

# Annex 7

MERKUR SLOTS, 292-292A GREEN LANES, PALMERS GREEN, LONDON, N135TW

LICENSING SUB-COMMITTEE HEARING

16<sup>TH</sup> JUNE 2021

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# **Skeleton Argument of Philip Kolvin QQC**

## ENFIELD LICENSING SUB-COMMITTEE

16<sup>TH</sup> JUNE 2021

IN THE MATTER OF 292 GREEN LANES LONDON N13 5TW

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### SUBMISSIONS OF CASHINO GAMING LIMITED

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#### 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 27<sup>th</sup> 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 4<sup>th</sup> 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 27<sup>th</sup> 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 21<sup>st</sup> 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 14<sup>th</sup> 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 necessity<sup>1</sup> 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

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<sup>1</sup> 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 642<sup>2</sup>). 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.

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<sup>2</sup> 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.<sup>3</sup>**
- **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,

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<sup>3</sup> 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**  
**7<sup>TH</sup> June 2021**

**11 KBW**  
**Temple EC4**

**Witness statement from Amanda  
Kiernan, Head of Compliance at  
Cashino Gaming Limited**

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## LICENSING SUB - COMMITTEE HEARING – 16<sup>TH</sup> JUNE 2021

### SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

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#### 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 7<sup>th</sup> 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 27<sup>th</sup> 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 2<sup>nd</sup> 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 24<sup>th</sup> 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 14<sup>th</sup> 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: 1<sup>st</sup> June 2021



**Witness statement from Steve  
Ambrose, Operations Director at  
Cashino Gaming Limited**

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## LICENSING SUB - COMMITTEE HEARING – 16<sup>TH</sup> JUNE 2021

### SUPPLEMENTAL STATEMENT – STEVE AMBROSE

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1. I am the Operations Director for Merkur having held this position since December 2016 responsible for all day to day operations across our estate of Adult Gaming Centres, High Street Bingo premises and Bingo Halls.
2. I am a Director of the Bingo Trade Association The Bingo Association and the Division 3 Chairman of the Amusement Trade Association BACTA covering Adult Gaming Centres across Great Britain.
3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position of Operations Director, this experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, in rural and city centre locations.
4. Through my years of working in the gambling industry I can state categorically that it is rare for Merkur Slots UK Limited's venues, and specifically its high street bingo premises, to be associated with crime and disorder, anti-social behaviour or local nuisance.
5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this reflects the type of gaming operated by Merkur and its customer demographic, which is approximately 50% female with an average age of over 30.
6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues, there is no 'event' taking place.
7. Across the high street bingo estate, average customer numbers at any one time remain relatively low, in single figures, and customer numbers between 5 and 10 at any one time, would be considered an exceptionally busy period.
8. Customer numbers do not vary significantly throughout the hours of premises operation and due to the relatively low numbers, later hours of operation are often sought, with the majority of Merkur premises operating into the early hours. Later hours of opening appeal to shift workers and employees of the late-night economy and Merkur Slots policies, procedures, safeguards, and security measures are designed to ensure that premises operate securely and safely at all hours of operation.
9. 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: 1<sup>st</sup> 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 27<sup>th</sup> May 2021 from 13:30hrs to 22:45hrs and on Friday 28<sup>th</sup> 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 27<sup>th</sup> 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 28<sup>th</sup> 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 27<sup>th</sup> 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 28<sup>th</sup> 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

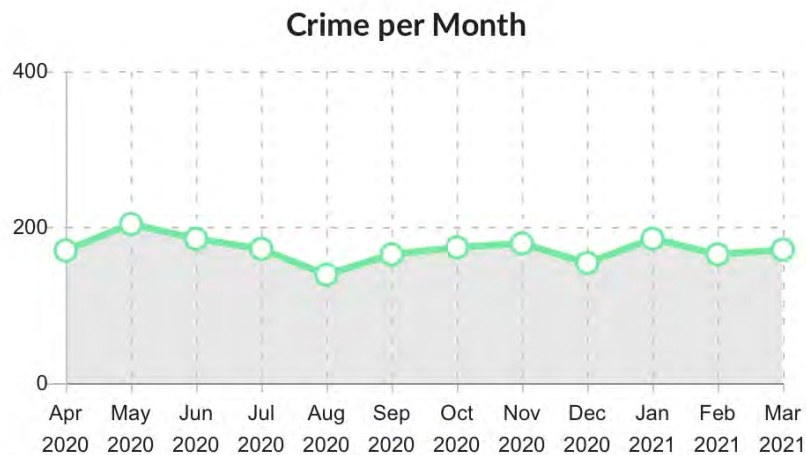
45. I have been asked to review local crime data relevant to the premises situated at 292-292A, Green Lanes, Palmers Green, N13 5TW and concerns that the presence of these premises may impact on the local community with an increase in local crime trends, in particular, an increase in anti-social behaviour 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 2<sup>nd</sup> 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 29<sup>th</sup> 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 10<sup>th</sup> 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**  
**30<sup>th</sup> May 2021**

