

<u>Meeting</u> Licensing Sub-Committee
<u>Date and time</u> Tuesday 25th October, 2022 At 10.30 am
<u>Venue</u> CL-Conference Suite 1 - London Borough of Barnet, 2 Bristol Avenue, Colindale, NW9 4EW

Dear Councillors,

Please find enclosed additional papers relating to the following items for the above mentioned meeting which were not available at the time of collation of the agenda.

Item No	Title of Report	Pages
5	Report of the Trading Standards & Licensing Manager - Merkur Slots 118 High Street Barnet EN5 5XQ	
	Addendum	
5.1	Applicant's Submission: Barnet Bundles 1-3	3 - 584

Governance Service governanceservice@barnet.gov.uk

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MERKUR SLOTS, 241 WALSGRAVE ROAD, COVENTRY, CV2 4BB

LICENSING SUB-COMMITTEE HEARING

AGENDA ITEM 5a

10 OCTOBER 2022

REMOTE HEARING – BUNDLE INDEX

DOCUMENT	PAGE
Skeleton Argument from Philip Kolvin QC, Counsel for the applicant	I-XV
Proposed Application Conditions	XVI
Witness statement from Amanda Kiernan, Head of Compliance at Merkur Slots UK Limited	1-8
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Witness statement from Andy Tipple, Head of Product at Merkur Slots UK Limited	11
Copy of Illustrative plan of the premises	12
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Copy of the Local Area Risk Assessment	14-29
Covert Inspection Reports: Operational Merkur premises:	
- 182-184 Edgware Road, London, W2 2DS	30-64
- 19 The Concourse, Edmonton Green Shopping Centre, London, N9 0TY	65-89
- 33 Town Centre, Hatfield, AL10 0JX	90-118
- 456 Holloway Road, London, N7 4QA	119-148
- 148 High Street, Hounslow, Middlesex, TW3 1LR	149-179
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- 3 Central Parade, 254 Streatham High Road, London, SW16 1HT	214-247
- 69 Tottenham Court Road, London, W1T 2HA	248-282
- 403- 405, Green Street, Upton Park, Plaistow E13 9AU	283-312
- 91 High Road, Wood Green, London, N22 6BB	313-339
Merkur Slots Social Responsibility, Operational Compliance & Training Documents, including:	339-487

<ul style="list-style-type: none"> a. Operational Standards b. Working Together c. Licensing Objectives including Safer Gambling and G4 Global Gambling Guidance Group accreditation d. G-Tab - Bringing Traditional Bingo to the High Street e. Social Responsibility Policy f. Powers of the Gambling Commission g. Money Laundering Policy h. Keeping Alcohol Out i. Dealing with Aggressive Customers j. Complaints Procedure k. Marketing and Promotional Guidelines l. Access to Gambling by Children and Young Persons m. Employment of Children and Young Persons n. Customer Interaction o. Self-Exclusion p. IHL Tablet Guide: Premises Compliance q. Compliance Policy; r. CCTV Policy s. Machine Fraud Policy t. Machine Ratio Check Policy u. Staff Guard Policy; v. Smoking/Vaping Policy w. Acceptable Proof of Age x. Learning and Development: Staff Training <ul style="list-style-type: none"> i. Safeguarding and Responsible Gambling ii. Merkur Slots Training Workbook: y. Sample Window Displays z. Sample Responsible Gambling Messaging 	
<p>Extracts of the Gambling Commission’s Licence Conditions and Codes of Practice for Bingo Premises</p>	<p>488-543</p>
<p>Highlighted Extracts of the Gambling Commission’s Guidance to Licensing Authorities</p>	<p>544-553</p>
<p>Extracts from Hansard Parliamentary Debate discussing the inclusion of the prevention of public nuisance as a Licensing Objective</p>	<p>554-556</p>
<p>Extracts of Paterson’s Licensing Acts 2020 Part 8 Para 5.158 – Premises Licences</p>	<p>557-559</p>
<p>The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007: Schedule 2 Part 1 – Conditions attaching to bingo premises licences</p>	<p>560-562</p>

BARNET COUNCIL

LICENSING SUB-COMMITTEE

25TH OCTOBER 2022

APPLICATION FOR BINGO PREMISES LICENCE

118 HIGH STREET, BARNET EN5 5XQ

SKELETON ARGUMENT ON BEHALF OF APPLICANT

INTRODUCTION

1. This is an application by Merkur Slots UK Limited (“the applicant”) for a new bingo premises licence.
2. The purpose of this skeleton argument is to help the Sub-Committee navigate the material by setting out some of the background to the application, explaining the legal context under the Gambling Act 2005, and making brief submissions dealing with the representations.
3. In considering the application, the Committee may be particularly assisted by looking at the following documents:
 - Witness statements:
 - Amanda Kiernan, Head of Compliance (pages 1-8)
 - Steve Ambrose, Operations Director (pages 9-10)
 - Andy Tipple, Head of Product (page 11)
 - Legal obligations to promote licensing objectives:

- Gambling Commission’s Licence Conditions and Codes of Practice applicable to non-remote bingo licences (pages 488-543)
 - Mandatory and default conditions attaching to bingo premises licences (pages 560-562)
 - The individual conditions offered by the applicant (page XVI)
- Operational standards (pages 339-341)

SUMMARY

4. The applicant is a national provider of bingo and adult gaming centres which operates to the highest standards of social responsibility and compliance.
5. It has over 220 premises. It has been granted licences at every site at which it has applied and has never suffered a regulatory intervention or review. Its sites are across a range of areas, geographically and socially. It has three existing sites in Barnet, at 48 Golders Green Road NW11 8LL, at 847 High Road, Finchley N12 8PT and 48 Ballards Lane, Finchley N3 2BX, which all trade without regulatory concern.
6. The applicant has prepared a detailed local area risk assessment in accordance with the Gambling Commission’s Licence Conditions and Codes of Practice.
7. The Police were consulted both before the submission of this application and again in the normal way following the application, and have made no representation. As the Sub-Committee will be aware, the Police are its main sources of advice on crime and disorder and community protection locally, including harm from low level street disorder, and have particular knowledge in this case because they are familiar with the applicant’s existing premises in Barnet. The Police view is consistent with the applicant’s widespread experience, independently confirmed by Mr. Jenkins and Mr. Mason, who have covertly observed many Merkur premises.
8. There is no representation from the child protection authority or the environmental health authority or indeed the licensing authority itself, or any third sector agency or organisation concerned with the protection of vulnerable people.

BACKGROUND

9. The applicant is part of the Gauselmann group, which is one of the most experienced providers of gaming premises on the high street across the UK, including adult gaming centres and bingo premises. Players in high street bingo premises access bingo games through the use of tablets, which are increasingly replacing paper bingo cards as provided in large, flat-floor bingo halls. It is because the applicant wishes to offer bingo in its premises that it is required to apply for a bingo premises licence.
10. As one would expect, the applicant and its sister companies have detailed systems for compliance with the law and promotion of the licensing objectives, which they implement through staff training and management programmes and supervise through area and national management oversight and independent audit.
11. 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 this case, the applicant has offered further conditions as part of the application (page XVI).

The nature of high street bingo premises

12. 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 12:1 (7,683 v 648¹). As to impact, betting offices can bring with them social issues. Hence, when an application is made for a bingo premises licence, it is sometimes thought that it will bring with it the same kind of issues as arise at high street betting offices.
13. In fact, high street bingo premises in general and the applicant's in particular are completely different from betting offices in terms of local impact.
14. It is therefore important to try to convey why the applicant's premises trade without regulatory concern.
15. *On arrival.* It is noticeable that groups do not loiter or gather outside high street bingo premises smoking, drinking, littering and importuning passers-by. The absence of such activity is not only observable but is explained by several facts:
 - The customer demographic is different from betting offices. It is older and up to 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.
 - 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 on the shop floor, greeting customers as they enter, which also means controlling who is permitted to enter and effectively supervising the premises.

¹ Gambling Commission industry statistics.

- 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.
16. The effect on the streetscape is important. Those passing high street bingo premises do not have to walk past groups of people standing or misbehaving in the street, whether during the school run, the evening or otherwise. Consistent and authoritative evidence on this topic is given by company witnesses and also by Mr Jenkins and Mr Mason in their inspection of 10 other Merkur sites.
17. *Exterior appearance.* The facades of high street bingo premises are smart, well-maintained and spotlessly clean. It is not possible to see gambling taking place inside, unlike (for example) betting offices, or pubs which admit children. There is no advertising on the exterior which might be attractive to children: this is strictly controlled by the Advertising Standard Authority's Codes of Practice which are translated into legally enforceable regulation by the Gambling Commission's Licence Conditions and Codes of Practice. The exterior contains signage explaining that Think 25 is operated, that alcohol is not permitted and that CCTV is in operation, alongside responsible gambling messaging.
18. *Upon entry.* Those entering will be greeted face to face by a uniformed member of staff. This is an opportunity to observe whether the customer appears 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 check 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.
19. *Appearance.* The interiors 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 also prominently displayed, explaining where and how to obtain help with problem gambling.
20. *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.

21. *Protection of vulnerable people from being harmed or exploited by gambling.* So far as vulnerable persons are concerned:

- Alcohol is not permitted in the applicant's bingo premises.
- Those who are intoxicated through alcohol or drugs are not permitted on the premises.
- As required by the Gambling Commission's Licence Conditions and Codes of Practice, the applicant'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 may set time limits on machines 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.

22. *Protection of children from being harmed or exploited by gambling.* As regards this objective:

- Although children are entitled to enter bingo premises as a matter of law, children are not allowed in the applicant's premises.
- The exterior contains no advertising or marketing which might be attractive to children.
- Gambling cannot be seen from the outside unlike, say, in betting offices and sometimes pubs.

- The exterior (and the interior) contains prominent messaging stating that Think 25 is applied.
- Those entering are greeted by staff members, so that their appearance is checked immediately.
- Staff are required to log all Think 25 events electronically, with premises data checked by the applicant's audit department to ensure that the system is being properly operated.
- Third party age verification testing is conducted.
- It is fair to report that the outward appearance, interior ambience, supervision, layout and product in bingo premises are not attractive to children, and the applicant's systems have proved more than effective to ensure that underage gambling is not an issue in its premises. It is also right to mention that, trading on busy high streets nationally, premises are almost always in close proximity to fast food outlets attractive to children, but this has not proved problematic.

23. *Security.* As stated above, the applicant does not suffer significant issues with crime and disorder. This is a function of the customer demographic, the ban on alcohol and the nature of the product, but is also because of the measures taken by the applicant to prevent it:

- Staffing levels are set following a security risk assessment.
- 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 (inside and out) 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 electronically and reviewed at national level.
- Premises are fitted with maglocks, enabling entry to be controlled when necessary.
- The applicant maintains good liaison with local Police.
- It will also join any available Betwatch scheme.

THE REGULATORY RECORD OF THE APPLICANT

24. In the previous section, we have briefly described the standard controls used by the applicant to provide a safe, welcoming and pleasant environment for customers while also promoting the licensing objectives.

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

- **It has over 220 licences. It has been granted licences in every premises it has applied for.²**
- **None of its trading licence has ever been reviewed.³**

26. This is despite the range of areas in which the applicant operates, including those with high social deprivation and other social issues. Its systems, staff training, compliance monitoring and audit have proved sufficient to ensure that the licensing objectives are promoted.

27. It is a record of which the applicant is proud and guards with care. In the very rare event of any kind of issue, it will always liaise with relevant authorities to ensure that it is resolved promptly and effectively.

THE LAW

28. As the Committee will be aware, each piece of licensing legislation sets out a different approach to the question of grant. The approach relevant to gambling is in section 153 of the Gambling Act 2005:

In exercising their functions under this Part, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:

(a) in accordance with any relevant code of practice [issued by the Gambling Commission]

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

(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)).

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

³ In 2021, reviews were commenced in Enfield but were rejected without a hearing by the licensing authority under section 198 Gambling Act 2005 since they were in substance objections to gambling in general rather than to the operator or the premises.

29. The gambling licensing objectives are:

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

(b) ensuring that gambling is conducted in a fair and open way, and

(c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

30. The effect of the aim to permit in section 153 makes the Gambling Act 2005 different from the Licensing Act 2003. This is explained by the Gambling Commission in its Guidance to licensing authorities as follows:

1.20 The Act places a legal duty on both the Commission and licensing authorities to aim to permit gambling, in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives. The effect of this duty is that both the Commission and licensing authorities must approach their functions in a way that seeks to regulate gambling by using their powers, for example, powers to attach conditions to licences, to moderate its impact on the licensing objectives rather than by starting out to prevent it altogether.

31. It is not open to an authority to refuse a licence on the basis that it is inappropriate to licence an operation or a further operation, in an area. As the Guidance says:

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).

32. Rather, as the paragraph makes clear, there would need to be reasons which demonstrate that the licensing objectives would not be met. That means demonstrate by evidence.

33. The following points should be noted:

- a. The section 153 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. In the hierarchy of considerations in section 153, the licensing objectives come third and the policy comes fourth, expressly subject to the considerations in (a), (b) and (c). As the Guidance states (para 5.21): *“In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this guidance, and its own policy statement or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission’s codes and this guidance take precedence.”*

- e. 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.
- f. The following considerations are legally irrelevant to the determination of an application for a premises licence:
 - i. Planning considerations. Planning and licensing are separate systems. However, an applicant which cannot obtain planning permission cannot open.
 - ii. Nuisance (see Guidance by Gambling Commission).
 - iii. A dislike of gambling.
 - iv. A general notion that it is undesirable to allow gambling premises in an area.
 - v. Moral or ethical objections to gambling.
 - vi. The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.

34. It is therefore necessary to consider whether there is evidence which demonstrates that the licensing objectives would not be met by granting a licence. This is not the same as demonstrating that an area does, or does not, have social or economic challenges. It is a question of asking whether the evidence demonstrates that this operator, with the operating model and conditions proposed, would harm the licensing objectives in a way which cannot be mitigated by conditions.

35. It is necessary to bear the above in mind when considering the representations which have been submitted by members of the public.

REPRESENTATIONS

36. The Sub-Committee's expert advisors are the responsible authorities. In this case, none has submitted any representation against this application.
37. There is, however, a representation from the Barnet Society. This is dealt with as follows.
38. *Planning.* The representation is a representation upon a planning application. As the Sub-Committee will be aware, planning is a separate system from licensing, with independent judgments to be made by decision-makers under each system, on the evidence before them.
39. *Under 18s passing as over 25s.* The applicant operates comprehensive systems to prevent underage gambling, and in any case finds that its premises are not attractive to children. The applicant operates a Think 25 system. Unlike in betting offices and pubs, staff are not behind the counter but are on the shop floor. They are specifically trained in operating the Think 25 system and do so without criticism (by licensing authorities, the Gambling Commission or anyone else) across the land.
40. *Vulnerable adults living nearby.* There is no objection from any safeguarding authority or agency. The applicant does not "target" vulnerable people as suggested. Rather, it operates approved processes to protect them, and does so without criticism (by licensing authorities, the Gambling Commission or anyone else) across the land. The applicant operates 220 premises, including in deprived areas. Its systems for protection of vulnerable people, represent best practice, are approved by the Gambling Commission and are properly operated by its trained staff under the supervision of management and are subject to audit. None of its licences has ever been reviewed.
41. *Three betting shops.* It is agreed that there are three betting shops on the High Street. It is disagreed that this is relevant. The demand for gambling is statutorily irrelevant. The application is not for a betting shop licence. There is no evidence that the betting shops are themselves harming the licensing objectives. Even if there were, there is no evidence that the applicant will do so: it takes great care not to.

42. *Precedent.* The Sub-Committee will receive legal advice that precedent is irrelevant in licensing matters. That is because each case is determined on its own merits.
43. *Deterrence of other commercial uses.* This is not relevant to a gambling licence application.
44. *Hours.* The default hours set by Parliament since 2007 for bingo premises are 9 a.m. to midnight for bingo and 24 hours for machines. The only basis for curtailing the hours under the licensing regime is that there is evidence that it is necessary to promote the licensing objectives. None of these requirements is met. Rather, there is no evidence at all.
45. *Safeguards for vulnerable adults.* There are extensive safeguards written into legal obligations on bingo providers, as set out above. There is no evidence that more are necessary in this case.

CONCLUSION

46. In conclusion:

- The applicant is a highly competent organisation, regulated by the Gambling Commission, and one whose corporate systems, staff training, management and audit are directed towards promotion of the licensing objectives.
- It is part of a group which operates 220 licensed gambling premises in a wide variety of locations of higher and lower crime, deprivation and population density.
- Despite that, it has never experienced a regulatory complaint, review of a trading venue or prosecution.
- There is no evidence before the Council that it has failed to promote the licensing objectives elsewhere, including in Barnet.
- The type of premises, their layout, their customer demographic, the low numbers of customers simultaneously using premises and the quality of management mean that issues of crime and disorder are rare.

- The premises, if licensed, will be subject to strict regulatory requirements, deriving from: the Licence Conditions and Codes of Practice; machine stake, prize and numbers limits, and mandatory and default premises licence conditions and individual conditions.
- There are no representations from responsible authorities.
- The applicant has a strong track record of co-operation with local statutory bodies. In the unlikely event of an untoward consequence, it will work to resolve the issue promptly and efficiently.

47. For these reasons, it is submitted that the test in section 153 is fully met. Conversely, taking into account the competence and track record of the applicant (nationally and locally), its legal obligations under the Act, Regulations and codes, and the conditions to which it is proposing to submit, it has not been demonstrated that the licensing objectives are unlikely to be met.

48. Accordingly, the Council is respectfully invited to grant the application as asked.

PHILIP KOLVIN QC
12th October 2022

11 KBW
Temple EC4

Merkur Slots, 118 High Street, Barnet

Conditions offered within the application

1. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and licensing officers if requested, subject to data protection legislative requirements.
2. A CCTV camera shall be installed to cover:
 - a. All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
 - b. The areas of the premises to which the public have access (excluding toilets)
 - c. Gaming machines
3. A Think 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
4. Prominent signage and notices advertising the Think 25 policy will be displayed.
5. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by ground floor staff.
6. A suitable intruder alarm complete with panic button facility shall be maintained.
7. An incident log shall be maintained and made available on request to an authorised Local Authority officer or the Police, which will record the following:
 - a. All crimes reported to the venue.
 - b. Any complaints or incidents regarding crime and disorder.
 - c. Refusals and banned customers.
 - d. Any faults in the CCTV system.
 - e. Any visit by a relevant authority or emergency service.
 - f. Any Challenge 25 Refusals.

LICENSING SUB - COMMITTEE HEARING – 25 OCTOBER 2022

SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

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 (the parent company of Merkur Slots UK Limited), responsible for all internal and external audit policies and procedures. During 2018 a merge of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the Merkur organisation.
2. Merkur operates a national estate of over 220 licensed bingo, adult gaming centre and family entertainment centre premises.
3. Merkur is a leading national operator of bingo premises with clear and proactive policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with Responsible Authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
4. Merkur has full authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which Merkur has put in place to ensure that it implements effective player protection, anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Licence Conditions and Codes of Practice.
5. Merkur Slots UK Limited, has never had a review of a trading premises licence, which evidences the high standard of operation applied across the Company's licensed estate. Two premises licences were subject to review applications last year in Enfield, but both applications were rejected by the Authority without a hearing, as the substance of both applications was based on objections to gambling in principle rather than identifying any concerns with the proposed operation at the premises.
6. Merkur holds key positions within the Bingo Association and BACTA (the trade association for the amusement and gaming machine industry in the UK) Executive and Social Responsibility Committees, working closely with these groups to innovate and promote Compliance and Social Responsibility within the industry.
7. Merkur has over 50 Personal Management Licence Holders throughout its operational structure, all of whom are aware of their roles and responsibilities in regard to the Licence Conditions and Codes of Practice (LCCP). Legal obligations are placed upon personal licence holders to promote the Licensing Objectives whilst undertaking their respective duties.
8. Merkur has appointed a dedicated team of compliance auditors that work independently of its Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. The Company conducts a minimum of two compliance audits per year in each venue. Audits include Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification records. During the audits, premises staff are tested on their level of knowledge and understanding of all relevant criteria. Venues may be re-visited and any additional training needs addressed. Records of incidents, interactions, self-exclusion breaches and age

verification checks are collated on a central hub, which is regularly reviewed and monthly reports are provided to Operations Teams.

9. Merkur operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the Gambling Commission's Licence Conditions and Codes of Practice and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice and sample window displays can be seen in the supporting documents.
10. Venue window displays are designed in consideration of premises' location, particularly in busy high street areas where Children and Young Persons may pass by, and maintain the Company's focus that all gambling should be carried out in a socially responsible manner. Direct line of sight into premises is blocked by appropriate window displays and barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.

Relationship with the Responsible Authorities and Interested Parties

11. Merkur takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
12. For the purposes of the original bingo premises licence application, the local Police Licensing Team were initially approached on the 5th January 2022.
13. The local Police Licensing Team confirmed on the 6th January 2022 that they had no objection to the proposal, and provided no objection or comment during the objection period.
14. All other responsible authorities, including the Licensing Authority, Child Protection team and Gambling Commission did not raise any concerns regarding Merkur's bingo premises licence proposals and did not object to the application.
15. 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.
16. Merkur has considered local police crime statistics and the premises location along with the Council's Statement of Licensing Principles under the Gambling Act 2005. We understand that the local area may suffer with general crime and disorder and nuisance, albeit not specifically associated with gambling premises. It has been our consistent experience in the majority of circumstances that we do not experience the kind of difficulties sometimes experienced by betting offices in terms of crime and disorder and nuisance, due to our different clientele, product, layout and management. A position which is supported by the police comments. Nevertheless, lines of communication will be maintained with the local police and the Licensing Authority to ensure that local knowledge is continuously shared and that the premises adapt to any emerging risks or local concerns identified.
17. We have identified local providers of vulnerability support services within the local area risk assessment and we will endeavor to contact any relevant organisations and invite feedback on any local concerns that can be incorporated into premises training and evaluation. The Company is also committed to working with all Responsible Authorities to ensure that any emerging risks are identified, incorporated into the premises risk assessment and effectively addressed

Merkur Compliance – Protection of Children and Vulnerable

18. 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.
19. 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'.
20. In February 2022, Merkur were subject to the G4 follow up audit where it retained its accreditation status. The auditor commended the senior management training in regards to gambling harm and social responsibility (YGAM), noted that Merkurs Safer Gambling ethics shine through as priority and customer care is a strong focus of the business. The auditor further noted that staff loyalty, enthusiasm and knowledge were all of a high standard.
21. 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 accredited Social Responsibility and Interaction training for its premises management teams. Excerpts from the Company's training platform are provided in the supporting documents.
22. Merkur have one National Training Centre 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.
23. 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.
24. Following a customer interaction, customers may be offered a variety of self-help measures 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.

25. 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.
26. Examples of some of Merkur's responsible gambling information have been provided in the supporting documents.
27. As part of Merkur's continuing commitment to high standards of staff training and compliance, the Company engaged the services of the charities YGAM (Young Gamers & Gamblers Education Trust) and Betknowmore to assist with the development and provision of additional Safer Gambling training and resources for venue and area managers. This training has been designed to complement our existing face to face training, is City and Guilds accredited and has been delivered to over 200 venue and area managers to date.
28. In October 2020, Merkur launched its 360 Safer Gambling Program, which was developed in consultation with the Global Gambling Guidance Group (G4) and comprises an Advisory Board of Senior Executives and external specialists. The program cements the Company's commitment to safer gambling and includes the establishment of a Customer Experience Group, which provides customer feedback on the effectiveness of the Company's customer interaction, safer gambling tools, messaging and support services.
29. 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.
30. 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

31. The premises was previously a TSB Bank.
32. A detailed local area risk assessment has been supplied in the supporting documentation, designed in consideration of the councils Gambling Statement of Licensing principles, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
33. 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.
34. Merkur is an experienced operator with premises in many large cities and towns across the country, each with their own local profiles and risk. Merkur effectively and responsibly operates in these areas, some of which are subject to greater and lower levels of general crime and disorder and deprivation. The Company's responsible gambling safeguards, security measures and strictly controlled marketing practices are proven to be effective and management will always adapt to local circumstances.

35. As a result of the Company's commitment to responsible operation and the resources directed to responsible play, none of Merkur's operational premises licences have been subject to review proceedings or revocation.
36. Merkur Slots UK Limited operates five licensed gambling premises within the Council's jurisdiction, including 3 similar high street bingo licensed premises at Merkur Slots, 48 Golders Green Road, Merkur Slots, 847 High Road, Finchley and Merkur Slots 48 Ballards Lane. No concerns have been raised by the authorities surrounding the operation of these premises.

Underage Gambling

37. 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.
38. By law, licensed bingo premises can permit under 18s on the premises and can also apply for a premises licence under the Licensing Act 2003. However, Merkur's premises are strictly adult only, operate Think 25 and will not obtain a licence under the Licensing Act 2003.
39. 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.
40. Merkur Slots customer demographics are up to 50% female with an average age over 30.
41. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
42. To ensure the effectiveness of the Company's Think 25 policy, venues regularly undergo random test purchasing and details can be provided to local authorities upon request.
43. In our experience venues are not more susceptible to access by underage individuals due to the nature of our gaming services and customer demographics. This is consistently seen across our licensed estate and Merkur's products do not appeal to underage individuals.
44. 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. The protocols in place are highly regarded and have never been criticised or called into question by an authority or the Gambling Commission.

Crime and Vulnerability

45. 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.

46. Merkur is an experienced operator with a proven history of operating premises in some challenging areas and incidents relating to crime and disorder are rare.
47. 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.
48. Local premises management will always work with local authorities under the Act, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.
49. It is rare for our venues that operate late at night to attract customers leaving alcohol licensed venues as the entertainment offering is significantly different. Merkur's late night operation appeals to shift workers and employees of the late night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
50. 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 identifies and sends alerts of suspicious activity and 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.
51. All Merkur Slots venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools are designed to ensure minimal conflict and successful implementation of our strict policies. In our experience, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate regardless of premises location.
52. As an Operating Licence holder, Merkur Slots UK Limited provides details of incident records and self-exclusion to the Gambling Commission as part of its Regulatory Returns and compliance process. Whilst incidents across our licensed estate are rare, all records are regularly evaluated to ensure that premises operate safely and responsibly.

Local Concerns

53. The representations received from the Interested Party identify that the proposed premises will be an increased risk to vulnerable people and children in the area should the Licensing Sub-Committee be minded to grant the current premises licence application.
54. Merkur has provided 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.
55. Merkur will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to children or vulnerable 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.

56. Merkur Slots premises, from experience, are not attractive to young persons and sites rarely have issues with young person's attempting to gain access. All our premises are over 18s and operate a Challenge 25 policy.
57. Merkur Slots premises usually only have low numbers of customers within the premise at any one time, with members of staff continually walking around. This safeguards the premises that in the rare event a young person will attempt to enter the premises, they would be intercepted and challenged for their ID at the earliest opportunity.
58. The Company's detailed training procedures and evaluation tools have been designed to mitigate any local risk to the Licensing Objectives, with a particular focus on the protection of children and the vulnerable from harms associated with gambling. As part of Merkur's Socially Responsible Gambling Policy, customers are continually monitored and interactions completed where concerns are identified. As part of the interaction process, customer play is assessed to trigger customer affordability and source of funds enquiries to ensure that all gaming remains controlled. I have described the Company's approach above, and it will of course be implemented in these premises.
59. Should the Committee members be minded to grant the new licence application we believe all potential operational risks will be effectively mitigated through the provision of the 7 proposed conditions included within the application. Within these conditions is the proposal to install a MagLock at the premises and a suitable intruder alarm to provide both safety to the staff and customers alike.
60. Merkur Slots also operate StaffGuard, a nationwide security platform allowing staff members to contact nearby centralised conflict management team if required.
61. 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. This premises will be no exception.
62. Due to the nature of the gaming that is provided at Merkur venues, it is rare for customers to congregate outside, unlike betting premises, as there is no ongoing entertainment such as a sporting event. It is also rare for our venues to have significant customer numbers at any one time with total customer numbers almost always in single figures. Customers leaving our premises rarely cause concern to our local neighbours.
63. Merkur is committed to partnership working and will always engage with local Betwatch, Pubwatch, or other similar schemes to share best practice and local knowledge of venue operation or identified risks, whether or not they strictly relate to gambling premises.

Premises Operation

64. 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.
65. 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.
66. 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.

67. 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.
68. 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.
69. Staff numbers and premises operation are regularly risk assessed, incorporating monitoring of premises operation, internal compliance audit completed by our field based compliance team, evaluation of customer numbers and feedback from Responsible Authorities and Interested Parties. These effective measures ensure that premises are able to quickly adapt to any emerging risk or local concern. Staff numbers and rotas are continuously reviewed to adapt to customer numbers and cognisance is taken of police advice.

Conclusion

70. 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.
71. 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.
72. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
73. 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.
74. Merkur continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

Ms Amanda Kiernan, Head of Compliance, Merkur Slots UK Limited

Date: 12/10/2022

SUPPLEMENTAL STATEMENT – STEVE AMBROSE

1. I am the Operations Director for Merkur having held this position since December 2016 responsible for all day to day operations across our estate of Adult Gaming Centres, High Street Bingo premises and Bingo Halls.
2. I am a Director of the Bingo Trade Association "The Bingo Association" and the Division 3 Chairman of the Amusement Trade Association "BACTA" covering Adult Gaming Centres across Great Britain.
3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position of Operations Director, this experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, in rural and city centre locations.
4. Through my years of working in the gambling industry I can state categorically that it is rare for Merkur Slots UK Limited's venues, and specifically its high street bingo premises, to be associated with crime and disorder, anti-social behaviour or local nuisance.
5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this reflects the type of gaming operated by Merkur and its customer demographic, which is approximately 50% female with an average age of over 30.
6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues, there is no 'event' taking place.
7. Across the high street bingo estate, average customer numbers at any one time remain relatively low, in single figures, and customer numbers between 5 and 10 at any one time, would be considered an exceptionally busy period.
8. Customer numbers do not vary significantly throughout the hours of premises operation and due to the relatively low numbers, later hours of operation are often sought, with the majority of Merkur premises operating into the early hours. Later hours of opening appeal to shift workers and employees of the late-night economy and Merkur Slots policies, procedures, safeguards, and security measures are designed to ensure that premises operate securely and safely at all hours of operation.
9. We operate premises throughout the UK in busy high street locations that have a high footfall of Children and Young persons. Due to the nature of our gambling premises, customer demographic and presentation of our venues on the high street, we do not see a significant number of underage individuals seeking to gain access to our premises regardless of location. In our experience, Merkur's product does not appeal to the younger generation.
10. Merkur's Think 25 policy and its implementation are effective tools ensuring that our venues operate responsibly. By strictly controlling our marketing and advertising and limiting line of site into venues, individuals that pass by our venues are not exposed to ambient gambling, which may be visible in other operator's venues, such as some betting premises and public houses that provide gaming machines.
11. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.
10. Our venue teams seek to form genuine relationships with local police, town centre groups, support services and Betwatch or Pubwatch schemes should they be available. Our staff are

proud of the areas in which they live and work and do not wish to see any level of anti-social behaviour.

11. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers and offering tea and snacks.
12. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained not only to enable effective premises management but also to ensure that customers can be continually monitored and assisted where necessary. As part of our commitment to working with local authorities, we will always liaise with local police licensing teams to ensure that where local police concerns are identified, sufficient staff members are on site during premises hours of operation,
13. Customer monitoring, interaction and any incidents including implementation of our Think 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Merkur Slots UK Limited's independent audit team can regularly monitor all records.
14. The Company's audit department collates and evaluates monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.
15. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours.
16. Machine emptying is only carried out when customer numbers are low and security systems implemented, which include activating the premises maglock and ensuring sufficient staff remain on duty.
17. Merkur Slots UK Limited's venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor.
18. Venues are equipped with our staff guard system. The system allows direct communication with a central monitoring station through audio and CCTV. The central monitoring station would then contact the relevant emergency services in case of incident.
19. We have considered the local concerns raised by the Interested Party and believe that should the Committee members be minded to grant the new premises licence all perceived operational risks and fears should have been effectively addressed through the conditions included within the application.
20. In our local area risk assessment we have identified a number of organisations that provide support services to local vulnerable individuals. Merkur is committed to working in partnership with local authorities and any organisations identified to discuss local concerns, ensuring that local risks are identified and incorporated into our risk assessment and management training.
21. All of these features mean that our premises provide safe and congenial environments and do not impact on their localities. In my experience, while concerns are sometimes expressed by local residents and some authorities with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises actually open.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 12/10/2022

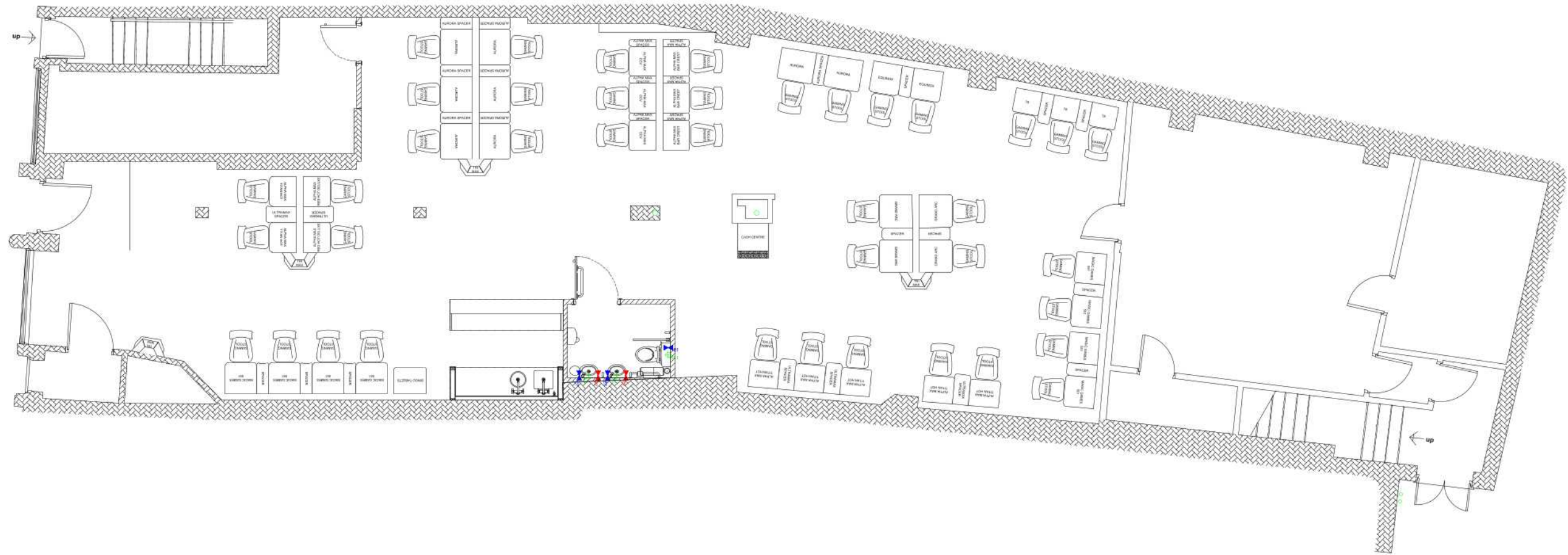
LICENSING SUB-COMMITTEE HEARING – 25 OCTOBER 2022

SUPPLEMENTAL STATEMENT - ANDY TIPPLE

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 220 'High Street Bingo' premises, bingo clubs, Family Entertainment Centres and 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 gaming machines provided 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. Following successful grant of the new bingo premises licence, we have proposed that there will be 14 B3 machines, 38 Cat C machines and 20 bingo Tablets. Details of the gaming content provided in the bingo tablets has been provided in the supporting documentation. In line with the proposed premises closing time, both bingo and gaming machine activities will be available until midnight each day.
9. 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.
10. As stated above, electronic bingo is a natural evolution of 'traditional bingo' and has been operated nationally for many years since the inception of the Gambling Act 2005 and is approved and understood by the Gambling Commission.

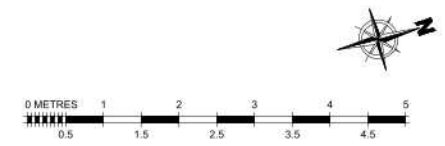
Mr Andy Tipple, Head of Product, Merkur Slots UK Limited

Date: 12/10/2022



TOTAL GROUND FLOOR AREA PROPOSED USE: AGC	
211.8m ²	2279.9ft ²

FOR ILLUSTRATION
PURPOSES ONLY



MACHINES LEGEND	
MACHINE CATERGORY	QUANTITY
CAT B3	0
CAT C	0
CAT D	0
DUOPOTS	0
TRIMAX	0
TABLETS	0
RATIO	0/0

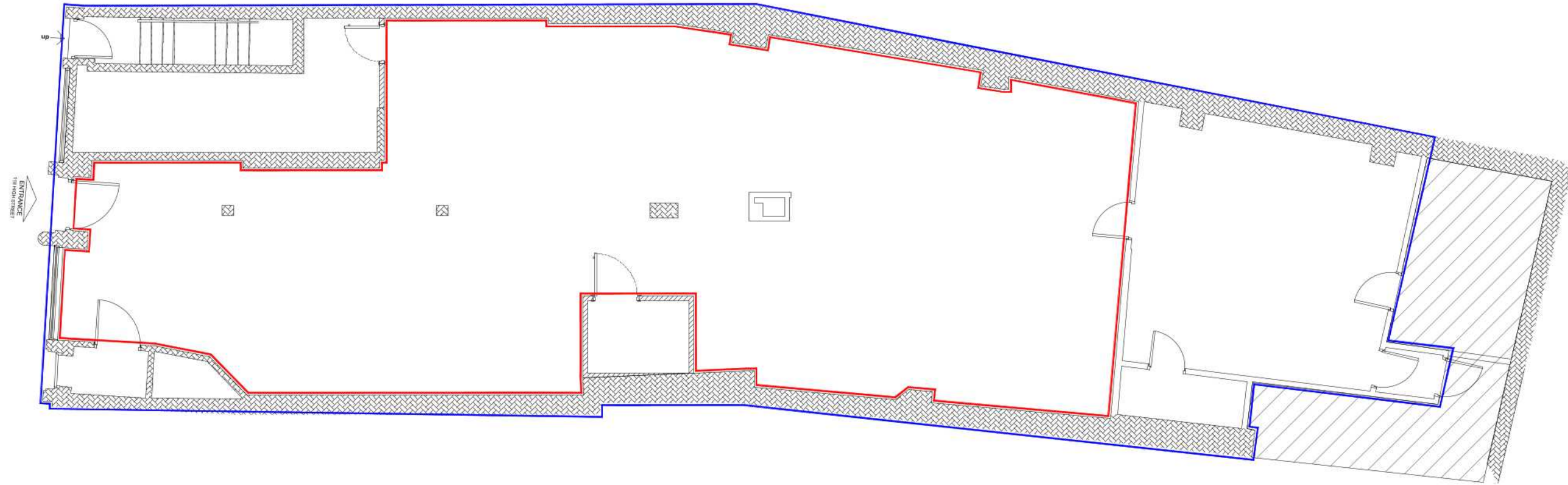
REVISIONS REV 00:

FIT OUT TYPE CONCEPT
PROJECT MERKUR SLOTS 118 High Street Barnet EN5 5XQ
DESCRIPTION PROPOSED MACHINE PLAN

REFERENCE DRAWINGS
SCALE 1:75
DRAWN BY
DATE 00/00/00



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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 Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.

REVISIONS REV 00:

FIT OUT TYPE CONCEPT 2
PROJECT MERKUR SLOTS 118 HIGH STREET BARNET EN5 5XQ
DESCRIPTION PROPOSED LICENCE PLAN

REFERENCE DRAWINGS
SCALE 1:100
DRAWN BY MG
DATE 16/05/22
DRAWING No. 700-PL-14
REVISION 00



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Merkur Slots, 118 High Street, Barnet, Herts EN5 5XQ

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	118 High Street, Barnet, Herts EN5 5XQ
Local Authority:	London Borough of Barnet
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-025 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
Name and Title of Assessor:	Agnieszka Szczerkowska – Internal Compliance Auditor
Date of Assessment:	09/05/2022
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots is located on a very busy High Street with a variety of typical main high street businesses. The premises on the road include coffee shops, takeaways, banks, supermarkets, hair and beauty salons, betting shops, charity shops, estate agencies and some international food suppliers. Sphire shopping centre is almost opposite Merkur Slots premise. Barnet High Street Bus Stop (D) is only few steps away. Merkur operates the following premises licensed for Gambling by the London Borough of Barnet; Merkur Slots, 48 Ballards Lane, Finchley, N3 2BX, Merkur slots, 847 High Road, North Finchley, N12 8PT, Merkur Slots, 48 Golders Green Road, NW11 8LL and Beacon Bingo, 200 Cricklewood Broadway, Cricklewood, NW2 3DU.
Establishments of note:	There is Toy Galaxy store 2 doors away from Merkur Slots premise, Iceland and Sainsbury's supermarkets are also close by. Barnet Southgate College Wood Street Campus is only 3 mins walk away. There are 3 betting shops in close vicinity: Paddy Power, Bedfred and Ladbrokes and CeX is located in Sphire shopping centre.
Adjoining premises:	Merkur Slots premise is situated between North London Hospice charity shop to the left and Maison Internet Café and convenience store to the right. Space above the venue is currently unoccupied.
Crime statistics:	In the year ending June 2021, the crime rate in Barnet was 69.56 which is about the same as the average crime rate across similar areas and lower than average for the Metropolitan Police force area. In February 2022, there were 56 crime incidents recorded within half a mile from Merkur Slots Barnet postcode predominantly consisting of anti-social behaviour (12), violence and sexual offences (11), theft (8) and vehicle crime (7).
Population:	High Street, Barnet area has a population of 2232 usual residents, gender split is 49/51 male/female. Dominating age group is 30-44 – 26% of all residents, 19% are children and young people under the age of 18 and 17% are people at retirement age. Majority of local residents are single 50.2%. 80% of people in High Street, Barnet area claim to have good and very good health, which is above UK average. Education levels – 46% of local population has a degree or a similar qualification, 16% has no qualifications and only 7.3% has other qualification which indicates the area doesn't have very higher concentration of immigrants.
Culture:	The area containing High Street, Barnet can be considered more ethnically diverse than the UK average. 80% of local residents describe themselves as White, compared to 86% UK population. Other sizeable ethnic groups include immigrants from European Union (9.5%), Indian (4.3%), Mixed Ethnicity (3%) and Other Asian (2.6%). Dominating religion here is Christianity (51%), 36% residents of local area claim to have no religion or didn't state their religious views and there is small number of people identify themselves as Jewish (5.2%), Muslim (4.3%) or Hindu (2.6%).
Unemployment:	Current unemployment rate in Barnet area is 5.3% which is slightly lower than London average of 5.9% (2021). 65.7% of resident population is in work, 8% are people with long term illness or disabled, 7.5% are students and another 7.5% are people who already retired. Main source of employment here are elementary occupations, mainly Health and social work (15.6%), Professional, Scientific and Technical Roles (14.8%), Retail (13%) and Education (12.7%). There is high volume of employees who work in supervisory, clerical, and junior managerial, administrative and professional roles (39%) and those in higher and intermediate managerial, administrative, or professional positions (36%).
Deprivation:	In Index of Multiple Deprivation 2019, High Street in Barnet has been ranked amongst 50% least deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation causing biggest concern is Education, Skills and Training Domain classified within 20% most deprived areas in the country. Barriers to housing and other services and Health and Disability Domain are both better here than in 30% of areas of England. Income deprivation affecting children, Living Environment domain and crime deprivation are all better than in 40% of areas in UK. Income and Employment Deprivation are better than in 50% of areas in UK. Only 10% of properties in local area are socially rented, which contrast with national average of 18%.
Local Police:	High Street, Barnet, EN5 5XQ is within the High Barnet policing neighbourhood, under the Metropolitan Police Service force area. Closest police station is Barnet Police Station, 26 High St, Chipping Barnet, Barnet EN5 5RU and it's only 0.3 miles away from Merkur Slots Barnet premise.

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

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration London Borough of Barnet Council local authority Statement of Gambling Principles, reference section 10.12 Bingo Centres and Barnet Council Borough Profile 2011.

