

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

## Local Area Risk Assessment

<b>Trading Name:</b>	Merkur Slots
<b>Premise</b>	292/292A Green Lanes, Palmers Green, London, N13 5TW
<b>Local Authority:</b>	London Borough of Enfield
<b>Premise Licence No:</b>	New application
<b>Operator Licence No:</b>	000-003266-N-103444-024 (Cashino Gaming Ltd)
<b>Company Details:</b>	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
<b>Name and Title of Assessor:</b>	Agnieszka Szczerkowska and Iwona Grynczel (Internal Compliance Auditors). Amanda Kiernan (Head of Compliance)
<b>Date of Assessment:</b>	26/08/2020 and 23/11/20
<b>Review Date:</b>	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><b>Unemployment</b>                      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><b>Deprivation</b>                      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><b>Age Verification</b>  <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Praesepe operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots 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><b>Schools and Education</b>  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><b>Community Centres and Youth Centres</b>  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><b>Parks, play grounds and sports/leisure facilities</b>  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><b>Vulnerable and addiction support services</b>  Medstar- UK, 200 Green Lanes, N13 5UE</p> <p><b>Pawnbrokers and Loan Shops</b>  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><b>Vulnerability</b>  Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p><b>Customer Interaction</b>  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><b>Medical Centres, Care Homes and Mental Health facilities</b>  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 &amp; 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  Saivi House, 39 Doveridge Gardens, N13 5BJ</p> <p><b>Gambling premises</b>  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><b>Residential Areas</b>  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><b>Player Protection</b>  <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><b>Bus stops and other Transport links</b> Lodge Drive Bus Stop, N13 5TT Palmers Green Station, Aldermans Hill, N13 4PN</p> <p><b>Locally Identified Premises</b> Palmers Green Library, Broomfield Ln, N13 4EY</p> <p><b>Public Houses and Alcohol Licensed Premise</b> 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><b>Deprivation</b> 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><b>Homelessness</b> 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><b>Crime statistics</b> 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><b>Local Police</b> 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><b>Premise Security and violence in the workplace</b> <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots 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><b>Public Houses and Alcohol Licensed Premise</b>  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><b>Pawnbrokers and Loan Shops</b>  Cashpoint Pawnbrokers, 12 Aldermans Hill, N13 4PJ  G Mantella Ltd. Jewellers Since 1982, 290A Green Lanes, N13 5TW</p> <p><b>Gambling premises</b>  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><b>Residential Areas (impacted by Anti-Social Behaviour)</b>  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><b>General Crime and Disorder</b>  <i>To identify aggressive customers to prevent crime and disorder</i>  <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for Swale - Chalkwell policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with Kent Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <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><b>Anti-social behaviour outside the premise</b>  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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Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.

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

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

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

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

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

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

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

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

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

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



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

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

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

Merkur Slots 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><b>Money Lending</b> Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p><b>Bingo/Gaming Machine and Supervision</b> The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p><b>Customer Complaints</b> <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p>

		<p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p><b>Marketing</b> Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</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><b>Places of worship and Religious Buildings</b>  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><b>Ethnicity and Local Area Demographic</b>  Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p><b>Training &amp; Social Responsibility</b>  Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>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><b>COVID 19</b> All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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## Merkur Slots Palmers Green Premise Layout

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

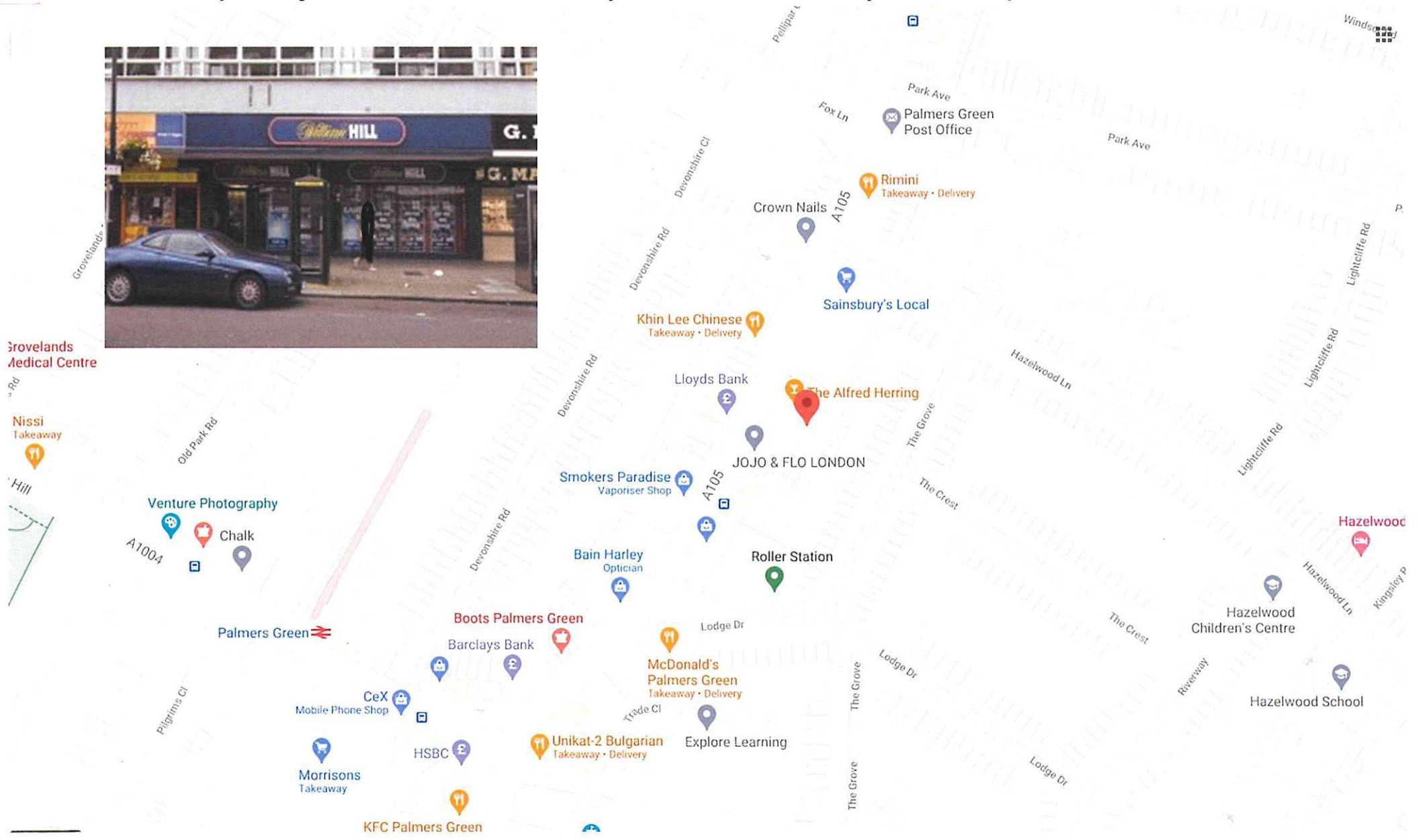
Praesepe is accredited by the G4 Global Gambling Guidance Group for Responsible Gambling.