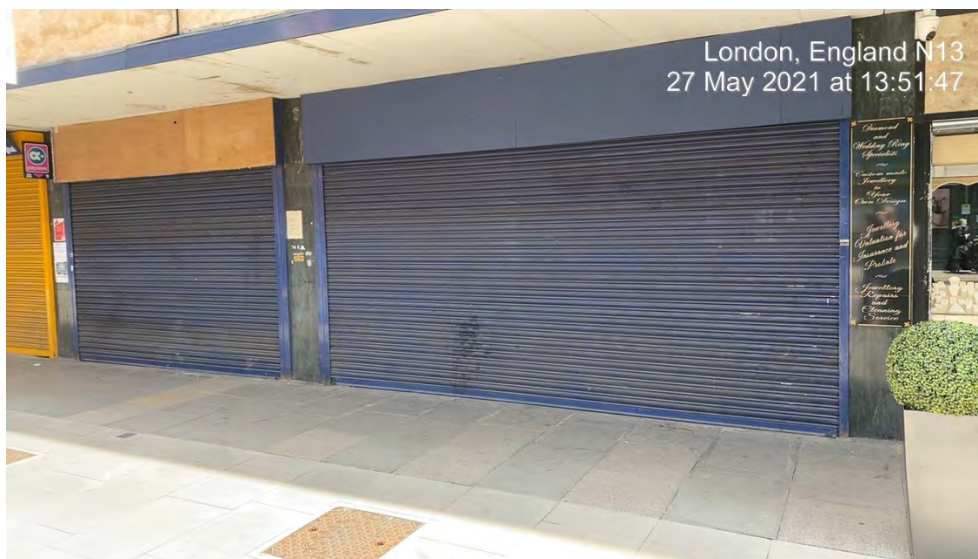
## Appendi A

292 Green Lanes, Palmers Green, London N13 5TW

27<sup>th</sup> May 2021 13 30hrs – 22 45hrs

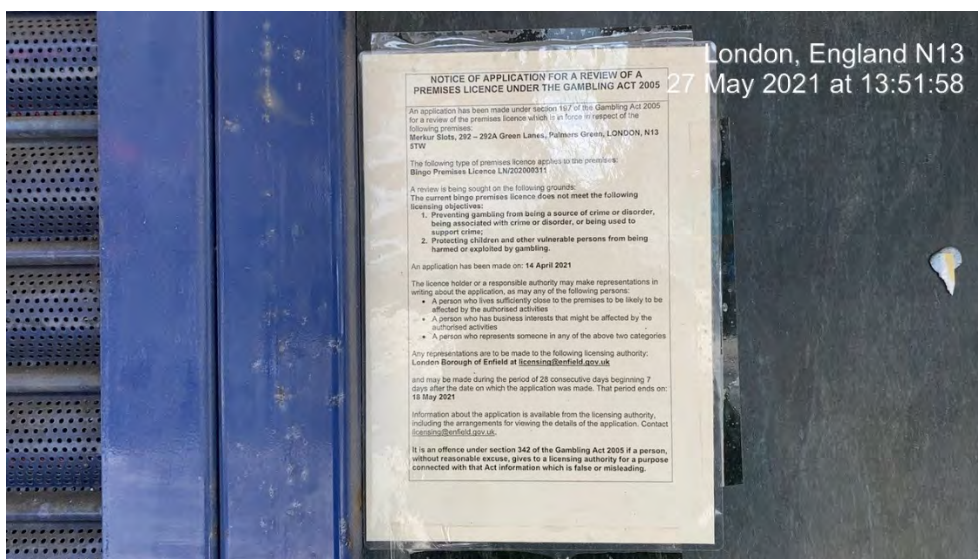
### Image A1

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



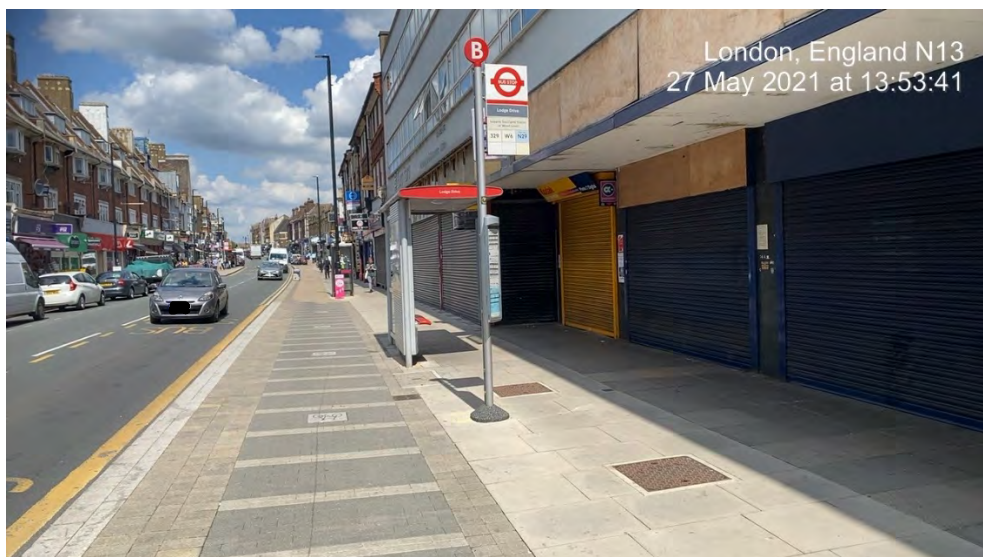
**Image A3**

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



Appendix A - 292 Green Lanes, Palmers Green, London N13 5TW

### 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



Appendix A - 292 Green Lanes, Palmers Green, London N13 5TW

**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



Appendix A - 292 Green Lanes, Palmers Green, London N13 5TW

**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



Appendix A - 292 Green Lanes, Palmers Green, London N13 5TW