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
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p>Unemployment Current unemployment rate in Barnet area at 5.3% which is slightly lower than London average of 5.9% (2021). 65.7% of resident population is in work, 8% are people with long term illness or disabled, 7.5% are students and another 7.5% are people on retirement. Main source of employment here are elementary occupations, mainly Health and social work (15.6%), Professional, Scientific and Technical Roles (14.8%), Retail (13%) and Education (12.7%). There is high volume of employees who work in supervisory, clerical, and junior managerial, administrative and professional roles (39%) and those in higher and intermediate managerial, administrative, or professional positions (36%).</p> <p>Deprivation In Index of Multiple Deprivation 2019, High Street in Barnet has been ranked amongst 50% least deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation causing biggest concern is Education, Skills and Training Domain classified within 20% most deprived areas in the country. Barriers to housing and other services and Health and Disability Domain are both better here than in 30% of areas of England. Income deprivation affecting children, Living Environment domain and crime deprivation are all better than in 40% of areas in UK. Income and Employment Deprivation are better than in 50% of areas in UK. Only 10% of properties in local area are socially rented, which contrast with national average of 18%.</p> <p>Schools and Education Barnet and Southgate College - Wood Street Campus, Wood St, EN5 4AZ Queen Elizabeth's Girls' School, High St, EN5 5RR</p>	<p>Age Verification <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Barnet 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>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</p>

<p>St Catherine's RC Primary School, Barnet, Vale Dr, EN5 2ED Foulds School, Byng Rd, EN5 4NR Ark Pioneer Academy, Westcombe Dr, EN5 2BE Underhill School and Children's Centre, 215 Mays Ln, EN5 2LZ Christ Church C Of E Primary School, Byng Road, EN5 4NS Mount House School, Camlet Way, EN4 0NJ Monken Hadley C Of E Primary School, Monken Hadley C of E Primary School, Camlet Way, EN4 0NJ Susie Earnshaw Theatre School, 68 High St, Chipping Barnet, EN5 5SJ Perform Barnet, United Reformed Church, EWEN HALL, Wood St, EN5 4BW High Barnet School of Dance, St Albans Rd, EN5 4LA</p> <p>Community Centres and Youth Centres The Centre, 1 Bath Pl, Hadley, EN5 5XE The Bull Theatre, 68 High St, Chipping Barnet, EN5 5SJ Chipping Barnet Club, 33 High St, Chipping Barnet, EN5 5UW Barnet Army Reserve Centre, Army Reserve Centre, St Albans Rd, EN5 4JX Hope Corner Community Centre, 185 Mays Ln, EN5 2DY</p> <p>Parks, play grounds and sports/leisure facilities Barnet Park, 29-41 Wood St, EN5 4BE Old Court House Recreation Ground, Manor Cl, EN5 4BE King George's Fields, 24 East View, EN5 5TN Whalebones Park, 140 Wood St, EN5 4DA High Barnet Park, 55 Barnet Ln, EN5 2DW Byng Road Playing Fields, EN5 4NS The Shire London, St Albans Rd, EN5 4RE Old Fold Manor Golf Club, Old Fold Ln, Hadley Green, EN5 4QN</p> <p>Vulnerable and addiction support services TouchBase South East, 12 Hyde Cl, Hadley, EN5 5TJ</p> <p>Homeless shelters and food banks Christ Church Barnet, Christ Church, EN5 4LA The Open Door Centre & Cafe, St Albans Rd, EN5 4LA The Rainbow Centre, Dollis Valley Dr, EN5 2UN</p> <p>Pawnbrokers and Loan Shops CeX, 10 The Spires, EN5 5XY</p> <p>Medical Centres, Care Homes and Mental Health facilities Springwell Centre, Barnet Hospital, Wellhouse Ln, Chipping Barnet, EN5 3DJ Moreways Healthcare® St Christophers House - High Barnet, 6 Mays Ln, EN5 2EE Barnet Hospital, Wellhouse Ln, EN5 3DJ Hadley Wood Hospital, 52 Moxon St, EN5 5TS The Hadleigh Clinic, 5su, 161 High St, Hadley, EN5 5SU</p>	<p>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>The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p>
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AK Medical Aesthetics, 161 High St, Hadley, EN5 5SU
 Longrove Surgery, Vale Dr, EN5 2ED
 The Wood Street Clinic, 133 Wood St, EN5 4BX
 Simpson Claire, Level 2/Wellhouse La, EN5 3DJ
 Vale Drive Primary Care Centre, Vale Dr, EN5 2ED
 C L C H, 22 Vale Dr, EN5 2ED
 Ellesmere Clinic, 1 Ellesmere Grove, EN5 2FT
 Gloucester Road Surgery, 1B Gloucester Rd, New Barnet, EN5 2RD

Hadley Lawns Care Home – Bupa, Kitts End Rd, EN5 4QE
 Kingsdowne Society, 37 Dury Rd, EN5 5PU
 Home Care Preferred Barnet, Galley House, 3c, Moon Ln, EN5 5YL
 Ravenscroft Cottages of Potters Lane, Potters Ln, EN5 5AG
 Home Instead Barnet – Home Care & Companionship, 1st Floor,
 Raydean House, 15-17 Western Parade, Great North Road,
 London, EN5 1AD
 Valley Way House, Pellow Cl, EN5 2UL
 Eleanor Palmer Trust, Cantelowes House, Spring Cl, EN5 2UR
 Carlton Court Care Home, 112 Bells Hill, EN5 2SQ
 Richmond Fellowship Residential House, Leecroft Road, Leecroft
 House, EN5 2TH
 Signature at Barnet, 59 Wood St, EN5 4BS
 Hertswood Court, Hillside Gardens, EN5 4AU
 John Garrett's Almshouses, Wood St, EN5 4BW
 James Ravenscroft Almshouses, Wood St, EN5 4BW
 Abbey Ravenscroft Park Nursing Home, 3-6 Ravenscroft Park,
 EN5 4ND
 Eleanor Palmer Trust, HEAD OFFICE:, 106B Wood St, EN5 4BY

Gambling premises

Betfred, 158 High St, Hadley, EN5 5XP
 Paddy Power, 62 High St, Chipping Barnet, EN5 5SJ
 Ladbrokes, 168 High St, Hadley, EN5 5XP

Public Houses and Alcohol Licensed Premise

Ye Olde Monken Holt, 193 High St, Hadley, EN5 5SU
 Hadley House restaurant & cocktail Bar, 149 High St, EN5 5SU
 The Library Bar, 143 High St, EN5 5UZ
 The Butchers Arms, 148 High St, Hadley, EN5 5XP
 Sebright Arms, 9 Alston Rd, EN5 4ET
 Kings Head, 84 High St, Chipping Barnet, EN5 5SN
 Ye Olde Mitre Barnet, 58 High St, Chipping Barnet, EN5 5SJ
 The Red Lion, 31 High St, Chipping Barnet, EN5 5UW
 The Lord Nelson, 14 W End Ln, EN5 2SA
 Arkley Barnet, Barnet Rd, Arkley, EN5 3EP
 Queens Arms, Great N Rd, New Barnet, EN5 1AB
 Weavers Pub, Greenhill Parade, 26/27, New Barnet, EN5 1HY

Residential Areas

The area containing High Street, Barnet consists predominantly of flats (64%), which is common in inner cities, student

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.

Customer Interaction

Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).

Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.

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.

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.

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.

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.

Player Protection

To identify signs associated with problem gambling and people who may be at risk of gambling related harm
Failure to provide information to customers on responsible gambling
Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews

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

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

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

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

	<p>neighbourhoods and poorer suburban settings. There is higher than average level of rented housing (excluding social housing) - 42% of household spaces. This contrasts with the national average of just over 16%. 38% of properties are owned with or without a mortgage. 46% of dwellings are occupied by a single person.</p> <p>Bus stops and other Transport links High Barnet, Barnet Hill, EN5 5RP Barnet High Street (Stop D), Chipping Barnet, EN5 5UR Barnet High Street (Stop J), Chipping Barnet, EN5 5UT Barnet Church Wood Street (Stop E), EN5 4BE St Albans Road Hadley Green (Stop A), EN5 5SY</p> <p>Regular Festivals, Town Events and Mass Gatherings Barnet Summer Festival Barnet Summertime</p>	<p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector.</p> <p>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p>
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being</p>	<p>Crime statistics In the year ending June 2021, the crime rate in Barnet was 69.56 which is about the same as the average crime rate across similar areas and lower than average for the Metropolitan Police force area. In February 2022, there were 56 crime incidents recorded within half a mile from Merkur Slots Barnet postcode</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p>

<p>used to support crime</p>	<p>predominantly consisting of anti-social behaviour (12), violence and sexual offences (11), theft (8) and vehicle crime (7).</p> <p>Local Police High Street, Barnet, EN5 5XQ is within the High Barnet policing neighbourhood, under the Metropolitan Police Service force area. Closest police station is Barnet Police Station, 26 High St, Chipping Barnet, Barnet EN5 5RU and it's only 0.3 miles away from Merkur Slots Barnet premise.</p> <p>Public Houses and Alcohol Licensed Premise Ye Olde Monken Holt, 193 High St, Hadley, EN5 5SU Hadley House restaurant & cocktail Bar, 149 High St, EN5 5SU The Library Bar, 143 High St, EN5 5UZ The Butchers Arms, 148 High St, Hadley, EN5 5XP Sebright Arms, 9 Alston Rd, EN5 4ET Kings Head, 84 High St, Chipping Barnet, EN5 5SN Ye Olde Mitre Barnet, 58 High St, Chipping Barnet, EN5 5SJ The Red Lion, 31 High St, Chipping Barnet, EN5 5UW The Lord Nelson, 14 W End Ln, EN5 2SA Arkley Barnet, Barnet Rd, Arkley, EN5 3EP Queens Arms, Great N Rd, New Barnet, EN5 1AB Weavers Pub, Greenhill Parade, 26/27, New Barnet, EN5 1HY</p> <p>Pawnbrokers and Loan Shops CeX, 10 The Spires, EN5 5XY</p> <p>Gambling premises Betfred, 158 High St, Hadley, EN5 5XP Paddy Power, 62 High St, Chipping Barnet, EN5 5SJ Ladbrokes, 168 High St, Hadley, EN5 5XP</p> <p>Residential Areas (impacted by Anti Social Behaviour) The area containing High Street, Barnet consists predominantly of flats (64%), which is common in inner cities, student neighbourhoods and poorer suburban settings. There is higher than average level of rented housing (excluding social housing) - 42% of household spaces. This contrasts with the national average of just over 16%. 38% of properties are owned with or without a mortgage. 46% of dwellings are occupied by a single person. In February 2022, there were 56 crime incidents recorded within half a mile from Merkur Slots Barnet postcode, 12 of which were related to anti-social behaviour. Higher concentration of reported incidents are Maxon Street, High Street and area around a supermarket.</p>	<p>Merkur Slots Barnet 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 Barnet will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder <i>To identify aggressive customers to prevent crime and disorder Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for the local 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 local Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Barnet will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p>Anti-social behaviour outside the premise</p>
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Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

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

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

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

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

Money Laundering

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

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

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

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

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

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

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

		<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 Barnet will operate TITo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</p> <p>As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p>Alcohol and Drugs Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise. 'No Alcohol Allowed' signage on the door.</p>
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		<p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>Bingo/Gaming Machine and Supervision The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p>Customer Complaints <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses.</p>

		<p>4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p>Marketing Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
Other	<p>Places of worship and Religious Buildings St Mary the Virgin, Monken Hadley, Hadley Green Rd, EN5 5PZ Church House Monken Hadley, 105 Camlet Way, EN4 0NJ Christ Church Barnet, Christ Church, EN5 4LA High Barnet Baptist Church, 197 High St, Hadley, EN5 5SU Querido de Deus, 19B Alston Works, EN5 4EL The Barnet & Queensbury Methodist Circuit, Wesley Hall, 9 Stapylton Rd, EN5 4JJ The Stable, Salisbury Rd, EN5 4JW Barnet Christian Spiritualist Church, 1A Union St, Chipping Barnet, EN5 4HY St John the Baptist Church, Chipping Barnet, Church House, 2 Wood St, Chipping Barnet, EN5 4BW High Barnet Spiritualist Church, Union St, EN5 4HZ Barnet URC Church, 48 Wood St, EN5 4BW Mary Immaculate & St Gregory the Great R C Church, 82 Union St, EN5 4HZ Barnet Church, 82 Union St, EN5 4HZ Saint Stephens Church of England, 150 Bells Hill, EN5 2SL St Andrew's Chesterfield Road URC, 89 Chesterfield Rd, EN5 2RE Underhill Baptist Church, 42 Elton Ave, EN5 2EA St Mark's Church, Barnet Vale, 56 Potters Rd, EN5 5HY</p>	<p>Ethnicity and Local Area Demographic Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p>

		<p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p> <p>COVID 19 All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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Merkur Slots Barnet Premise Layout


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

Additional Comments

I have worked in Gaming Industry for over 15 years. I have gained a lot of experience working first in operations within numerous venues across London, including Ealing, Acton, Southall, Wembley, Shepherds Bush, Holloway and more. I have spent a few years working as part of Income Protection team, carrying cash collections in London area and many towns and cities all over the country. In 2019, I joined Audit and Compliance department. In the past 3 years, I have completed a number of Local Area Risk Assessments for existing venues as part of annual compliance audit and newly opened venues across the country. I fully understand how some neighbourhoods could prove challenging due to different levels of depravation and ethnical diversity and how important it is to have safety measures in place to, as an operator, minimize the risk to potential customers and employees – Agnieszka Szczerkowska (Internal Compliance Auditor).

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

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

Assessors Name:	Agnieszka Szczerkowska
Signature:	PP 
Date:	09/05/2022

Merkur Slots, 118 High Street, Barnet, Herts EN5 5XQ



Merkur Slots, 118 High Street, Barnet, Herts EN5 5XQ – Shop frontage example



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Full Observation Report

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

Merkur Slots

182-184 Edgware Road London W2 2DS

Executive Summary

1. Observations were conducted on Merkur Slots premises at 182-184 Edgware Road London W2 2DS and the surrounding area between 21:00 hours on Thursday 1st September 2022 and 06:15 hours on Friday 2nd September 2022, then again between 22:50 hours and 23:35 hours on Thursday 15th September 2022.
2. Two covert visit were made to the site and the surrounding area. The observations showed the premises are situated on a busy high street within a parade of shops on the A5 Edgware Road. The visits showed the premises to be well run with no issues on each occasion.
3. There are two other operators in the area with a similar business model to Merkur Slots which are Little Vic Casino 156 – 158 Edgware Road W2 2DS and Reel Time 212 Edgware Road W2 1DH which are advertised as being open 24-hours a day. From the observations and my visits to the area, it is clear that Merkur Slots operating 24-hours a day would not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

4. I have been instructed to conduct independent observations on the Merkur Slots premises at 182-184 Edgware Road London W2 2DS and the surrounding areas.

5. These premises are licenced under the Gaming Act 2005 and are open Sunday to Thursday 07:00 to 01:00 hours and Friday and Saturday 07:00 hours to 02:00 hours.
6. The premises come under the jurisdiction of Westminster City Council.

Personal – Stuart Jenkins

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. 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 – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) 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.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

13. I carried out my observations of Merkur Slots premises at 182-184 Edgware Road and the surrounding area between 21:00 hours on Thursday 1st September 2022 and 06:15 hours on Friday 2nd September 2022, and again between 22:50 hours and 23:35 hours on Thursday 15th September 2022.
14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. The area of observations is densely populated with many retail premises, licensed bars, and restaurants. Edgware Road is well served by public transport with regular bus routes, taxis, and trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. There are London Underground Stations located at Edgware Road to the north of the premises and Marble Arch to the south. These transport mediums allow the public to arrive and leave the area safely and quickly.
18. The area has a diverse community living together in a mixture of privately owned and rental accommodation. The area also has several hotels and bed and breakfast establishments.
19. The premises is situated on the A5 a busy road running North to South. The southern end finishes at one of London's iconic tourist venues, Marble Arch and Hyde Park with the exclusive premises of Park Lane close by. To the north is the Marylebone Flyover which connects to the A40 a main arterial route into London. The road has two-way vehicular traffic passing the venue.
20. Running off Edgware Road, east to west are numerous residential hotel and commercial premises. On either side of Edgware Road there are many retail outlets including independent shop premises, licensed premises, gaming premises, betting shops, restaurants, estate agents, supermarkets, mini-supermarkets, hairdressers, barber shops, chemists and fast-food premises.
21. Immediately north of the premises is an empty shop then the junction with Crawford Place. Immediately south of the premises is a McDonalds Restaurant and then a large Waitrose Supermarket. Opposite there are a number of small independent shops including a mobile phone sales and service premises (Mr Tech and Linku), a Salon (Baghdad Salon) and a Pharmacy.
22. Pedestrian and vehicular traffic varied during the times of the observations. There was zoned parking in local side roads and additional underground parking for some of the residential apartment premises.
23. The area of observations was from Chapel Street in the north and George Street in the south.
24. There are seven other gambling premises in the Edgware Road W2 area of observations. The four bookmaker premises were all closed by 22:00 hours, the other gaming premises were open 24-hours:
 - i. Coral Bookmakers 214 Edgware Road W2 1DH – Image A16
 - ii. Ladbrokes Bookmakers 113-115 Edgware Road W2 2HX – Image A18
 - iii. Paddy Power Bookmakers 242 Edgware Road W2 1DS – Image A15
 - iv. William Hill Bookmakers 95 Edgware Road W2 2HX – Image A19
 - v. Little Vic Casino 156 – 158 Edgware Road W2 2DS – Image A10

- vi. Reel Time 212 Edgware Road W2 1DH – Image A16
- vii. The Victoria - Grosvenor Casino 150-162 Edgware Road W2 2DS – Image A11

25. These premises can be divided into three main types:

- i. Casino premises that serve alcohol.
- ii. Betting premises not licensed to serve alcohol.
- iii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

26. There are two gaming premises that have a similar business model to Merkur Slots – Little Vic Casino 156-158 Edgware Road and Reel Time 212 Edgware Road which are both able to open 24-hours a day 7-days a week.

27. Throughout my observations in and around Edgware Road I saw no street drinkers, drug dealing, anti-social behaviour or other criminal activity around the premises or the area. There was begging taking place and homeless sleeping in doorways however this was well away from Merkur Slots and not linked to the premises in anyway – Image A8, A9.

28. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendices A and B.

Covert Observations

Deployment One

29. I conducted my covert observations from 21:00 hours on Thursday 1st September 2022 to 06:15 hours on Friday 2nd September 2022.

30. At 21:00 hours I arrived in the area of the Merkur Slots premises 182-184 Edgware Road W2 2DS and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall – Image A1.

31. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of night. Most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues – Image A2, A3, A4, A5, A6.

32. At 21:28 hours I saw a female engaged in begging outside Lloyds Bank Edgware Road with a homeless person sleeping nearby – Image A8.

33. At 21:30 hours I saw a homeless male and female couple asleep outside Barclays Bank Edgware Road – Image A9.

34. Between 22:00 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the shops, restaurants and late-night

takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Edgware Road with purpose – Images A21, A22, A23, A24.

35. Between 00:11 hours and – 00:21 hours I conducted a covert visit to the Merkur Slots Edgware Road – Images A25, A26.
36. The front display of the premises was clean, well maintained and looked professional. The signage was clear and bright.
37. At 00:11 hours I went to the entrance door which was closed. I saw that entry was controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in use.
38. I pushed the door and entered. On entry I saw to the right was a display board with the rules, policies and licences on show for customers and the authorities.
39. On entering this main area, the room opened into a large deep room. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
40. About half way down on the left I saw a reception area where refreshments were also prepared. At the reception desk I saw two male members of staff dressed in smart corporate clothing.
41. One of the males approached and informed me that the premises was due to close in about 10 minutes. I stated I thought it closed at 1am and he stated it did, but they were closing early to allow staff to thoroughly clean the gaming machines and room. I saw that he had an SIA door supervisor badge clearly displayed. The other member of staff then spoke to me confirming I only had 10 minutes to use the machines until the premises closed, I replied that would be fine.
42. I saw there was one other customer in the premises. He was male about 27 years of age and casually dressed. No other customers came into the venue during my visit.
43. I found a gaming machine to play and sat down. I asked the second male if there were drinks available. He stated there were only soft drinks available as they were about to close. I declined the offer and carried on playing the machine.
44. There was a facility to prepare hot and soft drinks at the reception desk area which was clean and tidy.
45. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.

46. After 10 minutes in the premises, I was informed by staff that they were now closed, and I needed to leave. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 00:21 hours – Image A26.
47. At 01:00 hours Merkur Slots Edgware Road formally closed without any issues or incidents.
48. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images A27, A28, A29, A30, A31, A32, A33, A34, A35, A36, A37, A38, A39, A40, A41.
49. I remained in the area until 06:15 hours when I concluded my observations.

Deployment Two

50. I conducted my covert observations from between 22:50 hours to 23:35 hours on Thursday 15th September 2022.
51. At 22:50 hours I arrived in the area of the Merkur Slots 182-184 Edgware Road W2 2DS and started my observations by monitoring the venue and the immediate area around it – Image B1.
52. Pedestrian and vehicular traffic passing the premises was constant but varied as is typical with Edgware Road 24-hours 7-days a week.
53. Between 22:56 hours and 23:28 hours I conducted a covert visit to the Merkur Slots 182-184 Edgware Road W2 2DS – Image B2.
54. At 22:56 hours I went to the entrance door which was closed. The front of the premises was as I have described previously.
55. I pushed the door and entered the premises. In front of me was the board with the premises policies, rules and licences on display. I passed the policies board and entered the main area which was the same as when I visited previously.
56. I saw there were two male staff on duty who were dressed in smart corporate clothing. One of the males was also wearing an SIA door supervisor badge.
57. The member of staff without the SIA badge approached me, welcomed me to the venue and asked if I needed any help with choosing a gaming machine to play. I stated I was fine and looked around the premises.
58. I saw there were five other customers in the venue at the time of my visit. All five were male aged between 28 years and 55 years and casually dressed.

59. I found a gaming machine beyond the reception desk. The staff left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
60. Whilst I was playing the machine the male member of staff who spoke to me originally asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
61. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
62. The hot and soft drinks were prepared at the reception desk area which was clean and tidy.
63. As before whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
64. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image B3, B4.
65. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. Prior to me leaving two male customers left and did not return. I left the premises at 23:28 hours – Image B5.
66. Throughout my continuing observations I recorded a further photographic image that demonstrated there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Image B6.
67. I remained in the area until 23:35 hours when I concluded my observations.

Summary

68. I found Merkur Slots in Edgware Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
69. At the time of my visits to the location, I saw mature females engaged in begging and homeless people sleeping in doorways on Edgware Road. However, this activity took place well away from Merkur Slots and was not linked to the premises in any way.
70. I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing or groups of youths hanging around.

71. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
72. It is clear the presence of Merkur Slots in Edgware Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
73. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
74. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
75. 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.
76. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
77. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

78. 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
20/09/2022

Appendix A

Observation Images

1st - 2nd September 2022

Merkur Slots

182-184 Edgware Road

London

W2 2DS

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1 HQ



Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A1

21:21hrs

Merkur Slots 182-184 Edgware Road London W2 2DS



Image A2

21:21hrs

Edgware Road looking south

Mercur Slots
Mercur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A3
21:21hrs
Edgware Road looking north



Image A4
21:26hrs
McDonalds 178 - 180 Edgware Road W2 2DS

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A5

21:26hrs

Waitrose Supermarket
168 - 176 Edgware Road W2 2DX



Image A6

21:27hrs

Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A7

21:27hrs

Pharmacentre 149 Edgware Road
(opposite Merkur Slots)



Image A8

21:28hrs

Female engaged in begging Edgware Road
looking north

Mercur Slots
Mercur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A9

21:30hrs

Rough Sleeper Edgware Road looking north

Image A10

21:30hrs

The Little Vic Casino 156 Edgware Road W2 2DS

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022

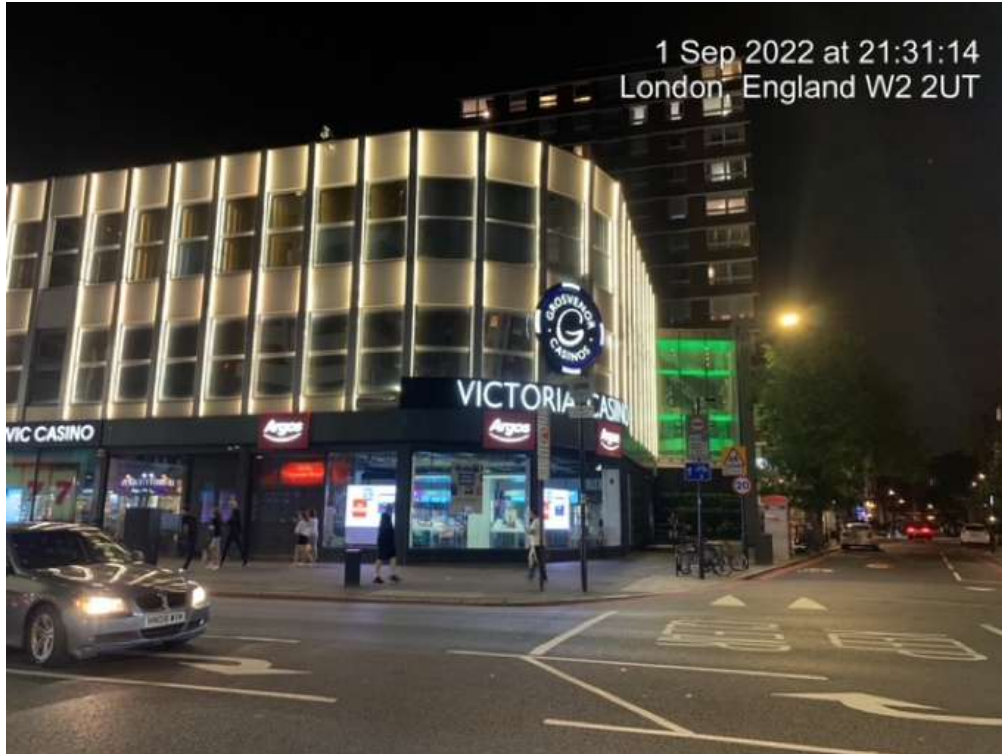


Image A11

21:31hrs

Victoria Casino 150 -162 Edgware Road W2 2DT



Image A12

21:32hrs

Female engaged in begging Edgware Road

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A13

21:32hrs

Congestion Charge Restrictions Signage Edgware Road



Image A14

21:40hrs

Edgware Road j/w Chapel Street and Praed Street looking south

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A15

21:40hrs

Paddy Power 242 Edgware Road W2 1DS



Image A16

21:42hrs

Coral Bookmakers 214 Edgware Road W2 1DH

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A17

21:43hrs

Reel Time 212 Edgware Road W2 1DH



Image A18

21:47hrs

Ladbrokes Bookmakers
113 - 115 Edgware Road W2 2HX

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A19

21:49hrs

William Hill Bookmakers 95 Edgware Road W2 2HX



Image A20

21:50hrs

Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A21

23:53hrs

Merkur Slots 182 - 184 Edgware Road W2



Image A22

23:55hrs

Edgware Road j/w Sussex Gardens looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A23
23:55hrs
Edgware Road looking south



Image A24
23:58hrs
Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A25

00:10hrs

Merkur Slots 182 - 184 Edgware Road



Image A26

00:22hrs

Merkur Slots 182 - 184 Edgware Road

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A27

02:40hrs

Merkur Slots 182 - 184 Edgware Road



Image A28

02:40hrs

Edgware Road looking south

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A29
02:40hrs
Edgware Road looking north



Image A30
02:41hrs
Al Mustafa Express 135 Edgware Road W2 2HR

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A31

02:42hrs

Little Vic Casino Edgware Road



Image A32

02:42hrs

Edgware Road looking south

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A33

04:37hrs

Merkur Slots 182 - 184 Edgware Road



Image A34

04:37hrs

Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A35

04:37hrs

Edgware Road looking south



Image A36

04:38hrs

Rough Sleepers Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A37

04:39hrs

The Little Vic Casino Edgware Road



Image A38

06:04hrs

Merlur Slots 182 - 184 Edgware Road

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A39

06:04hrs

McDonalds Edgware Road



Image A40

06:05hrs

Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A41

06:05hrs

Edgware Road looking south

Appendix B

Observation Images
15th September 2022

Merkur Slots

182 -184 Edgware Road
London
W2 2DS

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1 HQ



Merkur Slots
182-184 Edgware Road London W2 2DS

15th September 2022



Image B1

22:54hrs

Edgware Road looking north



Image B2

22:55hrs

Merkur Slots 182 -184 Edgware Road W2 2DS



Image B3

23:22hrs

Toilet Check Sheet
 Merkur Slots 182 - 184 Edgware Road



Image B4

23:22hrs

Staying in Control Literature / Gamcare Leaflets
 Toilets Merkur Slots 182-184 Edgware Road

Merkur Slots
182-184 Edgware Road London W2 2DS

15th September 2022



Image B5

23:28hrs

Merkur Slots 182 - 184 Edgware Road

Image B6

23:28hrs

Edgware Road looking south



Full Observation Report

Mr Nicholas Mason – Consultant

Leveche Associates Limited

Merkur Slots

19 The Concourse

Edmonton Green N9 0TQ

Executive Summary

1. Observations were conducted on Merkur Slots premises at 19 The Concourse Edmonton Green N9 0TQ and the surrounding area between 20:45hrs on Thursday 22nd September 2022 and 05:45hrs on Friday 23rd September 2022. The premises are situated in a pedestrianised area of Edmonton Green.
2. One covert visit was made to the Merkur premises and the surrounding area. Observations showed the premises to be well run and operating correctly with no issues.
3. There are no other gaming premises with a similar business model to Merkur Slots in the immediate area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

4. We are instructed to conduct independent observations at Merkur Slots premises at 19 The Concourse Edmonton Green Shopping Centre N9 0TQ and the surrounding area.
5. The premises has a 24-hour licence under the Gaming Act 2005 and is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of the London Borough of Enfield Council and the Edmonton Green Ward for the Metropolitan Police.

Personal Summary – Nicholas Mason

7. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for the risk assessment and management of intelligence led operations by covert means, including the disruption of organised crime groups infiltrating the licensing industry.
9. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
10. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into MPS through other UK crime authorities / Police forces.
11. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
12. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
13. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
14. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Observations

15. Observations were carried out at Merkur Slots premises at 19 The Concourse Edmonton Green Shopping Centre N9 0TQ and the surrounding area on Thursday 22nd September 2022 into the early hours of Friday 23rd September 2022.

16. The premises are situated in a pedestrianised area of Edmonton Green. The footway in front of the Merkur Slots premises runs generally east to west. Immediately next door and to the east is the Betfred Bookmakers and to the west is a large Lidl Supermarket – Image A1 .
17. Betfred is the only bookmaker premises in the vicinity of Merkur Slots. The Betfred premises trades Monday to Sunday 07:30hrs to 22:00hrs. There are other Bookmakers within Edmonton Shopping Centre but they are some distance away and unlikely to impact on the operation of the Merkur Slots premises.
18. There are no other Adult Gaming Centres at this location and no other premises that operate a similar business model to Merkur Slots premises.
19. There are only a small number of other shops in the vicinity of the Merkur Slots premises which include a Pharmacy, Café , Barbers, Chinese Medical Centre, Opticians, a Clothing Shop and a Western Union Money transfer premises. All of these premises were closed for the period of observations.
20. Opposite the Merkur Slots premises are fast food shops, The Lime Tree Café, Hi Wok take away and the Baraja Bakery. The Hi Wok was open when observations commenced but had closed by 21:30hrs, as had all the other premises.
21. At the eastern end of the pedestrian area is Edmonton Green Market which has numerous market stall premises and leads into Edmonton Green Shopping Centre though all of this area was closed at the time of observations – Image A2, A3, A4.
22. Parking in the surrounding streets is restricted by double yellow lines and residents parking permits. There is a large car park available that serves Edmonton Shopping Centre.
23. The location is well served for public transport with the main bus station only 100 metres from the Merkur premises at Edmonton Green providing transport away from the town centre. Edmonton Rail Station is within 150 metres of the Merkur premises and provides another transport option both locally and with a connection to Central London. During the course of observations numerous licensed taxis / Ubers were seen serving the locality – Image A5, A8.
24. Opposite the Bus Station there is an additional transport option with a 24hr Mini cab office – Image A10, there are also a number of fast food take away / restaurant premises and a mini-supermarket – Image A11.
25. On the roundabout opposite the war memorial at 29 The Concourse is BIMs Burger Shop. This was a focal point for Deliveroo delivery riders to congregate with their motorcycles, though the pavement is wide enough at this point for them not to impact on passing pedestrians – Image A6, A7.
26. Away from the pedestrianised area the location has multiple side streets with privately owned and rented residential accommodation including some tower blocks that overlook the pedestrian area – Image A12.

27. In front of the Lidl Supermarket and near the Merkur Slots premises the paved area extends and a number of benches are located.
28. There are no public houses or bars in the immediate vicinity of the Merkur Slots premises.
29. There are no religious premises or schools in the immediate vicinity of the Merkur Slots premises and no children were seen in the area at the time of these overnight observations.
30. The area is well lit and illuminated from street lighting, lighting from the Bus Station and shop front lights. I had clear and unobstructed views throughout the observations.
31. Photographic images of what was seen were obtained to support my findings. These images are documented in Appendix A.

Covert Observations

32. On Thursday 22nd September at 20:45hrs observations commenced and went through the night until 05:45 hours on Friday 23rd September 2022.
33. The Merkur Slots premises were open as were the adjacent premises, the Betfred Bookmakers and Lidl supermarket. The Merkur premises had a smart corporate and professional looking frontage that was well maintained and clean. There was no evidence of anti-social behaviour – Image A1.
34. From around 21:50hrs I positioned myself in the vicinity of the Betfred Bookmakers as it was closing for the evening. There was no evidence of criminality, additional noise or anti-social behaviour as the premises closed – Image A13.
35. At 22:01hrs 5 customers, 4 men and 1 woman left Merkur Slots premise. They walked past where I was standing and I could hear them talking. There was no disturbance or anti-social behaviour – Image A14.
36. At 22:06hrs the staff from Betfred Bookmakers left the premises, locked the front door and walked away in the direction of the bus station. Again, there was no disturbance or anti-social behaviour – Image A15 .
37. At 22:11hrs a group of young men were seated or standing by the benches outside Lidl Supermarket, some were drinking from what I believed to be beer cans and were occasionally shouting. None of these men were linked to the Betfred Bookmakers or the Merkur Slots premises – Image A16.
38. At 23:24hrs I was in the vicinity of the Merkur Slots premises and surrounding area, there was no evidence of additional noise or anti-social behaviour – Image A17, A18, A19.

39. At 23:25hrs I saw a white male in a blue casual track-suit approach the front door of the Merkur premises. I heard the buzz of the security bell and the man then walked into the premises and out of sight – Image A19.
40. At 00:47hrs I was in the vicinity of the Merkur Slots premises and surrounding area, there was no evidence of additional noise or anti-social behaviour – Image A20, A21, A22.
41. Between 01:00hrs and 01:40hrs I conducted a covert visit to the Merkur Slots premises at 19, The Concourse. As I approached I could see signage on the front door that stated no smoking on the premises, over 18' only, no alcohol and that CCTV was in use.
42. 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-hrs per day.
43. The front door was locked, there was a CCTV camera to my left with a push button that I pressed. The door was unlocked and opened by a member of security staff who was wearing a blue blazer saying security and had a lanyard around his neck that held an SIA badge. He greeted me and I walked in.
44. Once inside the entrance I saw there was an information board on my right. On this board were Merkur Slots information documents, premises rules, policies and licenses. 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.
45. I walked through the premises and could see there was a series of gaming machines going from the front to the back of the premises along both walls. The floor was carpeted providing a lounge style effect and at the rear of the premises was a reception area. Behind a Perspex shield was an area for preparing drinks, this area appeared clean and tidy. Two other members of staff, wearing Merkur liveried black shirts with black trousers were standing there.
46. I walked around the premises looking for a machine to play. There were 3 other customers playing machines, each was about 35 years old, they were all male casually addressed and each appeared to be on their own. I selected a machine along the left-hand wall near the front of the premises and sat down.
47. I began to play a machine when I was approached by a member of staff who I had seen at the rear of the premises. He asked if I would like a drink and I asked what

was available. He explained that there were soft drinks or coffee and I asked for a black coffee. He walked off returning with the coffee a few minutes later.

48. I continued to play the machine and noted that both staff I had seen at the rear of the premises were cleaning, one with spray, wiping down the machines while the staff member I had spoken to had a hand-held vacuum and was cleaning the carpet in different areas.
49. I paused playing my machine and spoke to the member of staff who had brought my coffee and asked if the toilet was at the rear of the premises. He confirmed that it was but then explained that it was out of order, there had been a leak, a plumber had been to look at it and would be returning in the morning.
50. I returned to playing the machine, neither I or any of the other 3 customers were pressurised or encouraged to spend money and I did not see anyone who was vulnerable or drunk. The staff were friendly and polite and the premises clean and tidy.
51. During the course of my visit no other persons entered the premises. I stood up to leave and as I did so the security guard walked to the front door and unlocked it. I thanked him and walked out of the premises at 01:19hrs. As I went out through the door there was no one loitering outside or looking to gain entry. There was no anti-social behaviour inside or outside in the vicinity of the premises – Image A23.
52. At 01:41hrs I saw an elderly male and female couple standing at the paved area in front of the Lidl Supermarket. The female was shouting at the male who was clearly very drunk. They were joined by another elderly couple and stood by the scaffolding close to Domino's Pizza delivery shop opposite the bus station. None of these people were linked to the Merkur Slots premises and after a short while walked away towards the bus station and out of my sight – Image A24.
53. As the night progressed there was some footfall and local traffic but nothing out of the ordinary. I obtained images from the vicinity of the Merkur Slots premises which demonstrate there was no evidence of any anti-social behaviour or criminality – Image A25, A26, A27, A28, A29, A30, A31.
54. At 05:45hrs I concluded my observations – Image A32.

Summary

55. During the observation periods I found no evidence of anti-social behaviour or criminality at the Merkur Slots premises or linked to it.
56. Early on during my observations at 22:11hrs I witnessed a group of young men at the benches outside Lidl Supermarket, some were drinking from what I believed to be beer cans and were occasionally shouting. None of these men were linked to the Betfred Bookmakers or the Merkur Slots premises.
57. At 01:41hrs I saw the elderly drunk male with his wife and another couple. None of these people were linked to the Merkur Slots premises.

58. During the course of my observations I saw no other evidence of anti-social behaviour, begging, crime and disorder, drug dealing or other groups of youths loitering in the area.
59. People entering the Merkur Slots premises were supervised on entry and whilst on the premises to ensure that anyone heavily intoxicated, juveniles or other vulnerable people didn't gain access.
60. The visit to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
61. At Merkur Slots premises 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.
62. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
63. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
64. In conclusion, from this visit and my visits to other Merkur premises it is my opinion these types of 24-hour gaming premises are well run and do not increase anti-social behaviour, noise or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure or wider local community.

65. 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.

Nick Mason - Consultant
Leveche Associates Limited
23rd September 2022

Appendix A

Observation Images

22nd - 23rd September 2022

Merkur Slots

19 The Concourse
Edmonton Green
N9 0TQ

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ



Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A1

20:55hrs

Merkur Slots 19 The Concourse Edmonton Green



Image A2

20:57hrs

Edmonton Green Market

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A3

20:57hrs

Edmonton Green Market looking towards Merkur Slots



Image A4

20:57hrs

Edmonton Green Market looking towards Shopping Centre

Mercur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022

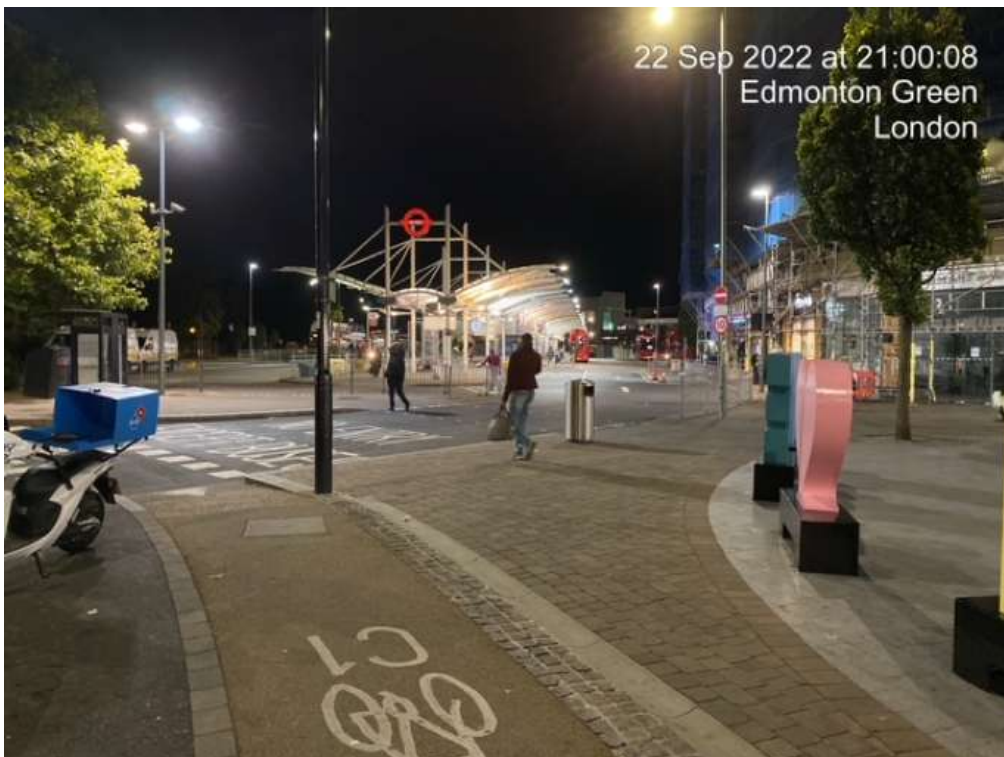


Image A5
21:00hrs
Edmonton Bus Station



Image A6
21:02hrs
Deliveroo riders outside BIMS Burger shop

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022

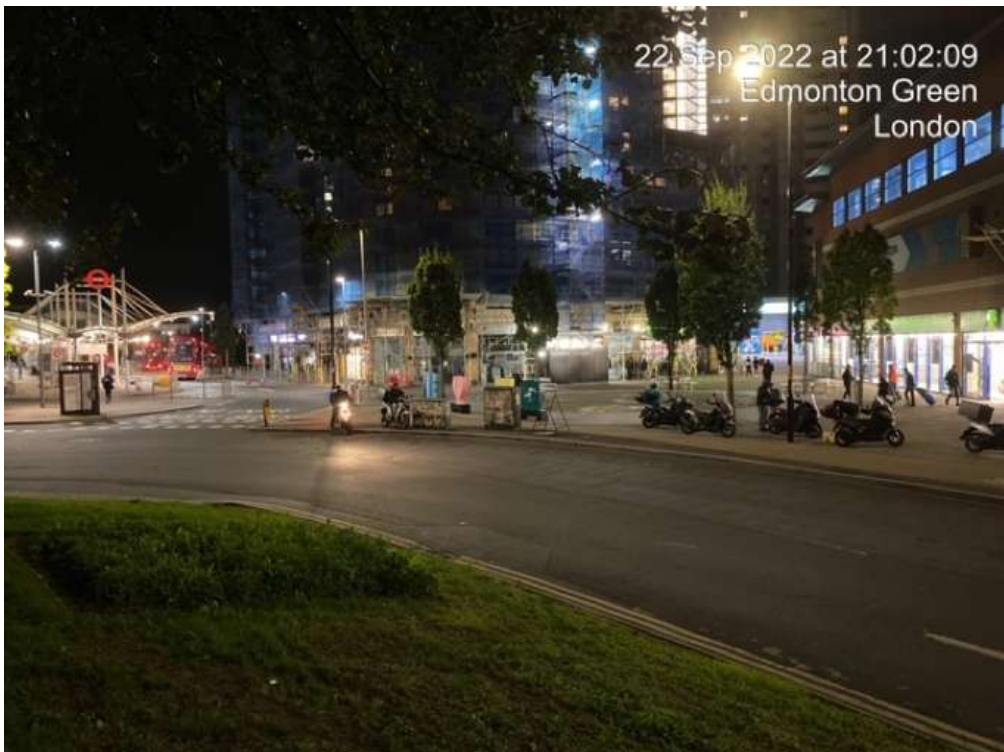


Image A7

21:02hrs

Deliveroo riders outside BIMS Burger shop

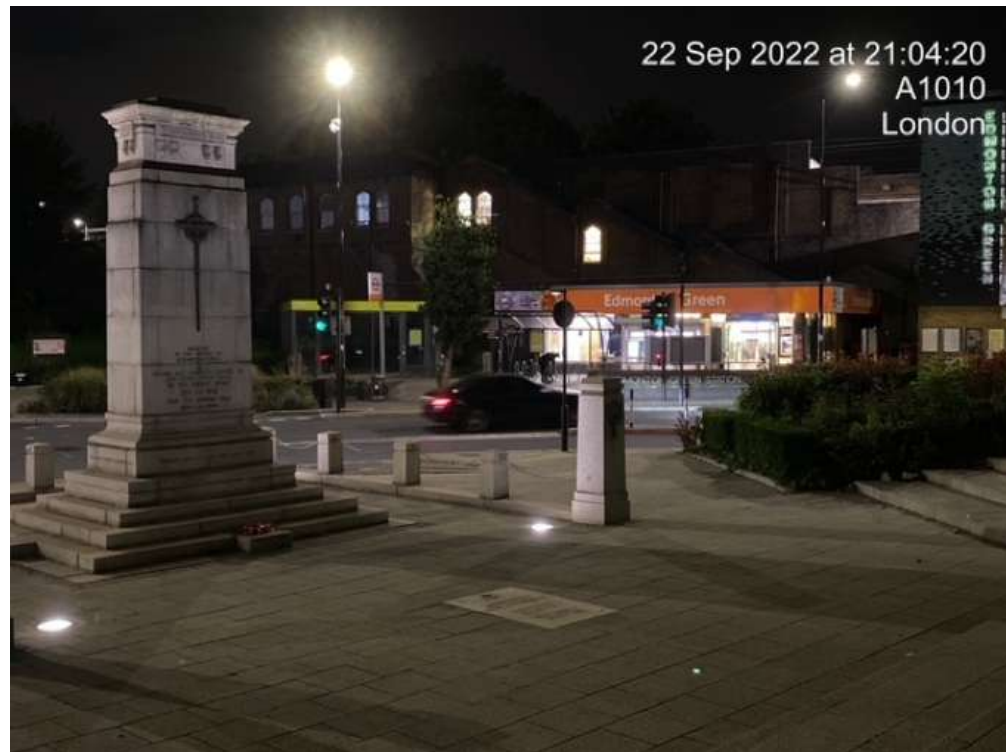


Image A8

21:04hrs

Edmonton Green Rail Station

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ

22nd -23rd September 2022



Image A9

21:08hrs

Merkur Slots 19 The Concourse Edmonton Green

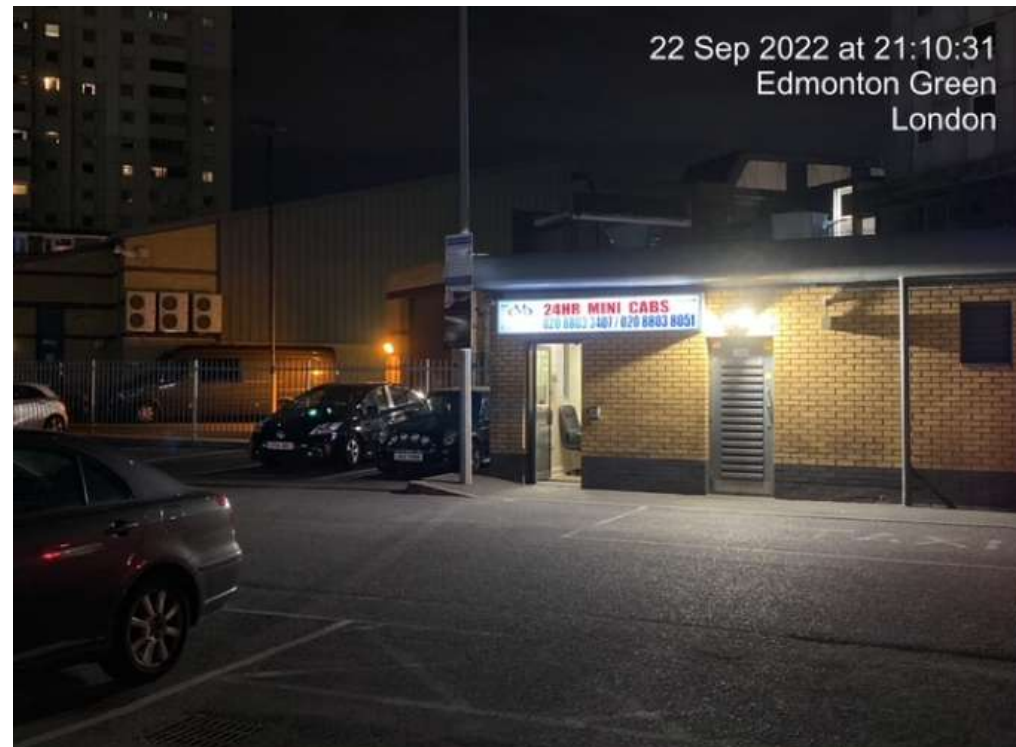


Image A10

21:10hrs

24hr Mini Cabs opposite Bus Station

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A11

21:10hrs

Food premises / Mini Supermarket opposite Bus Station



Image A12

21:53hrs

Residential Tower Blocks Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A13

21:56hrs

Betfred Bookmakers



Image A14

22:01hrs

Customers leave Merkur Slots Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A15

