role:

GAME CHANGER	GOAL	HOW I CAN ACHIEVE THIS
The Winning Formula		
Ahead of the Game		
Winning Together		
Communication Matters		
Our Biggest Fans		
The Game Rules		

Merkur Slots Training Plan



Helpful Reference Guides and Contacts



There are many processes that you will learn about through this workbook and whilst most are covered within your training, you may need to refer back to processes in the first few weeks of your new role in your own Merkur Slots Venue. Please see below where you will find these useful guides and manuals to help you in your role.

cash bank *(on your main venue PC/laptop desktop)*

1. Double click on Cash Bank
2. This will open up venue server details
3. Open up the Cash Bank folder
4. Click on Cashino paperwork master copies

This is where you will find the master copies of all the mc forms

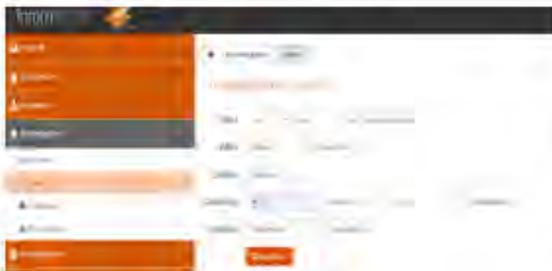
The Following Manuals will also appear there:

- G-Tab and Bingo Manuals
- Cash & Banking
- MARS Manual
- Fire Register & Risk Assessment

NB: If Cash bank does not appear on your desktop, please log a call with IT, and they will add this to your desktop.

Merkur Slots Training Plan

Inform People - Knowledge Base



1. Log into inform people
2. Double click on Knowledge Base
3. Double click on Search
4. Type in box 'containing' title of manual
5. Double click Run search

You can use knowledge Base to search for;

- IHL Tablet user guides
- Playright user guides

The following manuals will be delivered to your venue:

- Merkur Slots Operational Manual
- Compliance Manual

Merkur Slots Training Plan



Useful contact emails (Spaces to add additional)

Email	Department
marketing@praesepeplc.com	Marketing and promotional queries
HR@praesepeplc.com	HR-related queries/and or advice
LearningandDevelopment@praesepeplc.com	Training and development queries
ITsupport@praesepeplc.com	Technical issues non-gaming machine related
Cashier@praesepeplc.com	To order your bank books and cash bags and for any float or cash related queries (check who the supplier for your venue is)
IncomeProtection@praesepeplc.com	MARs passwords and any MARS problems
Payroll@praesepeplc.com	Shopworks password and any Payroll related queries

**Merkur Slots
Training Plan**



Please see below a list of acronyms and definitions used in the UK Gaming Industry. Some of these are questions on the Compliance Audit for both MERKUR Slots and MERKUR Bingo Clubs and will be asked when we visit your venue.

The Gambling Commission & Local Authority Compliance Officers may also ask these questions when they visit your venue. Please ensure your knowledge is up to date with our Compliance & Social Responsibility policies and procedures.

It is a condition of our Licence Conditions & Codes of Practice to be “Socially Responsible”.

COMPLIANCE		
ACRONYM/ABBREVIATION	MEANING	COMPLIANCE & SOCIAL RESPONSIBILITY DEFINITION
ADR	ALTERNATIVE DISPUTE RESOLUTION	If we are unable to resolve a customer complaint internally within our organisation, we would use the services of a “Alternative Dispute Resolution” provider. (See details below regarding our ADR provider IBAS).
AML	ANTI MONEY LAUNDERING	As a company we have to have procedures and policies in place to prevent anti money laundering and terrorist financing within our business. A new electronic AML button is now available on the IHL Tablet for reporting incidents of £50 or more of stained

		notes/dyed notes/foreign coins.
AML OFFICER	ANTI MONEY LAUNDERING OFFICER	<p>Our Licence conditions and codes of practice state that we have an appointed Anti Money Laundering Officer.</p> <p>The appointed officer is: AMANDA KIERNAN Email: amandakiernan@praesepeplc.com</p>
BCAP	BROADCAST COMMITTEE OF ADVERTISING PRACTICE	<p>As a company we have to comply with the advertising codes of practice issued by the Broadcast Committee of Advertising Practice. The code applies to the way in which we advertise gambling facilities and services. We are not allowed to use images of a child or young person and no-one who is, or appears to be under the age of 25 years of age. This includes being compliant with broadcasting information electronic TV screens which are installed in some Cashino venues and Beacon Clubs.</p>

<p>CAP</p>	<p>COMMITTEE OF ADVERTISING PRACTICE</p>	<p>As a company we have to comply with the advertising codes of practice issued by the Committee of Advertising Practice. The code applies to the way in which we advertise gambling facilities and services. We are not allowed to use images of a child or young person and no-one who is, or appears to be under the age of 25 years of age.</p>
<p>IBAS</p>	<p>INDEPENDENT BETTING ADJUDICATION SERVICES</p>	<p>IBAS are the external company who provide "<u>Alternative Dispute Resolution</u>" (ADR) services, whereby we are unable to resolve a customer complaint. Details are available on the Complaints & Disputes Policy leaflet available in your Compliance folder/staff area. Address details: Independent Betting Adjudication Services, P.O. Box 62639, London, EC3P 3AS</p>

LCCP	LICENCE CONDITIONS & CODES OF PRACTICE	All UK licensees have to abide by the rules and regulations of the Licence Conditions & Codes of Practice. The document is issued by the Gambling Commission who regulate the UK Gaming industry. New regulations have to be sanctioned by Central Government and the “Department of Culture Media & Sport” (DCMS) and agreed with the Gambling Commission.
MOSES	MULTI OPERATOR SELF EXCLUSION SCHEME	Multi Operator Self Exclusion Scheme came into effect on 6th April 2016. UK gaming operators have to use the scheme to allow customers to self-exclude from gaming premises. The scheme is sector specific i.e. AGC, Bingo, Licensed Betting Office and Casinos.
POCA	PROCEEDS OF CRIME ACT (2002)	Proceeds of Crime Act 2002 allows the authorities to enforce the law and prosecute criminals whereby criminal activity such as money laundering is taking place in gaming establishments. The authorities have the power to prosecute criminals which could lead to heavy fines and imprisonment!

TITO	TICKET IN TICKET OUT	TITO technology allows a player to insert cash into a machine to commence play. They then have the option to collect the credited amount, which is printed via a ticket. The ticket can be inserted into another machine with TITO, or redeemed for cash at a cash redemption machine or cash counter.
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OTHER USEFUL ACRONYMS

ACRONYM/ABBREVIATION	MEANING	DEFINITION
ABB	ASSOCIATION OF BRITISH BOOKMAKERS	The Association of British Bookmakers (ABB) is the leading trade association representing bookmakers in Great Britain. They work closely with the Gambling Commission and Central Government on Social Responsibility and Codes of Practise.
AGC	ADULT GAMING CENTRE	Adult Gaming Centre is prohibited to strictly Over 18's only. Offering a range of gaming machines, such as Category D, C and B3 £500 jackpot machines. High Street venues operating on a Bingo licence provide gaming machines and proprietary electronic bingo equipment.

<p>AWP</p>	<p>AMUSEMENT WITH PRIZE</p>	<p>Amusement with Prize is a fruit machine which requires player interaction and pays out a percentage. There are a variety of category types i.e. category B3, category C/D with different jackpots and price of play. They are regulated by the Gambling Act 2005. (Further details are available in the Machines Standards document available at your venue).</p>
<p>BA</p>	<p>BINGO ASSOCIATION</p>	<p>The Bingo Association represents Bingo Clubs in the UK. They were formed in 1998. They work closely with UK Operators and Bingo Club owners, the Gambling Commission, Central Government and organisations who deal with the research/treatment of problem gambling to keep them informed of industry changes and regulations. They offer advice and support for Social Responsibility & Code of Practise, Compliance, Machine Standards and problem gambling.</p>

BACTA	British Amusement Catering Trade Association	BACTA are the trade association in the UK. They represent Adult Gaming Centres (AGC's), Family Entertainment Centres (FEC's) and Machine Suppliers. They were formed in 1974. They work closely with the Gambling Commission, Central Government and organisations who deal with the research/treatment of problem gambling to keep them informed of industry changes and regulations. They offer advice and support for Social Responsibility & Code of Practise, Compliance, Machine Standards and problem gambling.
EBT	ELECTRONIC BINGO TERMINAL	Customers are able to play Bingo Variant Games and Cat D and Cat C type games. These machines will be operated in Bingo Licensed venues.
FEC	FAMILY ENTERTAINME NT CENTRE	A Family Entertainment Centre allows children under the age of 18 to enter. An FEC would offer ancillary machines, such as video games, cranes, pushers, air hockey, Prize SWP and category D machines . FEC's are very popular in the UK coastal areas and some may be found inland too.

FOBT	FIXED ODDS BETTING TERMINAL	These machines are operated in Licensed Betting Offices/Shops. They are classed as a category B2/B3 machine. They have a maximum prize of £500. Touch screen roulette, casino style games and virtual racing are available to play. They are regulated by the Gambling Act 2005.
LBO	LICENSED BETTING OFFICE	Licensed Betting Offices/shops can be found on our High Street and local areas in the UK. There are currently 9,000 LBO's in the UK. They are regulated by the Gambling Act 2005.
MARS	MACHINES ADMINISTRATI ON REPORTING SYSTEM	MARS is our new machine reporting system. MARS has a whole host of benefits and offers real time machine data/income, improved cash handling to name a few. A suite of reports are available for performance and machine management.
VBT	VIDEO BINGO TERMINAL	Video Bingo Terminal offer bingo type games and is a video bingo product. These machines will be operated in Bingo Licensed venues. They are regulated by the Gambling Act 2005.

The image shows a large, semi-transparent sign for 'Merkur Slots' mounted on a wall. At the top center is a large, stylized sun with a smiling face. To the right of the sun is a vertical green sign with the letters 'CCCP' in white. Below the sun, the words 'MERKUR' and 'SLOTS' are written in large, bold, white capital letters, with 'MERKUR' on the top line and 'SLOTS' on the bottom line. Below the text are four circular icons arranged in a 2x2 grid. The top-left icon is a circle with a diagonal line through it and a cigarette, labeled 'No Smoking'. The top-right icon is a circle with '18+' inside, labeled 'Over 18s Only'. The bottom-left icon is a circle with a diagonal line through it and a glass of alcohol, labeled 'No Alcohol'. The bottom-right icon is a triangle with a camera lens inside, labeled 'CCTV'. The sign is set against a background of a wall with some posters and a window.

INFORMATION



CODE OF PRACTICE

Persons under the age of 18 years are prohibited from entering the premises.

The management reserves the right to refuse admission to the premises. The company cannot be held responsible for personal items left on these premises. Dogs are prohibited for entry on any premises, restricted to one dog per machine. Dogs are not allowed on these premises (except guide dogs). Alcohol beverages or take-away food cannot be consumed on these premises. The management reserves the right to refuse admission to the premises or to refuse to provide services to any person who is under the influence of alcohol or drugs. Please note, smoking items must be advised to, so please ensure that all smoking or alcohol is placed off as advised or due to circumstances beyond their control. Please check your change before leaving the Cash Desk as retailers cannot be recalled later. In the interests of security, all cash taken will be recorded. All Prize Draws conducted on these premises are free to enter. No purchase is necessary to participate. The acceptance of a free prize does not obligate you to participate in any other company activities. Managers will conduct business in a manner which complies with all relevant Gambling Commission codes of practice. Complaints and Disputes Policy Manager at 0800 808 1333. Failure to resolve the customer complaint or dispute will result in the Duty Manager consulting an official form relating the issue to the Area Manager for action within 7 days. The form will also be lodged at our Head Office. Make an official complaint in writing to: The Duty Manager, Casino Gaming, Midland House, 21 Market Place, Norwich, NR1 1JG. A formal response will follow. Please ask a member of staff for a copy of our Complaints and Disputes Policy.