**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



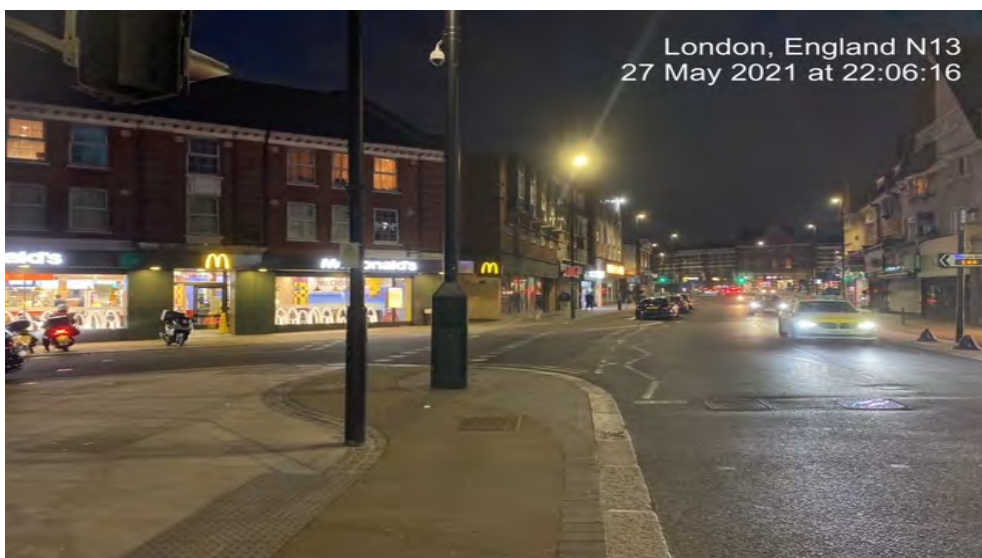
**Image A37**

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



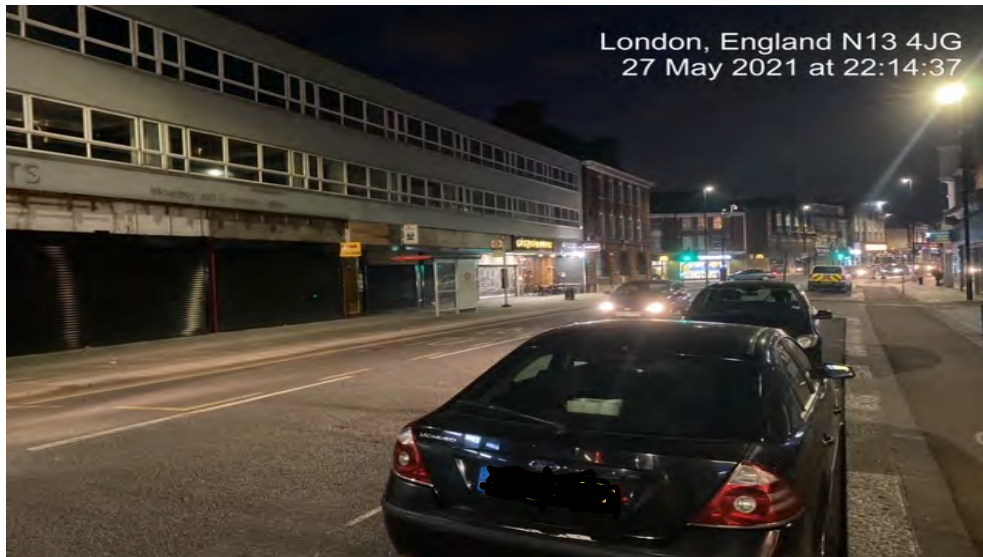
**Image A40**

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**

**28<sup>th</sup> 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 29<sup>th</sup> 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 29<sup>th</sup> May to 01:15 hours on Sunday 30<sup>th</sup> 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 29<sup>th</sup> May 2021 from 14:45 hours to 01:15 hours on Sunday 30<sup>th</sup> 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 24<sup>th</sup> 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 29<sup>th</sup> 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**