22:06hrs

Betfred Bookmakers closing time



Image A16

22:11hrs

Paved area outside Lidl Supermarket

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A17

23:24hrs

Paved area outside Lidl Supermarket



Image A18

23:24hrs

Edmonton Bus Station

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A19

23:25hrs

Merkur Slots 19 The Concourse Edmonton Green

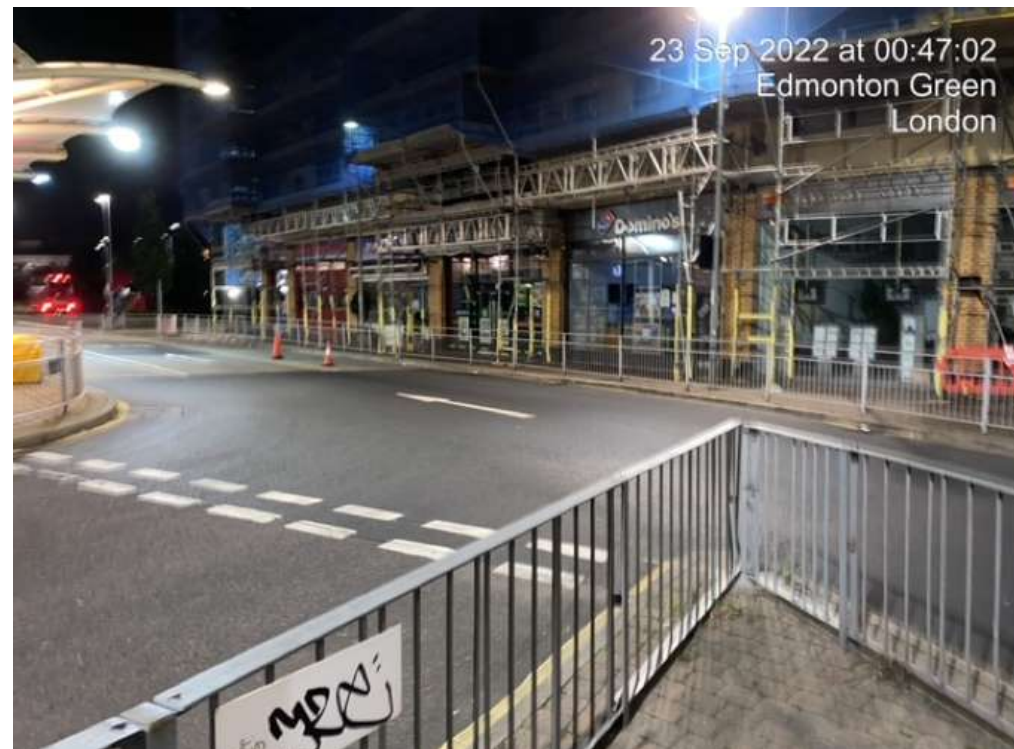


Image A20

00:47hrs

Food premises / Mini Supermarket opposite Bus Station

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022

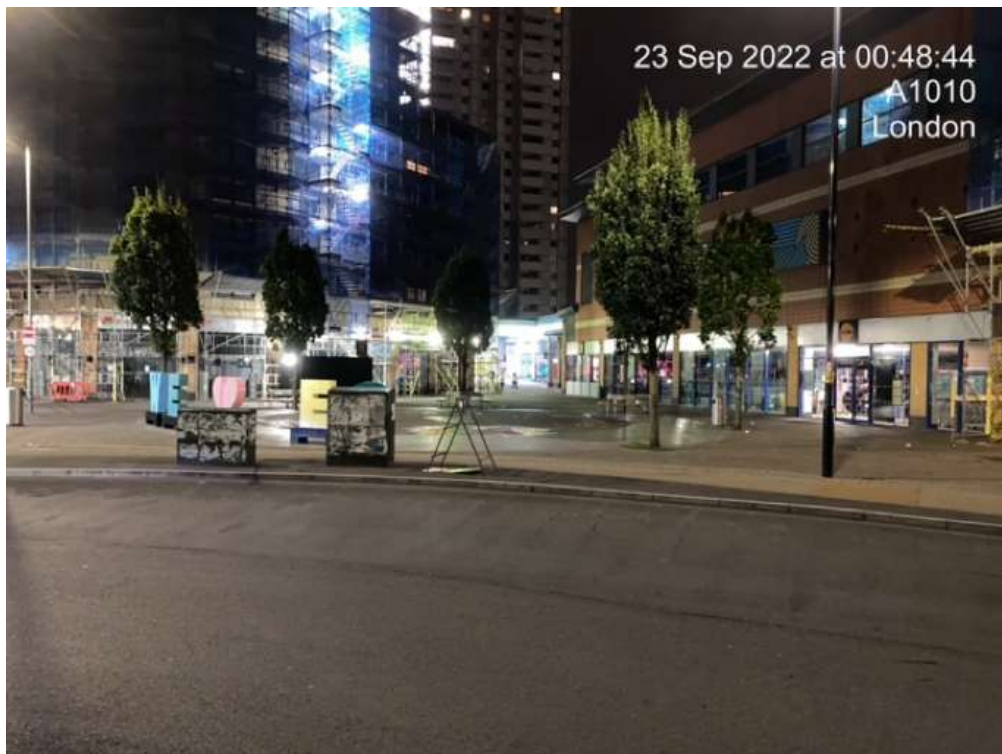


Image A21

00:48hrs

Paved area outside Lidl Supermarket



Image A22

00:52hrs

Merkur Slots 19 The Concourse Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A23

01:19hrs

Merkur Slots 19 The Concourse Edmonton Green

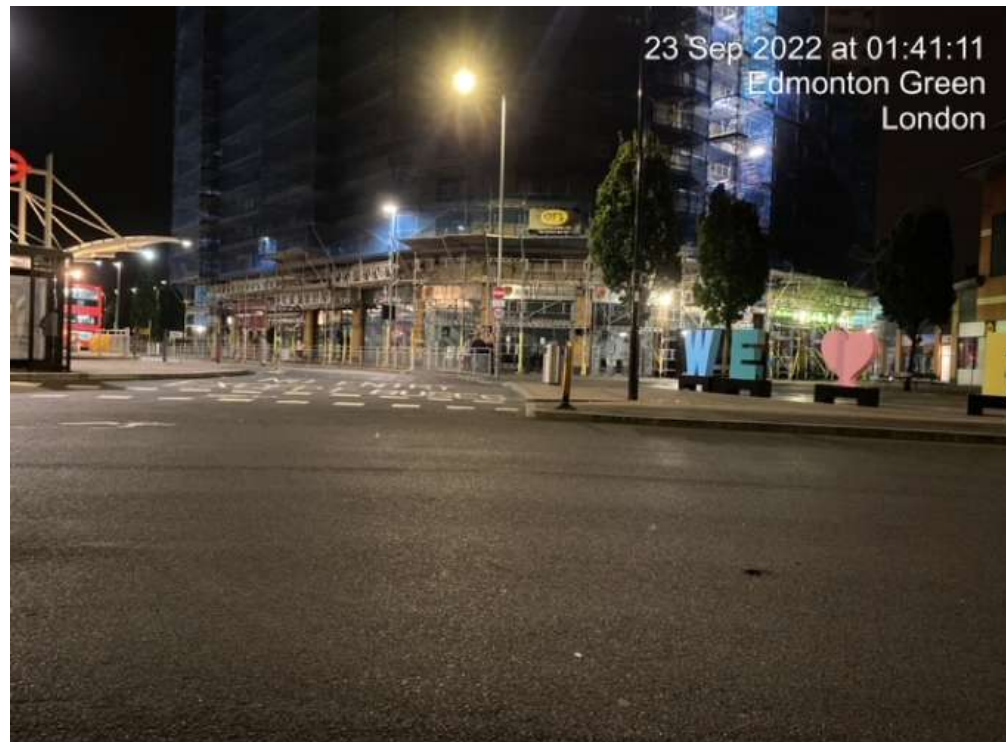


Image A24

01:41hrs

Paved area outside Lidl Supermarket

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A25

02:11hrs

Paved area outside Lidl Supermarket



Image A26

02:11hrs

Merkur Slots 19 The Concourse Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A27

03:30hrs

Merkur Slots Edmonton Green



Image A28

03:30hrs

Paved area outside Lidl Supermarket

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A29

04:42hrs

Paved area outside Lidl Supermarket



Image A30

04:42hrs

Merkur Slots Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A31

05:44hrs

Merkur Slots Edmonton Green

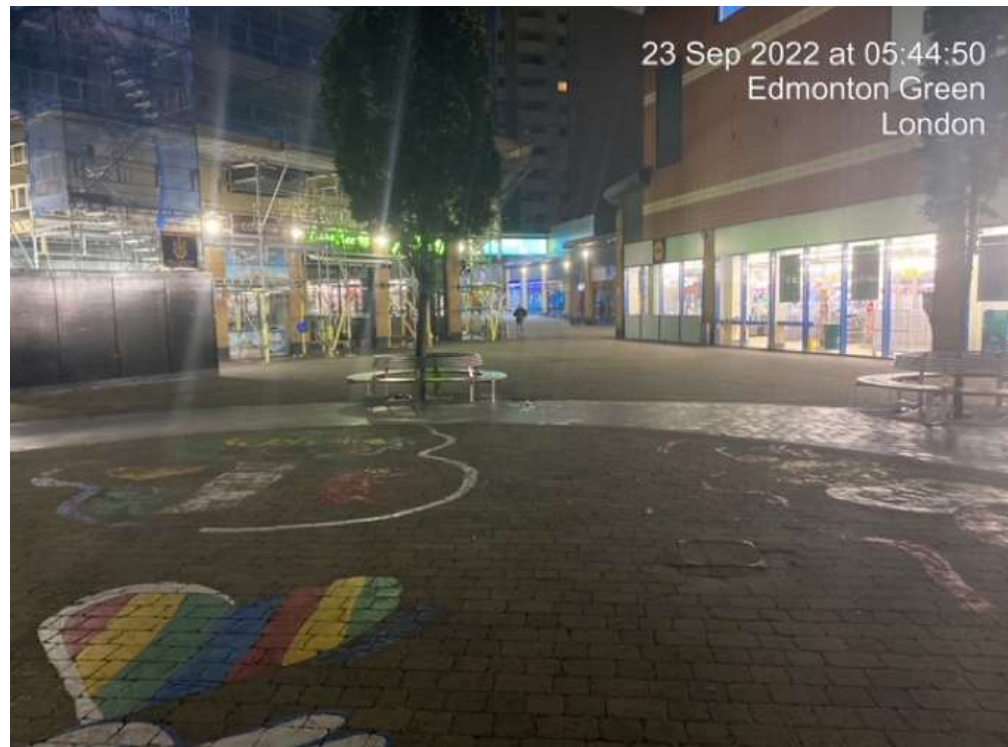


Image A32

05:44hrs

Paved area outside Lidl Supermarket



Full Observation Report

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

Merkur Slots

33 Town Centre Hatfield AL10 0JX

Executive Summary

1. Observations were conducted on Merkur Slots 33 Town Centre Hatfield AL10 0JX and the surrounding area between 20:00 hours on Wednesday 10th August 2022 and 06:45 hours on Thursday 11th August 2022. One covert visit was made to the site and the surrounding area. The observations showed the premises are in a quiet pedestrianised shopping area in the Town Centre of Hatfield with some residential accommodation above the shops. The covert visit showed the premises to be well run with no issues. There are no other gaming premises with a similar operation to Merkur Slots in the area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

2. I have been instructed to conduct independent observations on the Merkur Slots premises at 33 Town Centre Hatfield AL10 0JX and the surrounding area.
3. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
4. The premises come under the jurisdiction of the Hatfield Central Ward of Welwyn Hatfield Borough Council.

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 – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) 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 was 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.

Observations

10. I carried out my observations of 33 Town Centre, Hatfield AL10 0JX and the surrounding area between 20:00 hours on Wednesday 10th August 2022 and 06:45 hours on Thursday 11th August 2022.
11. The area felt safe with members of the public going about their business, working, shopping, and socialising.
12. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

13. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
14. The Merkur Slots premises is situated in the main pedestrianised Town Centre in Hatfield which encompasses pedestrianised shopping streets and a large square. Many of these shops have residential properties above them too. The section of the Town Centre that Merkur Slots is in, runs generally east to west. No vehicular traffic pass the venue but pedestrians can pass the premises in either direction – Image A1.
15. Mainstream shops line the pedestrian Town Centre, Town Square and Market Place.
16. During the observations pedestrian traffic passing the Town Centre and Market Place was varied. Vehicular traffic varied and passed Hatfield Town Centre via the B6426 Bypass, Wellfield Road, The Common and Lemsford Road - Image A2 and A3.
17. East of and next to the premises is Jade Pharmacy 31 Town Centre AL10 0JT. To the west of and next to the premises is an empty shop. Other shops line the Town Centre, Town Centre Square and Market Place.
18. Hatfield Mainline Train Station is a 15-minute walk from the Town Centre.
19. The area of observations is densely populated with many retail premises, that include supermarkets, mini supermarkets, department stores, pubs, nightclubs, cafes, hairdressers, estate agents, charity shops, bookmakers, restaurants, fast-food shops, and pawn brokers which service the transient and residential population alike.
20. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
21. The Town Centre is well served by public transport with a variety of bus routes, mainline rail and taxis. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
22. There are three other gambling premises in the Town Centre area, all of which close by 22:00 hours. Namely:
 - i. Betfred 19 Town Centre Hatfield AL10 0JT
 - ii. Bet Zone 88 Town Centre Hatfield AL10 0JT
 - iii. Ladbrokes The Common Hatfield AL10 0LU
23. These premises can be divided into two main types:
 - i. Betting premises not licensed to serve alcohol.

- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.
24. There are no other gaming venues in Hatfield Town Centre with a similar business model to Merkur Slots UK.
 25. There is one public house in the Town Centre called The White Hart, which is advertised as operating Monday, Tuesday and Wednesday 11:00 hours – 23:00 hours, Thursday 11:00 hours – 00:00 hours, Friday and Saturday 11:00 hours – 02:00 hours and Sunday 12:00 hours – 22:00 hours. At the time of my visit, it appeared to be well run and closed on time.
 26. Throughout my observations in the Town Centre, Market Place and The Common I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.
 27. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

28. I conducted my covert observations from 20:00 hours on Wednesday 10th August 2022 to 06:45 hours on Thursday 11th August 2022.
29. At 20:00 hours I arrived in the area of the Merkur Slots premises 33 Town Centre Hatfield and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
30. There was little pedestrian traffic in and around the Town Centre and Market Place. There were only a couple of shops open at the time of my arrival which included a hairdresser shop, large Asda Supermarket and takeaway / eat in premises. All of these remaining closed at various times between 21:00 hours and 00:00 hours. They were well run and had no issues.
31. Between 20:00 hours and 00:00 hours small groups of residents and visitors to the area sat in the Town Centre Square socialising with some using the public table tennis tables in the square. By 01:00 hours pedestrian activity was reduced to single people cycling or walking past Merkur Slots and through the Town Centre Square.
32. Between 00:10 hours and 00:25 hours I counted the pedestrian footfall that passed the Merkur Slots premises in a 15-minute period. On this occasion a total of 4 pedestrians passed the venue.

33. Between 02:16 hours and 02:41 hours I conducted a covert visit to the Merkur Slots 33 Town Centre Hatfield.
34. At 02:16 hours I went to the entrance door. Entry was controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
35. After a short time, the door was opened and I was greeted by a male member of staff who invited me into the premises. This male was wearing a smart corporate clothing – Image A28.
36. He escorted me into the premises. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
37. There was a reception desk to one side with a female member of staff behind it. She was smartly dressed in corporate clothing.
38. The male staff member asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine to play, towards the back of the premises.
39. He then asked if I would like a soft drink, water, coffee, or tea. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
40. After a couple of minutes, the male staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
41. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
42. The hot and soft drinks were prepared at a reception desk area which was clean and tidy. During my visit no other customers came into the venue.
43. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. 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.
44. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away.
45. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 02:41 hours – Image A29.

46. Between 02:45 hours and 03:00 hours I counted the pedestrian footfall that passed the Merkur Slots premises in a 15-minute period. On this occasion a total of 0 pedestrians passed the venue.
47. Between 04:08 hours and 04:23 hours I counted the pedestrian footfall that passed the Merkur Slots premises in a 15-minute period. On this occasion a total of 0 pedestrians passed the venue – Images A40, A41 and A42.
48. At around 06:00 hours shop traders started to arrive to prepare and open their premises ready for the day ahead – Images A33, A34, A35, A36 and A37.
49. I remained in the area until I completed my observations at 06:45 hours when I left.

Summary

50. I found Merkur Slots Hatfield to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around.
51. People entering these premises were vetted before being allowed entry to ensure drunken or other vulnerable people didn't gain access to the premises.
52. It is clear the presence of Merkur Slots in the Town Centre does not lead to or result in people, who have been on a night out, staying in the city centre any longer than they had planned to.
53. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.

54. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
55. 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.
56. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
57. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
58. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
59. 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
20/08/2022



LEVECHE
ASSOCIATES LIMITED

Appendix A

Observation Images
10th August 2022

Merkur Slots

33 Town Centre
Hatfield
AL10 0JX

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ

Merkur Slots
33 Town Centre Hatfield AL10 0JX
Wednesday 10th August 2022



Image A1

20:02hrs

33 Town Centre Hatfield AL10 0JX



Image A2

20:02hrs

Merkur Slots looking east along
Town Centre Pedestrian Street

Merkur Slots
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



Image A3

20:03hrs

Merkur Slots looking east towards
Town Centre Square



Image A4

20:03hrs

Betfred 19 Town Centre Hatfield AL10 0JT

Merkur Slots
33 Town Centre Hatfield AL10 0JX
Wednesday 10th August 2022



Image A5

20:05hrs

Hatfield Town Centre Pedestrian Square



Image A6

20:06hrs

Hatfield Town Centre Pedestrian Square
looking north

Merkur Slots
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



Image A7

20:08hrs

Hatfield Town Centre Pedestrian Square looking west



Image A8

20:08hrs

Hatfield Town Centre looking west
towards Merkur Slots



Image A9

20:16hrs

Hatfield Town Centre looking east
towards Merkur Slots



Image A10

20:17hrs

Asda Supermarket Hatfield Town Centre

Wednesday 10th August 2022



Image A11

20:17hrs

Asda Supermarket Car Park Hatfield Town Centre



Image A12

21:31hrs

Ladbrokes 44 The Common Hatfield AL10 0LU



10 Aug 2022 at 21:32:55
Hatfield, England AL10 0LU

Image A13

21:32hrs

The Common looking towards Asda Supermarket



10 Aug 2022 at 21:33:43
Hatfield, England AL10 0LU

Image A14

21:33hrs

The Common looking towards Asda Car Park

Wednesday 10th August 2022



Image A15

21:55hrs

Hatfield Town Centre Square looking west
towards Merkur Slots



Image A16

21:55hrs

Hatfield Town Centre Square looking north

Wednesday 10th August 2022



Image A17

21:56hrs

Hatfield Town Centre Square looking south



Image A18

21:56hrs

Shops off Hatfield Town Centre Square
southern end looking south

Merkur Slots
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



Image A19

21:57hrs

Merkur Slots Hatfield Town Centre



Image A20

21:59hrs

Hatfield Town Centre looking east



Image A21

23:55hrs

Mercur Slots Hatfield Town Centre



Image A22

23:55hrs

Town Centre Hatfield looking east

Merkur Slots
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



Image A23

23:55hrs

Town Centre Hatfield looking west



Image A24

00:08hrs

Rear of Merkur Slots Hatfield

Wednesday 10th August 2022



11 Aug 2022 at 00:11:04
Hatfield, England AL10 0JZ

Image A25

00:11hrs

Hatfield Town Centre Square looking north



11 Aug 2022 at 00:20:40
Hatfield, England AL9 7ZF

Image A26

00:20hrs

Hatfield Town Centre Square looking north

Mercur Slots
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



Image A27

02:14hrs

Hatfield Town Centre looking east



Image A28

02:15hrs

Mercur Slots Hatfield

Merkur Slots
33 Town Centre Hatfield AL10 0JX
Wednesday 10th August 2022



11 Aug 2022 at 02:41:56
Hatfield, England AL10 0JZ

Image A29

02:41hrs

Merkur Slots Hatfield



11 Aug 2022 at 02:42:29
Hatfield, England AL10 0JZ

Image A30

02:42hrs

Hatfield Town Centre Square looking north

Wednesday 10th August 2022



11 Aug 2022 at 02:42:41
Hatfield, England AL10 0JZ

Image A31

02:42hrs

Hatfield Town Centre Square looking east



11 Aug 2022 at 04:06:49
Hatfield, England AL10 0JT

Image A32

04:06hrs

Hatfield Town Centre looking east
towards Merkur Slots



Image A33

04:08hrs

Merkur Slots Hatfield



Image A34

04:09hrs

Hatfield Town Centre Square looking north

Wednesday 10th August 2022



Image A35

04:09hrs

Hatfield Town Centre Square looking west
towards Merkur Slots



Image A36

04:09hrs

Shops off Hatfield Town Centre Square
southern end looking south

Wednesday 10th August 2022



Image A37

04:11hrs

Shops in Market Place Hatfield



Image A38

04:12hrs

The White Hart Public House Queensway
Hatfield AL10 0LW

Merkur Slots
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



Image A39

06:20hrs

Hatfield Town Centre looking east



Image A40

06:21hrs

Merkur Slots Hatfield

Merkur Slots
33 Town Centre Hatfield AL10 0JX
Wednesday 10th August 2022



Image A41

06:23hrs

Hatfield Town Centre Square looking west



Image A42

06:23hrs

Hatfield Town Centre Square looking north



Full Observation Report

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

Merkur Slots

456 Holloway Road London N7 6QA

Executive Summary

1. Observations were conducted on Merkur Slots premises at 456 Holloway Road London N7 6QA and the surrounding area. The premises are situated on the crossroad junction of Holloway Road (A1) Seven Sisters Road (A503) and Parkhurst Road (A503) and are in a parade of shops on a busy crossroads. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There was one other gaming premises with a similar business model to Merkur Slots in the area, Admiral Casino 3 Seven Sisters Road N7 6AJ.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

Introduction

5. We are instructed to conduct independent observations at Merkur Slots premises 456 Holloway Road London N7 6QA and the surrounding area.

6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
7. The premises come under the jurisdiction of Islington Council.

Personal – Stuart Jenkins

8. 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 Metropolitan Police after completion of over 30 years exemplary service.
9. 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 – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) 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.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

14. Observations were carried out at Merkur Slots premises 456 Holloway Road London N7 6QA and the surrounding area between 21:00 hours on Saturday 3rd September 2022 and 06:00 hours on Sunday 4th September 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.

16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is situated on the crossroad junction of Holloway Road (A1) Seven Sisters Road (A503) and Parkhurst Road (A503). The premises are in a parade of shops on a busy crossroads and operates 24-hours a day 7-days a week. There are shops and commercial businesses on either side of Holloway Road. Many of these shops have residential properties above them – Image A1.
19. Holloway Road generally runs north to south and Seven Sisters Road east to west. The premises had two entrances in use, the main one on the Holloway Road junction with Seven Sisters Road and a second one in Seven Sisters Road. There was a third entrance on Holloway Road but this did not appear to be in use. Holloway Road is a main arterial 'A' road with two and sometimes three traffic lanes in each direction. Seven Sisters Road is a two-lane one-way road with the traffic travelling northbound.
20. Immediately outside the venue is a wide footpath then the roads themselves. During the observations vehicular and pedestrian traffic never stopped but was varied – Image A2.
21. East of and next to the premises is Vodaphone 454 Holloway Road N7 6QA. To the west of, next to the premises and the other side of the junction with Seven Sisters Road is Three (Phone Shop) 458 Holloway Road N7 6HT. To the north and next to the premises is Photo 7 Studio, 2 Seven Sisters Road N7 6AH. Other shops line the Holloway Road and Seven Sisters Road on both sides of the roads.
22. The area of observations was Holloway Road from Camden Road in the east and Hercules Road in the west and Seven Sisters Road to the junction with Salterton Road in the north.
23. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, pub, cafes, hairdressers, barbers, estate agents, slots casinos, bookmakers, restaurants, fast-food shops and pawn brokers which service the transient and residential population alike.
24. The area has a diverse community living together in a mixture of privately owned, local authority and rental accommodation.
25. Holloway Road and the immediate area are well served by public transport with a variety of bus routes, taxis, underground and mainline trains. There was ample car parking available in a nearby pay and display car park and restricted

parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.

26. Tufnell Park and Caledonian Road Underground Stations are nearby and Drayton Park Mainline Station 19 minutes' walk (0.9 miles).
27. There are five other gambling premises in the immediate area, all of which close by 22:00 hours except Admiral Casino:
 - i. Admiral Casino 3 Seven Sisters Road N7 6AJ– Image A3
 - ii. Betfred 10-12 Seven Sisters Road N7 6AH – Image A6
 - iii. Paddy Power 42-44 Seven Sisters Road N7 6AA - Image A8
 - iv. Ladbrokes 502 Holloway Road N7 6JA– Image A21
 - v. William Hill 37 Seven Sisters Road N7 6AX – Image A9
28. These premises can be divided into two main types:
 - i. Betting premises not licensed to serve alcohol.
 - ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.
29. Admiral Casino has a similar business model to Merkur Slots UK which operates 24-hours, 7-days a week.
30. There were three public houses in the vicinity of the gaming premises – The Enkel Arms 34 Seven Sisters Road N7 6AA, Big Red 385 Holloway Road N7 0RY and The Hercules Public House 505 Holloway Road N7 6JA. At the time of my visit, they all appeared to be well run and there were no issues – Images A7, A18, A22.
31. Throughout my observations in and around the area I saw no street drinkers, vagrants, or drug dealing around the premises. However, on two occasions I saw a female engaged in begging, approaching customers as they left McDonalds Restaurant 13-15 Seven Sisters Road N7 6AJ. There was no begging taking place anywhere near Merkur Slots premises.
32. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

33. I conducted covert observations from between 21:00 hours on Saturday 3rd September 2022 and 06:00 hours on Sunday 4th September 2022.
34. At 21:00 hours I arrived in the area of the Merkur Slots premises 456 Holloway Road N7 6QA and started observations by monitoring the venue and the immediate area around it.

35. Between 21:00 hours and 22:15 hours McDonalds in Seven Sisters Road was busy with customers. Delivery riders were parked on the road and footpaths outside McDonalds and other restaurants waiting to service fast food deliveries – Image A5.
36. There was a good volume of pedestrian traffic in and around shops that were open in Holloway Road and Seven Sisters Road. At this time most of the shops had closed. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food take aways, Admiral Casino, the pubs and some restaurants. They were well run and had no issues.
37. Between 22:15 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets and fast-food shops – Images A8, A9, A10, A11, A12, A13, A14, A15, A16, A17, A18, A19, A20, A21, A22, A23, A24, A27, A28, A29.
38. Between 01:00 hours and 02:46 hours pedestrian and traffic numbers reduced but there was still traffic in the area – Images A30, A31, A32, A33, A34.
39. Between 02:47 hours and 03.18 hours I conducted a covert visit to the Merkur Slots 456 Holloway Road– Image A35.
40. At 02:47 hours I went to the main central entrance door which was open, but I could see there was a male door supervisor just inside controlling the entrance. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
41. On entering I looked at the door supervisor and saw he was smartly dressed with his SIA badge clearly displayed. He acknowledged me and waved me through into the premises.
42. Once inside I found myself in a large carpeted room on one level and there were gaming machines of various types throughout the premises. In front of me was a reception desk area. This area was used for the preparation of refreshments with a facility to make hot drinks. Behind the desk was a female member of staff dressed smartly in corporate clothing who welcomed me to the premises.
43. As I walked through the premises and saw it went round to the right where there were further machines, past the toilets on the right and leading out into an open aired space at the back of the premises where customers could smoke.
44. I saw there were eight other customers in the venue. All were male aged between 28 years and 50 years. I found a machine and started to play it.

45. In front of and to the left of the reception desk was an office door. The door opened and another female member of staff came out into the main gaming area. She was smartly dressed in corporate clothing.
46. After a short period of time the second female staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and she stated they didn't sell alcohol but the non-alcoholic drinks they provided were free for customers. I accepted her offer of a coffee and after a couple of minutes, she brought over my drink.
47. The staff then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
48. During my visit I saw customers enter the venue and other customers leave. The numbers of customers never got above eight at any time. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
49. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
50. Before leaving I used the toilets and found them to be clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A36.
51. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:18 hours – Image A37.
52. Between 03:20 hours and 05:00 hours vehicular traffic and pedestrian traffic was varied.
53. Customers visited the 24-hour premises throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged during the course of my observations until 06:00 hours when I departed.
54. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A38, A39, A40, A41, A42.
55. On several occasions during my time in the area I saw the Merkur Slots door supervisor patrolling around the front of the premises in between the entrances to checking the front of the premises was clear and no one was loitering around.

Summary

56. I found Merkur Slots 456 Holloway Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
57. At the time of my visit to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing or groups of youths hanging around. However, on two occasions I did see a female engaged in begging approaching customers as they left McDonalds in Seven Sisters Road. There was no begging around Merkur Slots premises and I saw proactive patrols being conducted by the door supervisor to deter and prevent this activity or any other criminal behaviour from taking place.
58. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
59. It is clear the presence of Merkur Slots in the Holloway Road does not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to and that customers do not hang around outside the premises causing problems.
60. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
61. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.

62. At Merkur Slots premises 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.
63. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
64. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of and it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
65. 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
28/09/2022

Appendix A

Observation Images

3rd - 4th September 2022

Merkur Slots

456 Holloway Road
N7 6QA

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1 HQ



Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022

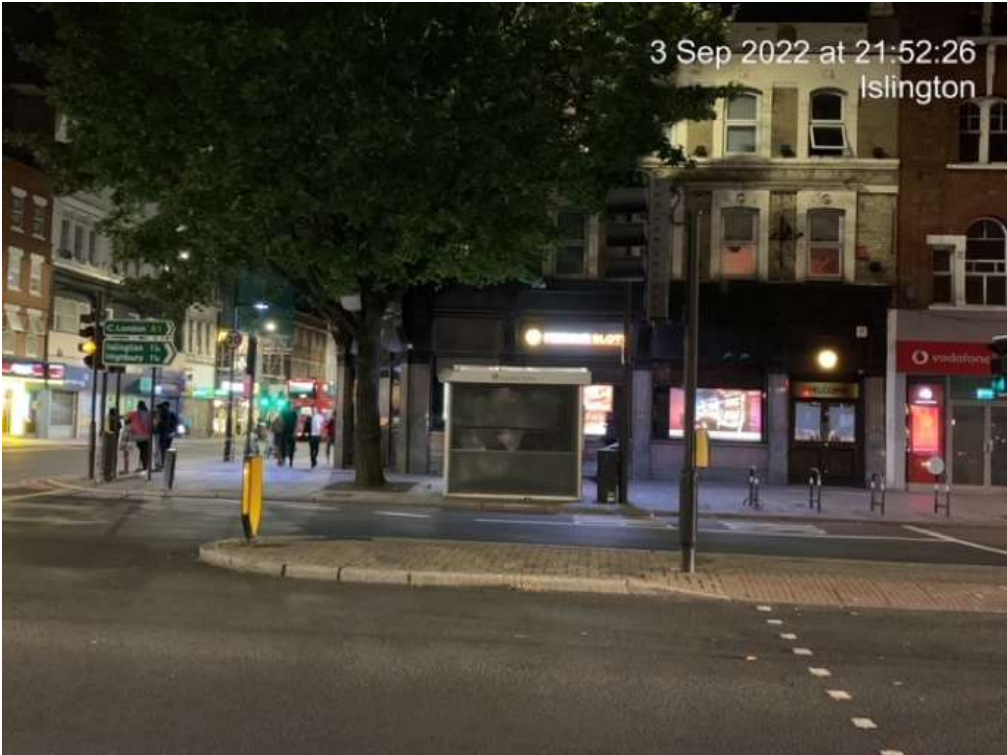


Image A1

21:52hrs

Merkur Slots 456 Holloway Road N7 6QA



Image A2

21:54hrs

Merkur Slots 456 Holloway Road N7 6QA

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A3

22:12hrs

Admiral Casino 3 Seven Sisters Road N7 6AJ



Image A4

22:12hrs

H & T Pawnbrokers 9 Seven Sisters Road N7 6AJ

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A5

22:12hrs

McDonalds 13-15 Seven Sisters Road N7 6AJ



Image A6

22:13hrs

Betfred 10-12 Seven Sisters Road N7 6AH

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A7

22:14hrs

The Enkel Arms 34 Seven Sisters Road N7 6AA



Image A8

22:15hrs

Paddy Power 42-44 Seven Sisters Road N7 6AA

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A9

22:16hrs

William Hill 37 Seven Sisters Road N7 6AX



Image A10

22:17hrs

Seven Sisters Road looking west

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A11

22:21hrs

Merkur Slots 456 Holloway Road



Image A12

22:21hrs

Holloway Road looking south

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A13
22:21hrs
Holloway Road looking north



Image A14
22:25hrs
Waitrose 366 Holloway Road j/w Tollington Road

Mercur Slots
Mercur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022

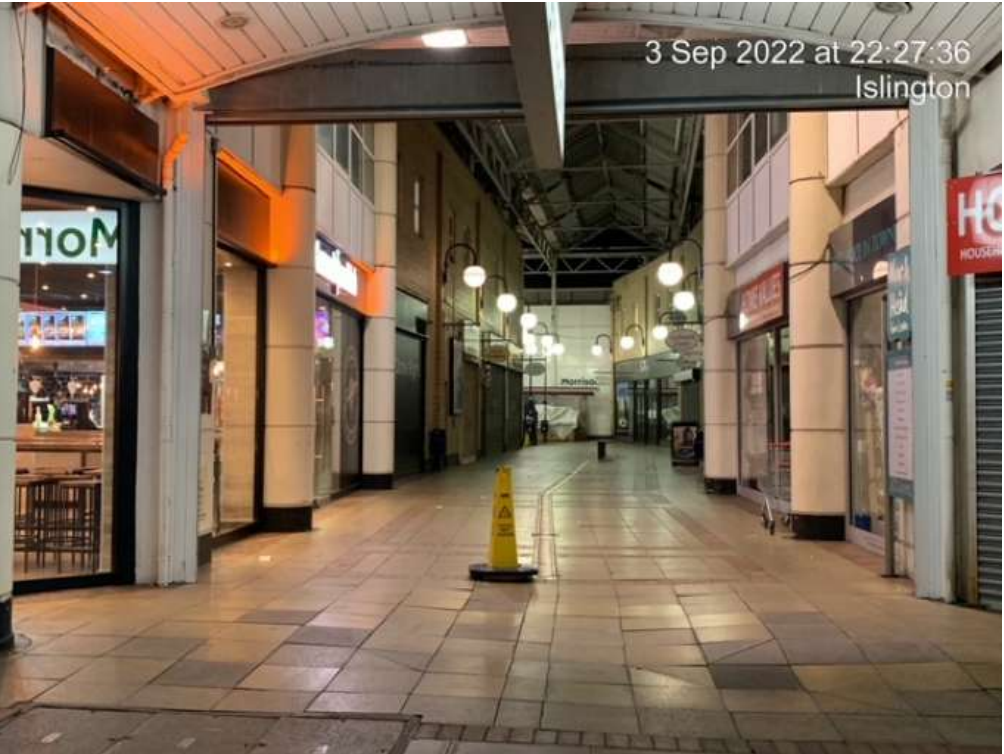


Image A15

22:27hrs

Shopping Arcade off Holloway Road leading to Morrisons Supermarket



Image A16

22:28hrs

Lidl 422-434 Holloway Road looking north

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A17
22:29hrs
Holloway Road looking north



Image A18
22:29hrs
Big Red 385 Holloway Road N7 0RY

Mercur Slots
Mercur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A19

22:31hrs

Odeon Lux Cinema 419 - 727 Holloway Road N7 6LJ



Image A20

22:32hrs

Holloway Road looking south

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A21

22:33hrs

Ladbrokes Bookmakers 502 Holloway Road N7 6JA



Image A22

22:34hrs

The Hercules Public House 504 Holloway Road N7 6JA

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A23

22:42hrs

Parkhurst Road looking east towards Holloway Road j/w Seven Sisters Road



Image A24

00:16hrs

Merkur Slots 456 Holloway Road

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A25

00:16hrs

Holloway Road looking north



Image A26

00:16hrs

Holloway Road looking south

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A27

00:19hrs

Looking towards Merkur Slots 456 Holloway Road



Image A28

00:21hrs

Seven Sisters Road looking east

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A29

00:22hrs

Seven Sisters Road looking east



Image A30

02:41hrs

Parkhurst Road looking towards j/w Holloway Road and Seven Sisters Road.

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A31

02:42hrs

Merkur Slots 456 Holloway Road



Image A32

02:42hrs

Holloway Road looking south

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A33

02:42hrs

Holloway Road looking north



Image A34

02:44hrs

Seven Sisters Road looking west

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A35

02:46hrs

Merkur Slots Holloway Road looking south



Image A36

03:15hrs

Toilet Check Sheet Merkur Slots Holloway Road

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A37

03:18hrs

Merkur Slots Holloway Road



Image A38

05:10hrs

Holloway Road looking north

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A39

05:10hrs

Holloway Road looking south towards Merkur Slots



Image A40

05:37hrs

Looking towards Merkur Slots 456 Holloway Road j/w Seven Sisters Road

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022

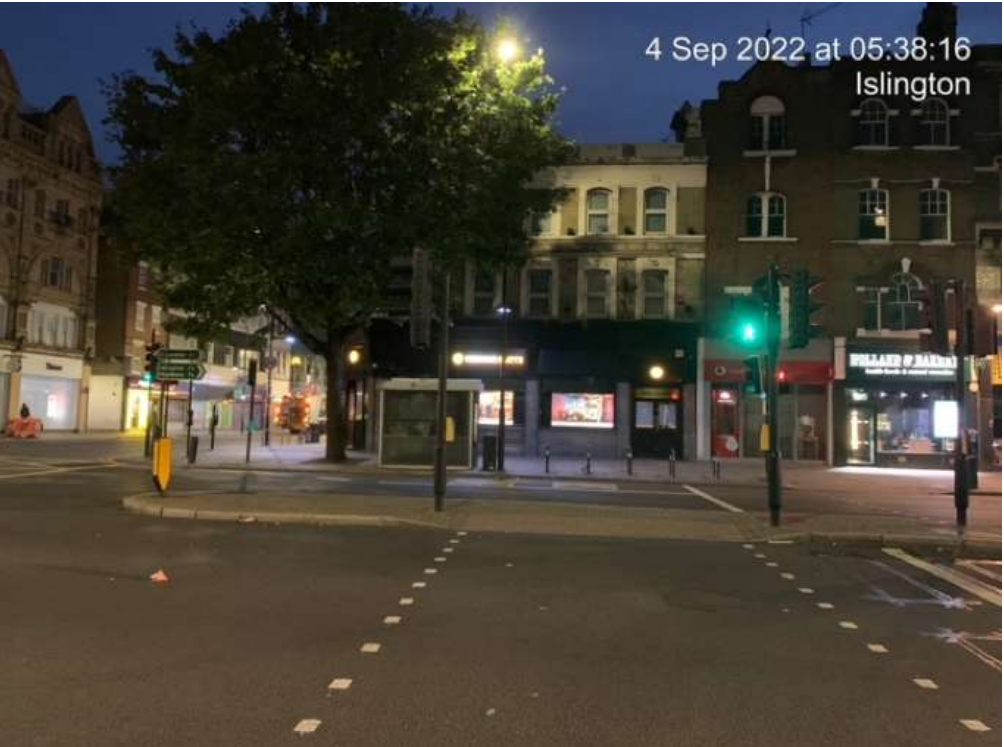


Image A41

05:38hrs

Merkur Slots 456 Holloway Road



Image A42

05:38hrs

Holloway Road looking north



Full Observation Report

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

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR

Executive Summary

1. Observations were conducted on Merkur Slots premises at 146 High Street Hounslow Middlesex TW3 1LR and the surrounding area. The premises are situated in a parade of shops on the High Street in Hounslow Town Centre. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There were two other gaming premises with a similar business model to Merkur Slots in the area, Admiral Casino 192 High Street TW3 1HL and Royal Casino Slots 1-2 Cressys Corner, Lampton Road TW3 1HA.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

Introduction

5. We are instructed to conduct independent observations at Merkur Slots premises 146 High Street Hounslow Middlesex TW3 1HR and the surrounding area.

6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
7. The premises come under the jurisdiction of Hounslow Borough Council.

Personal – Stuart Jenkins

8. 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 Metropolitan Police after completion of over 30 years exemplary service.
9. 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 – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) 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.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

14. Observations were carried out at Merkur Slots premises 146 High Street Hounslow Middlesex and the surrounding area between 21:00 hours on Thursday 25th August 2022 and 06:00 hours on Friday 26th August 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.

16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is in a large parade of shops on the High Street in Hounslow Town Centre. There are shops and commercial businesses on either side of High Street. Many of these shops have residential properties above them – Image A1.
19. High Street generally runs east to west. Immediately outside the venue is a wide footpath and beyond that the restricted one-way road with a separate cycle lane. At the time of my visit the road was closed to vehicular traffic due to ongoing road works. During the observations there was no vehicular traffic and pedestrian traffic was varied – Image A2, A3.
20. East of and next to the premises is Table 11 142-144 High Street Hounslow TW3 1LR. To the west of and next to the premises is the Dental Surgery 148-150 High Street Hounslow TW3 1LR then empty shop premises at 152 High Street Hounslow TW3 1LR. Opposite the premises were Primark 165-169 High Street Hounslow TW3 1QL and Iceland Supermarket 147-161 High Street Hounslow TW3 1QL. Other shops line the High Street on both sides of the road.
21. The area of observations was from Laurence Road in the east and Bell Road in the west. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, a pub, cafes, hairdressers, barbers, estate agents, slots casinos, bookmakers, restaurants, fast-food shops and pawn brokers which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. High Street and the immediate area are well served by public transport with a variety of bus routes, taxis, underground and mainline trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. Hounslow East and Hounslow Central Underground Stations are nearby and Hounslow Mainline Station 12 minutes' walk (0.6 miles).
25. There are eight other gambling premises in the High Street Hounslow area, all of which close by 22:00 hours except Admiral Casino, Merkur Slots and Royal Casino Slots:
 - i. Admiral Casino Slots 192 High Street Hounslow TW3 1HL – Image A6.