BINGO RULES

- Before play
 - Which game is in play, verified through the signpost.
 - Which machine or ball house for any other combination has to be completed to win.
 - When play begins each number will be selected at random by means of the Random Number Generator in the full view of the majority of players. Members must mark their cards/books in such a way that the numbers are sufficiently legible to be easily checked by the staff.
 - Random Number Generator (RNG) system.
- Should the game
 - The point at which the next number is drawn will be the moment the Caller has completed the number in any column. Once a number has been so started it will be completed and that number will become the last number called. The winning card/book must contain the last number called.
 - No further claims will be accepted for a line, or two lines for other combinations once the next number has been called. No further claims will be accepted after the next number has been called and the Random Number Generator set for the next game.
 - Should a member of staff stop the game before the next number is called, no member of staff will be allowed to accept this responsibility on behalf of a Member.

- Challenging the Prize
 - If the book/holders are being used then these must be intact upon checking a claim.
 - When a claim is being checked the following items will be announced/displayed:
 - the colour and type of card;
 - the last number called;
 - the other numbers on the card;
 - the winning number.
 - That decision. The reason why the claim has not been achieved will be announced.
- Multiple Wins
 - In the case of a special game for a prize (one card) provided by the Promoter, the Caller will announce before the game the proceeds to be shared in the event of more than one winner sharing the prize. In the event of more than one winner in a card, game, all prizes will be equally shared between the winners.
 - The Venue Manager's decision will be final to all matters.

SOCIAL MEDIA

The group will often take photographs of the group and/or individual members. However, we understand that our members may have concerns about privacy and the group will seek consent in any social media campaigns.

GAMBLING ACT 2005

- The Three Advertising Objectives
 - Preventing gambling from being a source of financial problems for individuals or families, being associated with crime or antisocial behaviour, or used to support crime - we ensure our advertising is responsible and does not encourage or glamorise gambling.
 - Ensuring that gambling is conducted in a fair and open way. Gambling machines comply with the relevant technical standards and software is tested and certified by independent testing agencies.
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling - policies prevent under age gambling and we contribute to the Responsibility in Gambling Act for the treatment of problem gamblers.

STAYING IN CONTROL

The Golden Rules

- Playing machines is buying fun, NOT investing money
- Only play with money you can AFFORD to lose
- Set LIMITS on how much you will spend
- Playing within your means can be FUN and exciting
- Spending outside your means can create PROBLEMS for yourself and others

A simple, yet powerful, message. It's about taking control of your gambling. It's about staying in control. It's about having fun. It's about staying in control. It's about having fun. It's about staying in control. It's about having fun.

GamCare: 0800 8020 133



FOOD HYGIENE RATING AWAITING INSPECTION

FOOD ALLERGENS AND INTOLERANCES. If you require further information regarding food served on these premises please speak to a member of staff who will advise you accordingly.

NO ALCOHOL. It is against the law to consume alcohol on these premises.

STRICTLY OVER 18s ONLY

NO SMOKING. It is against the law to smoke on these premises.

CUSTOMER CARE

Please either call 0800 808 5335 or email casinocustomers@praesepeplc.com

BeGambleAware.org



STAYING IN CONTROL

The Golden Rules of playing Fruit Machines

- **Playing machines is buying fun, NOT investing money**
- **Only play with money you can AFFORD to lose**
- **Set LIMITS on how much you will spend**
- **Playing within your means can be FUN and exciting**
- **Spending outside your means can create PROBLEMS for yourself and others**

A leaflet with more guidance is available here. If you feel you are in difficulty with your gambling or know someone who is and would like help, call the free GamCare helpline.

GamCare:
0808 8020 133

GAMCARE is the national centre for information, advice and practical help regarding the social impact of gambling. Their helpline is run by trained staff, who can offer counselling, information and advice to problem gamblers, family members and to friends of gamblers.



G GamCare.org.uk
f t @GamCare

Funded by

GambleAware

GamCare. A Charitable Company Registered in England No.3297914
Charity No. 1060005



BeGambleAware.org

Merkur Slots

Working Together





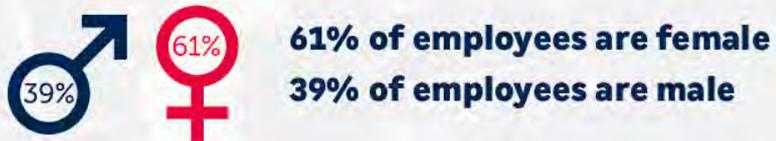
PART OF THE GAUSELMANN GROUP

A Strong Partner For More Than 60 Years



Merkur Casino UK, formerly Praesepe, is a subsidiary of the family run Gauselmann Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the Merkur Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best entertainment.

Merkur Casino UK employs over 1,600 people (61% Female) over 3 Bingo Clubs, over 180 High Street gaming centres and 3 Family Entertainment Centres under two main brands.



Merkur Slots is the main UK brand. All Merkur Casino and Casino Gaming venues will be rebranded into this new name over time. Our venues represent the very best in terms of exciting 'slot gaming' entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.



Merkur Bingo clubs, formerly Beacon Bingo, are very important to our customers in their local communities. Our teams strive to deliver not just great service but a Bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.

HIGH STREET BINGO

What is it?

Bingo is one of the UK's favourite pastimes and Praesepa is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



Our customers can attend and play bingo at any time with the numbers auto-called.

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



The market on the high street has evolved with venues now providing Electronic Bingo Tablets.



Bingo is available for play from 9am until midnight.

Our Bingo terminals offer B3, Cat C and Cat D products with an average stake of between 30-40p stake.



Bingo Terminals





RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

Being a responsible operator is high priority across the Gauselmann group and in the UK, Merkur Casino is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

GAMBLING COMMISSION

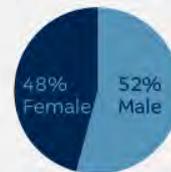
Merkur Casino is regulated by the Gambling Commission and Licensing Authorities



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



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



Our venues operate a Think 25 policy whereby any persons who look under 25 have to produce a form of photo ID.



Our venues appeal to all ages with our membership gender database split of 52% Male / 48% Female



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

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Merkur Casino also has a number of socially responsible gambling tools, and management and training initiatives that include:



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



Dedicated Learning & Development Team and National training centres.

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



All data is centrally reviewed and evaluated by an independent Audit/Compliance team.



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

Local Area Risk Assessments are updated annually to identify any changes in the local area.



PlayRight app installed in all venues that is a self-help tool for customers to manage their gambling.

Compliance



Training Centre



PlayRight App



Online Training





SOCIAL RESPONSIBILITY MEASURES IN PLACE

Machine Messaging



Customer Interaction Training



All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling. Our recent commitments include: Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.



Merkur Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our Merkur 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business.

Merkur Casino UK also engages with the Bingo Association, Bacta and Gambling Business Group bodies.



- Senior Manager representation Divisional meetings.
- Operations Director is the Chair for division 3 representing Adult Gaming Centres.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.



- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



Benefits for your High Street include:



Over 90% of new Merkur Slots venues occupy former vacant units.



Investment from £100,000 to £250,000 in long-standing vacant venues.



Linked trips with other shops helping to support other businesses.



Local jobs for between 6 and 12 people depending on the hours of operation.



Increased footfall to the High Street.



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

COMMUNITY & CHARITY

Merkur Initiative

Supporting Local Charities and Good Causes



Amongst other charities, some of your donations have helped:



Merkur Casino UK has raised in excess of
£1.2 million for good causes since 2005

Please contact us

For press enquiries:
email martha@sourcemc.co.uk
phone +44 (0) 7796 614137

Merkur Casino UK
Seebeck House
1A Seebeck Place
Knowlhill
Milton Keynes
MK5 8FR

phone 01908 351200
email info@merkur-casino.com



Extract of Licence Conditions and Codes of Practice (LCCP) for Bingo

Version effective from 31 October 2020

1.1.1 - Qualified persons – qualifying position

Applies to:

All operating licences, except ancillary remote licences, issued to small-scale operators

1. In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
2. Schedule X¹ lists those individuals notified to the Commission as qualified persons.
3. If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
4. An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
5. In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005(Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

1.2.1 - Specified management offices – personal management licences

Applies to:

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

1. Subject to 6 and 7 below, licensees must ensure:
 - a. that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter ‘a personal management licence’); and
 - b. that at least one person occupies at least one of those offices
2. The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a. the overall management and direction of the licensee’s business or affairs
 - b. the licensee’s finance function as head of that function
 - c. the licensee’s gambling regulatory compliance function as head of that function
 - d. the licensee’s marketing function as head of that function
 - e. the licensee’s information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f. oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g. in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
3. The person responsible for the licensee’s gambling regulatory compliance function as head of that function shall not, except with the Commission’s express approval, occupy any other specified management office.
4. Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder’s personal management licence.
5. Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual’s work and any requirements of the Commission in respect of such matters applicable during the period of the review.
6. Paragraphs 1 to 5 above shall not apply to a licensee for so long as the licensee is a ‘small-scale operator’ as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 (‘the Regulations’).
7. During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs 1 to 6 above shall apply subject to the proviso that the phrase ‘each individual’ in paragraph 1a shall not include any individual who was a ‘qualified person’ (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

2.1.1 - Access to (and provision of data from) key equipment

Applies to:

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1. Licensees must, on request, permit an enforcement officer to inspect any of their remote gambling equipment and/or provide to the Commission copies of data held on such equipment in such format and manner as the Commission may request.

2.2.1 - Gambling software

Applies to:

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1 All gambling software¹ used by the licensee must have been manufactured by the holder of a gambling software operating licence. All such gambling software must also be supplied to the licensee by a holder of a gambling software operating licence. Such software must only be installed or adapted by the holder of such a licence.

¹ As defined in section 41(2)&(3) of the Act

2.3.1 - Technical standards

Applies to:

All non-remote gaming machine technical and gambling software licences and remote operating licences, including remote gaming machine technical, remote gambling software and betting ancillary remote licences, but not remote betting intermediary (trading rooms only) licences

1. Licensees must comply with the Commission's technical standards and with requirements set by the Commission relating to the timing and procedures for testing.

2.3.2 - Bingo equipment specifications

Applies to:

Non-remote bingo operating licences and bingo ancillary remote licences

1. Licensees must comply with the Commission's specification for bingo equipment.

3.1.2 - Other networks

Applies to:

All remote casino, bingo, and betting licences (except ancillary remote and host licences)

1. Subject to 2 below, all licensees who provide facilities for gambling, other than peer to peer gaming, in circumstances in which they do not contract directly with all of the participants using those facilities ('network operators') must have, put into effect and monitor the effectiveness of policies and procedures designed to ensure that:
 - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the network operator, or that player and another holder of a Gambling Commission remote operating licence of the same kind as that held by the network operator ('a relevant licence');
 - b. the arrangements between the network operator and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c. the network operator's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
 - ii. investigation of suspected cheating,
 - iii. combating of problem gambling, and
 - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

3.1.3 - Hosting

Applies to:

All casino (game host), bingo (game host), general betting (host) (real events) and general betting (host) (virtual events) licences

1. Subject to 2 below, all licensees who provide facilities for gambling in circumstances in which they do not contract directly with any of the participants using those facilities ('hosts') must ensure that:
 - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the holder of a Gambling Commission remote casino, bingo, general betting (real events) or general betting (virtual events) operating licence ('a relevant licence');
 - b. the arrangements between the host and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c. the host's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
 - ii. investigation of suspected cheating,
 - iii. combating of problem gambling, and
 - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

4.1.1 - Segregation of funds

Applies to:

All remote operating licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

1. Licensees who hold customer funds must ensure that these are held in a separate client bank account or accounts.
2. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling,
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer, and
 - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

4.2.1 - Disclosure to customers

Applies to:

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

1. Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
2. Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
3. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5.1.1 - Cash and cash equivalents

Applies to:

All operating licences except gaming machine technical, gambling software and host licences

1. Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
2. Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

6.1.2 - Use of credit cards

Applies to:

All non-remote general betting, pool betting and betting intermediary licences, and all remote licences (including ancillary remote betting and ancillary remote lottery licences) except gaming machine technical, gambling software and host licences

1. Licensees must not accept payment for gambling by credit card. This includes payments to the licensee made by credit card through a money service business.