**Appendi C**

**292 Green Lanes, Palmers Green, London N13 5TW**

**29<sup>th</sup> May 2021 14 45hrs – 01 15hrs**

**Image C1**

**Male begging in Green Lanes opposite premises - 15:36hrs**



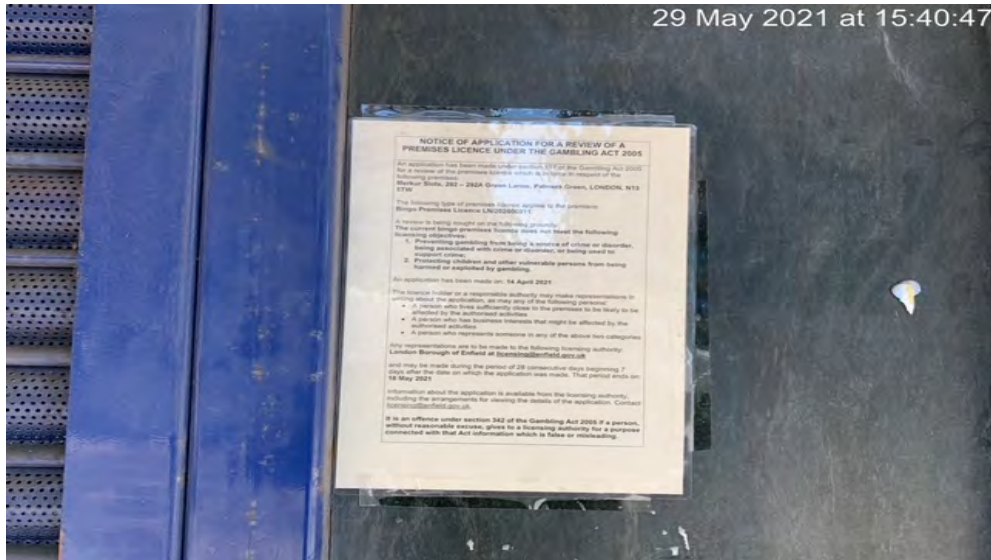
**Image C2**

**View of premises from centre of Green Lanes - 15:39hrs**



### 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



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

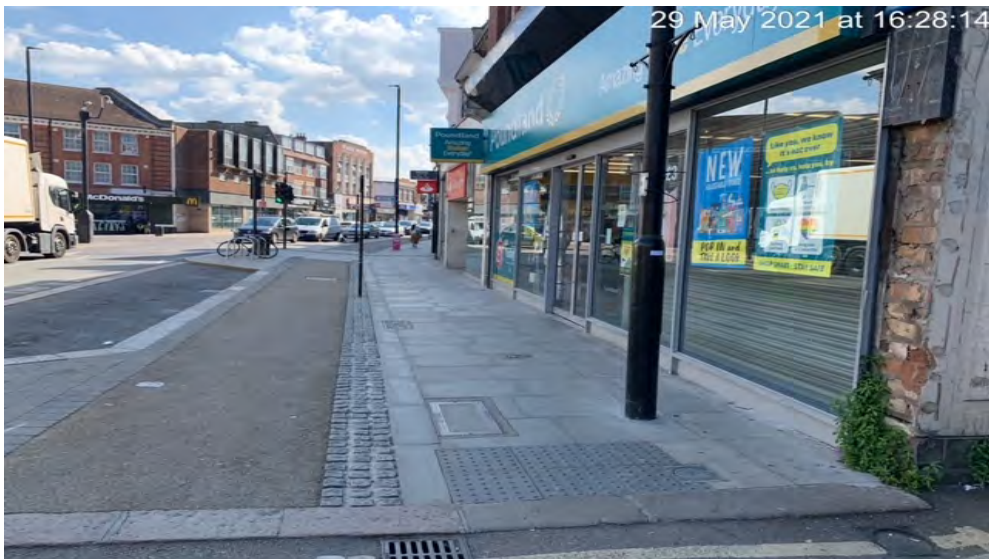
**Image C9**

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



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

**Image C17**

View of premises from opposite side of Green Lanes– 16:40hrs



**Image C18**

The Alfred Herring PH north of premises - 17:07hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

**Image C19**

Green Lanes looking south towards premises - 17:08hrs



**Image C20**

Premises from opposite side of Green Lanes - 17:54hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

**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



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

**Image C25**

Betfred Bookmakers South of premises - 20:46hrs



**Image C26**

Ladbrokes Bookmakers, opposite side of Green Lanes to the premises - 20:48hrs



Appendix C - 292 Green Lanes, Palmers Green, London N13 5TW.

**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**

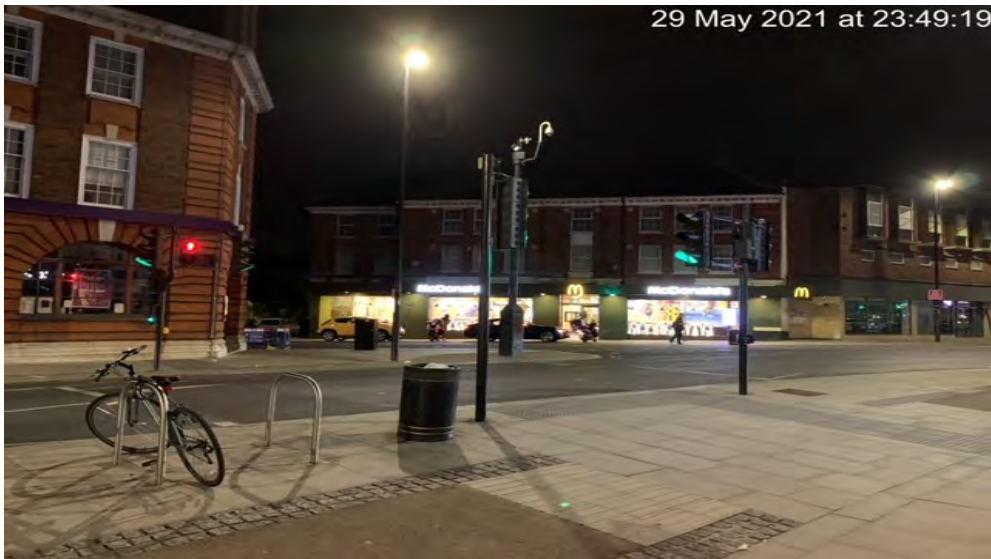
Premises from opposite side of Green Lanes - 23:48hrs