- ii. Betfred 2-7 Montague Road Hounslow TW3 1LD – Image A12
- iii. Coral 208 High Street Hounslow TW3 1HE – Image A8
- iv. Paddy Power 162 High Street Hounslow TW3 1BQ – Image A5
- v. Paddy Power 295 High Street Hounslow TW3 1EF - Image A15
- vi. Ladbrokes 113 A & B High Street Hounslow TW3 1QT – Image A23
- vii. Merkur Slots 237-239 High Street Hounslow TW3 1EA – Image A19
- viii. Royal Casino Slots 1-2 Cressys Corner Lampton Rd TW3 1HA – Image A17

26. These premises can be divided into two main types:

- i. Betting premises not licensed to serve alcohol.
- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

27. Admiral Casino and Royal Casino Slots have similar business models to Merkur Slots UK which operates 24-hours, 7-days a week.

28. There was one public house in the vicinity of the gaming premises – The Bell Public House 2 Staines Road Hounslow TW3 3JS. At the time of my visit it appeared to be well run and there were no issues – Image A16.

29. Throughout my observations in and around High Street I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.

30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

31. I conducted covert observations from between 21:00 hours on Thursday 25th August 2022 and 06:00 hours on Friday 26th August 2022.

32. At 21:00 hours I arrived in the area of the Merkur Slots premises 146 High Street Hounslow and started observations by monitoring the venue and the immediate area around it.

33. At 21:26 hours McDonalds 200-202 High Street Hounslow was very busy. Delivery riders were parked on the road and footpaths outside McDonalds and other restaurants waiting to service fast food deliveries – Image A7.

34. There was a good volume of pedestrian traffic in and around the parade of shops and in High Street. At this time most of the shops and the Treaty Centre had closed. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food take aways, The Bell Public House, Admiral Casino, Royal Casino Slots and some restaurants. They were well run and had no issues – Image A9.

35. Between 22:00 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets and fast-food shops. McDonalds in High Street closed at 00:00 hours – Images A23, A24, A27, A28, A29, A30, A31, A32.
36. Between 01:00 hours and 02:47 hours pedestrian and traffic numbers reduced – Images A33, A34, A35.
37. Between 02:48 hours and 03.10 hours I conducted a covert visit to the Merkur Slots 146 High Street – Image A36.
38. At 02:48 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
39. I pushed the door but it was locked. After a few seconds the door was opened by a male member of staff wearing smart clothing with an SIA door supervisor badge clearly displayed. He looked at me and I asked if I could come in to play the machines. He nodded and welcomed me into the premises.
40. Once inside I found myself in a large carpeted room on one level and there were gaming machines of various types throughout the premises.
41. On the left-hand side wall midway in the room there was a reception desk area. This area was used for the preparation of refreshments with a facility to make hot drinks.
42. As I approached the reception I saw there were two further members of staff, one female and one male who were dressed in smart corporate clothing. The female member of staff welcomed me to the venue and asked if I needed any assistance with choosing a machine to play. I stated I was fine.
43. I walked through the premises and saw there were two other customers in the venue. All were male aged between 35 years and 45 years. I found a machine and started to play it.
44. After a short period of time the female staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and she stated they didn't sell alcohol but the non-alcoholic drinks they provided were free for customers. I accepted her offer of a coffee and after a couple of minutes, she brought the drink to me.
45. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
46. During my visit no other customers came into the venue. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.

47. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
48. Before leaving I used the toilets which were located on the left-hand side towards the back of the premises. I found them to be clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A37, A38.
49. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:10 hours – Image A39.
50. Between 03:10 hours and 05:05 hours there was no vehicular traffic and low levels of pedestrian traffic – Images A40, A41, A42.
51. Customers visited the 24-hour premises throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged during the course of my observations.
52. I remained in the area until 06:00 hours. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A43, A44, A45, A46.

Summary

53. I found Merkur Slots 146 High Street Hounslow to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visit to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing, begging or groups of youths hanging around.
54. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
55. It is clear the presence of Merkur Slots in the High Street Hounslow does not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to and that customers do not hang around outside the premises causing problems.
56. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which

focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.

- ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
- iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
- iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.

57. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.

58. At Merkur Slots premises 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.

59. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.

60. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of and it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

61. 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
27/09/2022

Appendix A

Observation Images

25th -26th August 2022

Merkur Slots

146 High Street

Hounslow

Middlesex

TW3 1LR

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1 HQ



Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A1

21:19hrs

Merkur Slots 146 High Street Hounslow TW3 1LR



Image A2

21:19hrs

High Street Hounslow looking west

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A3

21:20hrs

High Street Hounslow looking east



Image A4

21:20hrs

Table 11 Restaurant 142 -144 High Street
Hounslow TW3 1LR

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A5

21:22hrs

Paddy Power 162 High Street Hounslow TW3 1BQ



Image A6

21.25hrs

Admiral Casino Slots 192 High Street
Hounslow TW3 1HL

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A7

21:26hrs

McDonalds 200-202 High Street Hounslow TW3 1HE



Image A8

21:28hrs

Coral Bookmakers 208 High Street Hounslow TW3 1HE

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A9

21:29hrs

Entrance to Treaty Centre High Street Hounslow



Image A10

21:31hrs

Holy Trinity Church High Street Hounslow

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A11

21:32hrs

H&T Pawnbrokers 253 High Street Hounslow TW3 1EA



Image A12

21:32hrs

2 - 7 Montague Road Hounslow TW3 1LD

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A13

21:34hrs

Market Place 281-287 High Street Hounslow TW3 1EF



Image A14

21:34hrs

High Street Hounslow looking east

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A15

21:35hrs

Paddy Power 295 High Street Hounslow TW3 1EF



Image A16

21:36hrs

The Bell Public House
2 Staines Road Hounslow TW3 3JS

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A17

21:38hrs

Royal Casino Slots 1-2 Cressys Corner
Lampton Road Hounslow TW3 1HA



Image A18

21:38hrs

Bath Road Hounslow looking west

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A19

21:44 hrs

Merkur Slots 237 -239 High Street Hounslow TW3 1EA



Image A20

21:44hrs

Merkur Slots 237 -239 High Street Hounslow TW3 1EA

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A21

21:54hrs

Cineworld Cinema Hounslow



Image A22

22:33hrs

High Street Hounslow looking west

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



25 Aug 2022 at 22:34:36
Hounslow

Image A23

22:34hrs

Ladbrokes 113 A & B High Street Hounslow TW3 1QT



25 Aug 2022 at 22:37:26
Hounslow

Image A24

22:37hrs

High Street Hounslow looking west
towards Merkur Slots

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A25

22:41hrs

Douglas Street j/w High Street Hounslow looking south



Image A26

00:30hrs

High Street Hounslow looking west

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A27

00:33hrs

High Street Hounslow looking west

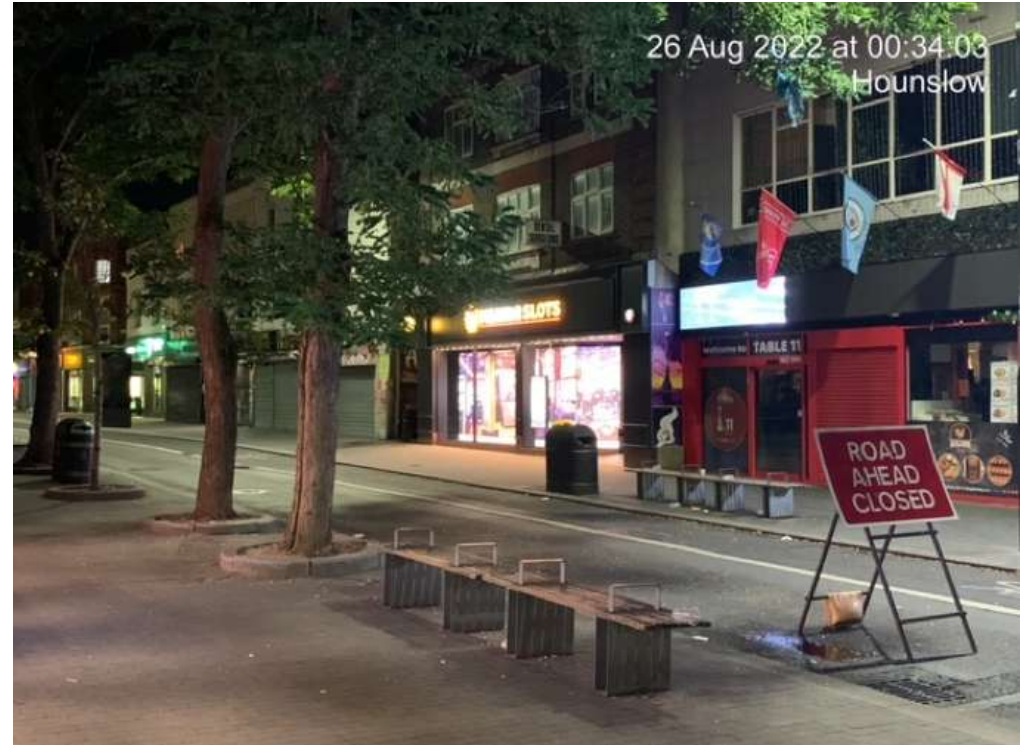


Image A28

00:34hrs

Mercur Slots 148 High Street Hounslow

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A29

00:36hrs

High Street Hounslow looking west



Image A30

00:38hrs

High Street Hounslow looking west

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A31

00:38hrs

McDonalds High Street Hounslow looking east



Image A32

00:41hrs

Merkur Slots 146 High Street Hounslow looking east

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A33

02:43hrs

High Street Hounslow Looking west



Image A34

02:45hrs

Gio's Bar 113B High Street Hounslow 1QT

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A35

02:46hrs

High Street Hounslow looking west



Image A36

02:47hrs

Merkur Slots 146 High Street Hounslow

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022

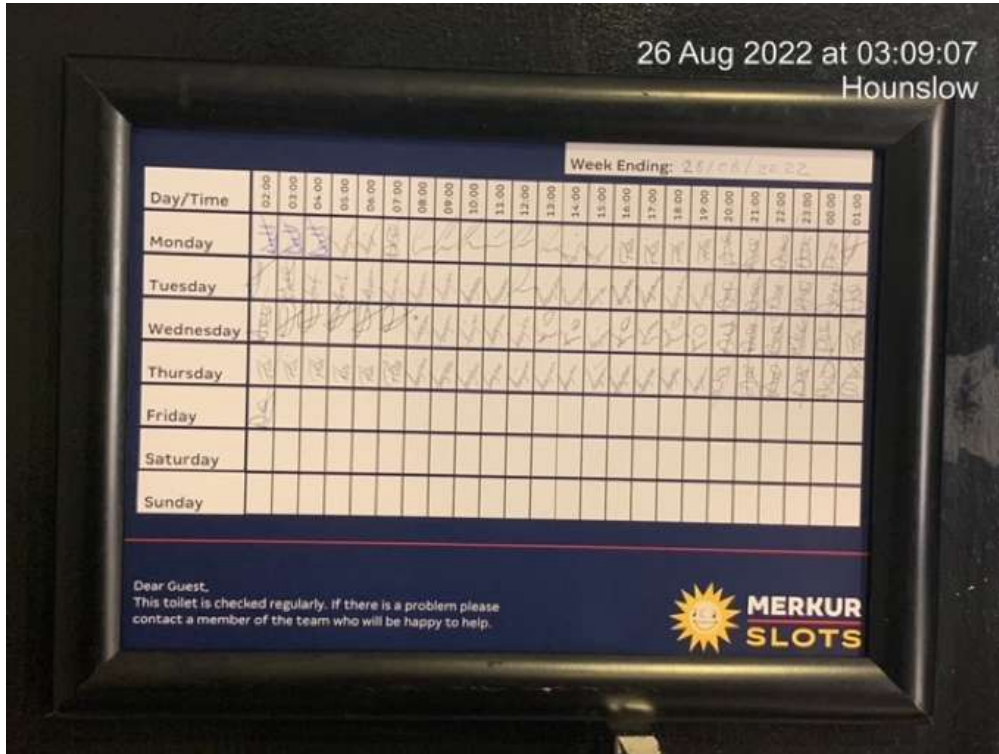


Image A37

03:09hrs

Toilet Check Sheet Merkur Slots 146 High Street Hounslow.

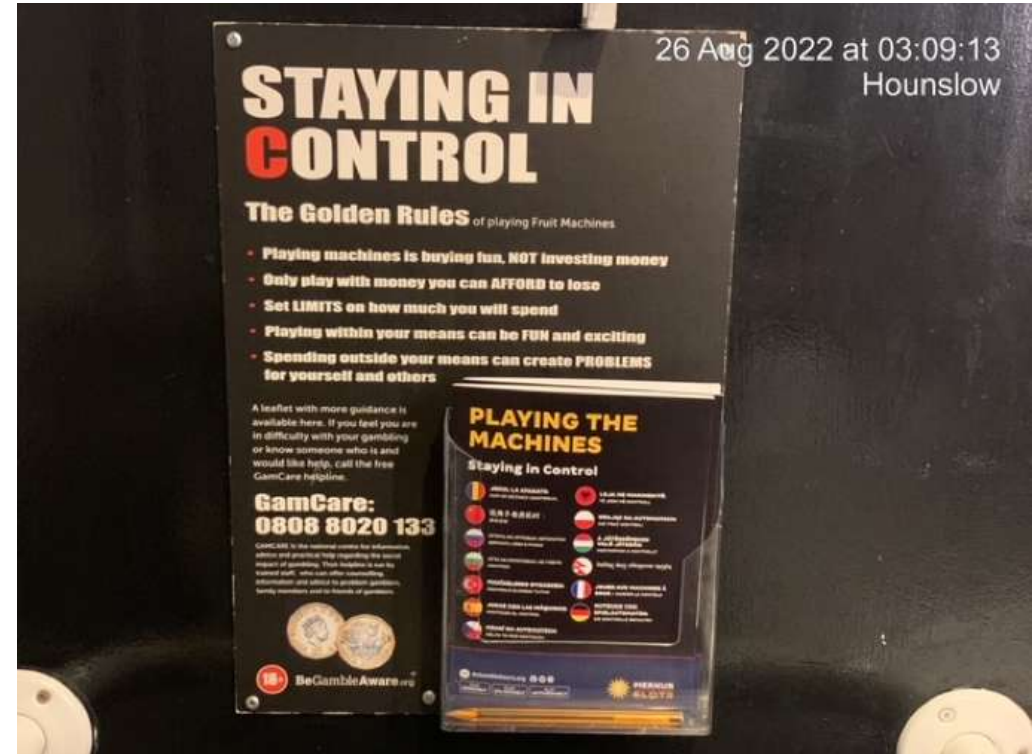


Image A38

03:09hrs

Staying in Control Poster and Gam Care Leaflets in Toilet

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A39

03:10hrs

Merkur Slots 146 High Street Hounslow



Image A40

03:10hrs

High Street Hounslow looking west

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A41

05:04hrs

High Street Hounslow looking west



Image A42

05:04hrs

High Street Hounslow looking east

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A43

05:09hrs

Merkur Slots 146 High Street Hounslow



Image A44

05:12hrs

High Street Hounslow looking east

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A45

05:12hrs

High Street Hounslow looking west



Image A46

05:14hrs

Merkur Slots 146 High Street Hounslow



Full Observation Report

Nicholas Mason – Licensing Consultant
Leveche Associates Limited

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP

Executive Summary

1. Observations were conducted on Merkur Slots 377-379 Harehills Lane Leeds LS9 6AP and the surrounding area between 19:45hrs on Thursday 1st September 2022 and 06:00hrs on Friday 2nd September 2022. One covert visit was made to the Merkur Slots premises.
2. The observations identified that this is an area of some deprivation with the premises located along a main road amongst small commercial businesses and local housing. The covert visit to the Merkur Slots premises found it to be well run with no issues. There are no other gaming premises with a similar operation to Merkur Slots in the area.
3. No anti-social behaviour was seen during the course of the observations and there was no evidence of criminality that could be linked to the Merkur Slots premises. The premises closed at 23:00hrs and observations continued through until 06:00hrs with no incidents that would cause concern being identified. It is clear that the Merkur Slots premises operating at this location does not create anti-social behaviour, noise or any other crime and disorder that would have a

negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

4. We are instructed to conduct independent observations on the Merkur Slots premises at 377-379 Harehills Lane Leeds LS9 6AP and the surrounding area.
5. Merkur Slots UK operate the venue which has a licence under the Gambling Act 2005 to trade from 09:00hrs to 23:00hrs.
6. The premises come under the jurisdiction of Leeds City Council.

Personal Summary – Nicholas Mason

7. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for the risk assessment and management of intelligence led operations by covert means, including the disruption of organised crime groups infiltrating the licensing industry.
9. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
10. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into MPS through other UK crime authorities / Police forces.
11. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
12. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
13. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
14. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Observations

15. Observations of the Merkur Slots premises at 377-379 Harehills Lane Leeds LS9 6AP and the surrounding area commenced at 19:45 hrs on Thursday 1st September 2022 and concluded 06:00 hrs on Friday 2nd September 2022.
16. The boundaries of observations were set as the BP Petrol Station to the east just past The Brown Hare Public House and the Morrisons Supermarket to the west. This encompassed the densely populated area with its many retail premises, that included bookmakers, supermarkets, mini supermarkets, cafes, hairdressers, estate agents and fast-food shops.
17. There is a diverse community living together in a mixture of privately owned and rental accommodation. The area appears deprived with many shops closed and some poor standards of housing. The streets were littered and many of the boundaries of premises had broken perimeter fences with discarded waste evident.
18. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
19. The Merkur Slots premises is situated in Harehills Lane which runs generally from the A64 York Road in the east to Chapel Allerton Hospital in the west. The area was busy with vehicular traffic and the premises is close to a traffic light-controlled junction at Compton Road. There is a wide pavement in front of the premises and on the opposite side of the road another pavement and a residential area.
20. Adjacent and east of the Merkur premises is the entrance to the Infinity Lounge and Restaurant. Stairs lead up to the main restaurant which is located above the Merkur premises ground floor area. Immediately to the west of the premises is an Estate Agents premises called Search. The parade of shops continues either side of the Merkur premises whilst over the road are residential homes in a number of side streets.
21. Parking is restricted in Harehills Lane by yellow lines close to the main junction at Compton Road. The rest of the surrounding area is subject to unrestricted parking and there is ample parking at the two local supermarket premises, Asda to the east and Morrisons to the west.
22. The location is well served for public transport with bus stops along Harehills Lane and Compton Road with late night buses seen operating. During the course of observations numerous licensed taxis / Ubers were seen serving the locality.
23. There are three other gambling premises in Harehills Lane located on the opposite side of the Compton Road junction and not in the immediate vicinity of the Merkur premises:

- i. William Hill Bookmakers 310-312 Harehills Lane LS9 7BG
- ii. Paddy Power Bookmakers 284-286 Harehills Lane LS9 7BD
- iii. Betfred Bookmakers 287 Harehills Lane LS9 6AA

These premises are licensed to operate Monday to Saturday, 08:00hrs - 22:00hrs and Sunday 09:00hrs - 22:00hrs. On a Sunday the William Hill premises operates from 09:00hrs - 20:00hrs.

24. There are no other gaming venues in Harehills Lane with a similar business model to Merkur Slots UK.
25. There is one public house in Harehills Lane, though not in the immediate vicinity of the Merkur premises, The Brown Hare located to the east past the Asda Supermarket and adjacent to the BP Petrol Station. The Brown Hare PH is advertised as operating 11:00 hours – 23:00 hours, Monday to Saturday and 12:00hrs to 22:00hrs on Sunday.
26. There are no obvious schools or religious premises in the immediate vicinity of the Merkur Slots premises though children were seen in Harehills Lane during the course of observations.
27. Photographic images of what was seen during the observations were obtained to support my findings and are documented in Appendix A.

Covert Observations - Deployment

28. I conducted my covert observations from 19:45 hours on Thursday 1st September to 06:00 hours on Friday 2nd September 2022.
29. At 19:52 hours a female member of Merkur Slots staff was standing outside the premises and talking to a Merkur customer who had exited the premises as I commenced the observations and was now seated on a motorcycle. The member of staff returned to inside the premises when she had finished her cigarette – Image A1.
30. At 20:10hrs I was in Compton Crescent looking towards Merkur Slots premises. There were numerous residential houses, some in poor condition and the streets were dirty with litter and discarded shoes and clothing – Image A2.
31. At around 20:12hrs at Harehills Lane there was some traffic waiting at the junction with Compton Road. The Merkur Slots premises was open but there were no customers outside the premises and there was no evidence of any anti-social behaviour – Image A3, A4, A5.
32. At around 20:35hrs I positioned myself in Harehills Lane in the vicinity of the three local bookmakers and then again at 22:00hrs as they were closing for the evening. A number of people were in the area, customers left the bookmakers premises, some of whom used the local fast-food establishments but there was

no evidence of criminality or anti-social behaviour – Image A13, A14, A15, A17, A18, A19.

33. Between 22:15hrs and 22:55hrs I conducted a covert visit to the Merkur Slots premises.
34. At 22:15 hrs I went to the entrance door which was accessed via a set of four steps at the front of the building. To my right and on the pavement there were four rubbish bags, these were sealed and appeared to be awaiting collection – Image A20, A21.
35. Entry was controlled by using a bell security entry system which I pressed. On the glass of the door, I saw signage stating over 18's only, no alcohol, CCTV in operation and that a time delay lock was in operation.
36. The door unlocked immediately and I entered the premises. As I entered I saw that there were two female members of staff who were both wearing Merkur Slots liveried clothing. One member of staff was seated at the reception area on my left and the other was by the front door. This member of staff was pleasant and greeted me, I recognised her as the person I had seen standing outside the premises earlier.
37. The premises layout was similar to other Merkur premises I have visited. Along the right and left hand walls were a variety of gaming machines available for customers use, there were machines also located at the front of the premises. The floor was carpeted creating a lounge effect.
38. The reception desk where the other member of staff was seated was to the left and there was an area for preparing drinks, this appeared clean and tidy. After the reception desk was the entrance door to the toilet.
39. I walked through the premises and noted that there were seven other customers using the gaming machines, a male and female couple aged approximately fifty-years old and a further five male customers whose ages ranged from thirty to forty years old. All the customers were casually dressed and there was no indication that they were vulnerable or impaired through drink. They were clearly not being pressurised or encouraged to spend money.
40. I selected a machine on the right-hand side of the premises and began to play. Almost immediately the female member of staff that had greeted me on entry approached and asked if I had been to a Merkur premises before, I confirmed that I had. She asked if I needed any help with the machines and I said I was okay.
41. She then offered me a membership incentive that provided me with a £5 credit for use on the machine I was playing. To obtain this credit incentive I provided my name and a post code and I was then provided with a credit slip which I used in the machine.

42. The member of staff walked away and I could hear her asking other customers if they would like any refreshments. A few minutes later she returned to where I was playing the machine and asked if I would like a drink. I asked if I could have a beer but she stated they only had soft drinks and offered me a coffee. She left and returned a short time later with a cup of coffee served in a clean china cup. The drink was hot and good quality.
43. Having provided my coffee the member of staff walked away and then returned almost immediately carrying a tray on which were chocolate snacks which she offered me. I selected a chocolate bar and she then walked away from me and circulated around the room offering the snacks to other customers. This member of staff was very friendly and pleasant to deal with.
44. I continued playing the machine I had selected and I did not feel pressurised or encouraged to spend money.
45. A male customer playing a machine near the front of the premises spilt his drink. Both members of staff acted immediately to clear up the spillage telling the customer not to worry and offering him another drink, a pepsi-cola soft drink.
46. At about 22:30hrs I asked the member of staff at reception if I could use the toilet. She came from behind the counter and unlocked the toilet door. On entering I found it to be clean and tidy. On the wall I saw a poster and leaflets relating to Gam-Care that could be taken away by customers and a toilet check sheet that showed the toilets were checked on an hourly basis. I used the toilet and then returned to the machine I had been playing – Image A22, A23.
47. At about 22:40hrs the female member of staff I had spoken to when I entered the premises approached me, asked if I was okay and then asked if I knew the premises closed at 23:00hrs. I told her I thought they were open later than that and she stated that they hope to be in the future.
48. I left the premises at 22:55hrs, as I went out through the door there was no one loitering outside or looking to gain entry and with the exception of a male and female couple the other customers had left. There was no evidence of anti-social behaviour inside, or in the vicinity of the premises.
49. At 22:56hrs the male and female couple I had seen inside the Merkur premises left and walked off west along Harehills Lane – Image A24.
50. At 23:05hrs the exterior lights of the premises were turned off – Image A25.
51. At 23:07hrs the two members of staff left the premises via the front door which they locked, both then walked away west along Harehills Lane. There was no evidence of anti-social behaviour inside, or in the vicinity of the premises – Image A26.
52. From 23:09hrs to 04:57hrs I obtained a series of photographic images that demonstrate there was no anti-social behaviour or criminality in the Hairhills Lane area or in the vicinity of the Merkur premises. Members of the public were

still in the area, some of whom were using the Premier 24-hr Supermarket located east of the Merkur premises at the junction with Coldcotes Avenue – Image A27 to A47

53. At 05:02hrs waste disposal operatives attended the Merkur premises and removed the bagged rubbish that was to the right of the front entrance – Image A48.
54. I remained in the vicinity of the premises until I concluded my observations at 06:00 hours when I left the area – Image A48, A50.

Summary

55. I found Merkur Slots Hatfield to have a smart, well-lit, and professional looking frontage. The premises were carpeted and the atmosphere was relaxed and welcoming.
56. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing or begging.
57. With the use of the Mag-lock at the front door people entering these premises were vetted before being allowed entry to ensure drunken or other vulnerable people didn't gain access.
58. It is clear the presence of Merkur Slots in the Town Centre does not lead to or result in people, who have been on a night out, staying in the Harehills Lane area any longer than they had planned to.
59. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.

60. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
61. 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.
62. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
63. In conclusion, from my visit it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
64. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
65. 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.

Nick Mason
Licensing Consultant
Leveche Associates Limited
8th September 2022

Appendix A

Observation Images

1st - 2nd September 2022

Merkur Slots

377-379 Harehills Lane

Leeds

LS9 6AP

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ



LEVECHE

ASSOCIATES LIMITED

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A1

19:52hrs

Merkur Slots 377-379 Harehills Lane LS9 6AP



Image A2

20:10hrs

Compton Crescent looking towards
Merkur Slots Harehills

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Leeds, England LS9 6AP
1 Sep 2022 at 20:12:56

Image A3

20:12hrs

Merkur Slots Harehills Lane



Leeds, England LS9 6AP
1 Sep 2022 at 20:13:02

Image A4

20:13hrs

Looking east opposite Merkur Slots Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A5

20:13hrs

Looking west opposite Merkur Slots Harehills Lane



Image A6

20:15hrs

Looking west Harehills Lane from Asda Store

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A7

20:16hrs

Asda Store Harehills Lane



Image A8

20:18hrs

The Brown Hare Public House Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A9

20:22hrs

Merkur Slots Harehills Lane



Image A10

20:22hrs

Compton Crescent opposite Merkur Slots Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A11

20:22hrs

Compton Row opposite Merkur Slots Harehills Lane



Image A12

20:23hrs

Harehills Lane j/w Compton Road

Mercur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A13

20:36hrs

William Hill Bookmakers
310-312 Harehills Lane



Image A14

20:37hrs

Paddy Power Bookmakers
284-286 Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A15

20:38hrs

Betfred Bookmakers
287 Harehills Lane



Image A16

20:42hrs

Morrisons Supermarket
Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A17

21:58hrs

Betfred Bookmakers
287 Harehills Lane



Image A18

22:00hrs

William Hill Bookmakers
310-312 Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A19

22:02hrs

Paddy Power Bookmakers
284-286 Harehills Lane



Image A20

22:15hrs

Harehills Lane looking west towards Merkur premises

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Leeds, England LS9 6AP
1 Sep 2022 at 22:15:32

Image A21

22:15hrs

Harehills Lane looking west towards Merkur premises



Leeds, England LS9 6AP
1 Sep 2022 at 22:31:05

Image A22

22:31hrs

Gamcare leaflets Merkur Slots Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A23

22:31hrs

Toilet Check Sheet Merkur Slots Harehills Lane



Image A24

22:56hrs

Customers leaving Merkur Slots Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A25

23:05hrs

Exterior lights turn off Merkur Slots Harehills Lane



Image A26

23:07hrs

Staff leaving Merkur Slots Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A27

23:09hrs

Harehills Lane looking west



Image A28

23:09hrs

Harehills Lane looking west towards
Merkur Slots premises

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A29

23:10hrs

The Brown Hare Public House Harehills Lane



Image A30

23:14hrs

Harehills Lane west towards Morrisons Supermarket

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A31

23:18hrs

Harehills Lane looking east



Image A32

23:18hrs

Harehills Lane looking east

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A33

23:44hrs

The Brown Hare Public House Harehills Lane



Image A34

01:30hrs

Harehills Lane looking east towards
Merkur Slots premises

Mercur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A35

01:31hrs

Harehills Lane looking east towards
Mercur Slots premises



Image A36

01:32hrs

Harehills Lane looking east towards
Mercur Slots premises

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A37

01:33hrs

Harehills Lane looking east towards
Merkur Slots premises



Image A38

01:35hrs

Merkur Slots Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Leeds, England LS9 6AP
2 Sep 2022 at 01:35:09

Image A39

01:35hrs

Opposite Merkur Slots Harehills Lane looking west



Leeds, England LS9 6AP
2 Sep 2022 at 01:35:14

Image A40

01:35hrs

Opposite Merkur Slots Harehills Lane looking east

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A41

01:35hrs

Compton Crescent opposite Merkur Slots
Harehills Lane



Image A42

03:01hrs

Harehills Lane looking east towards
Merkur Slots premises

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A43

03:03hrs

Merkur Slots Harehills Lane



Image A44

03:03hrs

Opposite Merkur Slots Harehills Lane looking west

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A45

03:03hrs

Opposite Merkur Slots Harehills Lane looking east



Image A46

03:06hrs

Harehills Lane looking west

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A47

04:57hrs

Premier 24-hour Supermarket Harehills Lane



Image A48

05:02hrs

Rubbish collection Merkur Slots Harehills Lane

Merkur Slots

377-379 Harehills Lane Leeds LS9 6AP
1st - 2nd September 2022



Image A49

05:41hrs

Merkur Slots Harehills Lane



Image A50

06:00hrs

Merkur Slots Harehills Lane



Full Observation Report

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

**Merkur Slots
3 Central Parade Streatham High Road
London SW16 1HT**

**Merkur Slots
110 Streatham Hill
London SW2 4RD**

Executive Summary

1. Observations were conducted on Merkur Slots premises at 3 Central Parade Streatham High Road London SW16 1HT and 110 Streatham Hill London SW2 4RD and the surrounding area between 21:00 hours on Saturday 27th August 2022 and 06:15 hours Sunday 28th August 2022 and again at Merkur Slots 3 Central Parade Streatham High Road London SW16 1HT between 21:20 hours and 22:10 hours on Thursday 15th September 2022.
2. Covert visits were made to these sites and the surrounding areas. The observations showed the premises are situated on Streatham High Road and Streatham Hill respectively. Both premises are on the busy A23. The visits showed the premises to be well run with no issues on each occasion.
3. There is one other operator in the area with a similar business model to Merkur Slots which is Admiral Casino 119 Streatham High Road SW16 1HJ located opposite the Merkur Slots premises in Streatham High Road. Both Admiral Casino in Streatham High Road and Merkur Slots in Streatham Hill operate 24-hours a day. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

4. I have been instructed to conduct independent observations on the Merkur Slots premises at 3 Central Parade Streatham High Road London SW16 1HT and 110 Streatham Hill London SW2 4RD and the surrounding areas. These premises are licenced under the Gaming Act 2005.
5. Merkur Slots in Streatham High Road is open 08:00 hours to 00:00 hours 7-days a week and the premises in Streatham Hill is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of Lambeth Council.

Personal – Stuart Jenkins

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. 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 – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) 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.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

13. I carried out my observations of Merkur Slots premises at 3 Central Parade Streatham High Road London SW16 1HT and 110 Streatham Hill London SW2 4RD and the surrounding area between 21:00 hours on Saturday 27th August 2022 and 06:15 hours Sunday 28th August 2022, and again at Merkur Slots 3 Central

Parade Streatham High Road London SW16 1HT between 21:20 hours and 22:05 hours on Thursday 15th September 2022 - Images A1, A2, B1, C3.

14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. Both premises are located on busy high streets on the main A23 leading into Central London. Many of these shops have residential properties above them.
18. Streatham High Road and Streatham Hill generally run north to south.
19. My initial observations centred around the Merkur Slots on Streatham High Road. The premises are situated within a parade of shops on a busy high street. Immediately outside the venue is a footpath and then the A23 road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was constant but varied.
20. North of and next to the premises is the Creamery & Coffee, 2 Central Parade Streatham High Road SW16 1HT. To the south of and next to the premises is Galaxy Cut Price Brands 4 Central Parade Streatham High Road. Other retail premises, shops and restaurants line the rest of Streatham High Road – Image A3.
21. The area of observations was from Pendennis Road in the north and Gleneldon Street in the south. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, pubs, cafes, bookmakers, restaurants, clothing shops and fast-food shops which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. Streatham High Road is well served by public transport with a variety of day bus routes, taxis, and the nearby train station of Streatham Hill. There was restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. There are three other gambling premises in the Streatham High Road area of observations:
 - i. Paddy Power Bookmakers 115 Streatham High Road SW16 1HJ – Image A5.
 - ii. William Hill Bookmakers 250 Streatham High Road SW16 1HS – Image A8.

iii. Admiral Casino 119 Streatham High Road SW16 1HJ – Image A4.

25. These premises can be divided into two main types:

- i. Betting premises not licensed to serve alcohol.
- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

26. Admiral Casino 119 Streatham High Road SW16 1HJ has a similar business model to Merkur Slots and operates 24-hours a day 7-days a week. The bookmakers all closed by 22:00 hours.

27. There are three public houses in the observation area:

- i. Pratts & Payne Beer Hall 103 Streatham High Road SW16 which is advertised as operating Monday to Thursday 12:00 hours to 23:00 hours, Friday and Saturday 12:00 hours to 00:00 hours and Sunday 11:00 hours to 22:00 hours – Image A7.
- ii. The Holland Tringham (Wetherspoons) Public House 107-109 Streatham High Road SW16 1HJ which is advertised as operating Sunday to Thursday 08:00 hours to 00:00 hours and Friday and Saturday 08:00 hours to 01:00 hours – Image A6.
- iii. The White Lion 232 Streatham High Road SW16 1BB which is advertised as closed Monday, Tuesday and Wednesday and operating Thursday 17:00 hours to 23:00 hours, Friday and Saturday 17:00 hours to 00:30 hours and Sunday 13:00 hours to 00:00 hours – Image A9.

28. After 02:00 hours my observations centred around the Merkur Slots on Streatham Hill. The premises are within the old Streatham Hill Theatre and are situated on the busy A23 which at that point has a three-lane carriageway either side of a central island. Immediately outside the venue is a footpath and then the A23 road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was constant but varied.

29. North of and next to the premises is the Raymondo Studios 108 Streatham Hill SW2 4RD. To the south of and next to the premises is the junction with Barrhill Road and then Domino's Pizza 114 -116 Streatham Hill SW2 4RS. Other retail premises, shops and restaurants line the rest of Streatham Hill.

30. The area of observations was from Wyatt Park Road in the north and Ardwell Road in the south. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, pubs, cafes, bookmakers, restaurants, clothing shops, and fast-food shops which service the transient and residential population alike.

31. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

32. Streatham Hill is well served by public transport with a variety of bus routes, taxis, and the nearby train station of Streatham Hill. There was restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
33. There are two other gambling premises in the Streatham High Road area of observations, all of which close by 22:00 hours:
 - i. Betfred Bookmakers 132-134 Streatham Hill SW2 4RS – Image B3
 - ii. Ladbrokes Bookmakers 79-81 Streatham Hill SW2 4UB – Image B4
34. There were no other premises with a similar business model to Merkur Slots in the area of observations.
35. During the observations I saw no illegal activity or anti-social behaviour taking place.
36. Throughout my observations in and around Streatham High Road and Streatham Hill I saw no begging taking place in the street, no street drinkers or drug dealing around the premises or the area.
37. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendices A, B and C.

Covert Observations

Deployment One

38. I conducted my covert observations from 21:00 hours on Saturday 27th August 2022 and 06:15 hours on Sunday 28th August 2022.
39. At 21:00 hours I arrived in the area of the Merkur Slots premises 3 Central Parade Streatham High Road London SW16 1HT and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
40. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of night. Most of the shops had closed when I arrived.
41. Between 22:00 hours and 02:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting restaurants and late-night takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Streatham High Road with purpose. At 00:00 hours Merkur Slots Streatham High Road closed without any issues – Images A10, A11, A12, A13, A14.

42. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images A18, A19, A20.
43. At 02:00 hours I moved my location to concentrate my observations on Merkur Slots 110 Streatham Hill SW2 4RD.
44. At 02:15 hours I arrived in the area of the Merkur Slots Streatham Hill and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall – Image B1, B2.
45. Between 02:32 hours and 03:03 hours I conducted a covert visit to the Merkur Slots 110 Streatham Hill SW2 4RD.
46. The front display of the premises was clean, well maintained and looked professional. The signage was clear and bright.
47. At 02:32 hours I went to the entrance door which was closed. I saw that entry was controlled by a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation – Image B5.
48. I pushed the door, but it was locked. I pressed the entry button and after a few seconds the door was opened by a male member of staff and I entered.
49. I found myself in a long corridor and followed the male member of staff into the main gaming area. On entering this area, I saw a reception area where refreshments were also prepared. At the reception desk was another male member of staff. Both members of staff were wearing smart corporate clothing.
50. At that point I saw the first member of staff, who let me into the premises was a security guard and had an SIA registration badge displayed.
51. The room was deep and opened out into a large area left and right. I saw there was a wide variety of gaming machines throughout this single room.
52. On seeing me the second member of staff approached and welcomed me to the premises. He asked if I had been to this Merkur Slots premises previously and I said I had. He then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine towards the middle of the premises on the back wall.
53. Whilst I was playing the machine the second member of staff asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
54. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.

55. There were eight other customers in the venue at the time of my visit. There four females and four males aged between 27 and 60 years. During my visit no other customer came into the venue.
56. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
57. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
58. Before leaving I used the toilets which were clean and tidy and located away from the main room along another corridor. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image B6, B7.
59. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:02 hours – Image B8.
60. Local Authority Street Cleaning vehicles and buses operated throughout the night.
61. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images B9, B10, B11, B12, B13, B14.
62. I remained in the area until 06:15 hours when I concluded my observations.

Deployment Two

63. I conducted my covert observations from between 21:20 hours to 22:10 hours on Thursday 15th September 2022.
64. At 21:20 hours I arrived in the area of Merkur Slots 3 Central Parade Streatham High Road London SW16 1HT and started my observations by monitoring the venue and the immediate area around it – Image C1, C2.
65. Pedestrian and vehicular traffic passing the premises was varied as is typical with Streatham High Road seven days a week.
66. Between 21:35 hours and 22:00 hours I conducted a covert visit to the Merkur Slots 3 Central Parade Streatham High Road SW16 1HT.
67. At 21:35 hours I went to the entrance door which was closed. I saw that entry was controlled by a bell security entry system. On the glass of the door, I saw signage

stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation – Image C3.

68. I pushed the door and entered the premises. In front of me I saw a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on one level which was carpeted and there were gaming machines of various types throughout.
69. Halfway down on the lefthand wall was a reception where refreshments were prepared. As I approached the reception, I saw a female member of staff wearing smart corporate clothing. She appeared to be engaged in preparing drinks.
70. At the time of my visit there were four other customers in the venue. Three male and one female aged between 30 years and 50 years.
71. I found a gaming machine just beyond the reception desk on the left-hand wall. The staff left me to enjoy playing the machine.
72. Whilst I was playing the machine I engaged the female member of staff in conversation and she asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and she explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted her offer of a coffee.
73. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask her.
74. I then saw a male member of staff come out of a staff door at the back of the premises and come to the reception. The female member of staff then went through the staff door and out of sight leaving the male managing the shop floor.
75. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
76. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image C4, C5.
77. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 22:00 hours.
78. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images C7, C8.
79. I remained in the area until 22:10 hours when I concluded my observations.

Summary

80. I found Merkur Slots in Streatham High Road and Streatham Hill to have smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
81. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around.
82. People entering these premises were vetted before being allowed admission or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
83. It is clear the presence of Merkur Slots in Streatham High Road and Streatham Hill does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
84. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
85. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
86. 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.

87. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.

88. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

89. 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
18/09/2022

Appendix A

Observation Images

27th - 28th August 2022

Merkur Slots

3 Central Parade
Streatham High Road
SW16 1HT

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ



Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A1

21:13hrs

Merkur Slots 3 Central Parade Streatham SW16 1HT



Image A2

21:13hrs

Merkur Slots 3 Central Parade Streatham High Road
looking south

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



27 Aug 2022 at 21:14:18
Lambeth

Image A3

21:14hrs

H&T Pawnbrokers 254 Streatham High Road SW16 1HT



27 Aug 2022 at 21:15:55
Lambeth

Image A4

21:15hrs

Admiral Casino 119 Streatham High Road SW16 1HJ

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A5

21:16hrs

Paddy Power 115 Streatham High Road SW16 1HJ



Image A6

21:16hrs

The Holland Tringham (Wetherspoon) PH
107-109 Streatham High Road SW16 1HJ

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A7

21:17hrs

Pratts & Payne Bar 103 Streatham High Road SW16 1HJ



Image A8

21:19hrs

William Hill Bookmakers
250 Streatham High Road SW16 1HS

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A9

21:22hrs

The White Lion 232 Streatham High Road SW16 1BB



Image A10

23:26hrs

Merkur Slots 3 Central Parade
High Road Streatham

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A11

23:26hrs

Merkur Slots 3 Central Parade Streatham High Road



Image A12

23:27hrs

Streatham High Road looking south

Mercur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A13

23:27hrs

Streatham High Road looking north



Image A14

23:28hrs

Streatham High Road looking north

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A15

01:52hrs

Streatham High Road looking south



Image A16

01:53hrs

Streatham High Road looking north

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



28 Aug 2022 at 01:53:29
Lambeth

Image A17

01:53hrs

The White Lion Streatham High Road



28 Aug 2022 at 01:59:13
Lambeth

Image A18

01:59hrs

Merkur Slots 3 Central Parade Streatham High Road

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



28 Aug 2022 at 01:59:19
Lambeth

Image A19

01:59hrs

Streatham High Road looking south



28 Aug 2022 at 01:59:28
Lambeth

Image A20

01:59hrs

Streatham High Road looking north

Appendix B

Observation Images
28th August 2022

Merkur Slots

110 Streatham Hill
London
SW2 4TD

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ



Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B1

02:21hrs

Merkur Slots 110 Streatham Hill London SW2 4TD



Image B2

02:22hrs

Streatham Hill looking north

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B3

02:23hrs

Betfred 132 - 134 Streatham Hill SW2 4RS



Image B4

02:28hrs

Ladbrokes 79 - 81 Streatham Hill SW2 4UB

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B5

02:30hrs

Merkur Slots 110 Streatham Hill SW2 4TD



Image B6

03:00hrs

Toilet Check Sheet
Merkur Slots 110 Streatham Hill SW2 4TD

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B7

03:01hrs

Staying in Control Literature in Toilets
Merkur Slots Streatham Hill



Image B8

03:03hrs

Merkur Slots 110 Streatham Hill SW2 4TD

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B9

04:59hrs

Merkur Slots 110 Streatham Hill SW2 4TD



Image B10

04:59hrs

Streatham Hill looking north

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B11

05:00hrs

Streatham Hill looking south



Image B12

06:03hrs

Streatham Hill looking north

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B13

06:03hrs

Streatham Hill looking south



Image B14

06:08hrs

Merkur Slots 110 Streatham Hill SW2 4TD

Appendix C

Observation Images
15th September 2022

Merkur Slots

3 Central Parade
Streatham High Road
SW16 1HT

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ



Merkur Slots
3 Central Parade Streatham High Road SW16 1HT
15th September 2022



Image C1

21:33hrs

Streatham High Road looking south



Image C2

21:34hrs

Streatham High Road looking north

15th September 2022



Image C3

21:34hrs

Merkur Slots 3 Central Parade Streatham SW16 1HT



Image C4

21:58hrs

Staying in Control Literature - Gamcare Leaflets

Merkur Slots
 3 Central Parade Streatham High Road SW16 1HT
 15th September 2022



Image C5

21:58hrs

Toilet Check Sheet
 Merkur Slots Streatham High Road



Image C6

22:01hrs

Merkur Slots 3 Central Parade

Merkur Slots
3 Central Parade Streatham High Road SW16 1HT
15th September 2022



Image C7

22:01hrs

Streatham High Road looking south

Image C8

22:01hrs

Streatham High Road looking north



Full Observation Report

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

Merkur Slots Cashino

69 Tottenham Court Road London W1T 2HA

Executive Summary

1. Observations were conducted on Merkur Slots Cashino 69 Tottenham Court Road London W1T 2HA and the surrounding area between 20:30 hours on Wednesday 17th August 2022 and 06:00 hours on Thursday 18th August 2022 and between 00:05 hours and 00:20 hours on Friday 16th September 2022.
2. Two covert visits were made to the site and the surrounding area. The observations showed the premises are situated on Tottenham Court Road near Godge Street Underground Station and are open 24-hours a day 7-days a week. The visits showed the premises to be well run with no issues on both occasions.
3. There are no other gaming premises with a similar operation to Merkur Slots in the immediate area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

4. I have been instructed to conduct independent observations on the Merkur Slots premises at Merkur Slots Cashino 69 Tottenham Court Road London W1 2HA and the surrounding area.

5. The premises has a 24-hour licence under the Gaming Act 2005 and is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of Camden Council in the London Borough of Camden.