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.

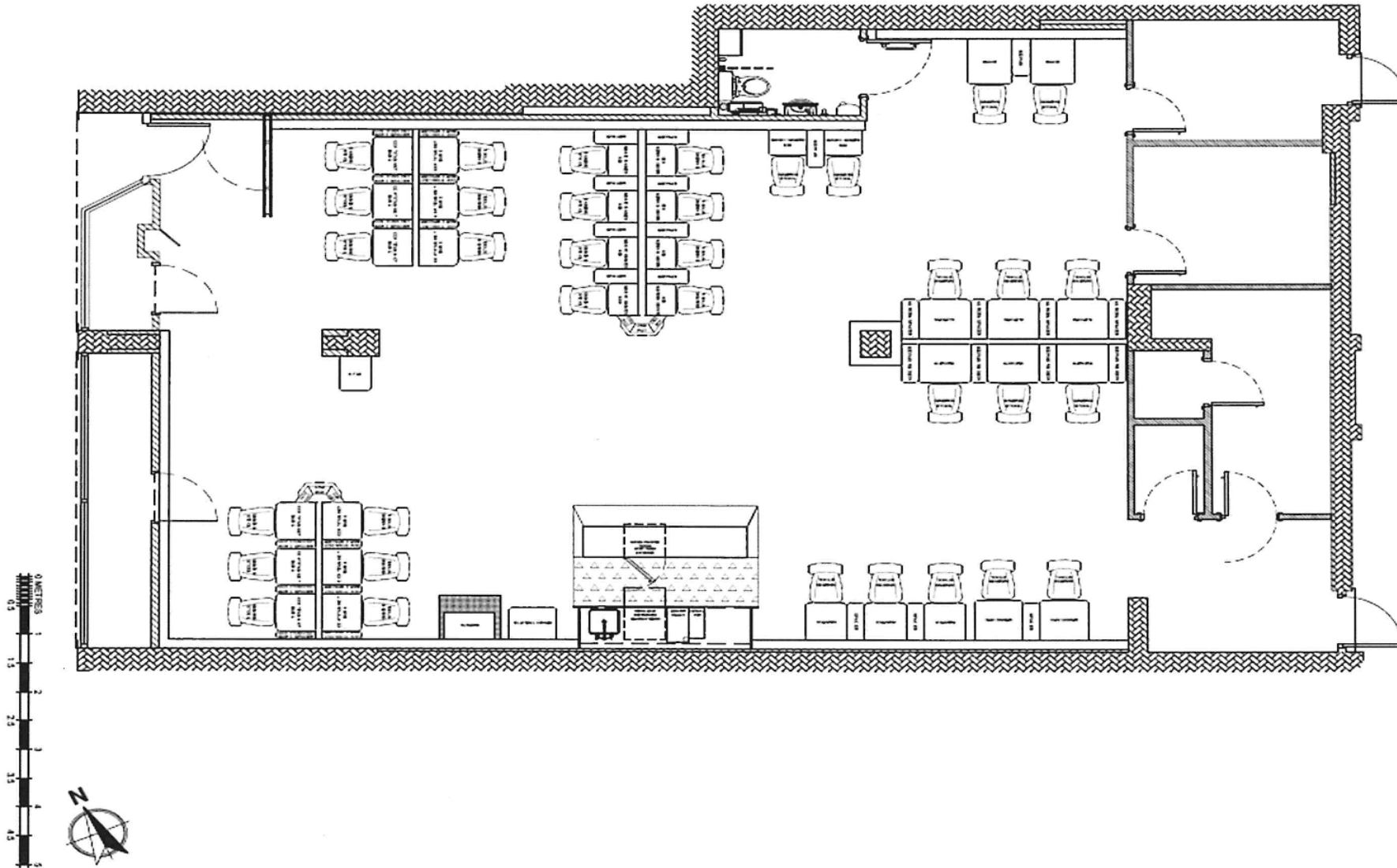
Where relevant, Praesepe has also considered any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However, the company does not operate discriminatory policies against any identified groups based on social 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.

<b>Assessors Name:</b>	AMANDA KIERNAN
<b>Signature:</b>	
<b>Date:</b>	23/11/20

# 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