**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



**Image C46**  
Green Lanes north towards premises - 01:05hrs



**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 1<sup>st</sup> June 2021 between approximately 19:50hrs and 20:15hrs I covertly visited Merkur Cashino, 91 High Road, Wood Green, London N22 6BB. The premises sits amongst a number of other betting and gaming premises on a busy high street.
11. The front display of the premises was smart and well-lit. It was clean, well maintained and looked professional.
12. The premises are advertised as being open for 24 hours per day.
13. The glass on the front door of the premises was displaying some information including a warning that CCTV was in operation, no smoking and over 18's only.
14. I entered the premises and immediately in front of me and to the right was a large branded Merkur display sign that provided Covid-19 information regarding 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 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
30. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
31. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**  
**Leveche Associates Limited**  
**06 06 2021**



## **Independent Covert Licensing Visit Report**

**Nicholas Mason – Consultant  
Leveche Associates Limited**

### **Merkur Slots**

**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 8<sup>th</sup> January 2021 at 18:10hrs and Thursday 11<sup>th</sup> February 2021 between 16:00hrs to 16:25hrs I attended the Merkur Slots premises at 403-405 Green Street, Plaistow E13 9AU.
10. At the time of these visits the premises were closed due to UK Government Covid-19 restrictions. However, the front of the premises were clean, of smart appearance and had what appeared to be new signage displayed across the front fascia.
11. The premises are situated on a busy road with residential accommodation close by and other retail premises.
12. The area is served by a number of bus routes and additionally Upton Park London Underground Station is approximately 100 metres east of the premises. During these visits the area was relatively quiet with few pedestrians and minimal vehicular traffic.
13. I saw no evidence of street drinking, begging, anti-social behaviour or any other criminality and I did not see any groups of youths in the area at that time.

## **Observations**

14. On Tuesday 1<sup>st</sup> June 2021 between approximately 15:35hrs and 16:15hrs I covertly visited the Merkur Slots premises at 403-405, Green Street, Upton

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 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
29. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
30. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**  
**Leveche Associates Limited**  
**04 06 2021**



## **Independent Covert Licensing Visit Report**

**Nicholas Mason – Consultant**

**Leveche Associates Limited**

**Merkur Slots**

**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 1<sup>st</sup> June 2021 between approximately 20:50hrs and 21:25hrs I covertly visited the Merkur Slots premises at 456, Holloway Road, London N7 6QA.
11. Situated on the corner of Holloway Road at the junction with Camden Road, this is a larger Merkur premises than I have previously visited. The front display of the premises is smart and well-lit with a clean, well maintained and professional appearance.
12. The premises are advertised as being open for 24 hours per day.
13. The front door of the premises was controlled by a door supervisor monitoring entry and exit. He was a white male, smartly dressed in a dark suit, wearing a face mask and displaying an SIA licence on his right arm. There was also a side door in Camden Road though this was closed for access to the premises.
14. The glass on the front door of the premises displayed information including a warning that CCTV was in operation, no smoking and over 18's only.
15. I entered the premises being greeted by the door supervisor as I did so. In the entrance area was information regarding Covid-19 and the use of hand sanitisers, social distancing and face coverings. I was able to use the hand sanitiser situated at this location.
16. Adjacent to this was an information board displaying the premises licences and rules and there was further clear signage in relation to CCTV in operation.

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 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
30. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
31. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**

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 1<sup>st</sup> June 2021 between approximately 17:00hrs and 17:30hrs I covertly visited Merkur Slots, 157, High Street North, East Ham E6 1JB.
11. The front display of the premises was smart and well-lit though older than some of the other Merkur premises I have visited. It appeared well maintained though the area itself was let down by a local authority bin situated on the pavement outside that had a number of sealed bin bags that were spilling onto the pavement.
12. The premises are advertised as being open for 24 hours per day.
13. There appeared to be two doors allowing access to the premises but the door to the left displayed a sign directing customers to use the other door. I entered via the front door on the right where two fire extinguishers and various signage was displayed. The information displayed included:
  - i. The premises license.
  - ii. The premises certificate of insurance.
  - iii. That CCTV is in operation.
  - iv. The premises are a no smoking venue.
14. Adjacent to the signage was a hand sanitiser station that I was able to use and next to this a QR Code and information re social distancing and the wearing of face masks in respect of Covid-19 regulations.
15. I entered the premises and immediately started to play a low value gaming machine. From here I was able to observe that there were gaming machines throughout the length of the floor. Each gaming machine area was defined by

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 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
29. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
30. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**  
**Leveche Associates Limited**  
**04 06 2021**





## **Independent Covert Licensing Visit Report**

**Nicholas Mason – Consultant**

**Leveche Associates Limited**

**Merkur Slots**

**62, East Street, Barking IG11 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 11<sup>th</sup> February 2021 at 16:42hrs, I attended the Merkur Cashino (Slots) premises at 62
12. East Street, Barking IG11 8EQ. The premises were closed and not trading at this time due to UK Government Covid-19 restrictions.
13. The location of these premises differs somewhat to other Merkur premises I have visited previously in that it is in a 'pedestrian only' controlled zone with no vehicular traffic and a market place with a number of stalls outside the front.
14. During my visit in February, though some of the Market Stalls were trading, this area was relatively quiet, something I attributed to the UK Government Covid-19 restrictions.
15. This Merkur premises had clearly been subject to recent renovation and the front of the premises were clean, of smart appearance. and had what appeared to be new signage displayed across the front fascia.
16. It is situated in what would normally be a busy retail hub with a concentrated residential area close by.