Personal – Stuart Jenkins

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. 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 – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) 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.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

13. I carried out my observations of Merkur Slots Cashino 69 Tottenham Court Road W1 2HA and the surrounding area between 20:30 hours on Wednesday 17th August 2022 and 06:00 hours on Thursday 18th August 2022 and between 00:05 hours and 00:20 hours on Friday 16th September 2022.
14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. The premises are located on a busy high street within a parade of shops in the heart of London. Mainstream shops line both sides of Tottenham Court Road. Many of these shops have residential properties above them – Image A1.
18. Tottenham Court Road generally runs north to south. Immediately outside the venue is a wide footpath and then the road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied.
19. North of and next to the premises is the entrance to Xen-Do Martial Arts Centre which shares the same postal address of 69 Tottenham Court Road and building as Merkur Slots Cashino. Next to the Martial Arts Centre entrance is CEX Entertainment Exchange 70 Tottenham Court Road and then Kentucky Fried Chicken 71 Tottenham Court Road. To the south of and next to the premises is Dianetics & Scientology Life Improvement Centre 68 Tottenham Court Road. Other retail premises, shops and restaurants line the rest of Tottenham Court Road.
20. The area of observations was from Warren Street in the north and Store Street in the south. This area is densely populated with many retail premises, that include small food shops, pubs, cafes, bookmakers, restaurants, fast-food shops, and furniture stores which service the transient and residential population alike.
21. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
22. Tottenham Court Road is well served by public transport with a variety of bus routes, taxis, hire bikes and the nearby underground train stations of Goodge Street and Warren Street. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
23. Bus Stops are nearby and opposite Merkur Slots Cashino with the Marylebone Mainline and Underground Station in Melcombe Place NW1 6JJ, a 12-minute walk (1.8 miles).
24. There are two other gambling premises in the Tottenham Court Road area of observations, all of which close by 22:00 hours:
 - i. Betfred Bookmakers 116 Tottenham Court Road W1T 5AJ
 - ii. Coral Bookmakers 75 Warren Street NW1 3AD
25. These premises can be divided into two main types:
 - i. Betting premises not licensed to serve alcohol.
 - ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

26. There are no other operators with a similar business model to Merkur Slots Cashino that operates 24-hours a day 7-days a week in the area of observations – Images A2, A3, A4, A5, A6, A7, A8, A9, A10, A11, A12 and A13.

27. There are four public houses in the observation area:

- i. Rising Sun Public House 46 Tottenham Court Road W1T 2EL which is advertised as operating Monday to Thursday 11:00 hours to 00:00 hours, Friday and Saturday 11:00 hours to 01:00 hours, and Sunday 11:00 hours to 22:30 hours – Image A14.
- ii. The Court Public House 108A Tottenham Court Road W1T 5AA which is advertised as operating Sunday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours – Image A25.
- iii. Fitzrovia Belle Bar & Hotel 174 Tottenham Court Road W1T 7NT which is advertised as operating Monday to Sunday 07:00 hours to 00:00 hours – Image A26.
- iv. TCR 183 Tottenham Court Road W1T 7PE which is advertised as operating Monday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours and Sunday 12:00 hours to 22:30 hours – Image A27.

28. North of the premises is Whitfield Gardens at the junction with Tottenham Street, an open space with gardens and seating for public use. During the observations I saw no illegal activity or anti-social behaviour taking place – Image A30.

29. Throughout my observations in and around Tottenham Court Road I saw no begging taking place in the street, no street drinkers or drug dealing around the premises or the area. However, I did see people who are living on the street encamped, some in tents, underneath the canopy of Heals Furniture Store 196 Tottenham Court Road W1T 7LQ. This is a daily occurrence with members of the local homeless community sheltering overnight at Heals – Image A10, A39, A40, A41, A42, A43 and A44..

30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendices A and B.

Covert Observations

Deployment One

31. I conducted my covert observations from between 20:30 hours on Wednesday 17th August 2022 and 06:00 hours on Thursday 18th August 2022.

32. At 20:30 hours I arrived in the area of the Merkur Slots Cashino premises 69 Tottenham Court Road and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
33. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of the day. Most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues.
34. Between 22:00 hours and 03:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting restaurants and late-night takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Tottenham Court Road with purpose. Delivery riders were parked on the road and footpaths outside fast food shops whilst servicing fast food deliveries.
35. Between 03:14 hours and 03:32 hours I conducted a covert visit to the Merkur Slots Cashino 69 Tottenham Court Road – Image A32.
36. The front display of the premises above the liveried shop glass front had been removed and was clearly being refurbished. Even though the signage was removed the shop front was clean, well maintained and looked professional.
37. At 03:14 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
38. I pushed the door and entered the premises. I saw to my left a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on two levels which were carpeted and there were gaming machines of various types throughout the premises.
39. Halfway down the right-hand wall was a reception area where refreshments were also prepared. At the reception desk were two male members of staff who were both wearing smart corporate clothing. After the reception desk there was an upper level with further gaming machines.
40. On seeing me one of the members of staff approached and welcomed me to the premises. He asked if I had been to this Merkur Slots premises previously and I said I had. He then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine towards the middle of the premises.
41. Whilst I was playing the machine he asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.

42. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
43. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
44. There were six other customers in the venue at the time of my visit. All six were male and aged between 27 and 45 years. During my visit one other customer came into the venue.
45. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
46. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. 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.
47. Before leaving I used the toilets which were clean and tidy and located in the basement area. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A33, A34.
48. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:32 hours – Image A35.
49. Local Authority Street Cleaning vehicles and buses operated throughout the night.
50. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Image A36, A37, A38, A39, A40, A41, A42, A43, A44.
51. I remained in the area until 06:00 hours when I concluded my observations.

Deployment Two

52. I conducted my covert observations from between 00:05 hours and 00:20 hours on Friday 16th September 2022.
53. At 00:05 hours I arrived in the area of the Merkur Slots Cashino premises 69 Tottenham Court Road and started my observations by monitoring the venue and the immediate area around it – Image B1.
54. I saw that since my visit new signage had been installed above the glass shop front saying 'Merkur Cashino'. Pedestrian and vehicular traffic passing the

premises was constant but varied as is typical with Tottenham Court Road seven days a week.

55. Between 00:06 hours and 00:17 hours I conducted a covert visit to the Merkur Slots Cashino 69 Tottenham Court Road – Image B2, B17.
56. At 00:06 hours I went to the entrance door which was closed. The time delay lock was in operation. I pressed the entry button and after a few seconds the door was opened by a male member of staff and I entered. I saw to my left the board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. The layout of the premises was as I have previously described.
57. As I followed the staff member through the premises he asked if I would like a soft drink, water, coffee, tea or a snack. I politely declined his offer.
58. I saw on the upper level another male member of staff monitoring customers. Both members of staff were dressed in smart corporate clothing.
59. At the time of my visit there were three other customers in the venue. They were all male, aged between 30 years and 40 years.
60. I found a gaming machine towards the back of the premises on the upper level. The staff left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
61. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
62. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 00:17 hours.

Summary

63. I found Merkur Slots Cashino in Tottenham Court Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
64. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around. There were, however, homeless people sleeping rough, but this wasn't anywhere near the Merkur Slots Cashino premises.

65. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
66. It is clear the presence of Merkur Slots in Tottenham Court Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
67. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
68. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
69. 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.
70. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
71. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
72. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

73. 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
17/09/2022



LEVECHE
ASSOCIATES LIMITED

Appendix A

Observation Images

17th - 18th August 2022

Merkur Slots Cashino

69 Tottenham Court Road
London
W1T 2HA

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A1

20:48hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image A2

20:48hrs

Tottenham Court Road looking south

17th - 18th August 2022



Image A3

20:48hrs

Tottenham Court Road looking north



Image A4

20:51hrs

Tottenham Court Road j/w Chenies Street looking north

Merkur Slots Casino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A5

20:51hrs

Tottenham Court Road looking north



Image A6

20:52hrs

Tottenham Court Road j/w Goodge Street looking west

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A7

20:53hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image A8

20:54hrs

Goodge Street Underground Station
Tottenham Court Road

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A9

20:54hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street



Image A10

20:55hrs

Heals Furniture Store
196 Tottenham Court Road

17th - 18th August 2022



17 Aug 2022 at 21:00:33
London, England W1T 7NH

Image A11

21:00hrs

Betfred 116 Tottenham Court Road W1T 5AJ



17 Aug 2022 at 21:02:35
London, England NW1 2BU

Image A12

21:02hrs

Warren Street Underground Station
Tottenham Court Road

17th - 18th August 2022



Image A13

21:23hrs

Tottenham Court Road j/w Store Street looking north



Image A14

21:23hrs

Rising Sun Public House
46 Tottenham Court Road W1T 2EL

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



17 Aug 2022 at 22:32:52
London, England W1T

Image A15

22:32hrs

Merkur Slots Cashino Tottenham Court Road



17 Aug 2022 at 22:33:10
London, England W1T

Image A16

22:33hrs

Tottenham Court Road looking south

17th - 18th August 2022



Image A17

22:33hrs

Tottenham Court Road looking north



Image A18

22:34hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

17th - 18th August 2022



Image A19

23:54hrs

Tottenham Court Road looking south



Image A20

23:54hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

17th - 18th August 2022



Image A21

23:54hrs

Goodge Street Unground Station
Tottenham Court Road



Image A22

23:55hrs

Merkur Slots Cashino Tottenham Court Road

17th - 18th August 2022



Image A23

23:55hrs

Tottenham Court Road looking south



Image A24

00:12hrs

Coral Bookmakers 75 Warren Street NW1 3AD

17th - 18th August 2022



Image A25

00:16hrs

The Court Public House
108A Tottenham Court Road W1T 5AA



Image A26

00:17hrs

Fitzrovia Belle Bar & Hotel
174 Tottenham Court Road W1T 7NT

Merkur Slots Casino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A27

00:18hrs

TCR Bar 183 Tottenham Court Road W1T 7PE



Image A28

00:22hrs

Pa Station 76 Tottenham Court Road W1T 2HG

17th - 18th August 2022



Image A29

03:10hrs

Tottenham Court Road looking north



Image A30

03:12hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A31

03:12hrs

Tottenham Court Road looking south



Image A32

03:13hrs

Merkur Slots Cashino Tottenham Court Road

17th - 18th August 2022



18 Aug 2022 at 03:24:54
London, England W1T

Image A33

03:24hrs

Staying in Control Poster Gam Care
Merkur Slots Cashino Tottenham Court Road



18 Aug 2022 at 03:25:00
London, England W1T

Image A34

03:25hrs

Toilet Check Sheet Merkur Slots Cashino
Tottenham Court Road

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A35

03:32hrs

Merkur Slots Cashino Tottenham Court Road



Image A36

03:36hrs

Godge Street Underground Station
Tottenham Court Road

17th - 18th August 2022



Image A37

03:37hrs

Tottenham Court Road looking north



Image A38

03:37hrs

Tottenham Court Road looking south

17th - 18th August 2022



Image A39

03:39hrs

Tottenham Court Road looking south



Image A40

05:51hrs

Tottenham Court Road looking north

17th - 18th August 2022



Image A41

05:52hrs

Tottenham Court Road looking south



Image A42

05:54hrs

Merkur Slots Cashino Tottenham Court Road

17th - 18th August 2022



Image A43

05:57hrs

Goodge Street Underground Station
Tottenham Court Road



Image A44

05:58hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

Appendix B

Observation Images
16th September 2022

Merkur Slots Cashino

69 Tottenham Court Road
London
W1T 2HA

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ



Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

16th September 2022



Image B1

00:06hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image B2

00:06hrs

New Signage - Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

16th September 2022



Image B3

00:17hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image B4

00:17hrs

Tottenham Court Road looking north



Full Observation Report

Stuart Jenkins – Licensing Consultant
Leveche Associates Limited

Merkur Slots

403 – 405 Green Street Upton Park Plaistow E13 9AU

Executive Summary

1. Observations were conducted on Merkur Slots premises at 403-405 Green Street Upton Park Plaistow E13 9AU and the surrounding area. The premises are situated in a parade of shops and located on the B167. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There was one other gaming premises with a similar business model to Merkur Slots in the area, Game Nation 353 Green Street E13 9AR which is open 24-hours a day 7-days a week.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

Introduction

5. We are instructed to conduct independent observations at Merkur Slots premises 403-405 Green Street Upton Park Plaistow E13 9AU and the surrounding area.
6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.

7. The premises come under the jurisdiction of Newham Borough Council.

Personal – Stuart Jenkins

8. 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 Metropolitan Police after completion of over 30 years exemplary service.
9. 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 – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) 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.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

14. Observations were carried out at Merkur Slots premises 403-405 Green Street Upton Park Plaistow E13 9AU and the surrounding area between 21:00 hours on Thursday 8th September 2022 and 06:10 hours on Friday 9th September 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.
16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is in a large parade of shops on the busy B167 junction with Redclyffe Road. There are shops and commercial businesses on either side of Green Street including the Queen Street Market which is on the opposite side of the road and to the north of the premises. Many of these shops have residential properties above them – Image A1, A5.
19. Green Street generally runs north to south. Immediately outside the venue is a wide footpath and beyond that the road. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied – Image A2, A3.
20. North of and next to the premises is W & W Handmade Shoes 401 Green Street E13 9AU. To the south of and next to the premises is the junction with Redclyffe Road and then Blossom & Brownes Sycamore 407 Green Street E13 9AU. Other shops line Green Street on both sides of the road.
21. The area of observations was from Plashet Grove in the north and Tudor Road in the south. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, a pub, cafes, hairdressers, estate agents, slots casinos, bookmakers, restaurants and fast-food which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. Green Street is well served by public transport with a variety of bus routes, underground trains and taxis. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. Bus Stops are located a short distance away at near the junction with Redclyffe Road and opposite Merkur Slots with the Upton Park Underground Station 100 metres to the north – Image A6.
25. There are four other gambling premises in the Upton Park area, all of which close by 22:00 hours except Game Nation Casino:
 - i. Ladbrokes Bookmakers 365 Green Street E13 9AR – Image A8
 - ii. Paddy Power Bookmakers 351 Green Street E13 9AR – Image A7
 - iii. Paddy Power Bookmakers 297 Green Street E13 9AR – Image A9
 - iv. Game Nation 353 Green Street E13 9AR - Image A7
26. These premises can be divided into two main types:
 - i. Betting premises not licensed to serve alcohol

- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol
27. Game Nation has a similar business model to Merkur Slots UK which operates 24-hours 7-days a week – Image A7.
28. There is one public house in the vicinity of the gaming premises called The Queens Public House 410 Green Street E13 9JJ which is advertised as operating Monday to Thursday 11:00 hours to 23:00 hours, Friday to Saturday 11:00 hours to 01:00 hours and Sunday 12:00 hours to 23:30 hours. At the time of my visit, it appeared to be well run and there were no issues.
29. Throughout my observations in and around Green Street I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.
30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

31. I conducted covert observations from between 21:00 hours on Thursday 8th September 2022 and 06:10 hours on Friday 9th September 2022.
32. At 21:00 hours I arrived in the area of the Merkur Slots premises 403 - 405 Green Street and started observations by monitoring the venue and the immediate area around it.
33. There was a good volume of pedestrian traffic in and around the Merkur Slots premises, most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food takeaway restaurants like Papa's Chicken / Pizza 337 Green Street E13 9AU which was advertised as being open from 09:00 hours to 05:30 hours on a Thursday. They were well run and had no issues.
34. Between 22:00 hours and 23:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets. Delivery riders were parked on the road and footpaths waiting to service fast food deliveries – Images A10 and A11.
35. Between 23:30 hours and 02:20 hours pedestrian and traffic numbers reduced – Images A15, A16, A17, A18, A19, A20, A21, A22, A23, A24, A25, A26, A27, A28, A29, A30, A31, A32, A33.
36. Between 02:31 hours and 03:00 hours I conducted a covert visit to the Merkur Slots 403-405 Green Street E13 9AU – Image A34.

37. At 02:31 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
38. I pushed the door and entered the premises. Immediately in front of me I saw a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
39. Further into the premises on the right-hand wall was a reception area where refreshments were prepared. At the reception desk were two male members of staff who were both wearing smart corporate clothing.
40. One of the male members of staff approached me and welcomed me to the premises. He asked if I had been to this Merkur Slots premises before and I said I had.
41. The male staff member then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine.
42. Once at the machines the same staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
43. After a couple of minutes, the male staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
44. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
45. There were four other customers in the venue at the time of my visit. All four were male and aged between 28 and 50 years. During my visit one other customer came into the venue.
46. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
47. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
48. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A35, A36.

49. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:00 hours – Image A37.
50. Between 03:00 hours and 05:00 hours pedestrian traffic was varied with customers visiting the Takeaway Restaurant until it closed without incident. Traffic using Green Street was constant, but the numbers of vehicles did vary.
51. The remaining premises open operated 24-hours a day and customers frequented them throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged until 05:00 hours.
52. At around 05:00 hours shop traders started to arrive to prepare and open their premises ready for the day ahead – Images A38, A39, A40.
53. I remained in the area until 06:10 hours. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A41, A42, A43, A44.

Summary

54. I found Merkur Slots Green Street Upton Park to have a smart, well-lit, and professional looking frontage. External CCTV cameras were mounted on the front, righthand side wall and rear of the building. There was good security lighting at the front and rear of the premises with bright street lightening illuminating the right-hand side of the premises.
55. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing, begging or groups of youths hanging around.
56. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
57. It is clear the presence of Merkur Slots in Green Street does not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to and that customers do not hang around outside the premises causing problems.
58. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.

- ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
59. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hours a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
60. At Merkur Slots premises 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.
61. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
62. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
63. 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
16/09/2022

Appendix A

Observation Images

8th-9th September 2022

Mercur Slots

403 - 405 Green Street

Upton Park

Plaistow

E13 9AU

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1 HQ



Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A1

21:03hrs

Merkur Slots
403-405 Green Street Upton Park E13 9AU



Image A2

21:03hrs

Green Street Upton Park looking south

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A3

21:04hrs

Green Street Upton Park looking north



Image A4

21:04hrs

The Queens Public House
410 Green Street E13 9JJ

Mercur Slots
403 - 405 Green Street Upton Park Plaistow, E13 9AU
8th - 9th September 2022



Image A5

21:05hrs

Queens Market Green Street E13 9BA



Image A6

21:06hrs

Upton Park Underground Station
Green Street E13 9AP

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A7
21:08hrs
Paddy Power Bookmakers



Image A8
21:09hrs
Ladbrokes 305 Green Street

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A9

21:10hrs

Paddy Power Bookmakers
297 Green Street j/w Plashet Grove



Image A10

21:29hrs

Green Street Upton Park looking south

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A11

21:35hrs

Side / rear view Merkur Slots Redclyffe Road



Image A12

23:26hrs

Green Street Upton Park looking south

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A13

23:27hrs

Merkur Slots Green Street Upton Park



Image A14

23:28hrs

Front Aspect Merkur Slots
Green Street Upton Park

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A15

23:30hrs

Green Street Upton Park looking south



Image A16

23:30hrs

Green Street Upton Park looking north

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022

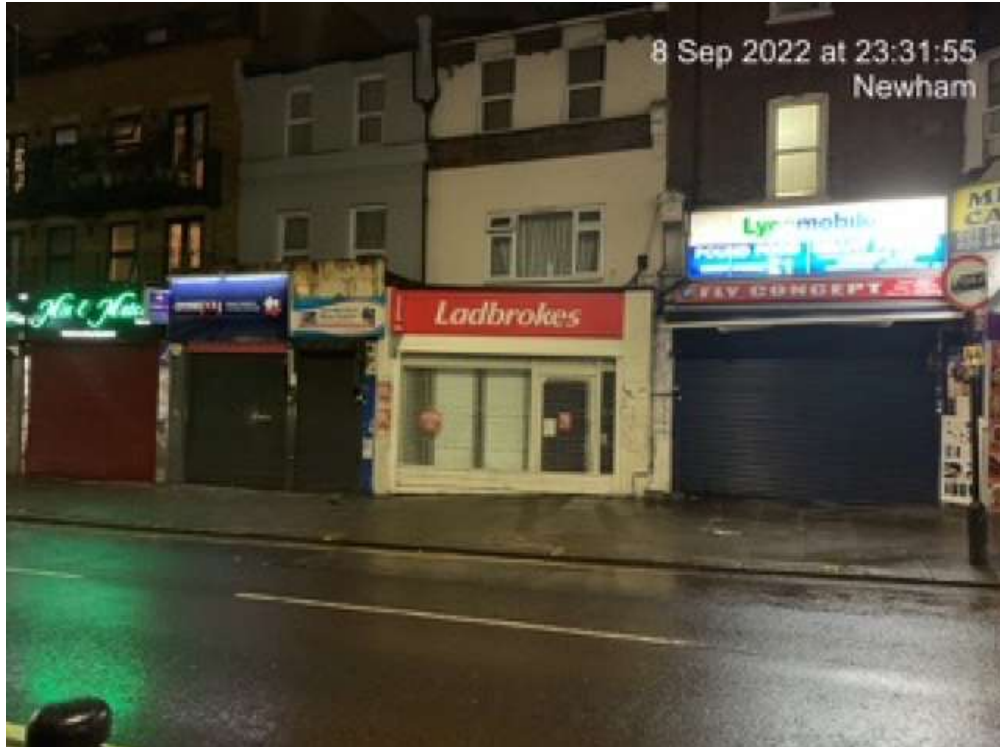


Image A17

23:31hrs

Ladbrokes 365 Green Street Upton Park



Image A18

23:32hrs

Green Street Upton Park looking north

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A19

23:36hrs

Merkur Slots Green Street Upton Park



Image A20

23:37hrs

Side Aspect Merkur Slots Green Street Upton Park

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A21

23:58hrs

Rear Aspect Merkur Slots Upton Park



Image A22

02:03hrs

Green Street Upton Park looking north

Mercur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A23

02:05hrs

Green Street Upton Park looking south



Image A24

02:06hrs

Mercur Slots Green Street Upton Park

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A25

02:07hrs

Green Street Upton Park looking north



Image A26

02:08hrs

Queens Market Green Street Upton Park

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A27

02:08hrs

Papa's 337 Green Street E13 9AU



Image A28

02:09hrs

Upton Park Underground Station
Green Street looking north

Merkur Slots

403 - 405 Green Street Upton Park Plaistow E13 9AU

8th - 9th September 2022



Image A29

02:11hrs

Game Nation 353 Green Street E13 9AR



Image A30

02:13hrs

H&T Pawnbrokers 342 Green Street E13 9AP

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A31

02:17hrs

Green Street Upton Park looking south



Image A32

02:17hrs

Green Street looking south towards
Upton Park Underground Station

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A33

02:18hrs

Upton Park Underground Station Green Street



Image A34

02:30hrs

Merkur Slots Green Street Upton Park

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A35

02:58hrs

Toilet Check Sheet Merkur Slots Green Street



Image A36

02:58hrs

Staying in Control Gam Care Literature
Merkur Slots Green Street

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A37

03:01hrs

Rear and Side Aspect of Merkur Slots Upton Park



Image A38

04:47hrs

Green Street Upton Park looking south

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A39

04:53hrs

Merkur Slots Green Street Upton Park



Image A40

04:54hrs

Shopping Area and Shops opposite
Merkur Slots Green Street

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A41

06:00hrs

Rear / side aspect Merkur Slots Upton Park



Image A42

06:01hrs

Green Street Upton Park looking north

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A43

06:01hrs

Merkur Slots Green Street Upton Park



Image A44

06:01hrs

Green Street Upton Park looking south



Full Observation Report

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

Merkur Slots

91 High Road Wood Green N22 6BB

Executive Summary

1. Observations were conducted on Merkur Slots premises at 91 High Road Wood Green London N22 6BB and the surrounding area. The premises are situated in a parade of shops and located on the A105. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There were four other gaming premises with a similar business model to Merkur Slots in the area namely: Game Nation, Little Vegas and the two Admiral Casinos.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

Introduction

5. We are instructed to conduct independent observations at Merkur Slots premises 91 High Road Wood Green London N22 6BB and the surrounding area.

6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
7. The premises come under the jurisdiction of Haringey Borough Council.

Personal – Stuart Jenkins

8. 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 Metropolitan Police after completion of over 30 years exemplary service.
9. 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 – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) 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.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

14. Observations were carried out at Merkur Slots premises 91 High Road Wood Green N22 6BB and the surrounding area between 21:00 hours on Friday 26th August 2022 and 06:00 hours on Saturday 27th August 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.

16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is in a large parade of shops on the busy A105. There are shops and commercial businesses on either side of High Road. Many of these shops have residential properties above them – Image A1, A5.
19. High Road generally runs north to south. Immediately outside the venue is a wide footpath and beyond that the road. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied – Image A2, A3.
20. North of and next to the premises is Hide & Seek 93 High Road Wood Green then Herb China 95 High Road Wood Green and McDonalds Restaurant 97-101 High Road Wood Green. To the south of and next to the premises is Ozan Jewellery Shop 89 High Road Wood Green. Other shops line High Road on both sides of the road.
21. The area of observations was from Gladstone Avenue in the north and Turnpike Lane in the south. This area is densely populated with many retail premises, that include mini supermarkets, small food shops, a pub, cafes, hairdressers, estate agents, slots casinos, bookmakers, restaurants and fast-food shops which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. High Road is well served by public transport with a variety of bus routes, taxis, underground and mainline trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. Bus Stops are located opposite Merkur Slots with the Turnpike Underground Station 5 minutes walk (0.3 miles) and Hornsey Mainline Station 13 minutes walk (0.7 miles) – Image A6.
25. There are nine other gambling premises in the Upton Park area, all of which close by 22:00 hours except Game Nation Casino, Little Vegas and the two Admiral Casinos:
 - i. Admiral Casino Slots 9 High Road Wood Green N22 6BH – Image A13.
 - ii. Admiral Casino Slots 117 High Road Wood Green N22 6BB – Image A16.
 - iii. Betfred 64 High Road Wood Green N22 6HK – Image A7.
 - iv. Paddy Power 33 High Road Wood Green N22 6BH – Image A15.

- v. Game Nation 49 High Road Wood Green N22 6BH - Image A8.
- vi. Ladbrokes 13 High Road Wood Green N22 6BH – Image A12.
- vii. Ladbrokes 12 The Broadway High Road N22 6DS – Image A19.
- viii. Little Vegas 17 High Road Wood Green N22 6BH – Image A11.
- ix. William Hill The Broadway High Road Wood Green N22 6DS – Image A18.

26. These premises can be divided into two main types:

- i. Betting premises not licensed to serve alcohol.
- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

27. Game Nation, Little Vegas and the two Admiral Casinos have similar business models to Merkur Slots UK which operates 24-hours 7-days a week – Images A8, A11, A13, A16.

28. There were no public houses in the vicinity of the gaming premises but there were late night restaurants and diners. At the time of my visit, it appeared to be well run and there were no issues.

29. Throughout my observations in and around High Road I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.

30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

31. I conducted covert observations from between 21:00 hours on Friday 26th August 2022 and 06:00 hours on Saturday 27th August 2022.

32. At 21:00 hours I arrived in the area of the Merkur Slots premises 91 High Road Wood Green and started observations by monitoring the venue and the immediate area around it.

33. There was a good volume of pedestrian traffic in and around the parade of shops and the whole road. At this time most of the shops had closed. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food take away and restaurants. They were well run and had no issues.

34. Between 22:00 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets. Delivery riders were parked on the road and footpaths waiting to service fast food deliveries – Images A16, A17, A18, A19, A20, A21, A22, A23, A24, A25, A26, A27.

35. Between 01:00 hours and 04:03 hours pedestrian and vehicular numbers reduced – Images A28, A29.
36. Between 04:06 hours and 04:35 hours I conducted a covert visit to the Merkur Slots 91 High Road Wood Green – Image A30.
37. At 04:06 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
38. I pushed the door and entered the premises. Immediately in front of me I saw a screen board. As I walked past it I saw on the back of it were the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on one level and carpeted.
39. As I moved into the premises I saw that there a series of gaming machines of various types throughout. On the left-hand side and further into the premises was the staff reception desk area. This area was also used for the preparation of refreshments with a facility to make hot drinks.
40. As I approached the reception area I was greeted by a male member of staff who was dressed in smart corporate clothing. He asked if I needed any assistance with choosing a machine to play, I stated I was fine.
41. I walked through the premises and saw there were six other customers in the venue. All were male aged between 27 years and 45 years.
42. I found a machine and started to play it. Whilst seated I noticed there was a second male member of staff in the venue who was smartly dressed in corporate clothing.
43. After a short period of time the first staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he stated they didn't sell alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee which was brought to me a few minutes later.
44. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
- e 45. During my visit on other customer came into the venue. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
46. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.

47. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A31, A32.
48. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight in and customers leaving left the area straight away. I left the premises at 04:35 hours – Image A33.
49. Between 04:40 hours and 05:00 hours pedestrian traffic was varied with customers visiting the takeaway restaurants that were open 24-hours a day. Traffic using High Road was constant, but the numbers of vehicles did vary. At this time market stall workers started to set up for the day ahead – Image A34.
50. Customers visited the 24-hour premises throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged until 06:00 hours.
51. I remained in the area until 06:10 hours. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A35, A36, A37, A38.

Summary

52. I found Merkur Slots 91 High Road Wood Green to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visit to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing, begging or groups of youths hanging around.
53. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
54. It is clear the presence of Merkur Slots in High Road Wood Green does not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to and that customers do not hang around outside the premises causing problems.
55. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.

- iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
56. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
57. At Merkur Slots premises 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.
58. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
59. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
60. 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
26/09/2022



Appendix A

Observation Images

26th - 27th August 2022

Merkur Slots

91 High Road
Wood Green
London
N22 6BB

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1 HQ

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A1

21:06hrs

Merkur Slots
91 High Road Wood Green London N22 6BB



Image A2

21:07hrs

Merkur Slots
91 High Road Wood Green London N22 6BB

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



26 Aug 2022 at 21:14:26
Haringey



26 Aug 2022 at 21:14:43
Haringey

Image A3

21:14hrs

High Road Wood Green looking north

Image A4

21:14hrs

High Road Wood Green looking south

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A5

21:15hrs

High Road Wood Green looking north



Image A6

21:15hrs

High Road opposite Merkur Slots looking north

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A7

21:17hrs

Betfred 64 High Road Wood Green N22 6HL



Image A8

21:20hrs

Game Nation 49 High Road Wood Green N22 6BH

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A9

21:21hrs

High Road Wood Green looking south



Image A10

21:21hrs

High Road Wood Green looking south

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A11

21:22hrs

Little Vegas 17 High Road Wood Green N22 6BH



Image A12

21:23hrs

Ladbrokes 13 High Road Wood Green N22 6BH

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A13

21:23hrs

Admiral Casino Slots
9 High Road Wood Green N22 6BH



Image A14

21:24hrs

High Road Wood Green j/w Turnpike Lane

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A15

21:26hrs

Paddy Power 33 High Road Wood Green N22 6BH



Image A16

22:29hrs

Admiral Casino Slots
117 High Road Wood Green N22 6BB

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A17

22:35hrs

High Road Wood Green looking north



Image A18

22:38hrs

William Hill The Broadway
High Road Wood Green N22 6DS

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A19

22.38hrs

Ladbrokes12 The Broadway
High Road Wood Green N22 6DS

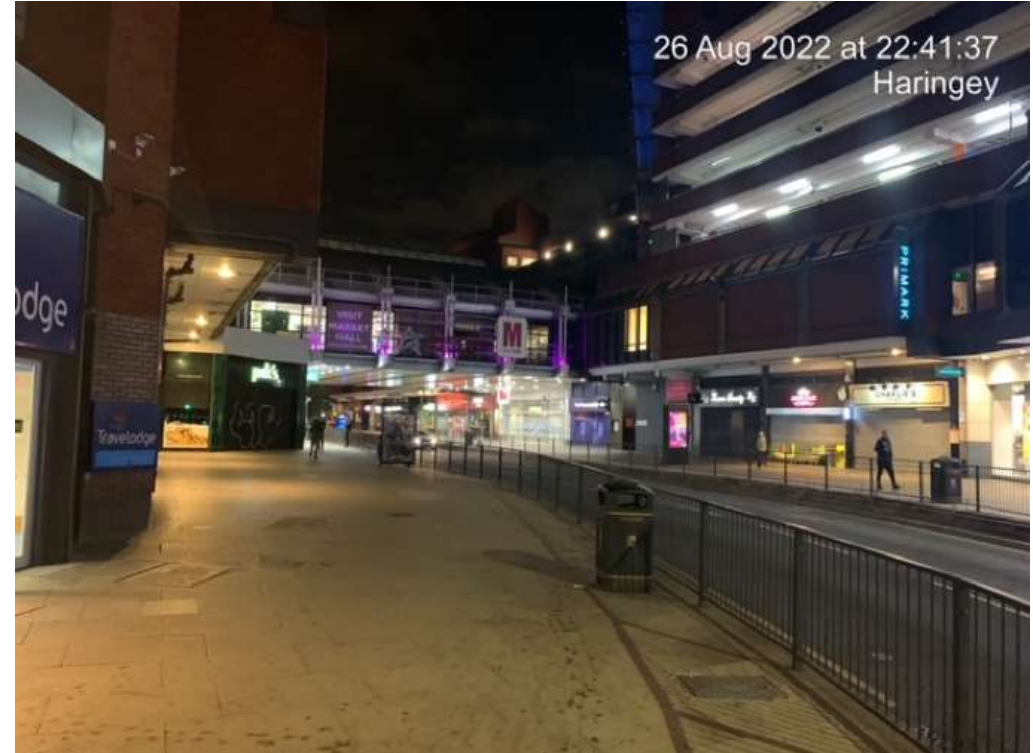


Image A20

22:41hrs

Looking south towards The Mall
Shopping Centre High Road

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A21

22:42hrs

High Road Wood Green looking north



Image A22

23:47hrs

McDonalds
97 - 101 High Road Wood Green N22 6BB

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A23

22:48hrs

Merkur Slots 91 High Road Wood Green



Image A24

00:31hrs

High Road Wood Green looking north

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A25

00:31hrs

High Road Wood Green looking south



Image A26

00:32hrs

Merkur Slots 91 High Road Wood Green

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A27

00:33hrs

High Road Wood Green looking south



Image A28

04:03hrs

High Street Wood Green

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A29

04:03hrs

High Road Wood Green looking north



Image A30

04:05hrs

Merkur Slots 91 High Road Wood Green

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A31

04:31hrs

Staying In Control Poster in Toilets



Image A32

04:32hrs

Toilet Check List Merkur Slots High Road Wood Green

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



27 Aug 2022 at 04:37:15
Haringey

Image A33

04:37hrs

Merkur Slots High Road Wood Green



27 Aug 2022 at 04:38:27
Haringey

Image A34

04:38hrs

High Road Wood Green looking north

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A35

05:53hrs

High Road Wood Green looking south



Image A36

05:53hrs

High Road Wood Green looking north

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A37

05:54hrs

Merkur Slots 91 High Road Wood Green



Image A38

05:54hrs

McDonalds High Road Wood Green

Cashino Gaming Limited

Operational Standards

THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

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

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

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

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

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

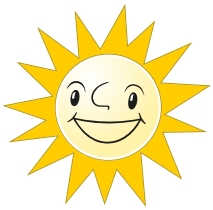
- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer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

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

The Praesepe Group
‘Working Together’ Document

WORKING TOGETHER





PART OF THE GAUSELMANN GROUP

A Strong Partner For More Than 60 Years



Praesepe is a subsidiary of the family run Gauselmann Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the Merkur Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best Entertainment.

Praesepe employs over 1,600 people (61% female*) over the 5 Bingo Clubs, 160 High Street Gaming centres (73 High Street Bingos and 87 Adult Gaming Centres) and 5 Family Entertainment Centres under three main brands:



Merkur Cashino is an established brand in the UK and represents the very best in terms of exciting “slot gaming” and high street bingo entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.

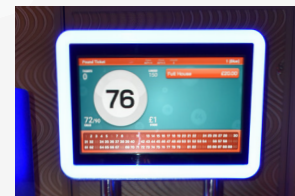


Merkur Slots is a new up and coming brand in the UK bringing the latest fun slots & bingo experience in smaller sized high street locations.



Beacon Bingo clubs are very important to our customers in their local communities. Our teams strive to deliver not just great service but a bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.

HIGH STREET BINGO



What is it?

Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



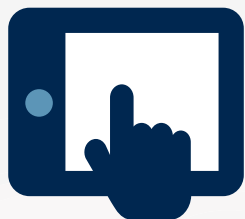
Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



Our teams remain with the customers on the venue floor rather than behind a counter.



Our customers can attend and play bingo at any time with the numbers auto-called.



The market on the high street has evolved with venues now providing Electronic Bingo Tablets.



Our Bingo terminals offer B3, Cat C and Cat D products with an average stake of between 30-40p stake.



Bingo is available for play from 9am until midnight.

Bingo Terminals



Think 25

RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

Being a responsible operator is high priority across the Gauselmann group and in the UK Praesepe is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

GAMBLING COMMISSION

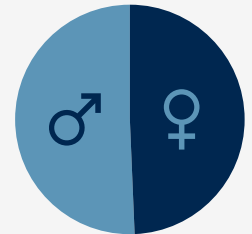
Praesepe is regulated by the
Gambling Commission and
Licensing Authorities



We provide complimentary refreshments, teas and coffees, to customers and do not sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.



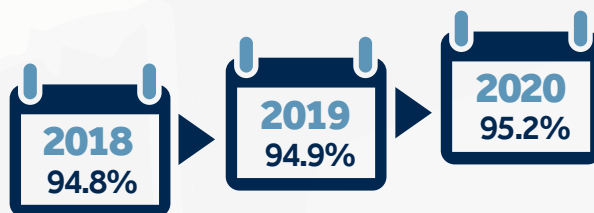
We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti social behaviour.



Our venues operate a Think 25 policy whereby any person's who look under 25 have to produce a form of photo ID.



Our venues appeal to all ages with our membership gender database split of 52 % Male / 48% Female



Our venues have 3 external age test visits per year with a compliance rate of over 94% for the last 3 years, compared to other industries that sit around 80%.

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Praesepe also has a number of socially responsible gambling tools, management and training that include:



All staff complete on-boarding and six-monthly refresher training on “The Essentials of Compliance and Social Responsibility” and “Safeguarding Children and Vulnerable People”.



Dedicated Learning & Development Team and National training centres.

IHL SMART tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.



All Data is centrally reviewed and evaluated by an independent Audit/Compliance team.

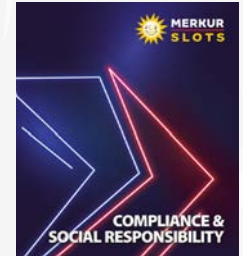


Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



Compliance



Training Centre



Online Training





Machine Messaging



Customer Interaction Training



SOCIAL RESPONSIBILITY MEASURES IN PLACE

All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling – Our recent commitments include; Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.

Praesepe also engages with the **Bingo Association** and **Bacta** trade groups:



- Senior Manager representation Divisional meetings.
- Operations Director is the Vice Chair for division 3 representing Adult Gaming Centres.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.



- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



Benefits for your High Street Include:



Investment from £100,000 to £250,000 in long standing vacant venues.



Increased footfall to the high Street.



Linked trips with other shops helping to support other businesses.



Local jobs of between 6 and 12 people depending on the hours of operation.



We provide an important natural surveillance on the high street, particularly late into the evenings.

COMMUNITY & CHARITY



Praesepe has raised in excess of £1.2m for good causes since 2005 and currently supports the Bacta Charitable Trust.

Please contact us.

Praesepe PLC

Seebeck House
1A Seebeck Place
Knowlhill
Milton Keynes
MK5 8FR

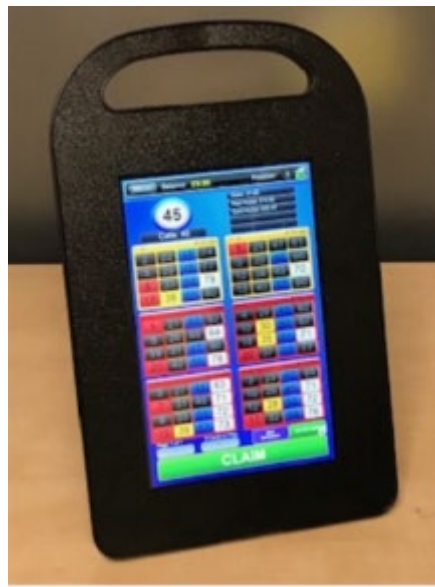
phone 01908 351200

email info@praesepeplc.com



G-TAB Bingo ‘Bringing Traditional Bingo to the High Street’

G-TAB Bingo



**Bringing Traditional Bingo
to the High Street**

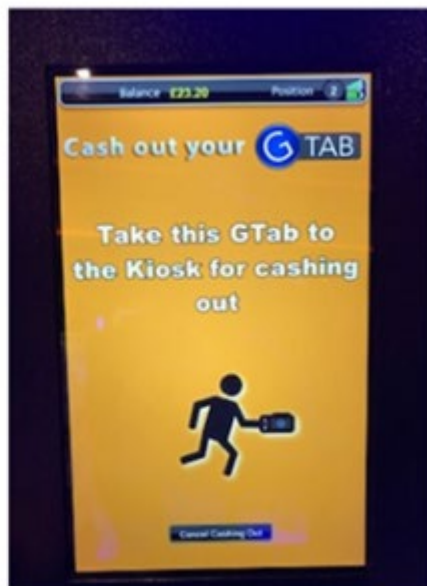
G-Tab is a multi-purpose gaming device offering live link Bingo Games, Bingo Variant Games and participation in the National Bingo Game which is played twice daily. Bingo tablets are bingo machines that provide games of both remote and non-remote bingo with remote bingo being the linked games operated via WiFi and the internet on licensed premises. Complies with the appropriate Gambling Commission Technical Standards and Machine Guidance.

Standalone Tablet Terminal

Bingo numbers announced and shown live on the top display



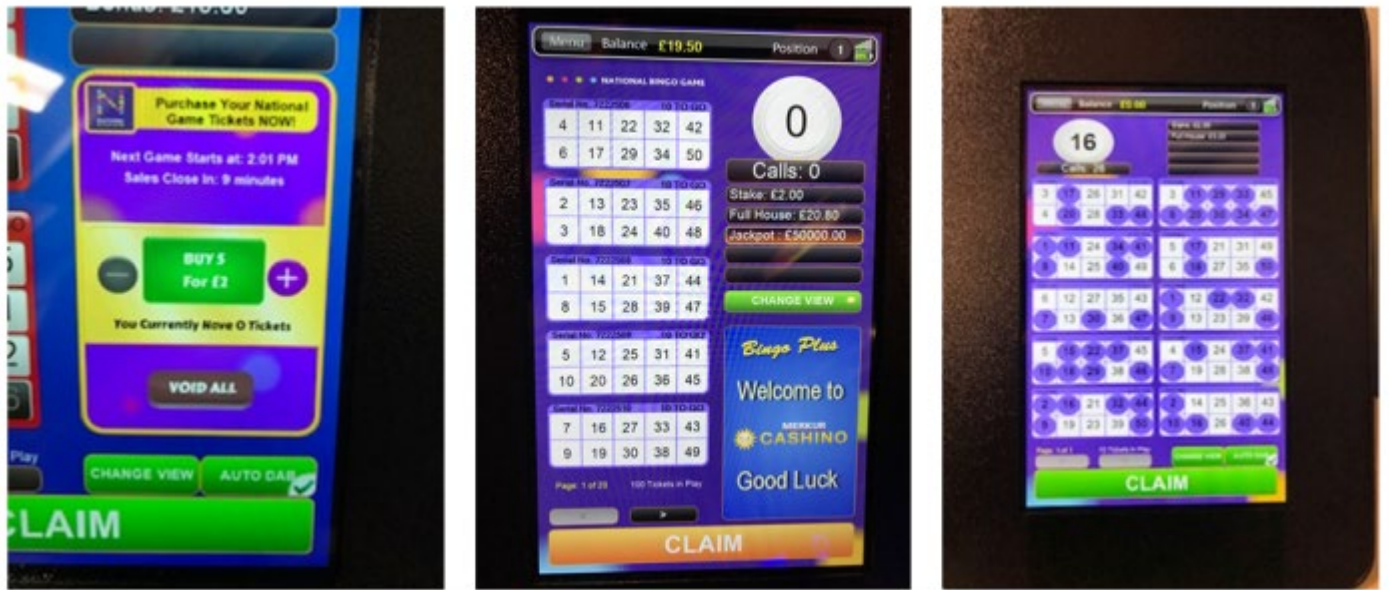
Charges to play clearly displayed



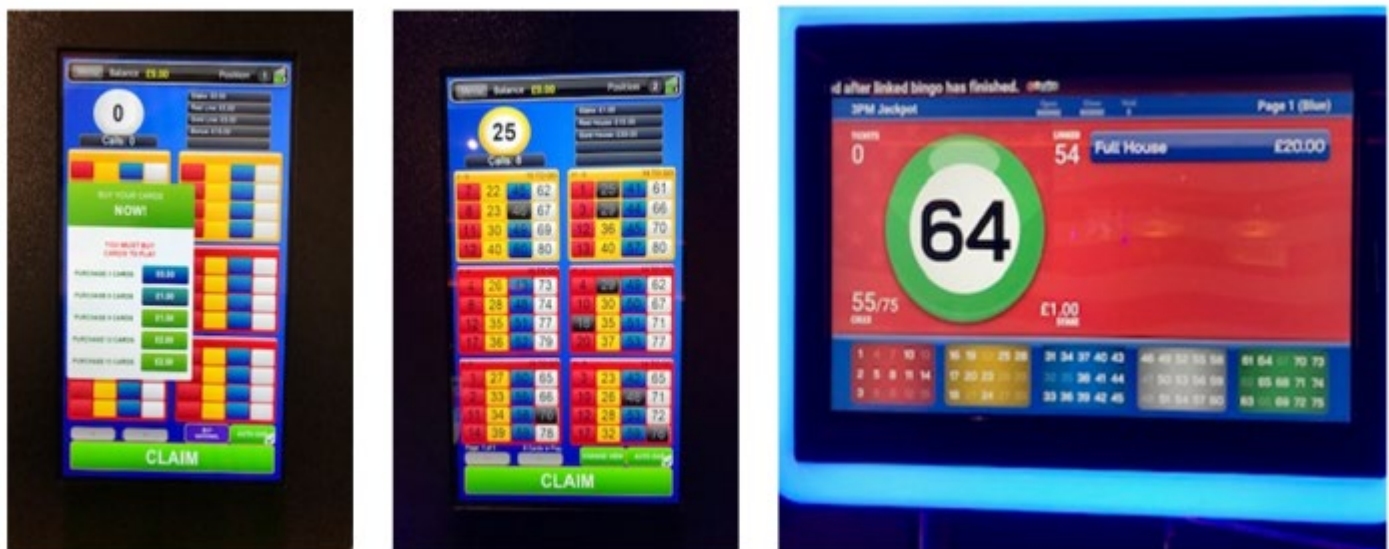
Customers cannot stake-up once game has commenced

“Making all traditional forms of Bingo like ‘Shutter Bingo’ played at the sea-side or ‘main-stage’ Bingo played in Clubs available”

National Bingo Game, linked to all Bingo Clubs (such as Mecca and Buzz) played twice daily (2pm and 7pm) at £2.00 for 5 tickets, maximum tickets 100 per position, making £40 maximum stake which is within the Bingo Association guidelines. Prize money including the National Jackpot is based on the number of cards in play, including bonus lines and is clearly displayed on the main display caller's unit, prior to the game commencing and on the individual tablets throughout the game.



