<u>Meeting</u>

Licensing Sub-Committee

Date and time

Thursday 28th September, 2023

At 10.30 am

Venue

Committee Room 3, Hendon Town Hall, The Burroughs, London NW4 4BQ

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 Licensing Manager - Merkur Slots, 48 Ballards Lane Finchley London N3 2BX	3 - 18

Governance Service governanceservice@barnet.gov.uk







Merkur Slots, 48 Ballards Lane, Finchley, London, N3 2BX

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	48 Ballards Lane, Finchley, London, N3 2BX
Local Authority:	London Borough of Barnet
Premise Licence No:	GABNG1/20/63022 – Bingo Premises
Operator Licence No:	000-003266-N-103444-028 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, (formerly Cashino Gaming LTD) 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
Name and Title of Assessor:	Karolina White - Internal Compliance Auditor. Amanda Kiernan – Head of Compliance
Date of Assessment:	25/3/2022
Review Date:	Annually on Compliance Audit Visit

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots is located on a corner position of Ballards Lane (A598) with a side street - which has CCTV coverage - Redbourne Avenue on one side. N3 1XP is a mixed residential and non-residential postcode in Barnet. This is predominantly a high street type location containing banks, retail shops, restaurants, cafes and takeaways.
Establishments of note:	Along Ballards Lane there are four Betting Shops, Betfred, Corals, William Hill and Paddy Power and Cash Converters.
Adjoining premises:	On the right is Sanatander Bank Barclays Bank and Vintage Wealth Management is located on the opposite side of Redbourne Avenue.
Crime statistics:	During December 2022 98 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were 22 Violence and sexual offences, 19 Anti-social behaviour, 13 Drug crimes, 11 Vehicle crime, 11 Burglary, 11 Shoplifting, 8 Criminal damage & arson and 5 Public order offences. (streetcheck.uk)
Population:	43% of households are employed in Health and Social Work and Accommodation and Food roles. 54% of the areas population are male which is lower than the UK average of 46%. The majority of the population are in the age bracket 30-44 and the majority 56% are single. (streetcheck.uk)
Culture:	The area is considered to be more ethnically diverse than the UK average with 56% classed as White, UK average 86%, Other Asian (12%), Indian (10%), Other (8%), Mixed Ethnicity (5%), Black African 3%), Pakistani (2%), Black Caribbean (2%), Chinese (2%) and Bangladeshi (1%). (streetcheck.uk)
Unemployment:	43% of the area are in full-time employment, 9% part time and 19% are self-employed. The majority of those employed work in Health and Social Work, Accommodation & Food. (streetcheck.uk)
Deprivation:	Overall deprivation in Ballards Lane Finchley better than 61% of areas in England, Income deprivation is better than 52% of areas in England, Employment Deprivation is better than 79% of areas in England, Health Deprivation is better than 83% of areas in England, Education Deprivation is better than 95% of areas in England, Barriers to Services Deprivation is better than 29% of areas in England, Living Environment Deprivation is better than 18% of areas in England, Crime Deprivation is better than 33% of areas in England. (UK local Area.com)
Local Police:	Ballards Lane, Barnet, London, N3 2BX is within the West Finchley policing neighbourhood, under the Metropolitan Police Service force area. Metropolitan Police, 1069 Finchley Road, London, NW11 0PU.
Incidents reported by venue:	During the previous 12 months the venue have recorded 35 incidents, only 2 of which required police attendance: 20 related to aggressive behaviour; 7 in regard to barred persons; 4 relating to disturbances outside the premise; and 4 relating to alcohol. The premise operates a policy of banning any customers who engage in crime, disorder or anti–social behaviour within or outside the premise.
Independent Security Reviews	MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area. Key comments from the reports include: '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 do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.' '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'. 'The presence of MERKUR Slots 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'.

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 Statement of Gambling Principles 2019–2022, reference 10.12 Bingo Centres and Barnet Borough Council Borough Profile 2011.