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 1<sup>st</sup> June 2021 between approximately 18:10hrs and 18:30hrs I covertly visited Merkur Slots, 62 East Street, Barking IG11 8EQ.
19. On the day of my visit the premises were advertised as being open from 09:00hrs until midnight.
20. The front display of the premises was smart and well-lit. It was clean, well maintained and looked professional. There was a push button keypad for the lock situated to the right of the front door and above this a doorbell. There was litter in front of the premises but this was clearly from the adjacent Market Stalls.
21. The glass on the front door of the premises displayed information including a warning that CCTV was in operation, no smoking and over 18's only. As I entered the premises I saw the opening times displayed and then immediately to the left was an information board displaying the Merkur Slots logo. The information displayed on this board included:
- i. The premises license.
  - ii. The premises certificate of insurance.
  - iii. The company code of practice which as its first heading had the information that persons under 18 were prohibited from entering the premises.
  - iv. The licensing objectives under The Gambling Act 2005.
  - v. A Gamcare information poster advertising help for those who may be experiencing issues with gambling.
  - vi. That CCTV is in operation.
  - vii. The premises are a no smoking venue.
  - viii. Think 25, where customers may be challenged for ID if they appear under 25.
  - ix. No alcohol notice.
  - x. Strictly over 18's only notice.
  - xi. Notice of Bingo rules.
22. As I entered the premises, a customer, a white male dressed in a grey track-suit was leaving and he was followed by a female with long dark hair. She  
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 1<sup>st</sup> June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
35. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
36. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nicholas Mason**  
**Consultant**  
**Leveche Associates Limited**  
**05 06 2021**



## **Independent Covert Licensing Visit Report**

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

**Merkur Slots  
847 847 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 2<sup>nd</sup> June 2021 I conducted a covert licensing visit to Merkur Slots, 847 High Road, North Finchley, N12 8PT. My visit took place between 23:00 hours and 23:30 hours.
2. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
3. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open from 08:00 hours to Midnight.
4. I went to the front door of the premises and entered. Once inside the entrance I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
  - i. The premises licence.
  - ii. The company codes of practice.
  - iii. It was a no smoking venue.
  - iv. Think 25 poster.
  - v. GamCare poster.

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

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

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.

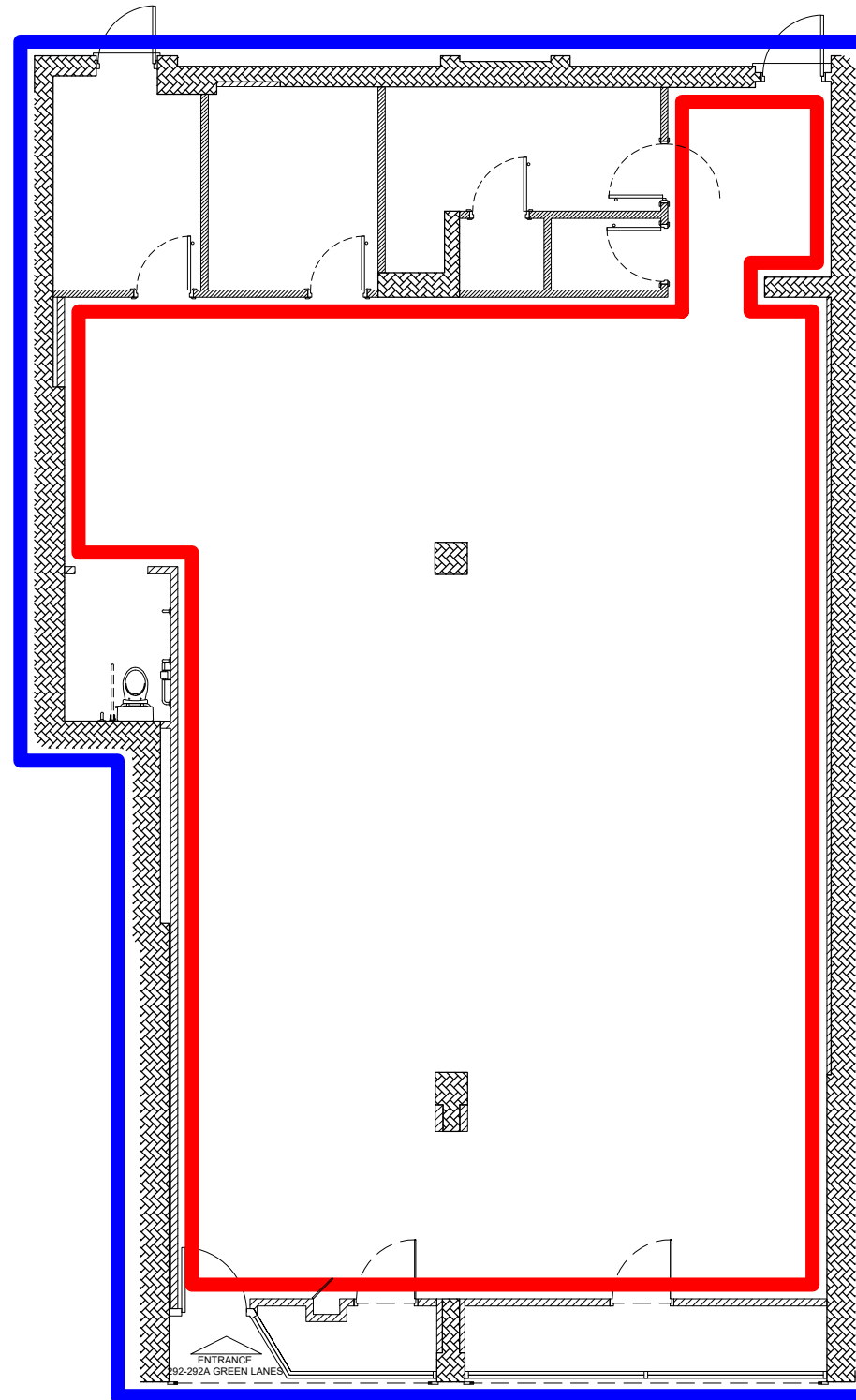
**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**06 06 2021**