7.1.1 - Fair and transparent terms and practices

Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
2. The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
3. Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
4. Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

8.1.1 - Display of licensed status

Applies to:

All remote casino, bingo and betting licences other than ancillary, host, remote betting intermediary (trading room only), remote general betting (limited) and remote general betting (standard) (remote platform) licences

1. Licensees providing facilities for remote gambling must display on every screen from which customers are able to access gambling facilities provided in reliance on this licence:
 - a. a statement that they are licensed and regulated by the Gambling Commission;
 - b. their account number; and
 - c. a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission's website.
2. Such statement, account number and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission in its technical standards applicable to the kind of facilities for gambling provided in accordance with this licence or otherwise notified to licensees for the purposes of this condition.
3. Licensees may also display on screens accessible from Great Britain information about licences or other permissions they hold from regulators in, or by virtue of the laws of, jurisdictions outside Great Britain provided it is made plain on those screens that the licensee provides facilities for gambling to persons in Great Britain in reliance on their Gambling Commission licence(s).

9.1.2 - Prohibited bingo prize games

Applies to:

All non-remote bingo operating licences

1. Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
2. Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
3. Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14.1.1 - Access to premises

Applies to:

All operating licences

1. Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15.1.1 - Reporting suspicion of offences etc – non-betting licences

Applies to:

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

1. Licensees must as soon as reasonably practicable, in such a form or manner as the Commission may from time to time specify, provide the Commission with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.¹

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website

15.1.3 - Reporting of systematic or organised money lending

Applies to:

All non-remote casino, non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.¹

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website

15.2.1 - Reporting key events

Applies to:

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

1. Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 3% or more of the issued share capital of the licensee or its holding company): • presenting of a petition for winding up • making of a winding up order • entering into administration or receivership • bankruptcy (applying to individuals only) • sequestration (applicable in Scotland), or • an individual voluntary arrangement.

Relevant persons and positions

2. In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
3. The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
4. The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). A 'key position' in relation to a licensee is:
 - a. in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b. in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c. a position where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
 - d. any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

Financial events

5. Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
6. Any breach of a covenant given to a bank or other lender.
7. Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
8. Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

9. The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
10. Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
11. Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
12. The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional, statutory or other regulatory or government body (in whatever jurisdiction)) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
13. The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
14. The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
15. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in

respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

16. Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
17. Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
18. In the case of remote gambling, the commencement or cessation of trading on website domains (including mobile sites or mobile device applications) or broadcast media through which the licensee provides gambling facilities (including domains covered by 'white label' arrangements). In this condition: 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - a. in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - b. a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Read additional guidance on the information requirements contained within this section.

¹Key events are to be reported to us online via the 'eServices' digital service on our website.

15.2.2 - Other reportable events

Applies to:

All operating licences

1. Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable)
 - b. any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
 - c. their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
 - d. any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002, or Part III of the Terrorism Act 2000, or any UK law by which those statutes are amended or superseded.

In this condition:

- a. 'group company' has the same meaning as in condition 15.2.1; and
- b. without prejudice to section 327 of the Gambling Act 2005, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

Read additional guidance on the information requirements contained within this section.

¹ Other reportable events are to be reported to us online via the 'eServices' digital service on our website.

15.3.1 - General and regulatory returns

Applies to:

All operating licences

1. On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.
2. In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.¹

Read additional guidance on the information requirements contained within this section.

¹ Regulatory returns are to be submitted to us online via the 'eServices' digital service on our website.

16.1.1 - Responsible placement of digital adverts

Applies to:

All licences

1 Licences must:

- a. Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b. take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c. ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

17.1.1 - Customer identity verification

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except any lottery licence the holder of which only provides facilities for participation in low frequency¹ or subscription lotteries, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo.

1. Licensees must obtain and verify information in order to establish the identity of a customer before that customer is permitted to gamble. Information must include, but is not restricted to, the customer's name, address and date of birth.
2. A request made by a customer to withdraw funds from their account must not result in a requirement for additional information to be supplied as a condition of withdrawal if the licensee could have reasonably requested that information earlier. This requirement does not prevent a licensee from seeking information on the customer which they must obtain at that time due to any other legal obligation.
3. Before permitting a customer to deposit funds, licensees should inform customers what types of identity documents or other information the licensee may need the customer to provide, the circumstances in which such information might be required, and the form and manner in which such information should be provided.
4. Licensees must take reasonable steps to ensure that the information they hold on a customer's identity remains accurate.

¹ A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw.

Ordinary code

These do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner.

Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

Social responsibility code

Compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution.

1.1.1 - Cooperation with the Commission

Ordinary code

Applies to:

All licences

1. As made plain in its Statement of principles for licensing and regulation, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

1.1.2 - Responsibility for third parties – all licences

Social responsibility code

Applies to:

All licences

1. Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
2. Licensees must ensure that the terms on which they contract with such third parties:
 - a. require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b. oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c. enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

1.1.3 - Responsibility for third parties – remote

Social responsibility code

Applies to:

All remote licences

1. Remote licensees must ensure in particular:
 - a. that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
 - i. include a term that any such user interface complies with the Commission's technical standards for remote gambling systems; and
 - ii. enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

2.1.2 - Anti-money laundering – other than casino

Ordinary code

Applies to:

All licences except casino licences

1. As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators). *

3.1.1 - Combating problem gambling

Social responsibility code

Applies to:

All licences

1. Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
2. Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2.5 - Bingo and FEC SR code

Social responsibility code

Applies to:

All non-remote bingo and family entertainment centre licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
 - a. checking the age of apparently underage customers
 - b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c. taking action when there are unlawful attempts to enter the adult-only areas.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b. the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
6. Licensees must only accept identification which:
 - a. contains a photograph from which the individual can be identified
 - b. states the individual's date of birth
 - c. is valid
 - d. is legible and has no visible signs of tampering or reproduction.
7. Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional guidance on the information requirements contained within this section.

3.2.6 - Bingo and FEC ordinary code

Ordinary code

Applies to:

All non-remote bingo and family entertainment centre licences

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
7. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website.

3.2.11 - Remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
2. Such procedures must include:
 - a. Verifying the age of a customer before the customer is able to:
 - i. deposit any funds into their account;
 - ii. access any free-to-play versions of gambling games that the licensee may make available; or
 - iii. gamble with the licensee using either their own money or any free bet or bonus.
 - b. warning potential customers that underage gambling is an offence;
 - c. regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
 - d. ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
 - e. enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

3.2.12 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

3.3.1 - Responsible gambling information

Social responsibility code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

1. Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
2. The information must cover:
 - a. any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b. timers or other forms of reminders or 'reality checks' where available
 - c. self-exclusion options
 - d. information about the availability of further help or advice.
3. The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
4. For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

3.3.2 - Foreign languages

Ordinary code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

1. Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a. the information on how to gamble responsibly and access to help referred to above
 - b. the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c. the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.3.4 - Remote time-out facility

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences

- 1 Licensees must offer a 'time out' facility for customers for the following durations:
 - a. 24 hours
 - b. one week
 - c. one month or
 - d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

3.4.1 - Customer interaction

Social responsibility code

Applies to:

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a. identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b. interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
2. Licensees must take into account the Commission's guidance on customer interaction.

3.5.1 - Non-remote and trading rooms SR code

Social responsibility code

Applies to:

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of those persons found in the gambling area or attempting to gamble from the premises.
7. Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

3.5.2 - Self-exclusion – non-remote ordinary code

Ordinary code

Applies to:

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.
7. Licensees should take steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.3 - Self-exclusion – remote SR code

Social responsibility code

Applies to:

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences. Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. a record of the card numbers to be excluded;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
7. Licensees must when administering the self-exclusion signpost the individual to counselling and support services.
8. Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid

inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

3.5.4 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
 - a. over the internet; this can be a box that must be ticked in order to indicate that they understand the system
 - b. by telephone; this can be a direct question asking whether they understand the system.
2. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
3. Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
4. Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
5. Licensees should take all reasonable steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
 - c. the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
 - d. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
 - e. at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
 - f. where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
 - g. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

6. The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
7. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
8. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.5 - Remote multi-operator SR code

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting, remote general betting (remote platform), remote betting intermediary (trading room only), remote general betting (limited), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences

1. Licensees must participate in the national multi-operator self-exclusion scheme.

3.5.6 - Multi-operator non-remote SR code

Social responsibility code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

1. Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

3.5.7 - Multi-operator non-remote ordinary code

Ordinary code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

1. Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6.2 - Bingo

Ordinary code

Applies to:

All non-remote bingo licences

1. Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
 - a. to employ them to provide facilities for playing bingo;
 - b. for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
 - c. to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a. children and young persons are never asked to perform tasks within 1a or 1b, above
 - b. all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:
 - a. children are not employed to work on bingo licensed premises at any time when the premises are open for business
 - b. neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

3.6.7 - Remote

Ordinary code

Applies to:

All remote licences, except remote lottery, remote pool betting, remote gaming machine technical, remote gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence to employ them to provide facilities for gambling.

3.8.2 - Money-lending – other than casinos

Ordinary code

Applies to:

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

1. Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

3.9.1 - Identification of individual customers - remote

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences) except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
2. Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
 - a. if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
 - b. all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
 - c. where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
 - d. individual financial limits can be implemented across all of a customer's accounts.
3. Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
4. A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof.

4.1.1 - Fair terms

Social responsibility code

Applies to:

All licences, except gaming machine technical and gambling software licences

1. Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

4.2.2 - Display of rules - bingo

Social responsibility code

Applies to:

All non-remote bingo licences

1. In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a. rules about each variant of bingo made available; and
 - b. rules about any prize gaming made available.

4.2.3 - Display of rules – remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must make the following available to customers:
 - a. a player's guide to each gambling opportunity (bet, game or lottery) made available by the operator; and
 - b. such additional information relating to the available gambling as the Commission shall from time to time publish to licensees: the current requirements are set out in the Commission's Remote gambling and software technical standards.

4.2.4 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Where practicable, the player's guide and additional information referred to in the social responsibility code 4.2.3 should be made available through the medium in which the remote gambling is to be conducted. Where that is not practicable, licensees should either:
 - a. send a copy of the guide and required additional information by post, fax or email; or
 - b. make these available to the customer in another medium to which he has access.

5.1.1 - Rewards and bonuses – SR code

Social responsibility code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

1. If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a. the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b. neither the receipt nor the value or amount of the benefit is:
 - i. dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii. altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c. if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d. if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
2. If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value', 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.

Licensees must take into account the Commission's guidance on high value customer incentives.

5.1.2 - Proportionate rewards

Ordinary code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

1. Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

5.1.3 - Alcoholic drinks

Social responsibility code

Applies to:

All non-remote bingo and casino licences

1. If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
2. Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

5.1.6 - Compliance with advertising codes

Social responsibility code

Applies to:

All licences, except lottery licences

1. All marketing of gambling products and services must be undertaken in a socially responsible manner.
2. In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
3. The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

5.1.8 - Compliance with industry advertising codes

Ordinary code

Applies to:

All licences

1. Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

5.1.9 - Other marketing requirements

Social responsibility code

Applies to:

All licences

1. Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
2. Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
3. The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

5.1.10 - Online marketing in proximity to information on responsible gambling

Ordinary code

Applies to:

All licences

1. Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

5.1.11 - Direct electronic marketing consent

Social responsibility code

Applies to:

All licences

1. Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6.1.1 - Complaints and disputes

Social responsibility code

Applies to:

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

1. Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
2. Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
3. The services of any such ADR entity must be free of charge to the customer.
4. Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
5. Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
6. Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
7. Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

- a. a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 and,
- b. whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

Read additional guidance on the information requirements contained within this section.

7.1.2 - Responsible gambling information for staff

Social responsibility code

Applies to:

All licences, including betting ancillary remote licences, but not other ancillary remote licences

1. Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8.1.1 - Ordinary code

Ordinary code

Applies to:

All licences

1. As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
2. Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a. any material change in the licensee's structure or the operation of its business
 - b. any material change in managerial responsibilities or governance arrangements
 - c. any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website.