Live Link Bingo played throughout the day from 50p for 3 cards, maximum 15 cards per position, making maximum stake of £2.50 per game. The prize money, based on number of cards in play, including bonus lines is clearly displayed on the main display caller's unit, prior to the game commencing, and on the individual tablet throughout the game.

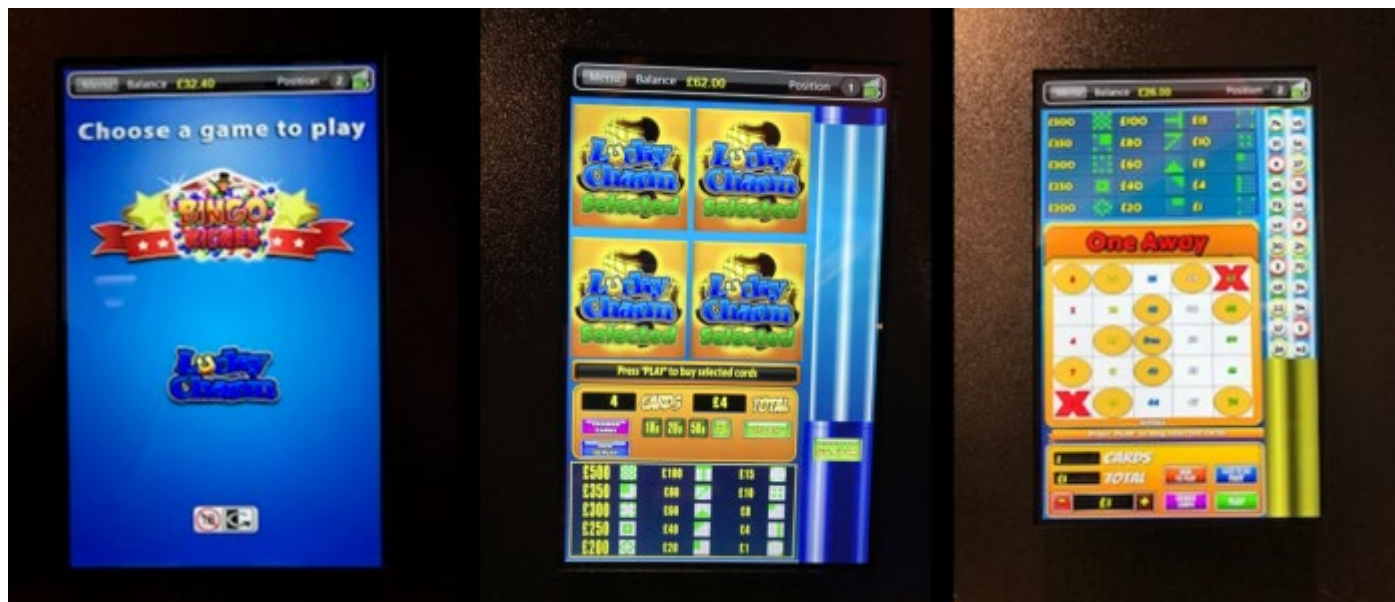


Bingo Variant (BV) Games are available 9:00 till midnight. The game of bingo stands alone on the tablet and does not connect via remote communication to a server or link to games across premises.

Bingo Riches: play from 10p (25p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £40 on 10p stake.



Lucky Charm: play from 10p (20p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £50 on 10p stake.



Low stake games:

The device also offers the player a choice of games which can be played from as little as 5p (maximum £1) a game all of which comply with Cat C technical standards.

**Merkur Cashino Compliance and Social
Responsibility Manual including
Gambling Commission's Licence
Conditions and Codes of Practice
applicable to non-remote bingo
licences**



COMPLIANCE

&

SOCIAL

RESPONSIBILITY



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1.2 THE 3 LICENSING OBJECTIVES	January 2020	V1.2
1.3 GAMBLING COMMISSION – LICENCE CONDITIONS AND CODES OF PRACTICE (LCCP)	January 2020	N/A
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2. CRIME & DISORDER		
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4.3 CUSTOMER INTERACTION & GAMBLING COMMISSION GUIDANCE	January 2020	V1.3
4.4 SELF EXCLUSION	July 2020	V1.2
4.5 SELF EXCLUSION FLOWCHART	June 2017	V1.1
4.6 SELF EXCLUSION REVIEW FORM	July 2016	V1.0
5. RECORDING REQUIREMENTS		
5.1 MONTHLY LOG CHECK SUMMARY & PAPER PREMISES LOGS	April 2019	V1.6
6. TRAINING		
6.1 COMPLIANCE TRAINING LOG G	April 2019	V1.6

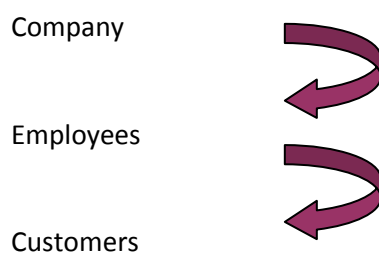
SOCIAL RESPONSIBILITY POLICY

1. STATEMENT OF INTENT

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Cashino Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

WHAT IS SOCIAL RESPONSIBILITY?

Social responsibility is about going above and beyond what is called for by the law. Ideally, proactively identifying signs of problem behaviours is better than reacting to a problem. We apply our social responsibility through three levels:



Social responsibility is being responsible to people, for the actions of people, and for actions that affect people. Cashino Gaming has clear policies, procedures and codes of practice which outline and support the development of the way in which staff intervene where there is a suspected problem and the Company then monitors and supports the development of the awareness and knowledge of its staff in dealing with such interventions.

The idea of being responsible to customers has actually long been embedded in the ethics of business, treating a customer with respect, attention and genuinely caring about what the customer wants and needs. As a Company we understand our responsibility to help people.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives. These are to:

- Keep crime out of gambling
- Ensure that gambling is conducted in a fair and open way; and
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling.



It is our responsibility to ensure that we comply with these licensing objectives at all times.

COMPANY

Our Statement of Intent is published and available to all our employees.

To support the licensing objectives and in addition to our Social Responsibility Policy we also have: -

- Sensible gambling procedures including Self Exclusion
- 'Think 25' policy

EMPLOYEES

The Company ensures that all employees are inducted responsibly into our organisation through: -

- Induction checklist
- Employee Handbook
- Reviews and sign off at 4,8,12 weeks

The above documentation includes comprehensive coverage of the following: -

- Social Responsibility Policy
- Sensible gambling procedures
- 'Think 25' policy

Ongoing training is available to all our employees and we provide a Customer Care training programme, that specifically trains our staff about problem gambling and how to interact with customers who may be affected (including arrangements for self exclusion), whilst also covering the following areas:

- Customer care
- Conflict management
- Social responsibility

In addition employees will receive refresher training every 6 months.



CUSTOMER

Information is clearly provided to the customer to enable them to understand the machine/game they are playing and the percentage returns that apply on all games.

The customer is made aware of and given advice on problem gambling through appropriate advertising, notices, information and Staying In Control leaflets on site. Further information including sources of help and support is available via the following organisations: -

- | | |
|-------------------------------|---|
| ▪ Citizen's advice | https://www.citizensadvice.org.uk |
| ▪ Gamble Aware/GamCare | https://www.begambleaware.org |
| ▪ GamesAid | https://www.gamesaid.org |
| ▪ Gam-Anon | https://www.gam-anon.org |
| ▪ Gamblers Anonymous | https://www.gamblersanonymous.org.uk |
| ▪ Gordon Moody Association | https://www.gordonmoody.org.uk |
| ▪ Action for Children Charity | https://www.actionforchildren.org.uk |
| ▪ National Debtline | https://www.nationaldebtline.org |

The implementation of the following policies and procedures and through Customer Care Training ensures that this is consistent throughout the Company: -

- Social Responsibility Policy
- Sensible gambling Procedure
- 'Think 25' policy

.....
Stefan Bruns
Chief Executive Officer
January 2019

THE 3 LICENSING OBJECTIVES

1. Keeping crime out of gambling

Whilst crime is considered 'low/medium risk' in our business, we have to be mindful of the fact crime still exists and our venues could be considered as a target for money laundering gained from the proceeds of crime and terrorist financing, i.e. drug money, TITO technology to conceal 'fake notes', life style and spending habits.

2. Ensuring gambling is conducted fairly and openly

We have to ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

3. Protecting children and vulnerable people from being harmed or exploited by gambling

We have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18's only. As a company we operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.

GAMBLING COMMISSION

Conditions and codes of practice applicable to

**Gaming machine general: Adult gaming centre
licences**

**Gaming machine general: Family entertainment centre
licences**

Including sector-specific extract of
LCCP January 2020

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General introduction

1 This document sets out the Gambling Commission's general licence conditions and associated code of practice provisions (LCCP) under the Gambling Act 2005 (the Act) which are applicable to the specified sector(s).

2 The LCCP document sets out:

Part I: (in black) statutory conditions attached by virtue of the Act

Part II: (in orange) the suite of general conditions attached to operating licences

Part III: (in blue) the principal code of practice, distinguishing between 'social responsibility' provisions and 'ordinary' provisions (the social responsibility provisions are in shaded boxes within the text).

3 An [index](#) to the provisions is provided at the end of this document, and if using an electronic version of this document, links are provided from both the contents and index pages to aid navigation.

4 Copies of LCCP can be obtained from the Commission's website: www.gamblingcommission.gov.uk or by writing to:

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP
T 0121 230 6666
F 0121 230 6720
E info@gamblingcommission.gov.uk

5 The Commission also produces sector-specific extracts of LCCP and these will be made available on the website. Further information about the history of LCCP (such as the results of completed consultations) and potential future amendments to LCCP can also be found on the website.

6 This extract of LCCP comes into force on **1 January 2020**.

7 Relevant requirements of the conditions and code provisions were notified in draft to the European Commission in accordance with Directive (EU) 2015/1535.

Part I: Statutory conditions attached by virtue of the Act

Social responsibility

This licence is subject to a condition that the licensee ensures compliance with any relevant social responsibility provision of a code of practice issued by the Commission. The social responsibility provisions that are relevant to the activities authorised by this licence are set out in the section entitled Codes of Practice (Part III).

(Sections 24 and 82(1) Gambling Act 2005)

Return of stakes to children: AGC

The following condition applies to gaming machine general: adult gaming centre operating licences only

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine.

(Section 83(1))

Return of stakes to children: FEC

The following condition applies to gaming machine general: family entertainment centre operating licences only

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine, or equal chance gaming.

(Section 83(1))

Part 1: Suite of general condition to operating licences under Section 75 of the Gambling Act 2005 (the Act)

1 Qualified persons and personal licences

1.1 Qualified persons

Licence condition 1.1.1

Qualified persons – qualifying position

All operating licences, except ancillary remote licences, issued to small-scale operators

- 1 In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
- 2 Schedule X¹ lists those individuals notified to the Commission as qualified persons.
- 3 If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
- 4 An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
- 5 In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

1.2 Personal licences

Licence condition 1.2.1

Specified management offices – personal management licences

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

- 1** Subject to **6** and **7** below, licensees must ensure:
 - a** that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter ‘a personal management licence’); and
 - b** that at least one person occupies at least one of those offices
- 2** The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a** the overall management and direction of the licensee’s business or affairs
 - b** the licensee’s finance function as head of that function
 - c** the licensee’s gambling regulatory compliance function as head of that function
 - d** the licensee’s marketing function as head of that function
 - e** the licensee’s information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f** oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g** in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
- 3** The person responsible for the licensee’s gambling regulatory compliance function as head of that function shall not, except with the Commission’s express approval, occupy any other specified management office.
- 4** Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder’s personal management licence.
- 5** Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual’s work and any requirements of the Commission in respect of such matters applicable during the period of the review.
- 6** Paragraphs **1** to **5** above shall not apply to a licensee for so long as the licensee is a ‘small-scale operator’ as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 (‘the Regulations’).
- 7** During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs **1** to **6** above shall apply subject to the proviso that the phrase ‘each individual’ in paragraph **1a** shall not include any individual who was a ‘qualified person’ (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

4 Protection of customer funds

4.2 Disclosure to customers

Licence condition 4.2.1

Disclosure to customers

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

- 1 Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
- 2 Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
- 3 In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5 Payment

5.1 Cash and cash equivalents, payment methods and services

Licence condition 5.1.1

Cash and cash equivalents

All operating licences except gaming machine technical, gambling software and host licences

- 1 Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
- 2 Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

6 Provision of credit by licensees and the use of credit cards

6.1 Provision of credit

Licence condition 6.1.1

Provision of credit

All gaming machine general operating licences for adult gaming centres and family entertainment centres

- 1 Licensees must neither:
 - a provide credit themselves in connection with gambling; nor
 - b participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

7 General 'fair and open' provisions

7.1 Fair and transparent terms and practices

Licence condition 7.1.1

Fair and transparent terms and practices

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
- 2 The contractual terms on which gambling is offered and any notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
- 3 Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes before they come into effect.
- 4 Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

12 Anti-money laundering

12.1 Prevention of money laundering and terrorist financing

Licence condition 12.1.1

Anti-money laundering

Prevention of money laundering and terrorist financing

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
- 2 Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
- 3 Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14 Access to premises

14.1 Access to premises

Licence condition 14.1.1

Access to premises

All operating licences

- 1 Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15 Information requirements

15.1 Reporting suspicion of offences

Licence condition 15.1.1

Reporting suspicion of offences etc - non-betting licences

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

- 1 Licensees must as soon as reasonably practicable provide the Commission or ensure that the Commission is provided with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.

15.2 Reporting key events and other reportable events

Licence condition 15.2.1

Reporting key events

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, or ensure the Commission is notified, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

In the case of licensees which are companies, a petition being presented for their winding up or the winding up of any group company of theirs, or they or any group company being placed in administration or receivership or their directors proposing to creditors a composition in satisfaction of its debts or a scheme of arrangement of its affairs.

In the case of licensees which are bodies corporate, but not companies, any event substantially equivalent to those listed at 1 above.

In the case of a licensee who is an individual (or a partner in a partnership licensee) their being presented with a petition for their bankruptcy or sequestration or their entering into an individual voluntary arrangement.

Relevant persons and positions

In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.

Any investment in a licensee which is not by way of subscription for shares.

The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.

The entering into an arrangement whereby a third party provides services to, or grants any licence concession or permission to, the licensee other than for full value: full details of the arrangements must be supplied.

The appointment of a person to, or a person ceasing to occupy, a 'key position': a 'key position' in relation to a licensee is:

- a** in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b** in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c** a position the holder of which is responsible for the licensee's anti-money laundering procedures, including suspicious activity reporting
 - d** any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)
- 9** Any change to the structure or organisation of the licensee's business which affects a 'key position' or the responsibilities of its holder.

Financial events

- 10 Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
- 11 Any breach of a covenant given to a bank or other lender.
- 12 Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
- 13 Any court judgments (in whatever jurisdiction) against the licensee or, where the licensee is a body corporate, a group company, remaining unpaid 14 days after the date of judgment.
- 14 Where the licensee is required to have their accounts independently audited, any qualification to an auditors' report; and any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an unqualified audit report.
- 15 Any change in the licensee's arrangements for the protection of customer funds in accordance with the general licence condition 4 relating to the protection of customer funds (where applicable).
- 16 Where the licensee holds customer funds in a separate bank account, any deficit on reconciliation of such bank account.
- 17 Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

- 18 The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
- 19a Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities in relation to the licensed entity of a personal licence holder or a person occupying a qualifying position employed by them, where such an investigation could result in the imposition of a sanction or penalty which, if imposed, could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
- 19b Any criminal investigation by a law enforcement agency in any jurisdiction in relation to which:
 - the licensee is involved (including, but not limited to investigations of crimes allegedly committed against the licensee or involving the gambling facilities provided under the licence), AND
 - the circumstances are such that the Commission might reasonably be expected to question whether the licensee's measures to keep crime out of gambling had failed.Notification of the event must occur as soon as practicable after the licensee becomes aware of any such investigation in which the licensee is involved and measures may have failed.
- 20 The receipt of any report from a professional, statutory or other regulatory or government body (in whatever jurisdiction) of the outcome of a compliance assessment in relation to the gambling activity of the licensee or, where the licensee is a body corporate, of any group company in which at least one person who holds a key position in or in respect of the licensee holds a key position: a copy of the report should be provided where available to the licensee.

- 21** The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor) about the provision of facilities for gambling which are expressed (in whatever terms) as requiring attention as a high priority: a summary of the nature of the concerns must be provided.
- 22** The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
- 23** The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
- 24** The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

- 25a** Any breach in the licensee's information security that adversely affects the confidentiality of customer data or prevents customers from accessing their accounts for longer than 24 hours.
- 25b** Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
- 26** Any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
- 27** The reference of a dispute to an ADR entity other than one in respect of which contact details were given in accordance with the social responsibility code provision on complaints and disputes; the reason for selection of that ADR entity should be given.
- 28** In the case of remote gambling, the commencement or cessation of trading on website domains (*including mobile sites or mobile device applications*) or broadcast media through which the licensee provides gambling facilities.

In this condition:

'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof

- a** in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
- b** a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

¹ Key events can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk

Licence condition 15.2.2

Other reportable events

All operating licences

- 1 Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, or ensure that the Commission is so notified, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a the conclusion of a dispute referred to an ADR entity and in such case providing the Commission with a copy of the decision or note of the outcome².
 - b any outcome adverse to the licensee of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.
 - c their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised or their becoming aware of a sustained or meaningful generation of the 3% / 10% threshold being exceeded by the group.

In this condition:

- a 'group company' has the same meaning as in condition 15.2.1; and
- b without prejudice to section 327 of the Act, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

¹ Events required to be notified to the Commission by 15.2.1 or 15.2.2 may be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk or by email to: key.events@gamblingcommission.gov.uk

² In respect of the referral of disputes to an ADR entity the licensee's attention is drawn to social responsibility code provision 6.

15.3 General and regulatory returns

Licence condition 15.3.1

General and regulatory returns

All operating licences

- 1 On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:
 - a the numbers of people making use of the facilities and the frequency of such use
 - b the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them
 - c the licensee's policies in relation to, and experiences of, problem gambling.
- 2 In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require¹.

¹Regulatory returns can be submitted securely online at the Commission's website through our eServices system available at www.gamblingcommission.gov.uk

16 Responsible placement of digital adverts

16.1 Responsible placement of digital adverts

Licence condition 16.1.1

Responsible placement of digital adverts

All licences

1 Licences must:

- a** Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b** take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c** ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

Part III: Code of practice

Introduction

This is the Commission's principal code of practice, issued under section 24 of the Gambling Act 2005.

There are two types of code provisions in this document:

- social responsibility code provisions: compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are set out in shaded boxes
- ordinary code provisions: these do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty; these code provisions are in the unshaded boxes in this section.

Code provisions

1 General

1.1 Cooperation and responsibility

Ordinary Code Provision 1.1.1
Cooperation with the Commission
All licences

- 1 As made plain in its *Statement of principles for licensing and regulation*, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

Social responsibility code provision 1.1.2
Responsibility for third parties – all licences
All licences

- 1 Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
- 2 Licensees must ensure that the terms on which they contract with such third parties:
 - a require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

2 Financial requirements

2.1 Anti-money laundering

Ordinary code provision 2.1.2
Anti-money laundering – other than casino
All licences except casino licences

- 1 As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators)*.

3 Protection of children and other vulnerable persons

3.1 Combatting problem gambling

Social responsibility code provision 3.1.1
Combating problem gambling
All licences

- 1 Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
- 2 Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2 Access to gambling by children and young persons

Social responsibility code provision 3.2.3

Access to gambling by children and young persons – AGC SR code

All adult gaming centre licences

- 1 Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2 This must include procedures for:
 - a checking the age of apparently underage customers
 - b removing anyone who appears to be under age and cannot produce an acceptable form of identification
 - c taking action when there are attempts by under-18s to enter the premises.
- 3 Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4 Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.
- 5 In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
- 6 Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
- 7 Licensees must only accept identification which:
 - a contains a photograph from which the individual can be identified
 - b states the individual's date of birth
 - c is valid
 - d is legible and has no visible signs of tampering or reproduction.
- 8 Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission.

Ordinary code provision 3.2.4

Access to gambling by children and young persons – AGC ordinary code

All adult gaming centre licences

- 1** The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
- 3** Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling.
- 5** Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 6** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code provision 3.2.5

Access to gambling by children and young persons – bingo and FEC SR code

All non-remote bingo and family entertainment centre licences

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2** This must include procedures for:
 - a** checking the age of apparently underage customers
 - b** refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c** taking action when there are unlawful attempts to enter the adult-only areas.
- 3** Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4** Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
- 5** Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a** all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b** the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c** procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
- 6** Licensees must only accept identification which:
 - a** contains a photograph from which the individual can be identified
 - b** states the individual's date of birth
 - c** is valid
 - d** is legible and has no visible signs of tampering or reproduction.
- 7** Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission.

Ordinary code provision 3.2.6

Access to gambling by children and young persons – bingo and FEC ordinary code All non-remote bingo and family entertainment centre licences

- 1** The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
- 3** Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling to the child or young person concerned.
- 5** Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
- 6** Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 7** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

3.3 Gambling management tools and responsible gambling management information

Social responsibility code provision 3.3.1

Responsible gambling information

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

- 1 Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
- 2 The information must cover:
 - a any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b timers or other forms of reminders or 'reality checks' where available
 - c self-exclusion options
 - d information about the availability of further help or advice.
- 3 The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
- 4 For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

Ordinary code provision 3.3.2

Responsible gambling information – foreign languages

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

- 1 Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a the information on how to gamble responsibly and access to help referred to above
 - b the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.4 Customer interaction

Social responsibility code provision 3.4.1

Customer interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

- 1** Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a** identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b** interacting with customers who may be at risk of or experiencing harms associated with gambling
 - c** understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
- 2** Licensees must take into account the Commission's guidance on customer interaction

3.5 Self-exclusion

Social responsibility code provision 3.5.1

Self-exclusion – non-remote and trading rooms SR code

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

- 1** Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2** Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3** Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4** This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5** Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6** Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a** a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b** photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c** staff training to ensure that staff are able to administer effectively the systems; and
 - d** the removal of those persons found in the gambling area or attempting to gamble from the premises.
- 7** Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
- 8** Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

Ordinary code provision 3.5.2

Self-exclusion – non-remote ordinary code

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

- 1** Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
- 2** Individuals should be able to self-exclude without having to enter gambling premises.
- 3** Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 4** Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
- 5** Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
- 6** Customers should be given the opportunity to discuss self-exclusion in private, where possible.
- 7** Licensees should take steps to ensure that:
 - a** the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b** any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c** a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d** at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e** where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f** notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 8** The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
- 9** Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 10** Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
- 11** Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
- 12** In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code provision 3.5.6

Self-exclusion – multi-operator non-remote SR code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1** Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

Ordinary code provision 3.5.7

Self-exclusion – multi-operator non-remote ordinary code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1** Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6 Employment of children and young persons

Ordinary code provision 3.6.5

Employment of children and young people – AGCs

All adult gaming centre licences

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a** to employ them to provide facilities for gambling;
 - b** if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
 - c** to employ them to carry out any other function on adult gaming centre licensed premises while any gambling activity is being carried on in reliance on the premises licence.
- 2** As to **1b**, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3** Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a** children and young persons are never asked to perform tasks within **1a or 1b**, above
 - b** all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4** Licensees should consider adopting a policy that:
 - a** children and young persons are not employed to work on adult gaming centre licensed premises at any time when the premises are open for business
 - b** gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

Ordinary code provision 3.6.6

Employment of children and young people – FECs

All family entertainment centre licences

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a** to employ them to provide facilities for gambling; and
 - b** if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time.
- 2** As to 1b, it should be noted that in the Commission’s view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3** Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a** children and young persons are never asked to perform tasks within 1a or 1b, above; and
 - b** all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4** Licensees should consider adopting a policy that:
 - a** children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place; and
 - b** gaming machines sited in adult-only areas are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

3.8 Money lending between customers

Ordinary code provision 3.8.2

Money-lending – other than casinos

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

- 1** Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

4 ‘Fair and open’ provisions

4.1 Fair terms

Social responsibility code provision 4.1.1

Fair terms

All licences, except gaming machine technical and gambling software licences

- 1** Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

5 Marketing

5.1 Rewards and bonuses

Social responsibility code provision 5.1.1

Rewards and bonuses – SR code

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1** If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a** the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b** neither the receipt nor the value or amount of the benefit is:
 - i** dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii** altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c** if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d** if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

Ordinary code provision 5.1.2

Proportionate rewards

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1** Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

Social responsibility code provision 5.1.6

Compliance with advertising codes

All licences, except lottery licences

- 1** All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2** In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
- 3** The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

Ordinary code provision 5.1.8
Compliance with industry advertising codes
All licences

- 1 Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

Social responsibility code provision 5.1.9
Other marketing requirements
All licences

- 1 Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
- 2 Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
- 3 The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

Ordinary code provision 5.1.10
Online marketing in proximity to information on responsible gambling
All licences

- 1 Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

Social Responsibility code provision 5.1.11
Direct electronic marketing consent
All licences

- 1 Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6 Complaints and disputes

6.1 Complaints and disputes

Social responsibility code provision 6.1.1

Complaints and disputes

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

- 1** Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- 2** Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
- 3** The services of any such ADR entity must be free of charge to the customer.
- 4** Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- 5** Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- 6** Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- 7** Licensees should keep records of customer complaints and disputes in such manner as the Commission may from time to time specify in advice or guidance. They must provide information to the Commission about customer complaints, disputes, the outcomes of disputes referred to ADR, and court proceedings adverse to the licensee, also in such manner as the Commission may from time to time specify.

In this code, 'ADR entity' means

- a** A offering alternative dispute resolution services whose name appears on the list person maintained by the Gambling Commission in accordance with the 'Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and information) Regulations 2015, and
- b** Whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

7 Gambling licensees' staff

7.1 Gambling licensees' staff

Social responsibility code provision 7.1.2

Responsible gambling information for staff

All licences, including betting ancillary remote licences, but not other ancillary remote licences

- 1 Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8 Information requirements

8.1 Information requirements

Ordinary code provision 8.1.1

Information requirements – ordinary code

All licences

- 1 As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
- 2 Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a any material change in the licensee's structure or the operation of its business
 - b any material change in managerial responsibilities or governance arrangements
 - c any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

¹ These matters can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk

Alternatively, for operators unable to access this system, you can these events by email to: key.events@gamblingcommission.gov.uk

² Events which **must** be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

10 Assessing local risk

10.1 Assessing local risk

Social responsibility code provision 10.1.1

Assessing local risk

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

- 1** Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
- 2** Licensees must review (and update as necessary) their local risk assessments:
 - a** to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b** when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c** when applying for a variation of a premises licence; and
 - d** in any case, undertake a local risk assessment when applying for a new premises licence.

¹This is the statement of licensing policy under the Gambling Act 2005.

Ordinary code provision 10.1.2

Sharing local risk assessments

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

- 1** Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

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GAMBLING COMMISSION

Conditions and codes of practice applicable to Non-remote bingo licences

Including sector-specific extract of
LCCP January 2020

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General introduction

- 1 This document sets out the Gambling Commission's general licence conditions and associated code of practice provisions (LCCP) under the Gambling Act 2005 (the Act) which are applicable to the specified sector(s).
- 2 The LCCP document sets out:
 - Part I: (in black)** statutory conditions attached by virtue of the Act
 - Part II: (in orange)** the suite of general conditions attached to operating licences
 - Part III: (in blue)** the principal code of practice, distinguishing between 'social responsibility' provisions and 'ordinary' provisions (the social responsibility provisions are in shaded boxes within the text).
- 3 An [index](#) to the provisions is provided at the end of this document, and if using an electronic version of this document, links are provided from both the contents and index pages to aid navigation.
- 4 Copies of LCCP can be obtained from the Commission's website: www.gamblingcommission.gov.uk or by writing to:
 - Gambling Commission
 - Victoria Square House
 - Victoria Square
 - Birmingham B2 4BP
 - T 0121 230 6666
 - F 0121 230 6720
 - E info@gamblingcommission.gov.uk
- 5 The Commission also produces sector-specific extracts of LCCP and these will be made available on the website. Further information about the history of LCCP (such as the results of completed consultations) and potential future amendments to LCCP can also be found on the website.
- 6 This extract of LCCP comes into force on **1 January 2020**.
- 7 Relevant requirements of the conditions and code provisions were notified in draft to the European Commission in accordance with Directive (EU) 2015/1535.

Part I: Statutory conditions attached by virtue of the Act

Social Responsibility

This licence is subject to a condition that the licensee ensures compliance with any relevant social responsibility provision of a code of practice issued by the Commission. The social responsibility provisions that are relevant to the activities authorised by this licence are set out in the section entitled Codes of Practice (Part III).

(Sections 24 and 82(1) Gambling Act 2005)

Return of stakes to children

The following condition applies to all remote operating licences except remote pool betting operating licences restricted to football only

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of Section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine.

(Section 83(1))

Credit

This licence is subject to a condition that the licensee may not:

- give credit in connection with gambling; or
- participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

But this condition shall not prevent the licensee from permitting the installation and use on their licensed premises of a machine enabling cash to be obtained on credit from a person (the “credit provider”) provided that:

- the licensee has no other commercial connection with the credit provider in relation to gambling;
- the licensee neither makes nor receives any payment or reward (whether by way of commission, rent or otherwise) in connection with the machine; and
- any conditions about the nature, location or use of the machine which may be attached to this licence by the Commission or by virtue of regulations by the Secretary of State are complied with.

(Section 81(2))

Part 1: Suite of general condition to operating licences under Section 75 of the Gambling Act 2005 (the Act)

1 Qualified persons and personal licences

1.1 Qualified persons

Licence condition 1.1.1

Qualified persons – qualifying position

All operating licences, except ancillary remote licences, issued to small-scale operators

- 1 In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
- 2 Schedule X¹ lists those individuals notified to the Commission as qualified persons.
- 3 If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
- 4 An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
- 5 In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

1.2 Personal licences

Licence condition 1.2.1

Specified management offices – personal management licences

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

- 1** Subject to **6** and **7** below, licensees must ensure:
 - a** that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter ‘a personal management licence’); and
 - b** that at least one person occupies at least one of those offices
- 2** The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a** the overall management and direction of the licensee’s business or affairs
 - b** the licensee’s finance function as head of that function
 - c** the licensee’s gambling regulatory compliance function as head of that function
 - d** the licensee’s marketing function as head of that function
 - e** the licensee’s information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f** oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g** in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
- 3** The person responsible for the licensee’s gambling regulatory compliance function as head of that function shall not, except with the Commission’s express approval, occupy any other specified management office.
- 4** Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder’s personal management licence.
- 5** Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual’s work and any requirements of the Commission in respect of such matters applicable during the period of the review.
- 6** Paragraphs **1** to **5** above shall not apply to a licensee for so long as the licensee is a ‘small-scale operator’ as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 (‘the Regulations’).
- 7** During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs **1** to **6** above shall apply subject to the proviso that the phrase ‘each individual’ in paragraph **1a** shall not include any individual who was a ‘qualified person’ (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

2 Technical standards, equipment specification, remote gambling equipment and gambling software

2.3 Technical standards and equipment specifications

Licence condition 2.3.3

Casino equipment specifications

Non-remote casino operating licences and casino ancillary remote licences

- 1 Licensees must comply with the Commission's specifications for casino equipment.

4 Protection of customer funds

4.2 Disclosure to customers

Licence condition 4.2.1

Disclosure to customers

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

- 1 Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
- 2 Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
- 3 In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5 Payment

5.1 Cash and cash equivalents, payment methods and services

Licence condition 5.1.1

Cash and cash equivalents

All operating licences except gaming machine technical, gambling software and host licences

- 1 Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
- 2 Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

7 General 'fair and open provisions'

7.1 Fair and transparent terms and practices

Licence condition 7.1.1

Fair and transparent terms and practices

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
- 2 The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
- 3 Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
- 4 Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

9 Types and rules of casino and other games

9.1 Casino and bingo games

Licence condition 9.1.2

Prohibited bingo prize games

All non-remote bingo operating licences

- 1 Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

12 Anti-money laundering

12.1 Prevention of money laundering and terrorist financing

Licence condition 12.1.1

Anti-money laundering

Prevention of money laundering and terrorist financing

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
- 2 Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
- 3 Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14 Access to premises

14.1 Access to premises

Licence condition 14.1.1

Access to premises

All operating licences

- 1 Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15 Information requirements

15.1 Reporting suspicion of offences

Licence condition 15.1.1

Reporting suspicion of offences etc - non-betting licences

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

- 1 Licensees must as soon as reasonably practicable provide the Commission or ensure that the Commission is provided with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.

15.2 Reporting key events and other reportable events

Licence condition 15.2.1

Reporting key events

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, or ensure the Commission is notified, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

- 1 In the case of licensees which are companies, a petition being presented for their winding up or the winding up of any group company of theirs, or they or any group company being placed in administration or receivership or their directors proposing to creditors a composition in satisfaction of its debts or a scheme of arrangement of its affairs.
- 2 In the case of licensees which are bodies corporate, but not companies, any event substantially equivalent to those listed at 1 above.
- 3 In the case of a licensee who is an individual (or a partner in a partnership licensee) their being presented with a petition for their bankruptcy or sequestration or their entering into an individual voluntary arrangement.

Relevant persons and positions

- 4 In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
- 5 Any investment in a licensee which is not by way of subscription for shares.
- 6 The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
- 7 The entering into an arrangement whereby a third party provides services to, or grants any licence concession or permission to, the licensee other than for full value: full details of the arrangements must be supplied.
- 8 The appointment of a person to, or a person ceasing to occupy, a 'key position': a 'key position' in relation to a licensee is:
 - a in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c a position the holder of which is responsible for the licensee's anti-money laundering procedures, including suspicious activity reporting
 - d any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)
- 9 Any change to the structure or organisation of the licensee's business which affects a 'key position' or the responsibilities of its holder.

Financial events

- 10 Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
- 11 Any breach of a covenant given to a bank or other lender.
- 12 Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
- 13 Any court judgments (in whatever jurisdiction) against the licensee or, where the licensee is a body corporate, a group company, remaining unpaid 14 days after the date of judgment.
- 14 Where the licensee is required to have their accounts independently audited, any qualification to an auditors' report; and any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an unqualified audit report.
- 15 Any change in the licensee's arrangements for the protection of customer funds in accordance with the general licence condition 4 relating to the protection of customer funds (where applicable).
- 16 Where the licensee holds customer funds in a separate bank account, any deficit on reconciliation of such bank account.
- 17 Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

- 18 The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
- 19a Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities in relation to the licensed entity of a personal licence holder or a person occupying a qualifying position employed by them, where such an investigation could result in the imposition of a sanction or penalty which, if imposed, could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
- 19b Any criminal investigation by a law enforcement agency in any jurisdiction in relation to which:
 - the licensee is involved (including, but not limited to investigations of crimes allegedly committed against the licensee or involving the gambling facilities provided under the licence), AND
 - the circumstances are such that the Commission might reasonably be expected to question whether the licensee's measures to keep crime out of gambling had failed.Notification of the event must occur as soon as practicable after the licensee becomes aware of any such investigation in which the licensee is involved and measures may have failed.
- 20 The receipt of any report from a professional, statutory or other regulatory or government body (in whatever jurisdiction) of the outcome of a compliance assessment in relation to the gambling activity of the licensee or, where the licensee is a body corporate, of any group company in which at least one person who holds a key position in or in respect of the licensee holds a key position: a copy of the report should be provided where available to the licensee.

- 21 The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor) about the provision of facilities for gambling which are expressed (in whatever terms) as requiring attention as a high priority: a summary of the nature of the concerns must be provided.
- 22 The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
- 23 The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
- 24 The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

- 25a Any breach in the licensee's information security that adversely affects the confidentiality of customer data or prevents customers from accessing their accounts for longer than 24 hours.
- 25b Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
- 26 Any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
- 27 The reference of a dispute to an ADR entity other than one in respect of which contact details were given in accordance with the social responsibility code provision on complaints and disputes; the reason for selection of that ADR entity should be given.
- 28 In the case of remote gambling, the commencement or cessation of trading on website domains (*including mobile sites or mobile device applications*) or broadcast media through which the licensee provides gambling facilities.

In this condition:

'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof

- a in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
- b a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

¹ Key events can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk

Licence condition 15.2.2

Other reportable events

All operating licences

- 1 Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, or ensure that the Commission is so notified, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a the conclusion of a dispute referred to an ADR entity and in such case providing the Commission with a copy of the decision or note of the outcome².
 - b any outcome adverse to the licensee of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.
 - c their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised or their becoming aware of a sustained or meaningful generation of the 3% / 10% threshold being exceeded by the group.

In this condition:

- a 'group company' has the same meaning as in condition 15.2.1; and
- b without prejudice to section 327 of the Act, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

¹ Events required to be notified to the Commission by 15.2.1 or 15.2.2 may be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk or by email to: key.events@gamblingcommission.gov.uk

² In respect of the referral of disputes to an ADR entity the licensee's attention is drawn to social responsibility code provision 6.

15.3 General and regulatory returns

Licence condition 15.3.1

General and regulatory returns

All operating licences

- 1 On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:
 - a the numbers of people making use of the facilities and the frequency of such use
 - b the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them
 - c the licensee's policies in relation to, and experiences of, problem gambling.
- 2 In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require¹.

¹Regulatory returns can be submitted securely online at the Commission's website through our eServices system available at www.gamblingcommission.gov.uk

16 Responsible placement of digital adverts

16.1 Responsible placement of digital adverts

Licence condition 16.1.1

Responsible placement of digital adverts

All licences

1 Licences must:

- a Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

Part III: Code of practice

Introduction

This is the Commission's principal code of practice, issued under section 24 of the Gambling Act 2005.

There are two types of code provisions in this document:

- social responsibility code provisions: compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are set out in shaded boxes
- ordinary code provisions: these do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty; these code provisions are in the unshaded boxes in this section.

Code provisions

1 General

1.1 Cooperation and responsibility for third parties

Ordinary Code Provision 1.1.1

Cooperation with the Commission

All licences

- 1 As made plain in its *Statement of principles for licensing and regulation*, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

Social responsibility code provision 1.1.2

Responsibility for third parties – all

licences All licences

- 1 Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
- 2 Licensees must ensure that the terms on which they contract with such third parties:
 - a require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

2 Financial requirements

2.1 Anti-money laundering

Ordinary code provision 2.1.2

Anti-money laundering – other than casino

All licences except casino licences

- 1 As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators)*.

3 Protection of children and other vulnerable persons

3.1 Combating problem gambling

Social responsibility code provision 3.1.1

Combating problem gambling

All licences

- 1 Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
- 2 Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2 Access to gambling by children and young persons

Social responsibility code provision 3.2.5

Access to gambling by children and young persons – bingo and FEC SR code

All non-remote bingo and family entertainment centre licences

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2** This must include procedures for:
 - a** checking the age of apparently underage customers
 - b** refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c** taking action when there are unlawful attempts to enter the adult-only areas.
- 3** Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4** Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
- 5** Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a** all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b** the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c** procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
- 6** Licensees must only accept identification which:
 - a** contains a photograph from which the individual can be identified
 - b** states the individual's date of birth
 - c** is valid
 - d** is legible and has no visible signs of tampering or reproduction.
- 7** Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission.

Ordinary code provision 3.2.6

Access to gambling by children and young persons – bingo and FEC ordinary code All non-remote bingo and family entertainment centre licences

- 1** The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
- 3** Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling to the child or young person concerned.
- 5** Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
- 6** Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 7** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

3.3 Gambling management tools and responsible gambling management information

Social responsibility code provision 3.3.1

Responsible gambling information

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

- 1 Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
- 2 The information must cover:
 - a any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b timers or other forms of reminders or 'reality checks' where available
 - c self-exclusion options
 - d information about the availability of further help or advice.
- 3 The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
- 4 For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

Ordinary code provision 3.3.2

Responsible gambling information – foreign languages

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

- 1 Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a the information on how to gamble responsibly and access to help referred to above
 - b the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.4 Customer interaction

Social responsibility code provision 3.4.1

Customer interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

- 1** Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a** identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b** interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c** understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
- 2** Licensees must take into account the Commission's guidance on customer interaction.

3.5 Self-exclusion

Social responsibility code provision 3.5.1

Self-exclusion – non-remote and trading rooms SR code

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

- 1 Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2 Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3 Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4 This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5 Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6 Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c staff training to ensure that staff are able to administer effectively the systems; and
 - d the removal of those persons found in the gambling area or attempting to gamble from the premises.
- 7 Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
- 8 Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

Ordinary code provision 3.5.2

Self-exclusion – non-remote ordinary code

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

- 1** Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
- 2** Individuals should be able to self-exclude without having to enter gambling premises.
- 3** Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 4** Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
- 5** Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
- 6** Customers should be given the opportunity to discuss self-exclusion in private, where possible.
- 7** Licensees should take steps to ensure that:
 - a** the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b** any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c** a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d** at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e** where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f** notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 8** The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
- 9** Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 10** Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.

- 11 Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
- 12 In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code provision 3.5.6

Self-exclusion – multi-operator non-remote SR code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

Ordinary code provision 3.5.7

Self-exclusion – multi-operator non-remote ordinary code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6 Employment of children and young persons

Ordinary code provision 3.6.2

Employment of children and young people – bingo

All non-remote bingo licences

- 1 Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
 - a to employ them to provide facilities for playing bingo;
 - b for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
 - c to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
- 2 As to **1b**, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a children and young persons are never asked to perform tasks within 1a or 1b, above
 - b all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
 - a children are not employed to work on bingo licensed premises at any time when the premises are open for business
 - b neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

3.8 Money lending between customers

Ordinary code provision 3.8.2

Money-lending – other than casinos

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

- 1 Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

4 'Fair and open' provisions

4.1 Fair terms

Social responsibility code provision 4.1.1

Fair terms

All licences, except gaming machine technical and gambling software licences

- 1 Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

4.2 Display of rules and supervision of games

Social responsibility code provision 4.2.2

Display of rules - bingo

All non-remote bingo licences

- 1 In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a rules about each variant of bingo made available; and
 - b rules about any prize gaming made available.

5 Marketing

5.1 Rewards and bonuses

Social responsibility code provision 5.1.1

Rewards and bonuses – SR code

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1 If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b neither the receipt nor the value or amount of the benefit is:
 - i dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

Social responsibility code provision 5.1.3**Alcoholic drinks****All non-remote bingo and casino licences**

- 1 If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 2 Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

Social responsibility code provision 5.1.3**Alcoholic drinks****All non-remote bingo and casino licences**

- 3 If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 4 Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

Social responsibility code provision 5.1.6**Compliance with advertising codes****All licences, except lottery licences**

- 1 All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2 In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
- 3 The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

Ordinary code provision 5.1.8**Compliance with industry advertising codes****All licences**

- 1 Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

Social responsibility code provision 5.1.9**Other marketing requirements****All licences**

- 1 Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
- 2 Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
- 3 The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

Ordinary code provision 5.1.10**Online marketing in proximity to information on responsible gambling****All licences**

- 1 Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

Social Responsibility code provision 5.1.11**Direct electronic marketing consent****All licences**

- 1 Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6 Complaints and disputes

6.1 Complaints and disputes

Social responsibility code provision 6.1.1

Complaints and disputes

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

- 1** Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- 2** Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
- 3** The services of any such ADR entity must be free of charge to the customer.
- 4** Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- 5** Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- 6** Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- 7** Licensees should keep records of customer complaints and disputes in such manner as the Commission may from time to time specify in advice or guidance. They must provide information to the Commission about customer complaints, disputes, the outcomes of disputes referred to ADR, and court proceedings adverse to the licensee, also in such manner as the Commission may from time to time specify.