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

# **Copy of Licensing plan of the premises**



PROPOSED GAMING AREA: 146.6m



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

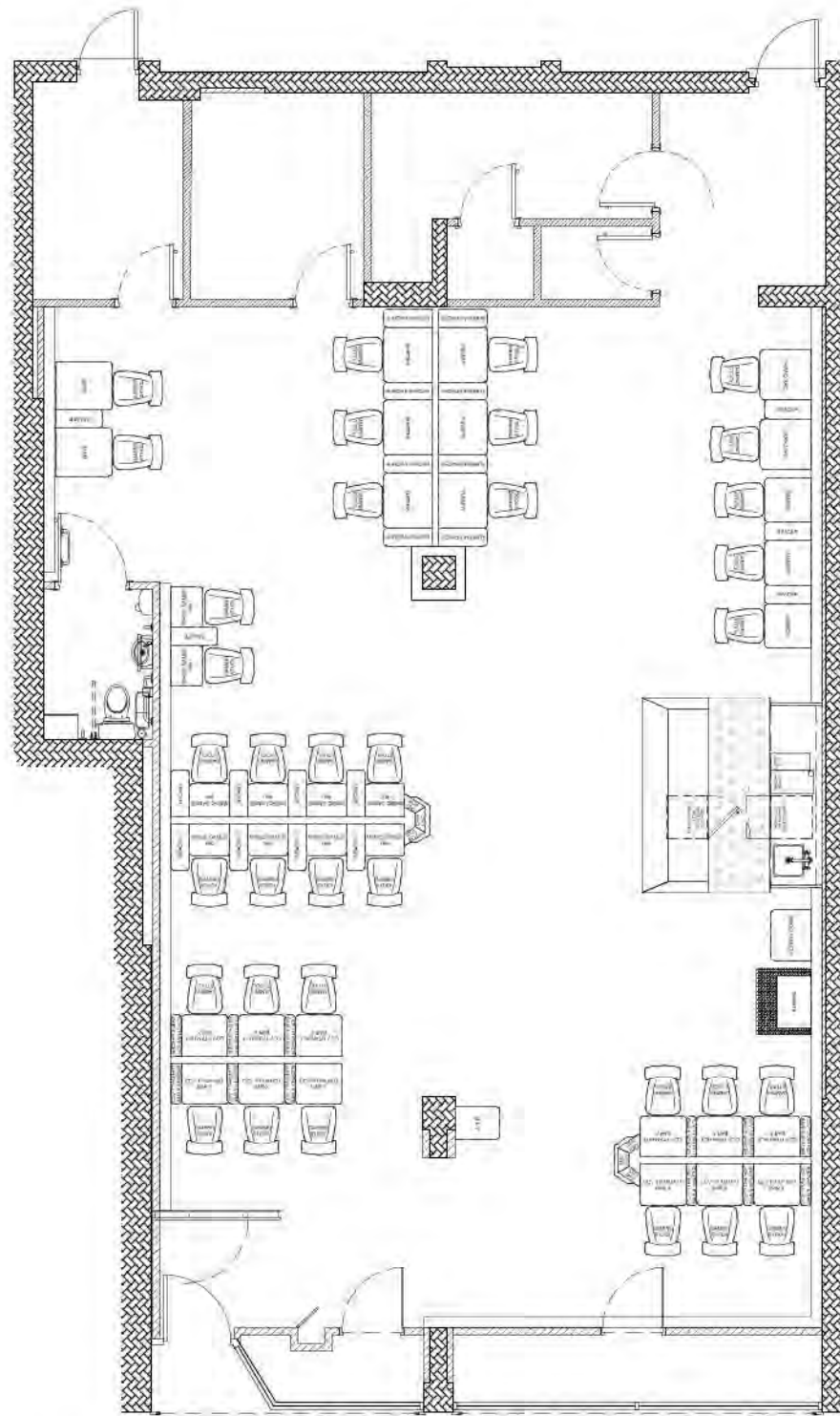
<b>FIT OUT TYPE</b> MERKUR SLOTS
<b>PROJECT</b> MERKUR SLOTS 292-292A GREEN LANES PALMERS GREEN LONDON N13 5TW
<b>DESCRIPTION</b> PROPOSED LICENSE PLAN