² Events which must be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

9.1.2 - Bingo

Social responsibility code

Applies to:

All non-remote bingo operating licences

1. Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
2. Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
3. Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

10.1.1 - Assessing local risk

Social responsibility code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
2. Licensees must review (and update as necessary) their local risk assessments:
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

¹This is the statement of licensing policy under the Gambling Act 2005.

10.1.2 - Sharing local risk assessments

Ordinary code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Highlighted Extracts of the Gambling Commission's Guidance to Licensing Authorities

4.5 Licensing authorities in England and Wales have responsibilities under the Licensing Act 2003 (opens in new tab). There are some inter-dependencies between the Licensing Act 2003 (opens in new tab) and the Act, in terms of the framework for decision making and the procedures that must be followed. However, licensing authorities must take care to ensure that they follow the procedures and only take into account issues that are relevant to the Act, when dealing with applications under the Act. Particular care should be taken to distinguish considerations made under the Act from those relevant to alcohol licensing, public entertainment or late night refreshments.

Licensing (Scotland) Act 2005

4.6 The position in Scotland is similar, with procedures and decision making requirements under both the Licensing (Scotland) Act 2005 (opens in new tab) and the Act. The same care must be taken by licensing authorities in Scotland to consider only those issues which are relevant to matters under the Act in their decision making, and to ensure that they follow the prescribed procedures under the Act.

Other provisions and legislation

4.7 Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's Licence conditions and codes of practice (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.

4.8 Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the Environmental Protection Act 1990 (opens in new tab).

Licensing authority decisions

4.9 S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:

- a. in accordance with any relevant code of practice under s.24
- b. in accordance with any relevant guidance issued by the Commission under s.25
- c. reasonably consistent with the licensing objectives (subject to a and b above),
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

4.10 Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the guidance contained in this document, any relevant Commission code of practice, the licensing objectives or the licensing authority's own policy statement.

Delegations

4.11 The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.

4.12 It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise to a risk of judicial review challenge, particularly on the basis of appearance of bias.

4.13 The tables at Appendix H set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

Part 5: Principles to be applied by licensing authorities

Licensing objectives

5.1 In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:

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

5.2 It is expected that the licensing authority will have set out their approach to regulation in their policy statement, having taken into account local circumstances. This is dealt with in more detail at Part 6.

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

5.3 Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6. A non-exhaustive list of licence conditions is provided at Appendix F.

5.4 A licensing authority will need to consider questions raised by the location of gambling premises when:

- formulating its statement of licensing policy
- receiving relevant representations to an application
- dealing with applications as a responsible authority in its own right considering applications before it.

5.5 In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.

5.6 Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.

5.7 Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 (opens in new tab) /Licensing (Scotland) Act 2005 (opens in new tab), in which context they have wider powers to also take into account measures to prevent nuisance.

5.8 In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (opens in new tab) (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this guidance.

5.9 There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers. Further information can often be found on the websites of industry trade associations.

5.10 Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

Objective 2 : Ensuring that gambling is conducted in a fair and open way

5.11 Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.

5.12 In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this guidance.

Objective 3 : Protecting children and other vulnerable persons from being harmed or exploited by gambling

5.13 In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (eg bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

5.14 Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.

5.15 If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.

5.16 In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the Licence conditions and codes of practice (LCCP) or as Gambling codes of practice. In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this guidance.

5.17 The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who

gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.

5.18 Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's policy statement. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

Section 153 principles

5.19 S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:

- a. in accordance with any relevant code of practice under s.24 (the LCCP)
- b. in accordance with any relevant guidance issued by the Commission under s.25 (this guidance)
- c. reasonably consistent with the licensing objectives (subject to a and b above)
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

5.20 Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this guidance, any relevant Commission code of practice, its own statement of licensing policy, and the licensing objectives.

5.21 In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this guidance, and its own policy statement or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this guidance take precedence.

5.22 In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:

- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
- s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.

5.23 A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.

5.24 The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

Codes of practice

5.25 The LCCP sets out the Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within the second part of the LCCP.

5.26 To assist licensing authorities in determining premises applications and inspecting premises, all the codes of practice) are also available as a single document. The codes specify a number of requirements, many of which relate to social responsibility issues and these may be of particular interest where a licensing authority has concern about matters such as protection of the young and vulnerable. It should be noted that the codes also apply to situations in which the gambling being offered is not normally the responsibility of an operating licence holder. Examples include the code of practice for equal chance gaming and the code for gaming machines in clubs and premises with an alcohol licence.

Good practice in regulation

5.27 Under the Legislative and Regulatory Reform Act 2006 (opens in new tab), any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation in the exercise of the function (Legislative and Regulatory Reform Act 2006 (opens in new tab), section 21). These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills⁵, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006 (opens in new tab). The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.

5.28 The statutory principles of good regulation and the Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act. The Legislative and Regulatory Reform (Regulatory Functions) Order 2007 (opens in new tab), was amended by the Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2009 (opens in new tab), which, amongst other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the Gambling Act 2005 (opens in new tab) - see Parts 3 and 7.

5.29 Guidance produced by Regulatory Delivery now replaced by the Office of Product Safety and Standards seeks to assist local authorities in interpreting the requirements of the Regulator's Code for example in delivering risk-based regulation in relation to age restrictions.

Age-restricted products and services framework (opens in new tab)⁶ sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the Age-restricted products and services: a code of practice for regulatory delivery (opens in new tab)⁷.

Human Rights Act 1998

5.30 The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing

authorities should bear in mind that they are subject to the Human Rights Act 1998 (opens in new tab) and in particular:

- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
- Article 6 – right to a fair hearing
- Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
- Article 10 – right to freedom of expression.

Other considerations

5.31 Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions. In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.

5.32 Licensing authorities must ensure that the application is in accordance with the relevant codes of practice, this guidance, the licensing objectives and the licensing authority's own policy statement. There is, therefore, significant scope for licensing authorities to request additional information from the applicant where they have concerns about both new applications and variations.

5.33 Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9 and a non-exhaustive list of licence conditions is included at Appendix F of this guidance.

5.34 Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

7.51 Previous guidance from DCMS (opens in new tab) and the Commission has been that an application for a variation will only be required where there are material changes to the layout of the premises. What constitutes a material change will be a matter for local determination but it is expected that a common sense approach will be adopted. When considering an application for variations, the licensing authority will have regard to the principles to be applied as set out in s.153 of the Act.

Representations

7.52 In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as 'responsible authorities' and 'interested parties'. Representations from other parties are inadmissible. Further information on these categories can be found in Part 8 of this guidance.

7.53 Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority's policy statement, or the Commission's guidance or codes of practice, are likely to be relevant.

7.54 The licensing authority will also need to consider if representations are 'frivolous' or 'vexatious'. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:

- who is making the representation, and whether there is a history of making representations that are not relevant
- whether it raises a 'relevant' issue
- whether it raises issues specifically to do with the premises that are the subject of the application.

7.55 The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission's approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

Making a decision

7.56 As explained earlier, the licensing authority's primary obligation under s.153(1) is to permit the use of premises in so far as it thinks that to do so is:

- a. in accordance with any relevant code of practice issued by the Commission
- b. in accordance with any relevant guidance issued by the Commission

- c. reasonably consistent with the licensing objectives (subject to a and b above)
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

7.57 Further information and guidance as to the meaning and effect of s.153 is set out at paragraph 5.19 above.

Consideration of planning permission and building regulations

7.58 In determining applications, the licensing authority should not take into consideration matters that are not related to gambling and the licensing objectives. One example would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal. Licensing authorities should bear in mind that a premises licence, once it comes into effect, authorises premises to be used for gambling. Accordingly, a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use. Equally, licences should only be issued where they are expected to be used for the gambling activity named on the licence. This is why the Act allows a potential operator to apply for a provisional statement if construction of the premises is not yet complete, or they need alteration, or he does not yet have a right to occupy them. Part 11 of this guidance gives more information about provisional statements.

7.59 As the Court has held in a 2008 case (*The Queen (on the application of) Betting Shop Services Limited –v- Southend-on-Sea Borough Council* [2008] EWHC 105 (Admin)), operators can apply for a premises licence in respect of premises which have still to be constructed or altered, and licensing authorities are required to determine any such applications on their merits. Such cases should be considered in a two stage process; first, licensing authorities must decide whether, as a matter of substance after applying the principles in s.153 of the Act, the premises ought to be permitted to be used for gambling; second, in deciding whether or not to grant the application a licensing authority will need to consider if appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

7.60 For example, where the operator has still to undertake final fitting out of the premises but can give a reasonably accurate statement as to when the necessary works will be completed, it may be sufficient to simply issue the licence with a future effective date, as is possible under the Regulations (SI 2007/459: *The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007* and SSI No 196: for Scotland). The application form allows the applicant to suggest a commencement date and the notice of grant allows the licensing authority to insert a date indicating when the premises licence comes into effect. In other cases, it may be appropriate to issue the licence subject to a condition that trading in reliance on it shall not commence until the premises have been completed in all respects in accordance with the scale plans that accompanied the licence application. If changes to the pre-grant plans are made, then parties who have made representations should be able to comment on the changes made. Part 9 of this guidance gives more information about licence conditions.

7.61 If the plans submitted at the time of the application for a premises licence are changed in any material respect during the fitting out of the premises after the grant of the licence, then the applicant will be in breach of the licence. If the applicant wishes to change the proposed plans after grant then, in order to avoid breaching the licence, it will be necessary for the applicant to either make a fresh application under s.159 or seek an amendment to a detail of the licence under s.187 of the Act. If there are substantive

9.25 The following mandatory conditions apply to all premises licences:

- the summary of the premises licence issued by the licensing authority must be displayed in a prominent place on the premises. In England and Wales this must include a summary of the terms and conditions of the premises licence.
- the layout of the premises must be maintained in accordance with the plan that forms part of the premises licence.
- neither National Lottery products nor tickets in a private or customer lottery may be sold on the premises in England and Wales. Sale of National Lottery and private lottery tickets are prohibited in Scotland.

9.26 There are also mandatory conditions attaching to each type of premises licence controlling access between premises. There can be no direct access between one premises licensed under the Act and another premises licensed under the Act, with the following exceptions:

- between licensed betting premises
- between bingo premises and alcohol-licensed premises/clubs with a club gaming or club machine permit/family entertainment centres (FECs) and tracks
- between tracks and alcohol-licensed premises/clubs with a club gaming or club machine permit/FECs/betting premises and bingo premises
- between FECs and alcohol-licensed premises/bingo halls/clubs with club gaming or club machine permit and tracks.

Default conditions

9.27 S.169 of the Act gives licensing authorities:

- the ability to exclude from premises licences any default conditions that have been imposed under s.168
- the power to impose conditions on premises licences that they issue.

9.28 Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

9.29 Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.

9.30 Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.

9.31 Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:

- relevant to the need to make the proposed building suitable as a gambling facility
- directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
- fairly and reasonably related to the scale and type of premises
- reasonable in all other respects.

Conditions that may not be attached to premises licences by licensing authorities

9.32 The Act sets out certain matters that may not be the subject of conditions:

- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
- s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
- s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

Part 10: Review of premises licence by licensing authority

Introduction

10.1 A premises licence may be reviewed by the licensing authority of its own volition or following the receipt of an application requesting a review from a responsible authority or an interested party (as defined in s.157 and s.158 of the Act). Licensing authorities should note that reviews cannot be delegated to an officer of the licensing authority – the lowest level of delegation permitted is to a licensing sub-committee.

10.2 The 'aim to permit' framework provides wide scope for licensing authorities to review premises licences where there is a potential conflict with the Commission's Licence conditions and codes of practice (LCCP) and this guidance, the licensing objectives or the licensing authorities own statement of policy. Whilst the Act does not provide a pre-defined list of issues that might prompt a licence review, it is expected that the licensing authority will have set out its view on local issues and priorities that underpin its approach to regulation in its statement of policy in any event, which might then prompt a review.