In this Code, 'ADR entity' means

- a** a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015, and
- b** whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

7 Gambling licensees' staff

7.1 Gambling licensees' staff

Social responsibility code provision 7.1.2

Responsible gambling information for staff

All licences, including betting ancillary remote licences, but not other ancillary remote licences

- 1 Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8 Information requirements

8.1 Information requirements

Ordinary code provision 8.1.1

Information requirements – ordinary code

All licences

- 1 As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
- 2 Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a any material change in the licensee's structure or the operation of its business
 - b any material change in managerial responsibilities or governance arrangements
 - c any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

¹ These matters can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk

Alternatively, for operators unable to access this system, you can these events by email to: key.events@gamblingcommission.gov.uk

² Events which **must** be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

9 Gaming machines in gambling premises

9.1 Gaming machines in gambling premises

Social responsibility code provision 9.1.2

Gaming machines in gambling premises – bingo

All non-remote bingo operating licences

- 1 Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

10 Assessing local risk

10.1 Assessing local risk

Social responsibility code provision 10.1.1

Assessing local risk

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

- 1 Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
- 2 Licensees must review (and update as necessary) their local risk assessments:
 - a to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c when applying for a variation of a premises licence; and
 - d in any case, undertake a local risk assessment when applying for a new premises licence.

¹This is the statement of licensing policy under the Gambling Act 2005.

Ordinary code provision 10.1.2

Sharing local risk assessments

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

- 1 Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

making gambling fairer and safer

www.gamblingcommission.gov.uk



POWERS OF THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS & OTHER OFFICERS

STATEMENT

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

The Company acknowledges its obligation to ensure that staff co-operate with the Gambling Commission's Enforcement Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises.

- The Company must provide the Gambling Commission with any information that they suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a license condition or a code of practice provision having the effect of a license condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating License.
- The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as: -
 - the numbers of people making use of the facilities and the frequency of such use.
 - the range of gambling activities provided by the licensee and the number of staff employed in connection with them.
 - the licensee's policies in relation to, and experience of, problem gambling.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.



RIGHTS OF GAMBLING COMMISSION ENFORCEMENT OFFICERS

- A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed.
- A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed.
- Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating license or premises license is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating license.
- Entry may also be made to assess the likely effects of activity when application has been made for a premises license.
- The powers of the constable, enforcement officer or authorised person can include inspection of any part of the premises or any machine, anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions.
- The power of inspection must be exercised only at a reasonable time.
- The enforcement officer or authorised person must provide evidence of his identify and authority.
- A constable, enforcement officer or authorised person may use reasonable force to enter a premise.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online UPSKILL Training platform hosts Essential of Compliance & Social Responsibility workbook and online quiz to be completed every 6 months by all employees.

PROCEDURE

Visits by Gambling Commission Enforcement Officers may be pre-arranged or unannounced, however: -

In all circumstances the employee must ask for identification from the visitor to establish that they a Gambling Commission Enforcement Officer.

The Duty Manager must attend the Enforcement Officer without delay.

The visitor must also be requested to sign into the visitors log book.

Staff are to co-operate at all times with the Commission’s Enforcement Officers in the proper performance of their compliance functions.

The Enforcement Officer may remove copies of documents as required.

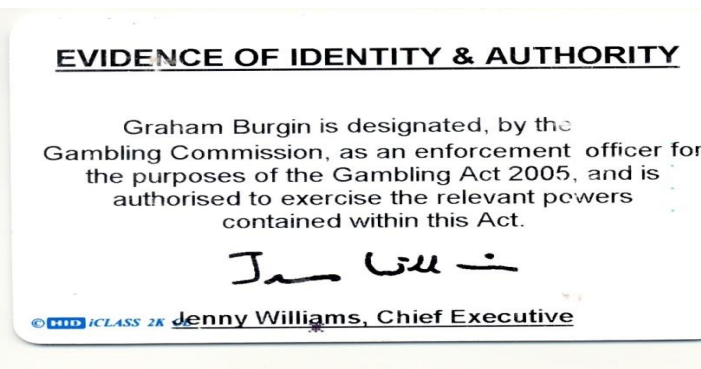
Gambling Commission Sample ID



Front Of Card

Contains the Following:

1. Officers Name
2. Photo ID
3. Serial Number
4. Date of Issue
5. Gambling Commission Contact Details



Back of Card

Contains the following:

1. Evidence of the Officers Identity
2. Signature of the Gambling Commission Chief Executive



MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

1. Introduction

This policy has been implemented in order to comply with the Money Laundering Regulations 2007 that requires processes to be adopted to avoid the possibility of money laundering.

New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering Regulations 2007 ("the Regulations"). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As of 31st October 2016 new money laundering regulations come into force. The regulations are applicable to the Licence Conditions & Codes of Practice (LCCP). Whilst our venues/sector is considered "Low Risk", this does not mean that there is "no risk" within our trading sectors.

As a result of this legislation Cashino Gaming is required to establish procedures to prevent the use of its services and resources for money laundering. Anti-Money Laundering is effective within our business by taking a "risk based" approach.

2. Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns. In arcades, both Adult Gaming Centre (AGC) and Family Entertainment Centre (FEC), this is typically stained or dyed notes and foreign coins. We should also be mindful of significant increases in customer spending habits which may be an indicator of criminal spend. In practice this is the most likely area of potential money laundering within our venues.

3. Policy

Cashino Gaming is committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

Cashino Gaming has appointed a designated Money Laundering Officer (MLO), Mrs. Amanda Kiernan.

Email: amandakiernan@praesepeplc.com



All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions. **All venues** need to report any suspicious cash transactions **of any** note denomination value, i.e. **one** stained/dyed note, and foreign coins to the value of **£50 during one machine empty or cash collection**. These incidents should be reported using the “(AML) ANTI MONEY LAUNDERING” app available on your IHL tablet. An automated alert will be sent to the Money Laundering Officer for the purpose of informing the relevant authorities.

4. Disclosure Procedure

Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the Money Laundering Officer as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means, including automated alerts of the “(AML) ANTI MONEY LAUNDERING” report available on your IHL tablet. Where there is suspicion of any type of potential money laundering incident CCTV images (if available and relevant) should be retained securely.

All incidents should be reported to your line Manager.

The Money Laundering Officer will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

5. Cash Handling

Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of: -

- Monetary stakes introduced to machines (gross takings where available)
- Money introduced to refloat machines
- Token transactions
- Customer refunds due to machine malfunctions
- Money removed from machines (net takings where available). Where gross takings and net takings information is not available the operation will provide an explanation to the Commission
- Ticket In Ticket Out (TITO) vouchers from machines in arcades can be used for money laundering. Vouchers can be cashed in at a later date and criminals will use a range of outlets to disguise the origin of funds

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to the effect retaining a copy for their future reference. The original is retained on the employee’s personnel file.



KEEPING ALCOHOL OUT

At Cashino Gaming we have clear rules and guidelines on the consumption and influence of alcohol.

INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL ON ENTRY

In all our sites individuals who are deemed to be under the influence of excessive alcohol should be prevented from entering any of our premises.

Procedure

When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence of alcohol and ask the individual to leave the premises.

Should the individual resist or refrain from leaving the premises in the first instance a Manager or Duty Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the staff on duty the police should be called to assist.

All incidents should be recorded fully on the premises log.

ALCOHOL CONSUMPTION ON SITE

Dependent upon which type of site you are on depends on the rules that need to be applied.

Bingo Clubs

Customers may purchase alcoholic drinks on site within the licensing regulations of the premises; however customers must not bring alcohol onsite to be consumed.

AGC's

Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

Betting

Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

Customers should be approached to either leave the premises or stop drinking on site.

EXCESSIVE CONSUMPTION

Procedure

For sites where alcohol may be purchased and a customer consumes to excess to the extent that their behaviour becomes inappropriate or disruptive they should in the first instance be prevented from consuming any more alcohol and should be requested to behave appropriately or be asked to leave the premises, usually by a duty manager.

Where the individual refuses to leave the premises then the police should be contacted for further assistance.

DEALING WITH AN AGGRESSIVE CUSTOMER

Both violence and aggression are used to show distress, to gain dominance, and sometimes to maintain stability. As such they can be termed 'normal' if not always socially acceptable.

WHAT CAUSES AGGRESSION AND VIOLENCE?

There are many reasons why someone may behave in an aggressive or violent manner towards an individual or object. Below are some of the reasons in different situations.

Platonic	Human beings tend to judge things they are familiar with as good and things not familiar as suspect.
Instinctive	The best defence is attack!
Learned Behaviour	Aggression is sometimes part of the behaviour we have learned from society.
Energy Source	Natural release of pent-up instinctual energy - a pressure relief valve. Many of the activities socially acceptable are high forms of controlled aggression. The career drive in some people may be explained as an attempt to express instinctual aggression drive, but in a way society accepts and rewards.
Frustration Response	When frustration in an individual reaches certain levels the only option open may be a display of aggression.

WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

Physical	Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather), Appearance, Illness, Defence of Territory of Possessions, Age
Psychological	Such as Fear, Frustration, Humiliation, Inappropriate Assertiveness, Pain, Vulnerability, Threats (Defence of self), Age, Illness (affective disorders, schizophrenia), Oppression.

IDENTIFYING AN AGGRESSIVE OR VIOLENT CUSTOMER

There are tell tale signs so the key thing is to observe customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour.

These are some of the signs that can help in predicting the likelihood of imminent violence:

- Muscles tensed?
- Facial expression?
- Balanced to move?
- Fingers or eyelids twitching?
- Pacing about?
- Withdrawn on approach?
- Voice - change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing - increase in respiration?
- Tears?
- Offensive weapon carried or available?

PROCEDURE

Quite simply whenever there is an incident you should: -

- H Hear the customer – listen to their complaint or issues.
- E Empathise – see to understand the problem.
- A Acknowledge – ‘I hear what you are saying’, ‘I’m sorry you feel that way’.
- T Take Action – progress with whatever action is relevant to the situation.

Here are some further techniques which can help when responding to a customer behaving aggressively or violently: -

- Be alert and consider if you need further assistance.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move - stay on person's weak side where possible.
- Consciously lower pitch and volume of voice.

- Speak clearly and slowly and don't stop talking because the other person doesn't answer.
- Try to get the person talking.
- Listen to what the person says and how it is said.
- Try to identify the source of concern and help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation - buy time to think, to plan, to obtain assistance.
- Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.
- Do not argue! You really cannot win because the other person does not have to be logical. If you lose the argument and have to back off, your position is weakened. You may get so involved, if you do not carefully measure your own response, that you might, in the end, lose some of your own self-control.
- Do not give orders!
- Never make promises you cannot keep.
- Do not disagree where it is not necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.
- Control your behaviour in body language, feelings and expression.
- In conversation with the person being confronted use expressions such as:
 - "I know you have a problem", "I know you are upset", "I believe you when you say something is wrong". Keep your voice at a calm, even pace.

These expressions will show that you have some affinity with the person and his/her position.

- Always consider if you need further assistance from a colleague, if the person becomes abusive in their language or behaviour they should be asked to leave immediately (remember to refund their stake money). If they refuse to leave then assistance from management or the police should be sought.

PREVENTING STAFF FROM BEING ABUSED

Under no circumstances should a member of staff put themselves at risk with an abusive customer. If the following of the guidelines above has failed in calming a customer or the customer refuses to leave the premises when asked a manager should be called. If the customer is still aggressive and still refuses to leave the premises then the police should be called.

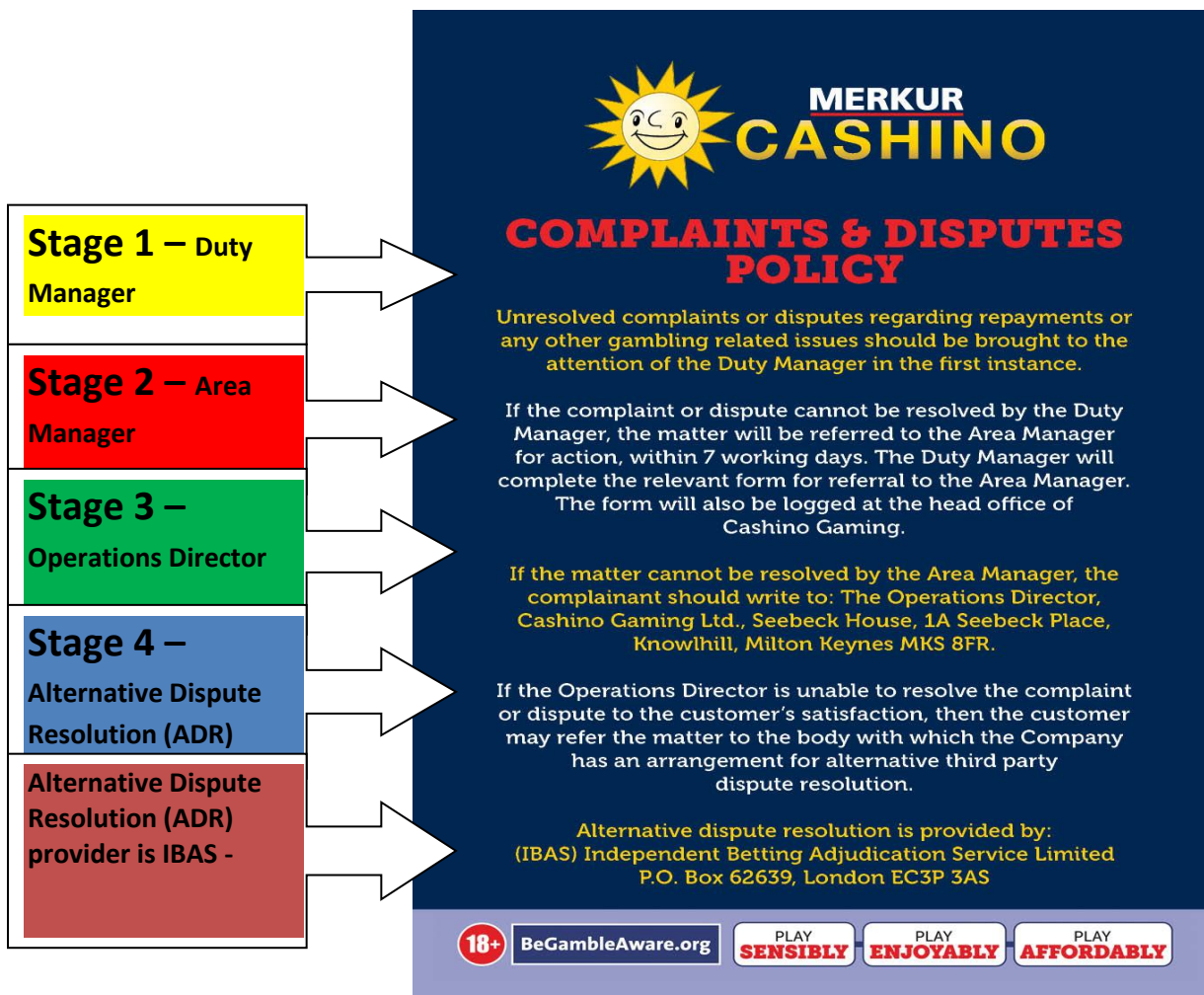
At no time should a member of staff intervene physically in the removal of an individual from a site.

All incidents should be fully recorded on the incident reports log.

COMPLAINTS PROCEDURE

The Company's written complaints procedure is available as a separate leaflet. Cashino venues operate a 4 stage complaints procedure as below.

If you receive a visit from the Gambling Commission/Local Authority they may ask you who our **Alternative Dispute Resolution** (ADR) provider is so ensure you know the answer – see details below.





MARKETING AND PROMOTIONAL GUIDELINES

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

We adopt the general principles that our advertising is:

- legal, decent, honest and truthful.
- prepared with a sense of responsibility to consumers and to society.
- respectful to the principles of fair competition generally accepted in business.
- not intended to bring advertising into disrepute.

Specifically we ensure that:

- advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise.
- advertisements and promotions are socially responsible and do not encourage excessive gambling.
- care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable.
- advertisements are not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old.
- persons shown gambling are not, nor do they appear to be, under 25 years of age.
- there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer.
- advertising and promotional material carries a reference for the need to keep gambling under control.
- it is never suggested or implied that gambling is a means of getting out of financial difficulty.



MARKETING AND PROMOTION

Any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) the scheme is designed to operate, and be operated, in such a way that neither the receipt nor the value or amount of the benefit is: -

- a) dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled.
- b) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

If the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

Procedure

All Marketing and Promotions must be compliant.

All Marketing and Promotional activities must be approved by one of the following Managers relevant to the site.

For Bingo Sites

- Operations Director
- General Manager
- Marketing Manager

For AGC's

- Operations Director
- Marketing Manager

For Betting

- Operations Director
- Marketing Manager



ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. It is illegal for any person who is under 18 years of age to be permitted entry to any Licensed Premises.

PROCEDURE

- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Licensed Premises.
- Any person known to be under 18 years of age will be refused entry.
- Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry or when it comes to the attention of staff. Members of staff are trained to 'think 25'.
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. If at any time there is suspicion of forged documents these incidents will be recorded and reported.
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. Acceptable forms of identification include those that carry the PASS logo (e.g. Citizen card, Validate and the Government's own Connexions card); a driving licence (including a provisional licence) with photograph, or a passport and military identification cards.
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.

- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.
- Any attempts by under-18s to enter the premises or designated area(s) are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises. Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. The Log is to be countersigned by the Duty Manager.
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s attempting to gamble in an adult-only environment, and under-18s are not allowed to retain any prize.
- Consideration will be given to permanently excluding from our Licensed Premises any adult who has previously and repeatedly attempted to gain entry when accompanied by a child or young person or, should entry have been gained, if the offence was committed knowingly or recklessly. Notwithstanding, that adult shall be required to stop gambling immediately and told to leave the premises.
- In instances where a child or young person repeatedly attempts to gamble on premises or in designated area(s) restricted to adults, or where repeated oral warnings have been issued, consideration will be given to reporting the matter immediately to the Gambling Commission and, where appropriate, police or local education welfare department.
- Consideration is to be given to reminding customers of their parental responsibilities and to assess whether there is a need to develop procedures for dealing with young or otherwise vulnerable children left unattended in the vicinity of our premises.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log.

EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in: -

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on the Licensed Premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence. All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

IT IS STRICT COMPANY POLICY THAT: -

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Licensed Premises are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.



CUSTOMER INTERACTION

**REMEMBER reporting an Interaction is NOT the same as reporting an Incident.
An Interaction is a Gambling related issue with a customer.**

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice listed under the Social responsibility code provision 3.4.1.

The Company makes use of all relevant sources of information to ensure effective customer interactions in particular, to identify at-risk customers who may not be displaying obvious signs of problem gambling.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager should be informed at the earliest available opportunity.

The Duty Manager is required to observe the individual and make a judgment as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity, or to discuss other options.

New Customer interaction – formal guidance was introduced by the Gambling Commission 31st October 2019. A copy is available to read in this section of your Compliance folder. Customer interaction consists of the following 3 parts;

PROCEDURE

PART 1; Identify and observation – behavior or activity you have spotted or something the customer tells you.

PART 2; Interact and take action - contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.

PART 3; Evaluate and record the outcome – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

The above 3 parts include the following;

- Behaviours may include intense mood swings, aggression, hysteria, remorse, excessive ATM use, time and money spent, damage to property, violence or the threat of violence to staff or other customers.

- The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not. [SmartINCIDENT app on IHL tablet]
- Staff are aware of where customers can be directed for confidential advice should they be approached by them for help. This includes the Staying in Control information leaflet which includes GamCare Helpline details.
- Members of staff are trained to deal with the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained for consideration.
- All venue staff should be aware of those customers that are frequent visitors or deemed to be "high value" players. Monitoring and interaction will take place with every customer during every visit. It is this interaction that may lead the Duty Manager to intervene or take appropriate action, possibly via the Machine Administration Reconciliation System (MARS), which is able to monitor the spend of particular customer on specific machines, who may be deemed "high value", and therefore potentially more at risk. Appropriate action would then be taken on a player by player basis.
- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.
- Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the Duty Manager will log all such reports which may result in customer interaction on an appropriate future occasion. The interaction will be conducted between the Duty Manager and the customer in a confidential and meaningful manner.
- Members of staff are trained as part of their 3 month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.



SELF EXCLUSION

POLICY

Whilst most customers are able to enjoy and control their gambling, Cashino Gaming recognises its duty of care to those who cannot. Accordingly we provide a self – exclusion facility for those customers to request their exclusion for a fixed period of time, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months each.

New regulations were implemented by the Gambling Commission and as from 6th April 2016, all gaming operators have to be part of a multi operator self-exclusion scheme, referred to as MOSES.

IF A CUSTOMER WISHES TO SELF-EXCLUDE IMMEDIATELY, WITHOUT MEETING WITH THE AREA MANAGER/DUTY MANAGER/SUPERVISOR OR WITHOUT A FURTHER VISIT TO OUR PREMISES, THEN THEIR DECISION MUST BE RESPECTED. THE DUTY MANAGER OR SUPERVISOR SHOULD ASSIST THE CUSTOMER IN THE COMPLETION OF A SELF EXCLUSION REQUEST IMMEDIATELY, SO THAT THE CUSTOMER NEED NOT MAKE A FURTHER VISIT TO THE GAMING PREMISES. PLEASE NOTE: YOU WILL NEED A WIFI CONNECTION IN ORDER TO ACCESS THE IHL HUB AND THE SmartEXCLUSION PAGE ON THE TABLET.

PROCEDURE – using the SmartEXCLUSION tablet

When a customer has requested that they be refused entry to our premises, the customer and the Area Manager/Duty Manager/Supervisor will formally acknowledge and document their request on the SmartEXCLUSION tablet, available at all Cashino venues. For further information please refer to the “SmartEXCLUSION User Guide” available at the venue.

Self-exclusion is sector specific:-

- **AGC LICENSED PREMISES** - 0.25km – 1km exclusion zone.
- **BINGO LICENSED PREMISES** – Traditional Bingo Clubs eg Beacon, Mecca and Gala plus High Street Bingo’s – National exclusion zone
- **Please Note: the staff member dealing with the self exclusion process should make the customer aware that if they self-exclude from a Cashino Venue with a Bingo Licence, they will be self excluded from ALL High Street Bingo’s and Traditional Bingo clubs in the UK.**
- Therefore you need to know what type of Premises Licence you hold at your venue. It will either be ADULT GAMING CENTRE PREMISES LICENCE (AGC) or BINGO PREMISES LICENCE. The tablet is set up to select your sector type by default, either AGC or BINGO. You will need to explain to ALL CUSTOMERS who wish to self-exclude, that it is sector specific and that they need to visit other establishments in your local area if they frequent premises operating Bingo, AGC, Licensed Betting Shops and Casinos licenses in order for them to self-exclude from **ALL gambling premises.**



The customer will be asked to assist us in applying the exclusion by allowing you to take an up-to-date photograph. The SmartEXCLUSION tablet has a built in web cam for this purpose. You will be prompted by the on-screen instructions when to take a photo of the customer during the self-exclusion process. **A photo is a mandatory requirement. The photo should be taken of head and shoulders only.**

The Area Manager/Duty Manager/Supervisor will confirm the customer's exclusion for a minimum period of not less than six months, nor more than 12 months.

The exclusion will apply to all Adult Gaming Centre (AGC) venues within a radius of 0.25km – 1 km, if your venue holds an AGC license and ALL Bingo licensed premises – Traditional and High Street if your premises hold a Bingo License.


It must be made clear to the customer that they may not revoke the self-exclusion during this time.


Once the customer has entered their electronic signature on the tablet and the self-exclusion is confirmed, the information will be retained on the tablet at the venue and electronic notification sent out to other similar licensed premises, nationally for Bingo licensed premises and within a 0.25km – 1km radius for AGC licensed premises.

A photo gallery is available to view for ease of identifying customers who have self-excluded in the local area and includes your venue within the selected radius. Milton Keynes Head Office will automatically be notified of all self-exclusions.


Please note on the photo gallery,

- Exclusions which are live have no coloured border.
- Exclusions which are in the 6 month 'cooling off' period have a **RED** border. These photos will remain on the tablet for 6 months. If the customer does not return to gambling within the 6 months period, photo will automatically disappear and be archived.
- Exclusions in the 24 hour 'cooling off period have a **BLUE** border. This will be visible for customers who have reinstated and wish to resume gambling and will disappear after the 24 hour period.

If a customer tries to enter gaming premises during a self-exclusion period, this is classed as a breach and details should be recorded on the tablet by selecting the customer photo and selecting the Report Breach button 

When the self-exclusion period ends, a customer has the option to return to gambling. **The customer should return to the venue where they originally self-excluded from to complete the re-instatement process on the tablet.** This button will be visible on the tablet only after the end date of the self-exclusion period .



If a customer wishes to extend their self-exclusion period for a further 6 months, they may do so by selecting the  button on the tablet.

PLEASE NOTE: For staff training purposes follow the instructions on the tablet and enter the following details on New Exclusion – Contact Details page:

First Name: **dummy**

Last Name: **test**

You **do not** need to take a photo of a person, just point the camera to the floor and take the photo. All test entries will automatically get archived once a week from the database.

As of 6th April 2016 you no longer need to add any self-exclusions **completed on the tablet** to 'LOG E – Self Exclusion' as the new SmartEXCLUSION tablet acts as the electronic log. (See details below for old style paper Self Exclusions).

PROCEDURE – using the old paper Self Exclusion Request Forms which have yet to expire

PLEASE NOTE: You will need to retain any previous paper copies of SELF EXCLUSION REQUEST FORMS on file, until such time they have expired and the 'END DATE' is reached. This could be up to 2020. **Do not throw them away as they are proof that a customer self-excluded prior to 6th APRIL 2016, when the regulations changed.** You will also need to retain the paper copy of the SELF EXCLUSION REVIEW FORM. This form will need to be completed if a customer wishes to return to our premises and resume gambling. **You will only need to use this form for paper copies of self-exclusions which are not on the tablet.**

PLEASE NOTE: For old style paper self-exclusions you have in your Compliance folder, which are still active, (see 'end date'), the Duty Manager or any other authorised person and the customer will review the request and record the process on a self-exclusion review form and attach this to the original self-exclusion request form. If the customer wishes to extend their self-exclusion, this will need to be completed on the tablet as a new entry for a minimum period of 6 months.

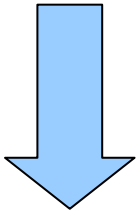
You will need to record on LOG E, any actions for old style paper Self Exclusion Request Forms you still have on file i.e. customer breach, customer review/resume gambling and 24 hour cooling off period.

If the customer does wish to continue gambling after the expiry of an exclusion period then a 24 hour cooling off period must be taken before gambling is resumed.

Paper self-exclusion request forms should be destroyed 6 months after the end date due to the data protection act.

PLEASE NOTE: Self-exclusion social responsibility code provision 3.5.1 is a condition of our Licence Conditions and Codes of Practice – (LCCP)

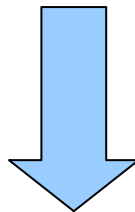
SELF EXCLUSION PROCEDURE FLOWCHART

CUSTOMER:	Requests to be excluded.
AREA MANAGER/DUTY MANAGER/SUPERVISOR:	Goes through the implications, for a minimum period of not less than six months, nor more than 12 months, with the customer, upon request, having the option to extend one or more periods for at least a further six months each. Advises the customer of the GamCare Self-Assessment test (on tablet) before self-excluding.
CUSTOMER AND AREA MANAGER/DUTY MANAGER/SUPERVISOR:	Completes the customer exclusion request using the SmartEXCLUSION tablet and follows the on screen instructions.
CUSTOMER:	Must allow a photograph to be taken using the built in webcam using the SmartEXCLUSION tablet.
	
AREA MANAGER/DUTY MANAGER/SUPERVISOR:	Explains to customer the exclusion is sector specific and applies to other similar operating premises in the locality within the default 0.25km – 1 km radius.
CUSTOMER:	Once customer has electronically signed and Duty Manager confirmed the self-exclusion on the SmartEXCLUSION tablet, the customer must now leave the site.

MANAGER:

Checks the SmartEXCLUSION tablet and photo gallery includes the customer in question. Informs Team Members and any regular relief staff. Make new starters aware if they start during the exclusion period.

MANAGER/DUTY STAFF



Must record a breach on the Smart EXCLUSION tablet when a customer who has elected to self-exclude themselves tries to enter the premises.

AFTER THE END OF THE EXCLUSION PERIOD:

Customers will be offered support and advice should they wish to resume gambling. They should return to the venue where they originally self-excluded from to complete the re-instatement process. If this is the case a 24 hour cooling off period is put in place. Information will also be provided on how to extend the self-exclusion period should they wish to do so.

See above instructions for old style paper self-exclusion request forms which have expired and reached the end date and the process to follow.

Full operating instructions for your SmartEXCLUSION tablet are available at all venues. Please refer to the SmartEXCLUSION User Guide available at your venue.



SELF EXCLUSION REVIEW FORM

Please note: this form should only be used for old style paper self-exclusions on file. You do not need to use this form for self-exclusions on the SmartEXCLUSION tablet.

Company:

Site Name:

Site Address:

Post Code:

Customer Name:

Customer Date of Birth:

Customer Address:

Post Code:

Self-Exclusion agreement start date:End Date:.....

Customer's Decision:
.....

Request to resume access and gambling following the self-exclusion period.

I confirm that I voluntarily no longer wish to be self-excluded from this site and other venues in the locality to which the agreement applies; that all options have been explained to me by the Company.

Signature: (Customer) Date:.....Time.....

Signature: (Appointed Manager) Date:.....Time.....

I have experienced a "cooling off" period of 24 hours and can resume gambling as of:

Date:.....Time:.....

Please note: if the customer wishes to be reinstated on the Membership database, a copy of this form needs to be emailed to Tracey Chapman – (Memberships) at Cashino Head Office, Milton Keynes.

Email:traceychapman@praesepeplc.com

Please note: Log E needs to be updated with these details in your Compliance folder for old style paper self-exclusion forms only pre 6th April 2016.

Please retain this form on file for your records for a further 12 months from date signed.

SOCIAL RESPONSIBILITY & CODES OF PRACTICE PREMISES LOGS

The Log Book contains the following:

- NEW:** Venue Monthly Compliance Log Check Summary
- LOG A:** Attempts By Children And Young Persons To Access Adult Areas – (recorded electronically using **Age Verification app** on tablet as of 9th July 2018)
- LOG B: 1** Customer Interaction - Gambling Related “At Risk” Customers – (recorded electronically using the **SmartINTERACTION app** on tablet as of 8th April 2019)
- LOG B: 2** Customer Incidents – Not Gambling Related – (recorded electronically using **SmartINCIDENTS app** on tablet as of 1st October 2018)
- LOG C:** Customer Complaints and Disputes (paper Log)
- LOG D:** Customer Incidents Requiring Police Assistance – (recorded electronically using **SmartINCIDENT app** on tablet as of 1st October 2018)
- LOG E:** Self-Exclusion Log - to be used for old paper Self Exclusions Forms which are not on the tablet and retained in Compliance Folder
- LOG F:** Incidents Relating To Aggressive Customers and Alcohol – (recorded electronically using **SmartINCIDENT app** on tablet as of 1st October 2018)
- LOG G:** Staff Training Summary – paper log to be signed and dated every 6 months by **all staff**, when they complete “Essentials of Compliance” training module. **Venue Managers** to check the log is up to date at the end of the month and sign the Log Check Summary to verify the log is correct.
(this will remain as a paper Log and will not be on the tablet)

NOTE: You can download and print these Premises Logs on Upskill > Knowledge Base > Categories > Cashino Compliance Folder Content

(Cashino Premises Logs – section 5 - Updated April 2019 – V1.6)

Venue Monthly: Compliance Log Check Summary

Venue Name		Month and Year	
Log	Description	Total No.	Comments
A	Attempts by children and young persons to enter venue [Age Verification app on tablet as of 9th July 2018]		
B 1	Customer Interactions related to Problem Gambling [SmartINTERACTION app on tablet as of 8th April 2019]		
B 2	Customer Incidents not related to Problem Gambling [SmartINCIDENT app on tablet as of 1st October 2018]		
C	Customer Complaints and Disputes [paper log]		
D	Customer Incidents Requiring Police Assistance [SmartINCIDENT app on tablet as of 1st October 2018]		
E	Paper Self-Exclusions , Attempts to enter, Attempts to Gamble [complete for any paper self- exclusion forms you have on file] further information on log sheet		
F	Incidents Relating to Aggressive Customers and Alcohol [SmartINCIDENT app on tablet as of 1st October 2018]		
G	Summary of Staff Training : Essentials of Compliance Only (EOC) [paper log to be completed & signed by <u>ALL STAFF</u> for EOC training]	NA	NOTE: Please check at the end of each month training dates on Log G correspond with Upskill EOC dates

Document to be completed checked and signed monthly by Venue Manager or designated person at the end of each month.

Area Manager check and sign every 8 weeks.

Signed Venue Manager		Date	
Signed Area Manager		Date	Comments
Signed Auditor/Compliance Manager		Date	Comments

(Regulatory reports to the Gambling Commission are for the period 1st April to 31st March each year)



SITE ADDRESS and NUMBER :

Month/Year:.....

LOG C : CUSTOMER COMPLAINTS AND DISPUTES

Date	Time	Details of Incident	Outcome/Action Taken – Complaint Resolved?	Duty Manager

SITE ADDRESS and NUMBER :

Month/Year:.....

LOG E : SELF-EXCLUSION LOG

Name	DOB	Photo Yes	Start Date	Attempts to Enter Date(s)	Attempts to Gamble Date(s)	Preventative Measures	End Date	'Cooling Off'	Resumed Gambling Y/N

1. This form needs to be completed only for **old paper self-exclusion requests forms** you still have on file which have yet to reach the “End” date. This could be up to 5th April 2020!
2. If a customer wishes to return to gambling, a **Self Exclusion Review Form** (copy in Compliance folder) needs to be completed and signed by you and the customer. You also need to complete the last 2 columns on this form.
3. This form needs to be completed if a customer who is self-excluded on old paper request form enters & attempts to gamble in the venue. This would be classed as a **“BREACH”**. Name of Customer and date/time and measures you took need to be recorded



SITE ADDRESS and NUMBER :

LOG G : SUMMARY OF STAFF TRAINING – Page 1

TO BE COMPLETED SIGNED AND DATED BY ALL EMPLOYEES EVERY 6 MONTHS FOR UPSKILL – ESSENTIALS OF COMPLIANCE TRAINING (EOC) AND QUIZ

Management and staff have declared that they have read and understood the following training documents and are fully aware of Company policy and procedures relating to them:

1. Access to Gambling by Children and Young Persons	6. Money laundering and Proceeds of Crime Act 2002
2. Access to Premises by the Gambling Commission’s Enforcement Officers	7. Self-Exclusion
3. Advertising Standards and Marketing	8. Customer Interaction for “At Risk” customers
4. Fair and Open Practice and Alternative Dispute Resolution/IBAS	9. Incidents relating to Aggressive Customers and Alcohol
5. Information on how to Gamble Responsibly and Help for Gamblers with problems	10. Employment of Children and Young Persons

Name	Position in Company	Training Date EOC Quiz	Staff Signature	Next Training Date Due in 6 months	Leaving Date	1	2	3	4	5	6	7	8	9	10
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

SITE ADDRESS and NUMBER :

LOG G : SUMMARY OF STAFF TRAINING – Page 2

TO BE COMPLETED SIGNED AND DATED BY ALL EMPLOYEES EVERY 6 MONTHS FOR UPSKILL – ESSENTIALS OF COMPLIANCE TRAINING (EOC) AND QUIZ

Name	Position in Company	Training Date EOC Quiz	Staff Signature	Next Training Date Due in 6 months	Leaving Date	1	2	3	4	5	6	7	8	9	10
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Extracts of Merkur Cashino Operations Manual:

- a. *Compliance Policy;*
- b. *Staff Guard Policy;*
- c. *CCTV Policy;*
- d. *Machine Fraud Policy*
- e. *Machine Ratio Check Policy;*
- f. *Smoking/Vaping Policy*
- g. *Marketing Code of Practice and sample window displays*
- h. *G4 Global Gambling Guidance Group accreditation*
 - i. *excerpts from the Company training platform*
 - j. *examples of the Company's responsible gambling information*



6. Compliance



Compliance Policy

Why:

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Cashino Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

Best Result:

All employees are fully aware of the importance of following policy and processes in regards to compliance and social responsibility. The business is run in line with the license conditions and codes of practice at all times and all employees work together to ensure the 3 licensing objectives are met.

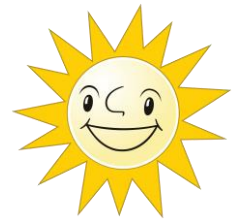
Worst Result:

Employees are not aware of the policy and processes in regards to compliance. The company is not operated in line with the 3 licensing objectives and the license conditions and codes of practice. The business is put at risk of its license being lost.

The 3 licensing objectives:

- **Keep crime out of gambling**
- **Ensure that gambling is conducted in a fair and open way**
- **Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling**





What:

- Employees must complete compliance training before being able to work with customers in any venue
- It is the responsibility of the venue manager to ensure that all employees are correctly trained and up to date with compliance training
- It is the responsibility of employees to check that they have completed all relevant compliance training on their inform people/upskill account regularly
- Employees must always follow the policies and processes in regards to compliance which are found in the Compliance and Social Responsibility folder

When:

- The policies and processes which form compliance and social responsibility apply at all times of operation.

Who:

- All employees have a responsibility to ensure that the business is operated in a way which is compliant at all times.

Related / supporting documents:

- The compliance and social responsibility folder.

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Compliance Manager



Staff Guard / P.A. Policy / Static Alarm

Why:

The security of employees is of the upmost importance; therefore personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.

Best Result:

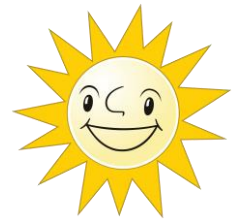
The staff guard and MPA fobs are carried by employees at all times as per policy. This increases the security of our employees and guests. Employees become more comfortable in their roles knowing they have methods of contacting assistance in emergency situations.

Worst Result:

The staff guard and MPA fobs are not carried by employees which reduces the safety of employees and guests. During events when emergency assistance is needed, it is not acquired.

What:

- Employees should always carry a mobile panic alarm (MPA) or staff guard fob on their person while at work. (ideally both should be carried)
- Activation of staff guard should be prioritised over using the MPA in circumstances which do not require immediate police attention.
- Staff guard should be tested at least once per week (Note: it is recommended to test the system during times of higher customer numbers, as it makes the customers aware that staff have a communication link to a security service)
- **Employees should not be hesitant to use staff guard** – This is a service which we pay for, there are no issues with false alarms or over usage. Use as often as necessary.
- Employees should be more thoughtful about using the MPA system, and should only activate it in times of imminent physical threat or robbery, or anything which police would usually be called for. This is a system which is linked directly to police. Inappropriate use of this device may lead to the venue losing the right to use it altogether.
- Staff guard and the MPA system should only be used if it is safe to do so – never endanger colleagues or customers during a situation arising when it would not be safe to active either system.
- For Static alarms ensure that the reset key is available at all times.



When:

- The staff guard unit should be tested once per week.
- The staff guard unit should be activated whenever staff are feeling uncomfortable or threatened.
- The MPA system should be used only when immediate police assistance is required

Who:

- The MPA unit and/or Staff guard fob should be carried by employees at all times.
- All venue employees should have access to these devices
- All venue employees should have received training on how to use these devices.

Related / supporting documents:

- N/A

Order of who to contact if in need of help / advice:

- Area Manager
- Commercial administrator
- For any technical issues regarding staff guard call: 01623 649013 (This is a 24hr line but it's best to call during normal business hours Out of hours, the number transfers straight to an engineer so he may be woken by the call Do not press the fob if you have maintenance issues – dial this number as directed)



How:

To Operate The Staff Guard Unit

1. Slide cover up on fob and press the red button – this dials Staff Guard.
2. A blue light will flash on the unit which shows that it's dialing.
3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds.

IF YOU ARE IN IMMEDIATE DANGER SAY:

CALL THE MANAGER - This is our pass phrase that tells them to call for **IMMEDIATE POLICE ASSISTANCE**

However, they will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

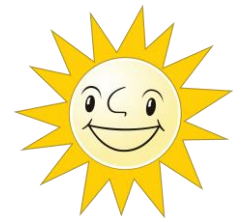
If you say: **"Stand By"**

They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say **"Standing by"** every few minutes to assure/remind you that they are still there.

Say: **"Stand down"** once you no longer need





CCTV Policy

Why:

CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue area covered by CCTV at all times.

Best Result:

The CCTV system is only accessed by those with authority to do so. Camera angles are never changed without the correct authority. The security of the venue is increased

Worst Result:

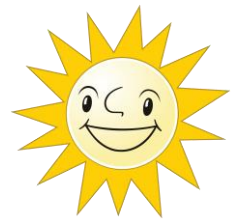
The CCTV is accessed by those who should have no access, data is lost. Cameras are moved without authorization causing a loss of coverage of key areas. The security of the venue is compromised

What:

- The CCTV system should be switched on and recording at all times.
- Any faults with the CCTV System should be communicated to your Area Manager immediately.
- CCTV should always cover: The front and rear exits, All machines, The offices and The GeWeTe
- The CCTV should be checked daily to ensure its working correctly and the time and date are all correct.
- Information in regards to the CCTV should never be disclosed to any 3rd parties.
- Placing and adjusting of the cameras should only be completed by the Area Manager or Operations Director (or another with authorisation from AM/OD)
- Records should be kept to show who has access to the CCTV password and username.
- Decorations should be not placed in areas which obscure the CCTV monitors
- The CCTV should be in a security cabinet
- The key to the Security Cabinet to be locked in the Key Cabinet

When:

- The CCTV should be checked daily to ensure correct function.



Who:

- The venue manager has responsibility for the CCTV system being checked and fully functional.

Order of who to contact if in need of help / advice:

- Area Manager.
- Commercial Administrator



Machine Fraud Policy

Why:

Machine fraud is a threat which is ever present. Employees should be aware of the ways in which fraud can take place and what to do in the event of spotting a “customer” defrauding a machine.

Best Result:

All employees are aware of the policy in regards to machine fraud and what to look out for. Machine fraud is reduced and the income for the business protected.

Worst Result:

Employees fail to identify fraud taking place resulting in loss of income. Further venues are targeted. The employees responsible may be subject to disciplinary processes.

What:

- The venue floor should never be left unattended.
- Employees should be thoughtful in regards to customers who they are not familiar with
- Employees should be given access to photos of known fraudsters by the manager
- Known fraudsters shall be asked to leave immediately upon entrance with no explanation needed to be given
- Following any machine being defrauded, at the earliest opportunity the duty manager must send an email to the security address with as much evidence and information as possible
- Employees are not to endanger themselves or customers at any time when dealing with a fraudster.

When:

Fraud may be taking place when

- Machines are being played with large amounts of credit. Normally people do not play with large credit in the machine (be aware that some customers may have won a jackpot and have that credit sitting in their balance)
- Machines going empty regularly or a large succession of tickets being collected.
- Suspicious activity – Large amounts of customers coming into the venue and dispersing or trying to distract employees.
- Customers with their hands over the coin mech, display or pay out tray.
- Large amounts of coins (one pounds and ten pence coins) being separated into denominations in the payout tray.

- Customers leaving the venue with machines still having money left in the bank.

Who:

- All employees have a responsibility for protecting the business from machine fraud.
- The manager should provide employees with photos of known fraudsters
- The duty manager should inform the security email address following machine fraud taking place

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Income Protection.

How:

If you suspect that machine fraud is taking place either:

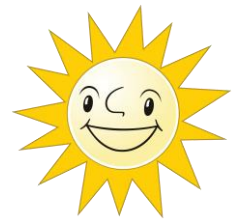
- Activate staff guard and ask the customer to leave the venue if you feel comfortable to do so

Or:

- Do not alert the suspect(s)
- Inform the duty manager who will telephone the police.
- Continue to watch the suspect(s) and try not to alert their attention that you have identified them

Following a fraud

1. Information should be gathered from the CCTV and stored on a memory stick.
2. This information should be provided by email to security@praespeplc.com as soon as possible to prevent another venue being targeted in the local area
3. The Area Manager should be contacted to inform them of the event.
4. Income protection should be informed.



Machine Ratio Check Policy

Why:

The quantity of B3 Machines which a venue is permitted to have is limited, in general to 20% of its total machines. Checks need to be completed to ensure that at all times every venue operates within its correct ratio.

Best Result:

The Machine Ratio Check policy is completed and the venue complies with legislation and operates within the legal ratio for B3 Machines

Worst Result:

The Machine Ratio Check policy is not completed and the venue operates more B3 machines than it is legally allowed.

What:

- MC105 should be completed
- Completed MC105 should be emailed to Incomeprotection@praesepeplc.com

When:

- After any Machine Move.
- When any Machine or Tablet is reported as out of order and not repaired on the next visit by the Service Engineer.

Who:

- The Duty Manager at the time of the move/removal.

Related / supporting documents:

- MC105 Machine Ratio Check Record.




Order of who to contact if in need of help / advice:

- Area Manager
- Income protection
- Gaming Machines.

How:

Complete the MC 105 Machine Ratio Check Record

MACHINE RATIO CHECK RECORD



Venue Name Venue No

Date of Move Week No

Name Signature

AREA 1 - MAIN	AREA 2 - SUB DIVISION
Total number of B3 Machines <input type="text"/>	Total number of B3 Machines <input type="text"/>
Total number of Cat C Machines <input type="text"/>	Total number of Cat C Machines <input type="text"/>
Total number of Cat D Machines <input type="text"/>	Total No of Cat C Tablets <input type="text"/>
Total No of Cat C/D Tablets <input type="text"/>	Total No of Cat C/D Tablets <input type="text"/>
Total No of Twin player Infills (count as 2 machines) (do not include any Class 2) <input type="text"/>	Total No of Twin player Infills (count as 2 machines) (do not include any Class <input type="text"/>) <input type="text"/>
Total <input type="text" value="0"/> a	Total <input type="text" value="0"/> a
Total number of B3 allowed legal ratio - (a) divided by 5 <input type="text" value="4"/> b	Total number of B3 allowed legal ratio - (a) divided by <input type="text" value="4"/> b
Total number of B3 Machines (b) actual count <input type="text"/> c	Total number of B3 Machines (b) actual count <input type="text"/> c
Total number of actual B3 (c) must not exceed number allowed	

This form must be emailed to IncomeProtection@praesepeplc.com

If your B3 actual total exceeds the allowed legal ratio you must contact your Area Manager immediately and email this form to gamingmachines@praesepeplc.com

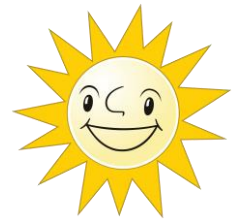
Confirm action taken:

MC105-V1

Walk around the venue and complete all the relevant sections with the correct number of machines in the main area of the venue

Email Completed document

Complete all relevant sections with correct number of machines if the venue has a 2nd licensed area



Smoking / Vaping Policy

Why:

The smoke free laws passed on 1st July 2007 prevent smoking in work places and other public places. Therefore to remain compliant with the law smoking should only be permitted in designated areas for employees and customers alike.