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



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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

<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>	LN/202000311
<b>Operator Licence No:</b>	000-003266-N-103444-027 (Merkur Slots UK Limited)
<b>Company Details:</b>	Merkur Slots UK Limited, 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 23/11/2020 – updated 11/12/2020 and 01/06/2021
<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). 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:	<p>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).</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, 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><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 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><b>Age Verification</b>  <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots 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><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>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>Vulnerable and addiction support services</b>  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><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>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</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>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><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>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><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>
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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><b>Crime statistics</b> 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><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>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>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 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 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><b>Residential Areas (impacted by Anti-Social Behaviour)</b>  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><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.  Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p><b>Money Laundering</b>  <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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<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>
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<p>Other</p>	<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>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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## 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**


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.

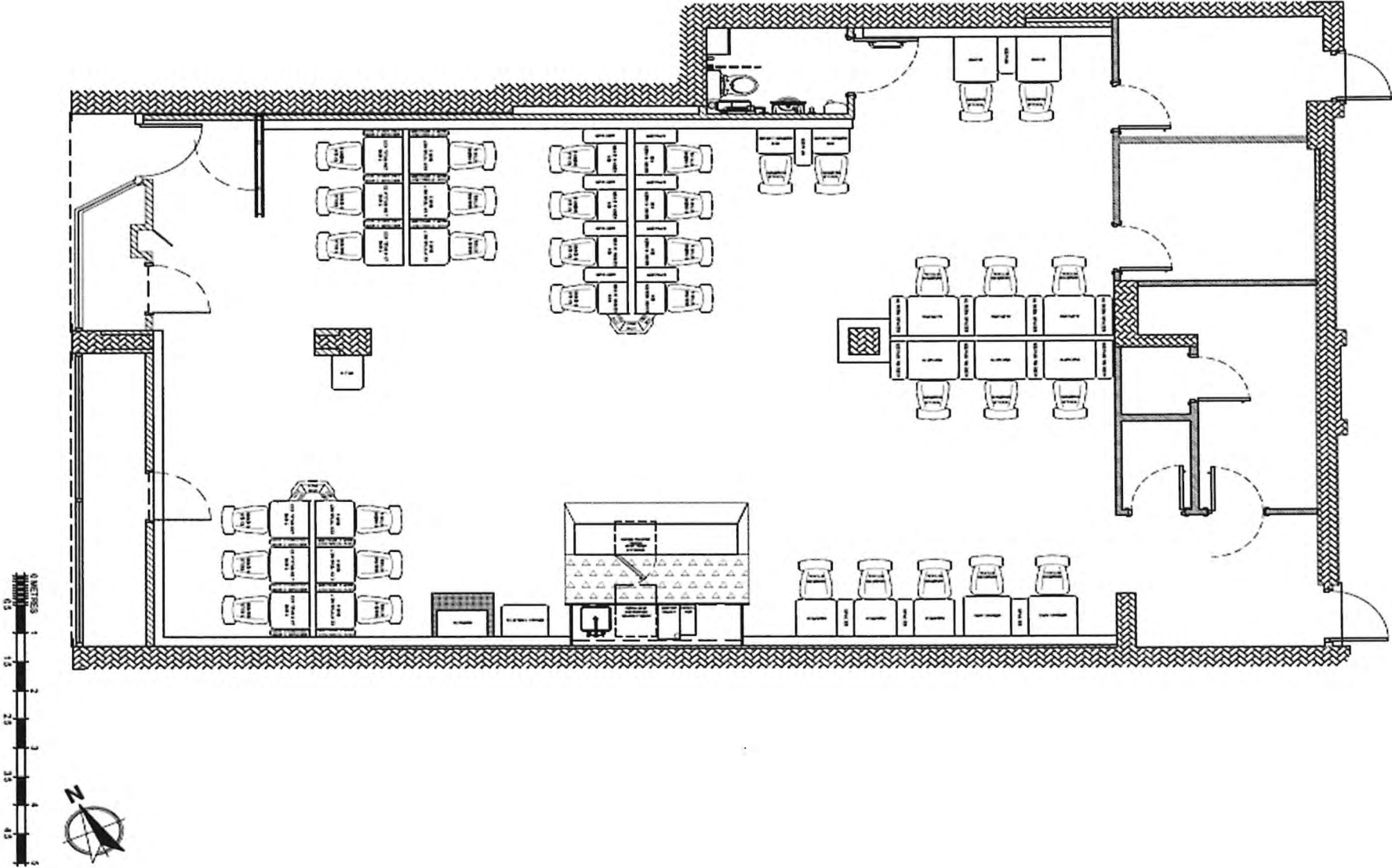
Where relevant, Merkur Slots has also considered any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However, the company does not operate discriminatory policies against any identified groups based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

<b>Assessors Name:</b>	AMANDA KIERNAN
<b>Signature:</b>	
<b>Date:</b>	07/06/21

# 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



# 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.