10.3 Licensing authorities are expected to act in a manner that is in accordance with the powers set out under the Act. This means that licensing authority actions, including reviews, should be in pursuit of the principles set out in s.153 of the Act or underpinned by reasonable concerns, such as changes to the local environment or resident complaints.

10.4 Licensing authorities might consider it prudent to have constructive discussions with operators about any such concerns, prior to discharging its powers. To this end, the operator might be asked to provide the licensing authority with its own local risk assessment (as provided for under ordinary code 10.1.2 of the LCCP which sets out the controls it has put in place to mitigate risks). The licensing authority has the right to exercise its powers under the Act, if the operator does not offer reasonable or practical suggestions for mitigating risks.

Initiation of review by licensing authority

10.5 S.200 of the Act provides that licensing authorities may initiate a review in relation to a particular premises licence or a particular class of premises licence. Licensing authorities may wish to consider in their scheme of delegations who initiates reviews, and any checking system of that to prevent unwarranted reviews from being conducted.

10.6 In relation to a class of premises, the licensing authority may review the use made of premises and, in particular, the arrangements that premises licence holders have made to comply with licence conditions. In relation to these general reviews, it is likely that the licensing authority will be acting as a result of concerns or complaints about particular types of premises, which may result in them looking at, for example, default conditions that apply to that category of licence.

10.7 In relation to particular premises, the licensing authority may review any matter connected with the use made of the premises if:

- it has reason to suspect that premises licence conditions are not being observed
- the premises is operating outside of the principles set out in the licensing authority's statement of policy
- there is evidence to suggest that compliance with the licensing objectives is at risk
- for any other reason which gives them cause to believe that a review may be appropriate, such as a complaint from a third party.

10.8 A formal review would normally be at the end of a process of ensuring compliance by the operator(s) which might include an initial investigation by a licensing authority officer, informal mediation or dispute resolution. If the concerns are not resolved then, after a formal review, the licensing authority may impose additional conditions or revoke the licence.

10.9 The licensing authority must give written notice to the licence holder and responsible authorities that it intends to undertake a review and must also publish notice of its intention to carry out the review. The Gambling Act 2005 (Premises Licences)(Review) Regulations 2007 (opens in new tab)(SI 2007/2258) and the Gambling Act 2005 (Review of Premises Licences)(Scotland) Regulations 2007 (opens in new tab) (SSI 2007/394) require the licensing authority to display notice at a place which is as near as reasonably practicable to the relevant premises or where it can be conveniently read by members of the public. The notice must be displayed for no less than 28 consecutive days, starting on the day that the licensing authority gives notice to the holder of the premises licence.

10.10 In addition, the notice must be published **either**:

- in a local newspaper or, if there is none, a local newsletter, circular or similar document within the licensing authority's area, at least once during the period of ten working days from the day on which the licensing authority gives notice to the holder of the premises licence, **or**
- on the licensing authority's internet website for no less than 28 consecutive days, starting on the day that the licensing authority gives notice to the holder of the premises licence.

Application for a review

10.11 S.197 of the Act provides that an application for review may be made by a responsible authority or an interested party, detailed in Part 8 of this guidance. Such applications must be submitted to the licensing authority in the prescribed form and state the reasons why a review is being requested, together with any supporting information and documents.

10.12 The regulations require the applicant to provide written notice of their application to the premises licence holder and to all responsible authorities, within seven days of making their application. Failure to do so will halt the application process until notice is received by all parties.

10.13 Representations must be made within 28 days, commencing seven days after the date on which the application was received. During these seven days the licensing authority is required to publish notice of the application, as per the process set out in the regulations referred to in paragraph 10.9.

Decision whether to grant an application for a review

10.14 S.199 provides that a licensing authority must grant an application for a review, unless it decides to reject the application under s.198 of the Act. By virtue of s.198, an application may, but need not, be rejected if the licensing authority thinks that the grounds on which the review is sought:

- a) are not relevant to the principles that must be applied by the licensing authority in accordance with s.153, namely the licensing objectives, the Commission's codes of practice and this guidance, or the licensing authority's statement of policy
- b) are frivolous
- c) are vexatious
- d) will certainly not cause the licensing authority to revoke or suspend a licence or to remove, amend or attach conditions on the premises licence
- e) are substantially the same as the grounds cited in a previous application relating to the same premises
- f) are substantially the same as representations made at the time the application for a premises licence was considered.

10.15 In the case of e) and f), the licensing authority shall take into account the period of time that has passed since the previous application or representations were made, in deciding whether this is a reasonable basis for not reviewing the licence.

10.16 As licensing authorities are required to permit the use of premises for gambling, in so far as it is in accordance with the s.153 principles, applications that raise general objections to gambling as an activity, that relate to demand for gambling premises, or raise issues relating to planning, public safety, and traffic congestion are unlikely to be considered an appropriate basis for review, leading to rejection under a) above.

10.17 The decision to grant a review must not amount to pre-judging the outcome of a review.

Carrying out a review

10.18 Having given notice of their intention to initiate a review or having decided to grant a review following an application, s.201 of the Act requires the licensing authority to carry out the review as soon as possible after the 28 day period for making representations has passed.

10.19 The purpose of the review will be to determine whether the licensing authority should take any action in relation to the licence, namely:

- add, remove or amend a licence condition imposed by the licensing authority
- exclude a default condition imposed by the Secretary of State or Scottish Ministers (for example, relating to opening hours) or remove or amend such an exclusion
- suspend the premises licence for a period not exceeding three months

**Extracts from Hansard Parliamentary
Debate discussing the inclusion of the
prevention of public nuisance as a
Licensing Objective**

Hansard Extract

On 9 November 2004 (Standing Committee B) there was a debate in the House of Commons over whether to amend the Licensing Objectives to include "the prevention of public nuisance.) Below are the relevant paragraphs from Hansard.

The amendment was withdrawn. The following are material extracts from Hansard:

Column Number: 012

Mr Foster - Amendment to include prevention of public nuisance in Licensing Objectives:

Why is it important that we deal with that in the objectives? The answer is simple. As the Bill stands, the local authority is unable to take account of effects that may occur not in a new casino or on gambling premises, but further afield, outside those premises. It is crucial that local authorities have the opportunity to do so. Indeed, the Local Government Association said when it wrote to all Members about the Second Reading debate that the prevention of public nuisance should be a licensing objective:

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Column Number: 037

The Minister for Sport and Tourism *Mr Richard Caborn, addressing the amendment*

Some gambling premises (casinos and bingo clubs) are allowed to serve alcohol to their customers, and the Bill will not stop that happening. Their entitlement does not spring from gambling laws: as one or two of my hon. Friends have said, it comes from the licensing law itself. Casinos and bingo clubs in England and Wales get their entitlement from the Licensing Act 1964. However, by the time the Bill is on the statute book, the Licensing Act 2003 will have come into force. The equivalent licensing laws govern casinos and bingo clubs in Scotland. The 2003 Act includes the prevention of public nuisance as a licensing objective, understandably so given the unfortunate connection between excess alcohol intake and bad behaviour. That was referred to by a number of hon. Members this morning.

The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and antisocial conduct, particularly at night. That has been referred to in connection with Guildford. Accordingly, it will be open to licensing authorities, when considering applications for casinos and bingo halls to be licensed premises under the 2003 Act, to take account of the public-nuisance risk just as they do when considering any other application. If any casino were to put its alcohol licence at risk by allowing public nuisance, it would almost certainly put its continued existence and its licence at risk. Therefore, it is unnecessary in the case of casinos and bingo clubs to duplicate provisions that are already in licensing law.

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the

law on noise and other nuisance. There is no well-established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate, I am not expressing a Government view on this, the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.

<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/pm/41109s02.htm>
<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/am/41109s03.htm>

**Extracts of Paterson's Licensing Acts
2020 Part 8:
Para 5.158 – Premises Licences
Para 5.177 - Review**

Section 1 Commentary
PART 8: PREMISES LICENCES

⁶ Standing Committee B, Thursday, 2nd December 2004 (Afternoon) Col 359.

Determination of application

[5.158]

In determining an application the licensing authority must hold a hearing¹ if:

- representations have been made by an interested party or responsible authority and have not been withdrawn;
- the authority intend to use their discretion under s 169(1) to attach a condition to a licence; or
- the authority intend to use their discretion under s 169 to exclude a default condition (ie a condition automatically attached to the licence under s 168 unless excluded by the authority in its discretion)².

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course³, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application⁴. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations⁵, presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence⁶ the authority cannot determine the application until the relevant operating licence has been issued⁷.

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it⁸. In making that determination the licensing authority will be subject to the provisions of s 153 which sets out the principles to be applied by the authority in exercising all their functions under Part 8 GA 2005 (ie including, but not limited to, the grant or refusal of an application for a premises licence). Section 153(1) provides as follows:

"In exercising their functions under this Part a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it—

- (a) in accordance with any relevant code of practice under s 24,
- (b) in accordance with any relevant guidance issued by the Commission under s 25,
- (c) reasonably consistent with the licensing objectives (subject to paras (a) and (b)), and
- (d) in accordance with the statement published by the authority under s 349 (subject to paras (a) to (c))."

The subsection starts by imposing a general duty on the authority to 'aim to permit the use of premises for gambling' and then sets out a series of four factors which may, in any individual case, qualify or override the general duty. The first point to note is that the provision imposes a duty on the licensing authority: it must, subject to the qualifying factors, aim to permit the use of premises for gambling. What is the scope of this duty? It is suggested that there are two elements: first, it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb 'to aim' is defined by the *OED*⁹ as meaning: '5. To calculate one's course with a view to arriving (at a point); to direct one's course, to make it one's object to attain. Hence fig To have it as an object, to endeavour earnestly'. The *Shorter OED*¹⁰ defines it as: '3. Direct one's course, make it one's object to attain, intend, try'. A person who 'aims' to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling. The most obvious way in which the authority will be able to exercise their powers in this way will be by an imaginative use of their power to frame and impose conditions (see para 5.159 below) so as to overcome objections to the application which might, in the absence of suitable conditions, lead to the application being rejected. No doubt the authority could also, in a case where a licence application gave rise to issues which could not be addressed by suitably drafted conditions, seek to consider with the applicant whether amendments to the application might overcome the objections and enable it to be granted. However, it is also necessary to recognise that the language of s 153(1) stops short of being mandatory; 'aim to permit' provides a strong steer to look favourably on an application, but no more.

As to the list of qualifying factors, these are set out in s 153(1)(a)–(d). Section 153(1)(a) qualifies the duty to aim to permit use of premises for gambling to the extent that such use must be in accordance with any relevant code of practice issued by the Gambling Commission under s 24. That section requires the Gambling Commission to issue codes of practice about the manner in which facilities for gambling are to be provided (whether by the holder of a licence or by another person). In issuing a code of practice the Gambling Commission will be subject to a duty under s 22 to promote the licensing objectives. Accordingly any code of practice should be consistent with those objectives. Section 153(1)(b) qualifies the licensing authority's duty to aim to permit the use of premises for gambling to the extent that such use must be in accordance with any relevant guidance issued by the Gambling

Section 1 Commentary

PART 8: PREMISES LICENCES

Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities¹¹ as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)-(d).

Next comes s 153(1)(c): this provides that the duty of the licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be reasonably consistent with the licensing objectives, but it goes on to provide that this condition is 'subject to paras (a) and (b)'. In principle there should, of course, be no conflict between (a) and (b) (which will both reflect the Gambling Commission's duty to promote the licensing objectives) and (c) (which will reflect the licensing authority's view of what the licensing objectives require). However the effect of the legislation appears to be that should there be any conflict between the two then the guidance set out in codes of practice or guidance emanating from the Gambling Commission will 'trump' any factors which the licensing authority themselves would otherwise have taken into account as relevant to the licensing objectives under s 153(1)(c).