Best Result:

All employees and customers observe the smoke free policy and only smoke in areas in which smoking is permitted. We are compliant with the law.

Worst Result:

Employees and customers do not observe the smoking policy, the customer experience is negatively affected and we are not compliant with the law. Employees found smoking inside the premises may face disciplinary action.

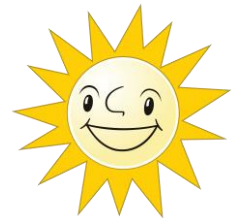
What:

- Smoking is strictly prohibited within venues
- Customers should not be allowed to smoke inside doorways or toilets
- Where possible there should always be a place to dispose of finished cigarettes
- Should the venue have no smoking area at the back of the venue, there should be steps taken to keep the front of the venue looking presentable at all times
- Vaping is allowed within our venues however these devices should not produce excess vapour
- Employees are not permitted to vape while on shift and therefore must take designated breaks to vape as smokers do. Employees must not vape in the venue.
- Employees who smoke / vape must cover their uniform while smoking and when possible smoke separately from customers
- No smoking signs should be clearly displayed

When:

- It is illegal for anyone to smoke inside the premises at any time.
- This policy is applicable at all times.





Who:

- This policy relates to both employees and customers.
- All employees are responsible for ensuring that this policy is followed at all times.

Order of who to contact if in need of help / advice:

- Venue manager
- Area manager
- Customer service manager



MARKETING CODE of PRACTICE

A guide to getting our advertising and promotions right – every time !

The Marketing Department provides an annual programme of National promotions activity. All these communications and point-of-sale/display materials are legally compliant and present our customers with a fair and professionally managed image of a responsible gaming provider. HOWEVER, occasionally 'local' activity may need to be arranged by YOU – so use this guide to ensure your activity meets our code by always being...

LEGAL - DECENT - HONEST - TRUTHFUL

1. All our advertising and promotions must be legally compliant and **MUST NOT** be misleading or indecent 
2. All our advertising and promotions must be socially responsible and **NOT** promote gambling for financial gain 
3. All our advertising and promotions must be **TRANSPARENT** and clearly state the offer and any requirements or conditions applied to obtaining it 
4. Any terms or conditions related to the offer, including offer end dates **MUST BE** displayed clearly at the point-of-sale and/or on any related printed literature or publicity materials 
5. Any printed literature, display or point-of-sale material **MUST** contain the company's approved compliance baseline (see example below) which includes the over 18 symbol and Gamble Responsibly statement alongside your business name, brand/logo 
6. Advertising and promotions **MUST NOT** be targeted at, or exploit children, or those vulnerable to gambling. The law states :
Advertisements and Promotions should not be specifically and intentionally targeted towards people under the age of 18 through the selection of media, style of presentation, content or context in which they appear. All advertisers and gambling operators should already be aware that it is an offence under Section 46 of the Gambling Act 2005 to invite a child or young person to gamble. 
7. The use of models, photographic images or illustrations in advertising or promotions must look a minimum of 25 years of age 
8. **DO NOT** make purchase a condition of entry into a draw or raffle – buying a 'chance' of winning is a lottery, so always state **NO PURCHASE NECESSARY** (even if for charitable causes) 
9. **DO NOT** present offers which reward extended play or incentivise disproportionate stake levels 
10. **ALWAYS** communicate offers clearly in grammatically correct English, avoiding slang, expletives or abusive text. Avoid anything customers could perceive as offensive or discriminatory and remember the 4 key code words : 

LEGAL - DECENT - HONEST - TRUTHFUL

IMPORTANT: If you are unclear or unsure whether your local activity complies with this code, please firstly consult or present your proposals to the Marketing Department on: 07880 570585 (Simon Coombes) - 07584 706892 (Sharon Lewis) - 07557 561795 (Jay Bhatti)



AKI

Think

25

If you are lucky enough to look under 25 years of age,
we need to check your ID.

Please do not be offended.

Acceptable forms of ID are: Driving Licence, Passport or Citizen Card



MERKUR SLOTS



BINGO
PLAYED
HERE

Think
25



50+ BeGambleAware.org 18+ SENSIBLE ENJOYMENT RESPONSIBLY

CLEANING & LAUND

24 HOURS SERVICE

WEDDING DRESS Dry Cleaning



NOW OPEN



MERKUR --- SLOTS



No Smoking



Over 18s Only



No Alcohol



CCTV

Praesepe Group
Merkur Slots, Merkur Cashino & Beacon Bingo

audit dates: 5 – 10 August 2020

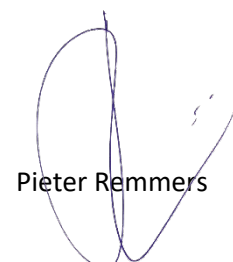
EG - 00120

10 August 2020

10 August 2020

10 August 2023


Jeffrey Derevensky


Pieter Remmers



by Praesepe Training

(Excerpts from training platform – six monthly refresher training)

Safeguarding Children & Vulnerable People

Our suite of Compliance training seeks to ensure you understand the Gambling Act and its 3 main objectives and that you follow the businesses defined processes to ensure we operate within the law.

Within the Gambling Act we have a duty to protect children and vulnerable people.

Safeguarding is the responsibility of everyone in our business and this session explains why its so important and how you can play your part.

What is Safeguarding *(Lesson 1)*

Safeguarding is a term usually associated with children; it makes us think about the protection of children, social services, abuse and the mistreatment of children. As a socially responsible operator, Praesepe and its operating businesses take a different view on Safeguarding and what it means:

The term actually means:

something that serves as a protection or defence or that ensures safety

For most of our customers gambling is an enjoyable hobby and a social event, however; we must be aware of players that may become addicted to gambling.

When a Customers gaming changes from enjoyment/social to a problem or addiction we **MUST** safeguard. Safeguarding is very much an action required within our business.

We should:

- ✓ Train staff on how to recognise and respond to indicators of concern
- ✓ Train staff to know how to protect their own safety if customers behave aggressively
- ✓ Make information and advice about gambling responsibly generally and discretely available, and provide contact details about where to get help
- ✓ Interact with customers to spot warning signs of a problem
- ✓ Offer/explain the Play Right App to help control time spent playing
- ✓ If the customer opts to self exclude make sure you provide the right information and follow the process for self exclusion (detailed in Compliance training)
- ✓ Encourage customers to register or become members so we have a point of contact

Children (Lesson 2)

The protection of children is vitally important to us as a business. We have a separate and detailed training module dedicated to this area (Age Verification) as well as the Essentials of Compliance training.

<p>The Challenge 25 scheme MUST be operated by ALL staff and only recognised proof of age accepted (for example photo driving licence or passport; PASS cards)</p> 	<p>Signage MUST BE prominently displayed at all points of entry regarding the prohibition of under 18's</p> 	<p>Signage MUST BE displayed on machines highlighting age restrictions</p> 
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Vulnerable People (Lesson 3)

The **Gambling Commission** puts a high priority on the social responsibilities operators have to **protect** vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of vulnerable adults.

It's is not possible to tell who is at risk by looking at them. Most customers are **in control and enjoy the **social** element of gambling**

Safeguarding means we have to look a little deeper and think about **those at risk of developing a problem.**

It's about the **signs and signals we **see and hear** whilst our customers are in our premises.**

Social responsibility/Safeguarding is about using your eyes and ears to understand who is vulnerable.

Click on the + signs to understand more about those people at risk:

Risks Factors: Developing a problem	+
Risk Factors: Impact	+
Managing The Risks	+

The Stages of Change (Lesson 4)

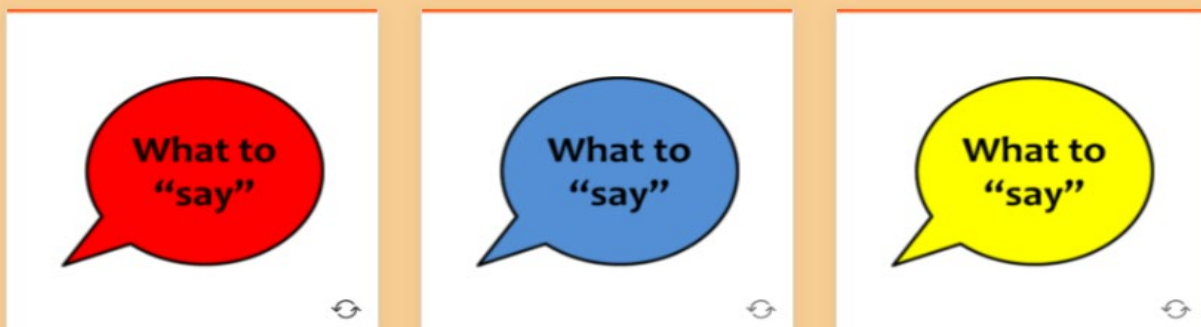
Gambling becomes a problem when people are not in control. Staying in control is vitally important and is the ethos we at Cashino & Beacon all work too.

When someone starts to change their gambling behaviour, there are often different stages of awareness that they move through. These include:

Stage One - No problem	+
State Two - Awareness	+
Stage 3 - Wanting to Make a Change	+
Stage 4 - Take Action	+
Stage 5 - Sticking to it	+
Stage 6 - Final Stage - Self Exclusion	+

Often the person who's gambling doesn't think that he or she has a problem; they don't see the subtle changes. Sometimes **YOU** will spot the problem first, because the customer might be convincing him/herself that everything is fine when really it isn't. It's important to use positive communication rather than being confrontational or critical. It's also important to be genuine and talk to the customer in a natural way.

For example:



Once you've started the conversation, listen carefully to what they have to say in response and be patient. Don't jump in or cut them off mid sentence, as this might drive them back into their shell or make them turn defensive. Being calm and caring is really important as is knowing what advice and support we can offer

Ultimately we as a business have a responsibility

Taking Action (Lesson 5/Observation module 6)

As a business we have several processes and tools in place to ensure we are promoting responsible gambling. These include:

- 1 Think 25 Policy
- 2 PlayRight App
- 3 Gamcare Information and Leaflets
- 4 Complaints Procedure and ADR (Alternative Dispute Resolution)
- 5 Responsible advertising
- 6 Self Exclusion Policy and Process
- 7 and most importantly - **YOU; OUR EMPLOYEES**

These processes and interventions only work if our employees know and understand them and to ensure you do we have the following training modules which refresh every 6 months to keep you up to date and trained to the latest standards



Dealing with Anger & Aggression (Lesson 7)

It is true that when Customers start to lose control of their gambling they may become agitated or upset and get angry and perhaps become confrontational; remember - this is a sign of a problem and rather than ignore it we have to deal with the situation and help the customers.

Things to avoid:

- Do not make threats you cannot carry through, such as threatening to remove the person.
- Do not be defensive or take it personally. What is being said may seem insulting and directed at you, but this is not really about you.
- Do not use humour unless you are sure it will help and you have a very good relationship with the customer
- Do not use sarcasm or humiliate the customer
- Do not put yourself at risk; use staffguard if you are alone and feel vulnerable

Advertising Responsibly (Lesson 8)

Whilst we do all we can to safeguard children and vulnerable people in our premises; we need to be aware of the messages that are reaching them outside of venues and clubs

Earlier we referred to the research on underage gambling undertaken on behalf of the Gambling Commission. in terms of advertising the figures are far reaching

(click to enlarge):



% of 11 - 15 year olds seeing promotional materials/advertising

When we run promotions locally we must adhere to the marketing code of conduct to ensure that we are safeguarding children and vulnerable people when we promote and advertise our business. Please read the code of conduct attached below. This is available as a printable poster in Knowledge base.



Marketing Code of Practice 2018.pdf



GamCare/Support (Lesson 9)

Our role is to be **aware** and provide **support** to any customer at risk. The industry has strong links to **organisations** that can help anyone who **thinks** they have a **problem with gambling**. It is our duty to provide this information readily and freely:



Every Venue and Club has Staying in Control Leaflets

Make sure you know where they are, the information in them and do not hesitate to share this information with customers who feel they need to make a change.

It's our responsibility to provide this information and support customers in their decision making.

Behaviours Quiz (Lesson 10)

Lesson 10 of 11

Behaviours



What behaviours should YOU our employees adopt in order to safeguard?

Look at the words on each card. Each word describes either a positive behaviour and is what we should be doing or a negative behaviour and what we should NOT be doing

THINK 25

LISTEN

NEGATIVE BEHAVIOURS



You have completed Part 1: Training
You now need to complete Part 2;
Knowledge Check

REMEMBER:

- **Listen, Observe, Interact and Break Play**
- **Follow the Think 25 policy**
- **Provide support and information to Customers at Risk**
- **Be Gamble Aware**

Let's all do our bit to be Socially Responsible

Please now complete Part 2 - Knowledge Check in order to finish your training

STAYING IN CONTROL

The Golden Rules of playing Fruit Machines

- **Playing machines is buying fun, NOT investing money**
- **Only play with money you can AFFORD to lose**
- **Set LIMITS on how much you will spend**
- **Playing within your means can be FUN and exciting**
- **Spending outside your means can create PROBLEMS for yourself and others**

A leaflet with more guidance is available here. If you feel you are in difficulty with your gambling or know someone who is and would like help, call the free GamCare helpline.

GamCare:
0808 8020 133

GAMCARE is the national centre for information, advice and practical help regarding the social impact of gambling. Their helpline is run by trained staff, who can offer counselling, information and advice to problem gamblers, family members and to friends of gamblers.



G GamCare.org.uk
f t @GamCare

Funded by
GambleAware[®]

GamCare: A Charitable Company Registered in England No.3297914
Charity No. 1060005

18+ BeGambleAware[®].org

Extract of Licence Conditions and Codes of Practice (LCCP) for Bingo

Version effective from 12 September 2022

1.1.1 - Qualified persons – qualifying position

Applies to:

All operating licences, except ancillary remote licences, issued to small-scale operators

1. In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
2. Schedule X¹ lists those individuals notified to the Commission as qualified persons.
3. If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
4. An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
5. In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005(Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

1.2.1 - Specified management offices – personal management licences

Applies to:

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

1. Subject to 6 and 7 below, licensees must ensure:
 - a. that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and
 - b. that at least one person occupies at least one of those offices
2. The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a. the overall management and direction of the licensee's business or affairs
 - b. the licensee's finance function as head of that function
 - c. the licensee's gambling regulatory compliance function as head of that function
 - d. the licensee's marketing function as head of that function
 - e. the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f. oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g. in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
3. The person responsible for the licensee's gambling regulatory compliance function as head of that function shall not, except with the Commission's express approval, occupy any other specified management office.
4. Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.
5. Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.
6. Paragraphs 1 to 5 above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 ('the Regulations').
7. During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs 1 to 6 above shall apply subject to the proviso that the phrase 'each individual' in paragraph 1a shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

2.1.1 - Access to (and provision of data from) key equipment

Applies to:

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1. Licensees must, on request, permit an enforcement officer to inspect any of their remote gambling equipment and/or provide to the Commission copies of data held on such equipment in such format and manner as the Commission may request.

2.2.1 - Gambling software

Applies to:

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1 All gambling software¹ used by the licensee must have been manufactured by the holder of a gambling software operating licence. All such gambling software must also be supplied to the licensee by a holder of a gambling software operating licence. Such software must only be installed or adapted by the holder of such a licence.

¹ As defined in section 41(2)&(3) of the Act

2.3.1 - Technical standards

Applies to:

All non-remote gaming machine technical and gambling software licences and remote operating licences, including remote gaming machine technical, remote gambling software and betting ancillary remote licences, but not remote betting intermediary (trading rooms only) licences

1. Licensees must comply with the Commission's technical standards and with requirements set by the Commission relating to the timing and procedures for testing.

2.3.2 - Bingo equipment specifications

Applies to:

Non-remote bingo operating licences and bingo ancillary remote licences

1. Licensees must comply with the Commission's specification for bingo equipment.

3.1.2 - Other networks

Applies to:

All remote casino, bingo, and betting licences (except ancillary remote and host licences)

1. Subject to 2 below, all licensees who provide facilities for gambling, other than peer to peer gaming, in circumstances in which they do not contract directly with all of the participants using those facilities ('network operators') must have, put into effect and monitor the effectiveness of policies and procedures designed to ensure that:
 - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the network operator, or that player and another holder of a Gambling Commission remote operating licence of the same kind as that held by the network operator ('a relevant licence');
 - b. the arrangements between the network operator and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c. the network operator's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
 - ii. investigation of suspected cheating,
 - iii. combating of problem gambling, and
 - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

3.1.3 - Hosting

Applies to:

All casino (game host), bingo (game host), general betting (host) (real events) and general betting (host) (virtual events) licences

1. Subject to 2 below, all licensees who provide facilities for gambling in circumstances in which they do not contract directly with any of the participants using those facilities ('hosts') must ensure that:
 - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the holder of a Gambling Commission remote casino, bingo, general betting (real events) or general betting (virtual events) operating licence ('a relevant licence');
 - b. the arrangements between the host and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c. the host's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
 - ii. investigation of suspected cheating,
 - iii. combating of problem gambling, and
 - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

4.1.1 - Segregation of funds

Applies to:

All remote operating licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

1. Licensees who hold customer funds must ensure that these are held in a separate client bank account or accounts.
2. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling,
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer, and
 - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

4.2.1 - Disclosure to customers

Applies to:

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

1. Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
2. Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
3. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5.1.1 - Cash and cash equivalents

Applies to:

All operating licences except gaming machine technical, gambling software and host licences

1. Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
2. Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

6.1.2 - Use of credit cards

Applies to:

All non-remote general betting, pool betting and betting intermediary licences, and all remote licences (including ancillary remote betting and ancillary remote lottery licences) except gaming machine technical, gambling software and host licences

1. Licensees must not accept payment for gambling by credit card. This includes payments to the licensee made by credit card through a money service business.

7.1.1 - Fair and transparent terms and practices

Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
2. The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
3. Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
4. Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

8.1.1 - Display of licensed status

Applies to:

All remote casino, bingo and betting licences other than ancillary, host, remote betting intermediary (trading room only), remote general betting (limited) and remote general betting (standard) (remote platform) licences

Read additional guidance on the technical requirements contained within this section.

1. Licensees providing facilities for remote gambling must display on every screen from which customers are able to access gambling facilities provided in reliance on this licence:
 - a. a statement that they are licensed and regulated by the Gambling Commission;
 - b. their account number; and
 - c. a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission's website.
2. Such statement, account number and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission in its technical standards applicable to the kind of facilities for gambling provided in accordance with this licence or otherwise notified to licensees for the purposes of this condition.
3. Licensees may also display on screens accessible from Great Britain information about licences or other permissions they hold from regulators in, or by virtue of the laws of, jurisdictions outside Great Britain provided it is made plain on those screens that the licensee provides facilities for gambling to persons in Great Britain in reliance on their Gambling Commission licence(s).

9.1.2 - Prohibited bingo prize games

Applies to:

All non-remote bingo operating licences

1. Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
2. Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
3. Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14.1.1 - Access to premises

Applies to:

All operating licences

1. Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15.1.1 - Reporting suspicion of offences etc – non-betting licences

Applies to:

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.¹

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website

15.1.3 - Reporting of systematic or organised money lending

Applies to:

All non-remote casino, non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.¹

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website

15.2.1 - Reporting key events

Applies to:

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

1. Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 3% or more of the issued share capital of the licensee or its holding company): • presenting of a petition for winding up • making of a winding up order • entering into administration or receivership • bankruptcy (applying to individuals only) • sequestration (applicable in Scotland), or • an individual voluntary arrangement.

Relevant persons and positions

2. In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
3. The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
4. The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). A 'key position' in relation to a licensee is:
 - a. in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b. in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c. a position where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
 - d. any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

Financial events

5. Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
6. Any breach of a covenant given to a bank or other lender.
7. Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
8. Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

9. The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
10. Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
11. Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
12. The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional, statutory or other regulatory or government body (in whatever jurisdiction)) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
13. The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
14. The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
15. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number

issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

16. Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
17. Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
18. In the case of remote gambling, the commencement or cessation of trading on website domains (including mobile sites or mobile device applications) or broadcast media through which the licensee provides gambling facilities (including domains covered by 'white label' arrangements). In this condition: 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - a. in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - b. a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Read additional guidance on the information requirements contained within this section.

¹Key events are to be reported to us online via the 'eServices' digital service on our website.

15.2.2 - Other reportable events

Applies to:

All operating licences

1. Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable)
 - b. any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
 - c. their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
 - d. any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002, or Part III of the Terrorism Act 2000, or any UK law by which those statutes are amended or superseded.

In this condition:

- a. 'group company' has the same meaning as in condition 15.2.1; and
- b. without prejudice to section 327 of the Gambling Act 2005, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

Read additional guidance on the information requirements contained within this section.

¹ Other reportable events are to be reported to us online via the 'eServices' digital service on our website.

15.3.1 - General and regulatory returns

Applies to:

All operating licences

1. On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.
2. In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.¹

Read additional guidance on the information requirements contained within this section.

¹ Regulatory returns are to be submitted to us online via the 'eServices' digital service on our website.

16.1.1 - Responsible placement of digital adverts

Applies to:

All licences

1 Licences must:

- a. Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b. take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c. ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

17.1.1 - Customer identity verification

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except any lottery licence the holder of which only provides facilities for participation in low frequency ^{[1](#1711-1)} or subscription lotteries, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo.

1. Licensees must obtain and verify information in order to establish the identity of a customer before that customer is permitted to gamble. Information must include, but is not restricted to, the customer's name, address and date of birth.
2. A request made by a customer to withdraw funds from their account must not result in a requirement for additional information to be supplied as a condition of withdrawal if the licensee could have reasonably requested that information earlier. This requirement does not prevent a licensee from seeking information on the customer which they must obtain at that time due to any other legal obligation.
3. Before permitting a customer to deposit funds, licensees should inform customers what types of identity documents or other information the licensee may need the customer to provide, the circumstances in which such information might be required, and the form and manner in which such information should be provided.
4. Licensees must take reasonable steps to ensure that the information they hold on a customer's identity remains accurate.

¹ A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw.

Ordinary code

These do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner.

Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

Social responsibility code

Compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution.

1.1.1 - Cooperation with the Commission

Ordinary code

Applies to:

All licences

1. As made plain in its Statement of principles for licensing and regulation, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

1.1.2 - Responsibility for third parties – all licences

Social responsibility code

Applies to:

All licences

1. Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
2. Licensees must ensure that the terms on which they contract with such third parties:
 - a. require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b. oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c. enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

1.1.3 - Responsibility for third parties – remote

Social responsibility code

Applies to:

All remote licences

1. Remote licensees must ensure in particular:
 - a. that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
 - i. include a term that any such user interface complies with the Commission's technical standards for remote gambling systems; and
 - ii. enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

2.1.2 - Anti-money laundering – other than casino

Ordinary code

Applies to:

All licences except casino licences

1. As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators). *

3.1.1 - Combating problem gambling

Social responsibility code

Applies to:

All licences

1. Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
2. Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2.5 - Bingo and FEC SR code

Social responsibility code

Applies to:

All non-remote bingo and family entertainment centre licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
 - a. checking the age of apparently underage customers
 - b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c. taking action when there are unlawful attempts to enter the adult-only areas.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b. the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
6. Licensees must only accept identification which:
 - a. contains a photograph from which the individual can be identified
 - b. states the individual's date of birth
 - c. is valid
 - d. is legible and has no visible signs of tampering or reproduction.
7. Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test

purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional guidance on the information requirements contained within this section.

3.2.6 - Bingo and FEC ordinary code

Ordinary code

Applies to:

All non-remote bingo and family entertainment centre licences

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
7. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website.

3.2.11 - Remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
2. Such procedures must include:
 - a. Verifying the age of a customer before the customer is able to:
 - i. deposit any funds into their account;
 - ii. access any free-to-play versions of gambling games that the licensee may make available; or
 - iii. gamble with the licensee using either their own money or any free bet or bonus.
 - b. warning potential customers that underage gambling is an offence;
 - c. regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
 - d. ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
 - e. enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

3.2.12 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

3.3.1 - Responsible gambling information

Social responsibility code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

1. Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
2. The information must cover:
 - a. any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b. timers or other forms of reminders or 'reality checks' where available
 - c. self-exclusion options
 - d. information about the availability of further help or advice.
3. The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
4. For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

3.3.2 - Foreign languages

Ordinary code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

1. Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a. the information on how to gamble responsibly and access to help referred to above
 - b. the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c. the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.3.4 - Remote time-out facility

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences

- 1 Licensees must offer a 'time out' facility for customers for the following durations:
 - a. 24 hours
 - b. one week
 - c. one month or
 - d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

3.4.1 - Premises-based customer interaction

Social responsibility code

Applies to:

All non-remote licences (except non-remote lottery, gaming machine technical, gambling software and host licences); only the following remote licences – ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote general betting limited, and remote betting intermediary (trading rooms only).

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a. identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b. interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
2. Licensees must take into account the Commission's guidance on customer interaction.

3.5.1 - Self exclusion – Non-remote and trading rooms SR code

Social responsibility code

Applies to:

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of those persons found in the gambling area or attempting to gamble from the premises.
7. Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.

8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

3.5.2 - Self-exclusion – non-remote ordinary code

Ordinary code

Applies to:

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.
7. Licensees should take steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.3 - Self-exclusion – remote SR code

Social responsibility code

Applies to:

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences. Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. a record of the card numbers to be excluded;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
7. Licensees must when administering the self-exclusion signpost the individual to counselling and support services.

8. Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

3.5.4 - Self-exclusion – Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
 - a. over the internet; this can be a box that must be ticked in order to indicate that they understand the system
 - b. by telephone; this can be a direct question asking whether they understand the system.
2. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
3. Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
4. Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
5. Licensees should take all reasonable steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
 - c. the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
 - d. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
 - e. at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
 - f. where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
 - g. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed

to accept such material.

6. The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
7. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
8. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.5 - Remote multi-operator SR code

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting, remote general betting (remote platform), remote betting intermediary (trading room only), remote general betting (limited), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences

1. Licensees must participate in the national multi-operator self-exclusion scheme.

3.5.6 - Multi-operator non-remote SR code

Social responsibility code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

1. Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

3.5.7 - Multi-operator non-remote ordinary code

Ordinary code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

1. Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6.2 - Bingo

Ordinary code

Applies to:

All non-remote bingo licences

1. Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
 - a. to employ them to provide facilities for playing bingo;
 - b. for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
 - c. to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a. children and young persons are never asked to perform tasks within 1a or 1b, above
 - b. all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:
 - a. children are not employed to work on bingo licensed premises at any time when the premises are open for business
 - b. neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

3.6.7 - Remote

Ordinary code

Applies to:

All remote licences, except remote lottery, remote pool betting, remote gaming machine technical, remote gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence to employ them to provide facilities for gambling.

3.8.2 - Money-lending – other than casinos

Ordinary code

Applies to:

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

1. Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

3.9.1 - Identification of individual customers - remote

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences) except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
2. Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
 - a. if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
 - b. all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
 - c. where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
 - d. individual financial limits can be implemented across all of a customer's accounts.
3. Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
4. A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof.

4.1.1 - Fair terms

Social responsibility code

Applies to:

All licences, except gaming machine technical and gambling software licences

1. Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

4.2.2 - Display of rules - bingo

Social responsibility code

Applies to:

All non-remote bingo licences

1. In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a. rules about each variant of bingo made available; and
 - b. rules about any prize gaming made available.

4.2.3 - Display of rules – remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must make the following available to customers:
 - a. a player's guide to each gambling opportunity (bet, game or lottery) made available by the operator; and
 - b. such additional information relating to the available gambling as the Commission shall from time to time publish to licensees: the current requirements are set out in the Commission's Remote gambling and software technical standards.

4.2.4 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Where practicable, the player's guide and additional information referred to in the social responsibility code 4.2.3 should be made available through the medium in which the remote gambling is to be conducted. Where that is not practicable, licensees should either:
 - a. send a copy of the guide and required additional information by post, fax or email; or
 - b. make these available to the customer in another medium to which he has access.

5.1.1 - Rewards and bonuses – SR code

Social responsibility code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

1. If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a. the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b. neither the receipt nor the value or amount of the benefit is:
 - i. dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii. altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c. if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d. if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
2. If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value', 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.

Licensees must take into account the Commission's guidance on high value customer incentives.

5.1.2 - Proportionate rewards

Ordinary code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

1. Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

5.1.3 - Alcoholic drinks

Social responsibility code

Applies to:

All non-remote bingo and casino licences

1. If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
2. Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

5.1.6 - Compliance with advertising codes

Social responsibility code

Applies to:

All licences, except lottery licences

1. All marketing of gambling products and services must be undertaken in a socially responsible manner.
2. In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
3. The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

5.1.8 - Compliance with industry advertising codes

Ordinary code

Applies to:

All licences

1. Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

5.1.9 - Other marketing requirements

Social responsibility code

Applies to:

All licences

1. Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
2. Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
3. The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

5.1.10 - Online marketing in proximity to information on responsible gambling

Ordinary code

Applies to:

All licences

1. Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

5.1.11 - Direct electronic marketing consent

Social responsibility code

Applies to:

All licences

1. Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6.1.1 - Complaints and disputes

Social responsibility code

Applies to:

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

1. Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
2. Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
3. The services of any such ADR entity must be free of charge to the customer.
4. Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
5. Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
6. Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
7. Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

- a. a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 and,
- b. whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

Read additional guidance on the information requirements contained within this section.

7.1.2 - Responsible gambling information for staff

Social responsibility code

Applies to:

All licences, including betting ancillary remote licences, but not other ancillary remote licences

1. Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8.1.1 - Ordinary code

Ordinary code

Applies to:

All licences

1. As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
2. Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a. any material change in the licensee's structure or the operation of its business
 - b. any material change in managerial responsibilities or governance arrangements
 - c. any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website.

² Events which must be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

9.1.2 - Bingo

Social responsibility code

Applies to:

All non-remote bingo operating licences

1. Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
2. Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
3. Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

10.1.1 - Assessing local risk

Social responsibility code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
2. Licensees must review (and update as necessary) their local risk assessments:
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

¹This is the statement of licensing policy under the Gambling Act 2005.

10.1.2 - Sharing local risk assessments

Ordinary code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Highlighted Extracts of the Gambling Commission's Guidance to Licensing Authorities

Other provisions and legislation

- 4.7** Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's *Licence Conditions and Codes of Practice* (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.
- 4.8** Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the Environmental Protection Act 1990.

Licensing authority decisions

- 4.9** S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:
- a. in accordance with any relevant code of practice under s.24
 - b. in accordance with any relevant guidance issued by the Commission under s.25
 - c. reasonably consistent with the licensing objectives (subject to a and b above)
 - d. in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a to c above).
- 4.10** Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the Guidance contained in this document, any relevant Commission code of practice the licensing authority's own statement of policy or were reasonably consistent with the licensing objectives.

Delegations

- 4.11** The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.
- 4.12** It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise to a risk of judicial review challenge, particularly on the basis of appearance of bias.
- 4.13** The tables at Appendix G set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

Part 5: Principles to be applied by licensing authorities

Licensing objectives

- 5.1 In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - ensuring that gambling is conducted in a fair and open way
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.

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

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

- 5.3 Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.
- 5.4 A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its statement of licensing policy
 - receiving relevant representations to an application
 - dealing with applications as a responsible authority in its own right
 - considering applications before it.
- 5.5 In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.
- 5.6 Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.
- 5.7 Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

- 5.8** In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.
- 5.9** There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations⁵.
- 5.10** Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

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

- 5.11** Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.
- 5.12** In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this Guidance.

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

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

⁵ For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers

- 5.14** Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.
- 5.15** If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.
- 5.16** In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the [Licence Conditions and Codes of Practice](#) (LCCP) In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this Guidance.
- 5.17** The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.
- 5.18** Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's statement of policy. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

S.153 principles

- 5.19** S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:
- a. in accordance with any relevant code of practice under s.24 (ie the LCCP)
 - b. in accordance with any relevant guidance issued by the Commission under s.25 (ie this Guidance)
 - c. reasonably consistent with the licensing objectives (subject to a and b above), and
 - d. in accordance with the licensing authority's statement of licensing policy (subject to a to c above).
- 5.20** Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.
- 5.21** In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this Guidance, and its own statement of policy or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this Guidance take precedence.

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

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

5.24 The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

Codes of Practice

5.25 The LCCP sets out the Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within Part II of the LCCP.

5.26 To assist licensing authorities in determining premises applications and inspecting premises, [all the codes of practice](#) are also available as a single document. The codes specify a number of requirements, many of which relate to social responsibility issues and these may be of particular interest where a licensing authority has concern about matters such as protection of the young and vulnerable. It should be noted that the codes also apply to situations in which the gambling being offered is not normally the responsibility of an operating licence holder. Examples include the *Code of practice for equal chance gaming* and the *Code for gaming machines in clubs and premises with an alcohol licence*.

Good practice in regulation

5.27 Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation⁶ in the exercise of the function. These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code⁷. The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.

5.28 The statutory principles of good regulation and the Regulators' Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act⁸.

⁶ Legislative and Regulatory Reform Act 2006, section 21

⁷ Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006

⁸ The Legislative and Regulatory Reform (Regulatory Functions) Order 2007, was amended by the Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2009, which, amongst other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the Gambling Act 2005 - see Parts 3 and 7

5.29 Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Regulators' Code, for example in developing their Compliance and Enforcement Policy⁹, and in delivering risk-based regulation in relation to age restrictions¹⁰.

Human Rights Act 1998

- 5.30** The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing authorities should bear in mind that they are subject to the Human Rights Act 1998 and in particular:
- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
 - Article 6 – right to a fair hearing
 - Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
 - Article 10 – right to freedom of expression.

Other considerations

- 5.31** Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 5.32** In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.
- 5.33** Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.
- 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).

⁹ *Template: Compliance and Enforcement Policy*, Better Regulation Delivery Office. This template policy was developed by the Local Better Regulation Office, with local authorities, to assist local authorities in developing a policy that is in line with the requirements of the Regulators' Compliance Code, or to review their existing policy. It is available on the BRDO website at <http://www.bis.gov.uk/brdo/resources/risk-based-regulation/compliance-policy>

¹⁰ *Age restricted products and services framework / updated April 2014* sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the *Age restricted products and services: a code of practice for regulatory delivery / updated April 2014*

- 7.50** A licence application, and any licence subsequently issued, is not valid if the relevant notifications have not been made.

Application for Premises Variation (s.187): ‘material change’

- 7.51** Previous guidance from the Department for Culture, Media and Sport (DCMS) and the Commission has been that an application for a variation will only be required where there are material changes to the layout of the premises. What constitutes a material change will be a matter for local determination but it is expected that a common sense approach will be adopted. When considering an application for variations, the licensing authority will have regard to the principles to be applied as set out in s.153 of the Act.

Representations

- 7.52** In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as ‘responsible authorities’ and ‘interested parties’. Representations from other parties are inadmissible. Further information on these categories can be found in Part 8 of this Guidance.
- 7.53** Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority’s statement of policy, or the Commission’s Guidance or Codes of Practice, are likely to be relevant.
- 7.54** The licensing authority will also need to consider if representations are ‘frivolous’ or ‘vexatious’. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:
- who is making the representation, and whether there is a history of making representations that are not relevant
 - whether it raises a ‘relevant’ issue
 - whether it raises issues specifically to do with the premises that are the subject of the application.
- 7.55** The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission’s approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

Making a decision

- 7.56** As explained earlier, the licensing authority’s primary obligation under s.153(1) is to permit the use of premises in so far as it thinks that to do so is:
- a. in accordance with any relevant code of practice issued by the Commission
 - b. in accordance with any relevant guidance issued by the Commission
 - c. reasonably consistent with the licensing objectives (subject to a. and b. above), and
 - d. in accordance with the licensing authority’s statement of licensing policy (statement of policy) (subject to a. to c. above).

- 7.57** Further information and guidance as to the meaning and effect of s.153 is set out at paragraph 5.19 above.

- 9.28** Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 9.29** Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.
- 9.30** Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.
- 9.31** Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:
- relevant to the need to make the proposed building suitable as a gambling facility
 - directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
 - fairly and reasonably related to the scale and type of premises
 - reasonable in all other respects.

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

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

**Extracts from Hansard Parliamentary
Debate discussing the inclusion of the
prevention of public nuisance as a
Licensing Objective**

Hansard Extract

On 9 November 2004 (Standing Committee B) there was a debate in the House of Commons over whether to amend the Licensing Objectives to include "the prevention of public nuisance.) Below are the relevant paragraphs from Hansard.

The amendment was withdrawn. The following are material extracts from Hansard:

Column Number: 012

Mr Foster - Amendment to include prevention of public nuisance in Licensing Objectives:

Why is it important that we deal with that in the objectives? The answer is simple. As the Bill stands, the local authority is unable to take account of effects that may occur not in a new casino or on gambling premises, but further afield, outside those premises. It is crucial that local authorities have the opportunity to do so. Indeed, the Local Government Association said when it wrote to all Members about the Second Reading debate that the prevention of public nuisance should be a licensing objective:

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Column Number: 037

The Minister for Sport and Tourism *Mr Richard Caborn, addressing the amendment*

Some gambling premises (casinos and bingo clubs) are allowed to serve alcohol to their customers, and the Bill will not stop that happening. Their entitlement does not spring from gambling laws: as one or two of my hon. Friends have said, it comes from the licensing law itself. Casinos and bingo clubs in England and Wales get their entitlement from the Licensing Act 1964. However, by the time the Bill is on the statute book, the Licensing Act 2003 will have come into force. The equivalent licensing laws govern casinos and bingo clubs in Scotland. The 2003 Act includes the prevention of public nuisance as a licensing objective, understandably so given the unfortunate connection between excess alcohol intake and bad behaviour. That was referred to by a number of hon. Members this morning.

The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and antisocial conduct, particularly at night. That has been referred to in connection with Guildford. Accordingly, it will be open to licensing authorities, when considering applications for casinos and bingo halls to be licensed premises under the 2003 Act, to take account of the public-nuisance risk just as they do when considering any other application. If any casino were to put its alcohol licence at risk by allowing public nuisance, it would almost certainly put its continued existence and its licence at risk. Therefore, it is unnecessary in the case of casinos and bingo clubs to duplicate provisions that are already in licensing law.

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the

law on noise and other nuisance. There is no well-established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate, I am not expressing a Government view on this, the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.

<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/pm/41109s02.htm>
<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/am/41109s03.htm>

**Extracts of Paterson's Licensing Acts
2020: Part 8 Para 5.158 – Premises
Licences**

⁶ Standing Committee B, Thursday, 2nd December 2004 (Afternoon) Col 359.

Determination of application

[5.158]

In determining an application the licensing authority must hold a hearing¹ if:

- representations have been made by an interested party or responsible authority and have not been withdrawn;
- the authority intend to use their discretion under s 169(1) to attach a condition to a licence; or
- the authority intend to use their discretion under s 169 to exclude a default condition (ie a condition automatically attached to the licence under s 168 unless excluded by the authority in its discretion)².

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course³, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application⁴. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations⁵, presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence⁶ the authority cannot determine the application until the relevant operating licence has been issued⁷.

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it⁸. In making that determination the licensing authority will be subject to the provisions of s 153 which sets out the principles to be applied by the authority in exercising all their functions under Part 8 GA 2005 (ie including, but not limited to, the grant or refusal of an application for a premises licence). Section 153(1) provides as follows:

“In exercising their functions under this Part a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it—

- (a) in accordance with any relevant code of practice under s 24,
- (b) in accordance with any relevant guidance issued by the Commission under s 25,
- (c) reasonably consistent with the licensing objectives (subject to paras (a) and (b)), and
- (d) in accordance with the statement published by the authority under s 349 (subject to paras (a) to (c)).”

The subsection starts by imposing a general duty on the authority to ‘aim to permit the use of premises for gambling’ and then sets out a series of four factors which may, in any individual case, qualify or override the general duty. The first point to note is that the provision imposes a duty on the licensing authority: it must, subject to the qualifying factors, aim to permit the use of premises for gambling. What is the scope of this duty? It is suggested that there are two elements: first, it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb ‘to aim’ is defined by the *OED*⁹ as meaning: ‘5. To calculate one’s course with a view to arriving (at a point); to direct one’s course, to make it one’s object to attain. Hence fig To have it as an object, to endeavour earnestly’. The *Shorter OED*¹⁰ defines it as: ‘3. Direct one’s course, make it one’s object to attain, intend, try’. A person who ‘aims’ to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling. The most obvious way in which the authority will be able to exercise their powers in this way will be by an imaginative use of their power to frame and impose conditions (see para 5.159 below) so as to overcome objections to the application which might, in the absence of suitable conditions, lead to the application being rejected. No doubt the authority could also, in a case where a licence application gave rise to issues which could not be addressed by suitably drafted conditions, seek to consider with the applicant whether amendments to the application might overcome the objections and enable it to be granted. However, it is also necessary to recognise that the language of s 153(1) stops short of being mandatory; ‘aim to permit’ provides a strong steer to look favourably on an application, but no more.

As to the list of qualifying factors, these are set out in s 153(1)(a)–(d). Section 153(1)(a) qualifies the duty to aim to permit use of premises for gambling to the extent that such use must be in accordance with any relevant code of practice issued by the Gambling Commission under s 24. That section requires the Gambling Commission to issue codes of practice about the manner in which facilities for gambling are to be provided (whether by the holder of a licence or by another person). In issuing a code of practice the Gambling Commission will be subject to a duty under s 22 to promote the licensing objectives. Accordingly any code of practice should be consistent with those objectives. Section 153(1)(b) qualifies the licensing authority’s duty to aim to permit the use of premises for gambling to the extent that such use must be in accordance with any relevant guidance issued by the Gambling

Section 1 Commentary

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Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities¹¹ as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)-(d).

Next comes s 153(1)(c): this provides that the duty of the licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be reasonably consistent with the licensing objectives, but it goes on to provide that this condition is 'subject to paras (a) and (b)'. In principle there should, of course, be no conflict between (a) and (b) (which will both reflect the Gambling Commission's duty to promote the licensing objectives) and (c) (which will reflect the licensing authority's view of what the licensing objectives require). However the effect of the legislation appears to be that should there be any conflict between the two then the guidance set out in codes of practice or guidance emanating from the Gambling Commission will 'trump' any factors which the licensing authority themselves would otherwise have taken into account as relevant to the licensing objectives under s 153(1)(c).

Finally, s 153(1)(d) provides that the duty of a licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be in accordance with the authority's own statement issued under s 349. In preparing that statement the authority are not themselves expressly required to have regard to the licensing objectives, but they are obliged to have regard to guidance issued by the Gambling Commission under s 25 and such guidance deals, amongst other things, with the formulation by the authority of their licensing policy (see para AM5.6655). Since the s 25 guidance must itself promote the licensing objectives the effect should be that the authority's licensing policy will itself be consistent with those objectives so that it should not conflict with any code of practice or guidance issued by the Commission nor with the licensing objectives themselves. However, s 153(1)(d) provides that consideration of the licensing authority's own policy is 'subject to paras (a) to (c)' which appears to mean that in the case of an inconsistency a relevant Commission code of practice, relevant guidance or the licensing objectives themselves would 'trump' the authority's licensing policy.

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide¹², nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval¹³. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected¹⁴.

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC¹⁵ and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition¹⁶ they must give their reasons¹⁷. If representations were made by an interested party or a responsible authority they must give their response to the representations¹⁸.

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant¹⁸. The notice must give the authority's reasons for rejecting the application¹⁹.

¹ As to procedure at hearings in relation to applications see SI 2007/173.

² GA 2005, s 162. See further para 5.159 below.

³ GA 2005, s 162.

⁴ GA 2005, s 162(3).

⁵ GA 2005, s 162(4).

⁶ Ie under GA 2005, s 159(3)(b).

⁷ GA 2005, s 163(2).

⁸ GA 2005, s 163(1).

⁹ *The Oxford English Dictionary* (2nd edn, 1989).

¹⁰ (5th Edn, OUP).

**The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007: Schedule 2
Part 1 – Conditions attaching to bingo premises licences**

SCHEDULE 2

Regulations 10 and 11

Conditions attaching to bingo premises licences

PART 1

Mandatory conditions attaching to bingo premises licences

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

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

- (a) a casino premises licence;
- (b) an adult gaming centre premises licence;
- (c) a betting premises licence other than a track premises licence; and

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

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

- (a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;
- (b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and
- (c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

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

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

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

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

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

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

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

- (c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.
 - (4) The notice may be displayed in electronic form.
 - (5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.
- 5.—**(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.
- (2) The condition in sub-paragraph (1) may be satisfied by—
 - (a) displaying a sign setting out the rules,
 - (b) making available leaflets or other written material containing the rules, or
 - (c) running an audio-visual guide to the rules prior to any bingo game being commenced.
- 6.** Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

PART 2

Default conditions attaching to bingo premises licences

1. Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
2. The condition in paragraph 1 shall not apply to making gaming machines available for use.