Finally, s 153(1)(d) provides that the duty of a licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be in accordance with the authority's own statement issued under s 349. In preparing that statement the authority are not themselves expressly required to have regard to the licensing objectives, but they are obliged to have regard to guidance issued by the Gambling Commission under s 25 and such guidance deals, amongst other things, with the formulation by the authority of their licensing policy (see para AM5.6655). Since the s 25 guidance must itself promote the licensing objectives the effect should be that the authority's licensing policy will itself be consistent with those objectives so that it should not conflict with any code of practice or guidance issued by the Commission nor with the licensing objectives themselves. However, s 153(1)(d) provides that consideration of the licensing authority's own policy is 'subject to paras (a) to (c)' which appears to mean that in the case of an inconsistency a relevant Commission code of practice, relevant guidance or the licensing objectives themselves would 'trump' the authority's licensing policy.

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide¹², nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval¹³. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected¹⁴.

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC¹⁵ and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition¹⁶ they must give their reasons¹⁷. If representations were made by an interested party or a responsible authority they must give their response to the representations¹⁸.

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant¹⁸. The notice must give the authority's reasons for rejecting the application¹⁹.

¹ As to procedure at hearings in relation to applications see SI 2007/173.

² GA 2005, s 162. See further para 5.159 below.

³ GA 2005, s 162.

⁴ GA 2005, s 162(3).

⁵ GA 2005, s 162(4).

⁶ Ie under GA 2005, s 159(3)(b).

⁷ GA 2005, s 163(2).

⁸ GA 2005, s 163(1).

⁹ *The Oxford English Dictionary* (2nd edn, 1989).

¹⁰ (5th Edn, OUP).

*Review of a premises licence***[5.177]**

The power conferred on the licensing authority to review a premises licence is designed to provide a means by which the authority may, where appropriate, monitor the use made of the premises and may, if necessary, take steps to control that use or even bring the use to an end by revoking the licence. A licensing authority may carry out a review in response to an application for review made to it by a third party who is qualified to apply, or it may carry out such a review on its own initiative.

*Application for review***[5.178]**

A responsible authority or an interested party may apply to the licensing authority for a review by the authority of a premises licence¹. Curiously the statutory provisions do not in terms specify that the premises licence to which the application relates must be one which was granted by the licensing authority to whom the application is made, but this is clearly to be implied. A responsible authority which applies for a review may often be part of the same local authority as the licensing authority, and this raises the prospect of a licensing authority sitting in judgment on an application to review a premises licence which was brought at the instigation of another section of the same local authority. Although the licensing authority would not be an independent and impartial tribunal for the purpose of Article 6 ECHR that requirement should be satisfied by the right of appeal to a magistrates' court so that the procedure as a whole should be Convention compliant. An application must be made in the form and manner prescribed by SI 2007/2258, reg 3 and Sch 1² specifying the grounds on which the review is sought and containing or being accompanied by prescribed information or documents². Regulations require the applicant to give notice of the application to the licensee and to the responsible authorities in relation to the premises, and require the local authority to publish notice of the application³. The regulations may, *inter alia*, require a notice to specify a time (28 days) within which the licensee, a responsible authority or an interested party may make representations about the application to the licensing authority⁴.

¹ GA 2005, s 197(1).

² GA 2005, s 197(2).

³ GA 2005, s 197(3), (4). See SI 2007/2258, regs 4 and 5.

⁴ GA 2005, s 197(6). See SI 2007/2258, reg 5(5).

*Grant or rejection of application***[5.179]**

A licensing authority may reject an application for review of a premises licence if they think that the grounds on which the review is sought

- do not raise an issue relevant to the principles to be applied in accordance with s 153. This (see para 5.158 above) is the section which lays down the principles to be applied generally by the licensing authority in the exercise of their functions¹;
- are frivolous or vexatious²;
- will certainly not cause the authority to wish to take action of a kind open to them following a review (ie to revoke or suspend the licence or modify one or more conditions)³;
- are substantially the same as the grounds specified in an earlier application for review⁴;
- are substantially the same as representations made in relation to the application for the grant of, or a variation of, the premises licence.⁵

In the case of the two latter grounds for rejection of the application the licensing authority must consider the length of time that has elapsed since the making of the earlier application for review or since the making of the representations⁶. Where the licensing authority consider that grounds for rejection of the application apply to some but not all of the grounds on which the application for review is made they may reject the application so far as it relates to those grounds but allow it to proceed on the other grounds⁷. If and in so far as the licensing authority do not reject the application for review they must grant the application and proceed to carry out the review⁸.

¹ GA 2005, s 198(1)(a).

- ² GA 2005, s 198(1)(b), (c).
- ³ GA 2005, s 198(1)(d).
- ⁴ GA 2005, s 198(1)(e).
- ⁵ GA 2005, s 198(1)(f), (4); s 187(3); s 161.
- ⁶ GA 2005, s 198(2).
- ⁷ GA 2005, s 198(3).
- ⁸ GA 2005, s 199; s 201(1)(a); (2).

*Initiation of review by licensing authority***[5.180]**

A licensing authority may carry out two types of review on its own initiative, namely:

- a general review of the use made of premises which trade under premises licences of a particular class¹
- a specific review of the use made of a particular set of premises in reliance on a premises licence.²

Again, curiously, the statutory provisions do not specify that these powers may be exercised by the licensing authority only in relation to premises licences which they have themselves granted; this is to be implied. Although the power to conduct both types of review is conferred by GA 2005, s 200 they are very different in their effects. The general review appears designed to authorise the licensing authority to review the functioning of a particular sector of the gambling industry (eg the casino sector, the adult gaming centre sector, the licensed betting office sector) within their area. The authority may review the use made of the premises and in particular the arrangements made by licensees to ensure compliance with conditions attached to the licence³. The authority is not obliged to give notice of its intention to conduct such a review and there is no provision for the licensee or anyone else to make representations about it or for any hearing to be held, though in most, if not in all, cases a review of this kind is likely to involve the authority in seeking information from licence holders. The authority is not obliged to publish any findings on completing the review nor is there any power to take any specific steps in the light of the review. Rather the purpose of such a general review appears to be to enable the authority to obtain information. No doubt if a licensing authority concluded that further investigations or steps were required they would consider whether to exercise their powers either to initiate a specific review or reviews of particular premises, or to carry out inspections through their inspectors, who are 'authorised persons' for the purposes of carrying out inspections of gambling premises under the GA 2005, Part 15.

As to the second type of review which a licensing authority may initiate, an authority may review any matter connected with the use of premises in reliance on a premises licence if they have reason to suspect that the premises may have been used in purported reliance on a licence but not in accordance with a condition of the licence, or if for any reason (which may relate to the receipt of a complaint about the use of the premises), they think that a review would be appropriate⁴. Before reviewing a premises licence the authority must give notice of their intention to hold the review to the licensee, and they must publish notice of their intention to hold the review⁵. Regulations have been made about the giving and publishing of notice⁶, and these in particular require a notice to specify a time (28 days) within which the licensee, a responsible authority or an interested party may make representations about the review to the licensing authority⁷.

¹ GA 2005, s 200(1).

² GA 2005, s 200(2).

³ GA 2005, s 200(1).

⁴ GA 2005, s 200(2)(a), (b).

⁵ GA 2005, s 200(3).

⁶ SI 2007/2258, reg 8 and Schs 4 and 5.

⁷ GA 2005, s 200(5).

*Review***[5.181]**

Where the licensing authority have granted an application for a review (see para 5.179 above) or have given notice of their intention to hold a review (see para 5.180 above) they must, as soon as reasonably practicable after the expiry of any period for representations by the licensee, a responsible authority or an interested party¹, review the premises licence². The purpose of the review is to consider whether to take in relation to the licence action of a kind specified in s 202(1) (ie revocation or suspension of the licence or modification of one or more conditions)³. The licensing authority is required to hold a hearing unless the applicant for the review (if there is one) and each of the persons who have made representations about the review⁴ have consented to the conduct of the review without a hearing⁵, or the licensing authority think that each representation made about the review⁴ is frivolous or vexatious or will certainly not influence the review⁵. As to the procedure at review hearings, see SI 2007/173.

¹ Ie under GA 2005, s 197(6) or s 200(5).

² GA 2005, s 201(1)(2).³ GA 2005, s 201(3).⁴ Ie under GA 2005, s 197(6) or s 200(5).⁵ GA 2005, s 201(4)(a).⁶ GA 2005, s 201(4)(b).*Action following the review***[5.182]**

As a result of a review of a premises licence the licensing authority may:

- revoke the licence;
- suspend the licence for a period not exceeding three months;
- exclude a default condition attached to the licence under s 168 or amend an exclusion;
- add, remove or amend a discretionary condition attached to the licence under s 169¹.

The fact that the authority 'may' take one of the above steps shows that a discretion is conferred on them to act or not to act as they see fit. Accordingly a fifth possibility exists, namely that the authority decide not to take any steps at all. In considering whether to take action of one of the four specified kinds following the review the licensing authority must have regard to:

- the matters specified in s 153 (ie the general principles to be applied by the licensing authority in the exercise of their functions under the GA 2005, Part 8 – see para 5.158 above);
- any representations made by the licensee, a responsible authority or an interested party;²
- any representations made at the hearing of the review (if there is one); and
- where the review is being held in response to an application by a responsible authority or an interested party any grounds specified in the application (apart from any which have been rejected)³.

A licensing authority may in particular take one of the steps authorised under s 202(1) on the grounds that the licensee has not used the licence⁴. If they do decide to take one of the authorised steps the licensing authority must specify the time at which the action is to take effect.⁵

As soon as possible after completion of a review of a premises licence under s 201 a licensing authority must give notice, which must be in the prescribed form and must give the authority's reasons for their decision,⁶ to the licensee, the applicant for review (if any), the Gambling Commission, any person who made representations,⁷ the chief officer of police for any area in which the premises are wholly or partly situated and HMRC⁸.

¹ GA 2005, s 202(1).² Ie under GA 2005, s 197(6) or s 200(5).³ GA 2005, s 201(5).⁴ GA 2005, s 202(3).⁵ GA 2005, s 202(2).⁶ GA 2005, s 203(2). See SI 2007/2258, regs 13 and 14 and Sch 6⁷ Ie under GA 2005, s 197(6) or s 200(5).

**The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007: Schedule 2
Part 1 – Conditions attaching to bingo premises licences**

SCHEDULE 2

Regulations 10 and 11

Conditions attaching to bingo premises licences

PART 1

Mandatory conditions attaching to bingo premises licences

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect—

- (a) a casino premises licence;
- (b) an adult gaming centre premises licence;
- (c) a betting premises licence other than a track premises licence; and

3.—(1) This paragraph shall apply where children or young persons or both are permitted by the licence holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.

(2) Any area of the premises to which category B and C gaming machines are located—

- (a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;
- (b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and
- (c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

(3) The reference to supervision in this paragraph means supervision by—

- (a) one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or
- (b) closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4.—(1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.

(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.

(3) The notice in sub-paragraph (2) shall include the following information—

- (a) the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;
- (b) in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and

Status: This is the original version (as it was originally made). This item of legislation is currently only available in its original format.

- (c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.
 - (4) The notice may be displayed in electronic form.
 - (5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.
- 5.—**(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.
- (2) The condition in sub-paragraph (1) may be satisfied by—
 - (a) displaying a sign setting out the rules,
 - (b) making available leaflets or other written material containing the rules, or
 - (c) running an audio-visual guide to the rules prior to any bingo game being commenced.
- 6.** Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

PART 2

Default conditions attaching to bingo premises licences

1. Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
2. The condition in paragraph 1 shall not apply to making gaming machines available for use.

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Annex 8

Conditions Arising from the Review Application

Existing Conditions on bingo premises licence LN/202000311:

- Any conditions attached to the licence by virtue of regulations made under sections 167 and 168 of the Gambling Act 2005 (other than any conditions under section 168 which have been excluded by the licensing authority); and
- Any conditions attached to the licence by virtue of specific provisions of the Gambling Act 2005.

See Annex 1 for the list of default conditions correct at time of issue.

The following conditions have been attached to the licence by the issuing authority under Section 169(1)(a) of the Gambling Act 2005:

1. The premises shall install and maintain a comprehensive CCTV system. All entry and exit points must be covered enabling frontal identification of every person entering in a light condition including customer facing areas. The CCTV system shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Subject to data protection legislation, recordings shall be made available upon the request of Police or authorised officer of the Licensing Authority.
2. A staff member from the premises who is conversant with the operation of the CCTV system shall be in the premises at all times when the premises is open.
3. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
4. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:
 - (a) all crimes reported to the venue
 - (b) all ejections of patrons
 - (c) any complaints received concerning crime and disorder
 - (d) any incidents of disorder
 - (e) all seizures of drugs or offensive weapons
 - (f) any visit by a relevant authority or emergency service.
 - (g) any attempts by children and young persons to gain access to the premises to gamble
 - (h) any Challenge 25 Refusals.
5. A Think 25 proof of age scheme shall be operated at the premises where Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards,

such as a driving licence, passport or proof of age card with the PASS Hologram.

6. A record of refusals shall be kept on the premises and completed when necessary. This record shall contain the date and time of the refusal, a description of the customer, the name of the staff member who made the refusal and the reason for the refusal. This record shall be made available to Police and/or the Local Authority upon request and shall be kept for at least one year from the date of the last entry.

7. The licensee shall provide induction training to all staff on the specific local risks to the licensing objectives that have been identified for these premises.

8. Refresher training shall take place at least every six months on the specific local risks to the licensing objectives.

9. All training shall be documented and records kept at the premises. These records shall be made available to the Police and/or Local Authority upon request and shall be kept for at least one year.

10. Staff shall have a clear view of the entrance from the sales desk and shall circulate the premises to enable good visibility and supervision of the machines and premises.

CONDITIONS PROPOSED BY THE LICENSING AUTHORITY AND NOT AGREED BY THE LICENCE HOLDER:

11. The premises shall only open between the hours of 07:00 and 00:00 Monday and Sunday.
12. A magnetic locking device, commonly referred to as a Maglock shall be installed and maintained on the main entrance/exit to the premises which shall be operated by staff.
13. Between the hours of 22:00 and closing the entrance will be locked with admittance to the premises only by video and buzzer using the maglock.
14. The licensee shall refuse entry to customers who appear to be under the influence of alcohol or drugs.
15. Only refreshment purchases or supplied on the premises may be consumed on the premises.
16. The door of the toilets shall be lockable by key and the key shall be available at the discretion of staff.

17. There shall be two or more members of staff on the shop floor between 15:00 and 17:00 hours Monday to Friday and between 20:00 hours and closing Monday to Sunday.
18. Customers shall not be permitted to leave bags or other belongings at the premises.
19. No-one under the age of 18 years shall be permitted inside the premises at any time. Notices to this effect shall be displayed at the entrance of the premises.
20. Third party testing on age restricted sales systems shall be carried out on the premises a minimum of 3 times a year.

If the Licensing Sub Committee is not minded to reduce the hours of the premises then the wording of condition 13 and 17 above will need to be amended. The Licensing Authority would then also invite the Licensing Sub Committee to consider whether a condition requiring security staff such as the one set out below would be appropriate:

21. At least one SIA registered Door Supervisor shall be employed at the premises every day from 22:00 – 07:00.

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LICENSING SUB-COMMITTEE - 10.3.2021

**MINUTES OF THE MEETING OF THE LICENSING SUB-COMMITTEE
HELD ON WEDNESDAY, 10 MARCH 2021**

COUNCILLORS

PRESENT (Chair) Mahmut Aksanoglu, Christine Hamilton (Deputy Mayor) and Maria Alexandrou

ABSENT

OFFICERS: Ellie Green (Principal Licensing Officer), Dina Boodhun (Legal Adviser), Jane Creer and Metin Halil (Democratic Services)

Also Attending: Mark Walsh and Eimear Walsh, Celtic Cross Ltd (Applicant)
George Domleo, Flint Bishop Solicitors, on behalf of the applicant
Interested Parties (referred to as IP1, IP3, IP5, IP6, IP8, IP14 and IP17) on behalf of local residents objecting
Councillor Derek Levy, Southgate Ward Councillor (SUP02)

1**WELCOME AND APOLOGIES FOR ABSENCE**

NOTED

Councillor Aksanoglu as Chair welcomed all attendees to the meeting, which was being broadcast live online. Sub-committee members confirmed their presence and that they were able to hear and see the proceedings. Officers, applicants and representative, and IP 1, 3, 5, 6, 8, 14 and 17 and SUP02 confirmed their presence. The Chair explained the order of the meeting.

2**DECLARATION OF INTERESTS**

NOTED there were no declarations of interest in respect of the item on the agenda.

3**THE WINCHMORE PUBLIC HOUSE, 235 WINCHMORE HILL ROAD, LONDON N21 1QA**

RECEIVED the application made by Celtic Cross Limited for the premises situated at The Winchmore, Public House, 235 Winchmore Hill Road, London, N21 1QA for a Variation of Premises Licence LN/201500123.

NOTED

1. The introduction by Ellie Green, Principal Licensing Officer, including:

LICENSING SUB-COMMITTEE - 10.3.2021

- a. The application was for a variation of premises licence LN/201500123, made by Celtic Cross Limited for the premises The Winchmore, 235 Winchmore Hill Road, London N21 1QA.
 - b. This premises had been operated as a bar / pub / restaurant / function room for a number of years. It had a significant licensing history, but under former licence holders. There had not been licensing issues under the current licence holder, who had been in place since June 2015. The Designated Premises Supervisor (DPS) remained the same: Mark Walsh. The Company Directors were Mark Walsh and his sister Eimear Walsh.
 - c. The original application in Annex 2 of the report had recently been amended as the applicants had tried to address the representations. The first supplementary report set out the hours applied for in Table 2. These times and activities were to be referred to in this hearing. The application sought a one hour extension for live and recorded music on Friday and Saturday, and an extension of hours on Sundays that preceded all Bank Holiday Mondays.
 - d. The original application had initially been subject to representations from the Metropolitan Police and from the Licensing Authority, both seeking modification of licence conditions. Those conditions had been agreed by the applicant and the representations were consequently withdrawn. The agreed proposed conditions were set out in Annex 5 of the report.
 - e. The application attracted 19 representations in objection from local residents (set out in Annex 3 of the report), and 2 representations in support from a ward councillor and a local resident (set out in Annex 4).
 - f. Since IP13 had withdrawn their representation following the amendments to the application this objection should no longer be considered. The other 18 representations in objection remained. These residents lived on Winchmore Hill Road, Houndsden Road, and Church Hill.
 - g. It was for the Licensing Sub Committee (LSC) to consider whether the application supported the four licensing objectives.
 - h. The applicant was represented by Flint Bishop Solicitors and both company directors.
 - i. Apologies had been received from IP4. Notification had been received from most of the IPs that their representations remained to the amended application, but even without such notification the LSC must consider those original representations.
 - j. Councillor Derek Levy (ward councillor) was in attendance as SUP02 in support of the application.
 - k. It was confirmed that not living locally did not prevent submission of a representation of support.
2. The statement of George Domleo, Solicitor, on behalf of the applicant, including:

LICENSING SUB-COMMITTEE - 10.3.2021

- a. It was acknowledged this premises had a background history, but his client had been the premises licence holder and DPS since 03/06/15.
- b. The premises was a community pub with an extensive food and drink offering. Time and money had been invested to make it a success and an asset to the area. It hosted a regular book club and supported the Rotary Club of Edmonton.
- c. Conditions requested by the Licensing Authority and the Police were agreed and their representations were subsequently withdrawn so there were now no representations from Responsible Authorities.
- d. There were representations from local residents. A number referenced car parking and allegations that customers parked in surrounding roads. This was not a material consideration under the Licensing Act. There were also references to customers gathering in numbers outside, with photos and video footage from June 2020. This was when the premises offered take away service during Covid restrictions. During those times, the premises was working within government guidelines, but the situation was new to everyone. Staff were continually going outside the premises to clear up. The premises was busy selling take away pints and there was a different clientele. It was likely those customers would not return and the premises would go back to normal use. That had been a different period and was very much an isolated occasion last summer. It was likely that Responsible Authorities would have made representation if they considered there would be similar issues in future.
- e. Having heard residents' concerns, the application was subsequently amended to affect Sunday hours only on days before a Bank Holiday Monday. This would provide more flexibility to the premises. Many pubs similarly operated an extra hour on those dates. One resident had subsequently withdrawn their representation, and IP10 no longer objected to these Sunday extensions.
- f. The application was not seeking to trade longer or stay open later on Fridays and Saturdays.
- g. The current licence conditions would be replaced by the agreed set of conditions set out in Annex 5 of the report.
- h. Additional information to support the application set out over pages 25 to 30 was highlighted, with many supportive comments and donations showing the pub was an integral part of the local community.
- i. There were two formal representations of support for the application, including from the ward councillor. It was a great tribute to Mark and Eimear Walsh and all they had achieved as licence holders. The premises had a chequered past, but since 2015 there had been no issues. It was evident that since the latest licence holders took over they had created a community hub for everyone to enjoy and which supported the licensing objectives.
- j. There would be no change of concept of the premises. It would continue to trade for the local community. There would be great food and beverage offering, giving a home from home experience. Work with charities would continue.

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k. In the case of any noise issues, there were powers available including licence reviews and abatement notices.

l. The LSC should support the business's right to operate. In the current circumstances this was more critical than ever. The premises promoted the licensing objectives and the licence holders knew what they were doing. This was a sensible proposal and the premises should be allowed to flourish.

m. Eimear Walsh confirmed that she backed everything in the solicitor's statement. She and Mark acknowledged there were residents close by and made themselves available all the time for the residents, with mobile numbers provided to enable them to make contact. They were trying to take actions to prevent the business going under, and were working with the Council and within the licensing objectives.

3. The applicants and representative responded to questions as follows:

a. In response to Councillor Alexandrou's queries regarding how potential nuisance from customers and from music would be controlled, the agreed conditions were referenced including keeping external doors and windows closed during regulated entertainment, and making regular boundary noise checks and keeping records. It was advised that neighbours could contact the licence holders and that any issues would be addressed straight away.

b. In response to Councillor Hamilton's query regarding customers drinking outside in the street and causing nuisance, it was advised that the photos and video were from the time when the premises was closed but able to trade in take away beer last summer. There was no evidence of similar issues before lockdown. Those were not normal circumstances. The premises did not have security staff on the door because there was no trouble. There was no condition on the licence requiring door staff. This was a community pub which was family friendly. The staff asked customers to respect the neighbours. The premises wanted local residents to come in, and it worked well with the local community.

c. In response to queries from the Chair, it was confirmed there was no requirement to keep an incident log within the existing licence conditions. If there had been incidents, action would have been taken. They were not aware of any incidents however, and if there had been any issues the Police would have made representation in respect of this application. Mark Walsh confirmed they had never had trouble on this site.

d. IP5 queried the statement there had never been incidents at the premises, highlighting the photos taken last summer and that lots of local residents had been afraid to leave their homes. They wanted no repeat of this, and feared that similar customers may be attracted to the pub.

e. IP14 asked in respect of offering later music and likely parties in the function room, whether the staff would be able to police multiple amounts of customers and everyone leaving at the same time late at night. It was confirmed that the pub had a policy in place in respect of people leaving, and that opening times would remain the same regardless of the music

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played. People would be leaving at the same times as they had for the previous six years. The staff were able to control this. There was already a condition for a dispersal policy. It was advised that this policy included the requirement for signage asking people to respect neighbours and leave quietly, that taxis be asked to pull into the car park, that staff patrolled outside areas and moved people on, and that the gate was locked once everyone had left.

f. In response to IP17, confirmation was given that the DPS understood their responsibilities and the potential problems that came with selling alcohol, and also their responsibilities under the licensing objectives.

g. In response to IP17's queries regarding the aims of the variation and the business plan, it was advised that nothing had changed in the business plan. They wanted to add value to the community, and to give customers a good experience and a good product range. Approval of the variation would provide an increased degree of flexibility for the business. In response to a further query whether the reason for the application was to increase profit, it was advised that it would add value, but the business was not making profit and was in debt.

h. In response to IP17's query whether approval of the variation would likely attract a younger client base and increased anti-social behaviour, this was advised as not the case.

i. IP17 asked whether the evidence within the representations was disputed. It was clarified by the applicant that they were putting their case forward and believed that the premises promoted the licensing objectives, and it was for all parties to put their case and for the LSC to make a decision.

j. The Chair gave a reminder in respect of confining questions to material licensing considerations, and a recommendation to summarise all remaining questions together if possible.

k. In response to IP17's query in respect of Enfield's public space protection order designation, it was confirmed that this was covered under Condition 18 of the licence.

l. In response to IP1's queries in respect of the outside space, it was clarified that they could not make more space outside, but wanted the extra hour applied for. There was no change proposed to the business concept outside, and the premises would continue to trade as before.

m. IP1 queried statements that there had been no incidents or issues raised, being aware of multiple emails from residents to the Council's noise team in respect of music volume, and occasions when the Police had been called out. It was advised that there was not evidence in the agenda pack, that the applicants were not aware of those emails, and that the Police had not submitted an objection. The Chair confirmed that all the written representations in objection to the application would be taken into consideration.

4. The statement of IP14 on behalf of the local residents making representation, including:

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- a. There were good reasons why this application should not be permitted.
- b. There had been concerns about the volume of music at the premises over a number of years. The building was not sound-proofed. The noise could be clearly heard within 100 yards of the pub.
- c. Local residents were entitled to a decent night's sleep. If they were unable to sleep before midnight that would be unfair. An extra hour of music would be problematic and cause a lot of distress. There were a lot of families and young children living close to the premises who would be affected.
- d. This area was generally quiet after 7:00pm, which meant that loud music could be noticed more clearly.
- e. It was considered the application was not properly advertised. A lot of local residents were not aware of the proposal. The sign was in the window of a closed pub during a time people were asked to stay at home. The applicants should have approached the local residents directly, and acted on their concerns. At a time when everyone was suffering in the pandemic, this left a bad taste and atmosphere of mistrust.
- f. Last year's anti-social behaviour could not be ignored. It went on for two months. The extended music applied for would act as an extra attraction to this clientele.
- g. All activities would finish at the same time. It was not considered there was an adequate dispersal policy in place to cope with the customers. The local residents had suffered verbal abuse from people leaving late at night from the pub and people affected by alcohol. The proposals would lead to a bottleneck with people leaving the pub at the same time around 1:00am.
- h. The issues were emotive. If this was a local pub it had to act for the community. These proposals were a step too far. Residents asked that they were listened to and that music was not permitted past 11:00pm.
- i. IP17 added that it was considered this application was based purely on financial considerations. If granted, it would change the client base to become a young persons' drinking and music establishment as opposed to a community pub. The operators had not demonstrated an ability to control matters.

5. The IPs responded to questions as follows:

- a. Councillor Alexandrou asked about when local residents had contacted the licence holders; if dialogue had been effective and that action been taken in response. IP14 confirmed that the contact they had was on the basis that the residents were listened to and there would not be any application for a late licence. There had been meetings in the pub where residents expressed that late night music would be disturbing. The residents understood the financial difficulties, but felt that this extension of music would have a terrible effect on them. IP1 advised that they had made calls to the pub when disturbed by music, but had never spoken to Mark or Eimear Walsh who had never been there at the time. Staff had always been friendly and given assurances that the music would soon be

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finishing. They had been able to bear the music until 11:00pm, but an extra hour of noise disturbance would make a big difference.

b. Councillor Levy highlighted additional steps to be taken by the applicant to promote the licensing objectives and asked if they were considered appropriate and proportionate, and whether specific additional conditions were sought. It was confirmed by IPs that neighbouring residents objected to any music beyond 11:00pm as intolerable, and that the premises' attraction as a party venue would increase, and large numbers of people would be leaving at the same time. The music could be heard from outside the premises as there was no sound-proofing and the noise escaped when customers used the door. The pub already had issues with noise and an extra hour of music would be a nuisance to local people.

c. In response to Councillor Levy's query whether local residents had applied for the licence to be reviewed, it was advised that the noise had been an ongoing issue for residents for a number of years but they had not known about the review process and had lived with the disturbance. However, they may apply for a review having now realised it was a possibility.

6. The statement in support from Councillor Derek Levy, SUP02 (Southgate Ward Councillor) including:

a. He recognised this was an emotive issue, but was clear in his support for this application.

b. It was the LSC's remit to consider whether the application demonstrated sufficient steps to promote the licensing objectives.

c. There was nothing in the agenda pack to evidence a history of noise issues.

d. The applicant was aware of their responsibilities and had operated the licence in an exemplary way.

e. He heard what was said by objectors, but much was conjecture and speculation.

f. The premises had a history of problems when it was The Willow, but for the past six years had been under this management and there had not been any application to review their licence. There was no compelling evidence against the licence holders and their steps to operate and manage the licence.

g. In respect of a licensing application, it was incumbent on the applicant to show they were taking all steps of mitigation. This was a minor variation in a popular community-oriented pub. It was for the LSC to consider if the steps were appropriate and if the conditions were strong enough to prevent potential worst excesses. Now the residents knew they were in a position to call a review of the licence, but today's hearing was to consider this variation and most of the evidence was very general and not of sufficient weight to challenge what was sought.

h. In his view, Mark and Eimear Walsh were the epitome of responsible licence holders and the application should be granted in full.

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7. Councillor Levy responded to questions as follows:

- a. In response to Councillor Alexandrou's query whether the other ward councillors for Southgate supported this application, Councillor Levy advised that he had been contacted by one fellow ward councillor who had initial reservations. Councillor Levy had shared his views and explained his knowledge of licensing and of this premises, and this had allayed the concerns and no objections were raised.
- b. In response to further queries whether as a ward councillor for Southgate, Councillor Levy had received any objections against this premises, he confirmed he had never had any objections to do with this premises before reading the bundle in this hearing agenda. Also, as previous Chair of Licensing Committee he never received anything from residents around The Winchmore.
- c. In response to IP14's query that he had disputed that local residents could hear music from the pub, Councillor Levy advised that he was not in a position to dispute that and he had just made the point that he had never received any representations from residents until today. Also, Responsible Authorities had not brought any evidence that they had sufficient concerns.
- d. In response to further queries regarding now having heard how the nuisance would be exacerbated after 11:00pm, Councillor Levy advised that he had highlighted there were additional conditions on the licence being proposed and these were agreed with the Responsible Authorities. It was incumbent on the licence holder to take preventative actions. There were reasonable steps being taken to minimise the risks. No one had objected to the proposed conditions.
- e. In response to IP1's queries why objections had been labelled as based on presumption when long term residents had made numerous complaints to the Council's noise team, Councillor Levy referred to the balance of evidence and that the applicant had put forward steps they would take to promote the licensing objectives. He was fully satisfied the measures were appropriate and proportionate. It added weight that the Responsible Authorities had not provided evidence or concerns that the application should not be granted.
- f. In response to further queries that objections were based on past experience that the licence holders could not control noise up to 11:00pm and could not therefore be expected to be controlled up to 00:00am, Councillor Levy considered the licence holders had taken reasonable steps in the application, as they had in the past, and that there was a lack of evidence from the past.
- g. A question on the consultation process was directed to the Principal Licensing Officer. It was clarified that the Licensing Act dictated how an application was advertised. It required a blue notice on the front of the premises displayed for 28 consecutive days and an advertisement in a local newspaper. There had been no amendments to the regime. The Licensing Team was satisfied that the criteria were met in this case. It was also confirmed that ward councillors were copied in to all licensing applications in their ward.

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8. The summary statement from Ellie Green, Principal Licensing Officer, that having heard from the representatives of all the parties and received all the written evidence, it was for the sub-committee to determine the appropriate steps to take. The relevant guidance and policies were highlighted.
9. The summary statement from the IPs that they were wholly against this variation application in a quiet local area. They believed the pub's atmosphere would become more like a nightclub and local residents would be made to suffer on Friday and Saturday until 01:00am. Nothing at the hearing had changed their view that the licence holders would not be able to control the situation at the pub. The residents' rights to a family life and peaceful enjoyment of their properties would be undermined. Long-time residents were clear that noise was an obvious issue. The premises had no sound-proofing and there was no commitment to put any in. What happened after closing time was also an issue as customers created disturbance well after then and this would be extended at weekends.
10. The summary statement of Councillor Levy that the applicant had taken reasonable steps in promotion of the licensing objectives. The evidence was that this premises was a community pub, and there was nothing to suggest it would be like a nightclub. He believed the case in favour had been fully made out and he supported the application in full.
11. The summary statement on behalf of the applicant that it was acknowledged this was an emotive topic. An additional condition was offered that a telephone number for the DPS or manager of the premises be given to any resident on request to allow complaints to be made directly when the premises was open, and a record would be kept of calls and action taken, and this would be made available to the responsible authorities. However, this was not an application for a late licence and there would be no change in concept or clientele at the pub, but the variation would give them more flexibility. There was no record of nuisance. Last summer had been an unprecedented time. That two month period should not determine this decision. Mark and Eimear Walsh were good operators and all the conditions showed they would continue to promote the licensing objectives. They wanted a positive relationship with local residents and there should be no issues, but objectors did have powers to take action. Eimear Walsh added that she had sent emails to the residents she knew and that she tried to run the business with both her head and her heart. The extra hour for music would help the business slightly but would not change the customer clientele. She did not want the pub to change, and she would continue to work with the local community.

RESOLVED that

1. In accordance with the principles of Section 100(a) of the Local Government Act 1972 to exclude the press and public from the meeting

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for this item of business on the grounds that it involves the likely disclosure of exempt information as defined in Paragraph 7 of Part 1 of Schedule 12A to the Act.

The Panel retired, with the legal representative and committee administrator, to consider the application further and then the meeting reconvened in public.

2. The Chair made the following statement:

“The Licensing Sub-committee has attentively listened to and considered the written and oral representations made by the applicant, the applicant’s representative and the local residents, IP1 to IP19 (except IP13) and those in support of the application, SUP01 and SUP02 (Cllr Derek Levy councillor for the ward). The Licensing Sub-Committee has made a decision: To grant the application for the licence variation in part, with the below conditions and amended times.

The Licensing Sub-Committee has also taken into account statutory guidance and the Enfield Licensing Policy Statement in making its decision to amend the hours set out in the application in particular paragraphs 8.4 and 12 Special Factors for Consideration and it has made its decision to promote the four licensing objectives 1) Prevention of crime and disorder 2) Public Safety 3) Prevention of Nuisance and 4) the Protection of children from harm. The Licensing Sub-Committee has welcomed and acknowledged that the applicant has agreed to a number of conditions to mitigate issues moving forward.”

3. The Licensing Sub-Committee resolved that the application be **GRANTED IN PART.**

(i) Licensing Hours and Activities:

Opening hours	Sunday to Thursday 09:00 to 23:30 Friday & Saturday 09:00 to 00:30 NO SEASONAL VARIATION
Supply of alcohol (on and off)	Sunday to Thursday 10:00 to 23:00 Friday and Saturday 10:00 to 00:00 NO SEASONAL VARIATION
Plays (indoors)	Friday & Saturday 09:00 to 00:00 (no change)
Live Music (indoors)	Sunday to Thursday 09:00 to 23:00 Friday & Saturday 09:00 to 23:30 NO SEASONAL VARIATION
Recorded Music (indoors)	Sunday to Thursday 09:00 to 23:00

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Friday & Saturday 09:00 to 23:30
NO SEASONAL VARIATION

(ii) Conditions (in accordance with Annex 5):

Conditions 1 to 18

**4
MINUTES OF PREVIOUS MEETINGS**

AGREED the minutes of the meetings held on Wednesday 14 October and Wednesday 21 October 2020 as a correct record.

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