Environmental Factors

In preparing this assessment Merkur Casino 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	Unemployment:	Age Verification
and other vulnerable	43% of the area are in full-time employment, 9% part time and	Ensuring Under 18's do not have access to licensed premises
people from being	19% are self-employed. The majority of those employed work in	
harmed or exploited	Health and Social Work, Accommodation & Food. (streetcheck.uk)	All Merkur Slots venues are strictly adult only (over 18's only).
by gambling		
	Deprivation:	Gambling is an age restricted product and Merkur Casino operates a 'Think
	Overall deprivation in Ballards Lane Finchley better than 61% of	25' policy.
	areas in England, Income deprivation is better than 52% of areas in England, Employment Deprivation is better than 79% of areas	Age verification is embedded in training platforms and responsible gambling
	in England, Health Deprivation is better than 83% of areas in	policies.
	England, Education Deprivation is better than 95% of areas in	policies.
	England, Barriers to Services Deprivation is better than 29% of	Over 18's notices are displayed on the entrance.
	areas in England, Living Environment Deprivation is better than	, , , , , , , , , , , , , , , , , , ,
	18% of areas in England, Crime Deprivation is better than 33% of	Think 25 advertising is prominently displayed throughout the premise.
	areas in England. (UK local Area.com)	
		Merkur Slots Ballards Lane Premise frontage is of a style which obscures the
	Schools and Education	interior with no advertising depicting images that may appeal to children.
	St Mary's CofE Primary School, Dollis Park, N3 1BT	
	Pardes House Primary School, Hendon Lane, Middlesex, N3 1SA	Marketing and Promotional activity complies with LCCP and standards set by
	Manorside Primary School, Squires Lane, N3 2AB	the Committee of Advertising Practice (CAP) and the Broadcast Committee
	Moss Hall Junior School, 187 Nether Street, N3 1NR Moss Hall Infant School, Moss Hall Grove, N12 8PE	of Advertising Practice (BCAP).
	Christ's College Finchley, East End Road, N2 0SE	Merkur Slots operate a comprehensive Think 25 Policy, age verification
	Bishop Douglass School Finchley, Hamilton Road, N2 OSQ	checks are carried out and recorded, any person unable or unwilling to verify
	St Michael's Catholic Grammar School, Nether Street, N12 7NJ	their age with appropriate ID will be told to leave, if they have managed to
	Hasmonean High School, Holders Hill Road, Hendon, NW4 1NA	play machines, their staked money will be returned to them.
	Wren Academy, Hilton Avenue, N12 9HB	
	The Archer Academy, Eagans Close, N2 8GA N2 0GA	Age verification test purchasing, and mystery shopper visits are frequently
	The Compton School, Summers Lane, N12 0QG	carried out by 3rd party companies - Check Policy and Store Checker. Age

Finchley Catholic High School, Woodside Lane, N12 8TA The Henrietta Barnett School, Central Square, Hampstead Garden Suburb, NW11 7BN

Hendon School, Golders Rise, Hendon, NW4 2HP Lexis School of English, 69 Ballards Lane, N3 1XT Explore Learning, 167-169 Ballards Ln, N3 1LP St Theresa's Catholic Primary School, E End Rd, N3 2TD Nacel English School, Sovereign House, 1 Albert Place, N3 1QB

Community Centres and Youth Centres

The nearest Youth facility, The Finchley Youth Activity Centre, 142 High Road, East Finchley, N2 9ED is 1.7 mile away.

Parks, playgrounds and sports/leisure facilities

Victoria Park, 62 Long Lane, N3 2PX.
The Park, 19 Gordon Road, London, N3 1EL.
Dollis Valley Greenwalk, N3 1RN.
Wilf Slack Sports Ground, E End Rd, London N3 2LE.
Finchley Lido Leisure Centre, Great North Leisure Park, Chaplin Square, N12 0GL.

Vulnerable and addiction support services

North London Hospice, 15 Ballards Lane, N3 1UX

Homeless shelters and food banks

Homeless Action in Barnet, 36b Woodhouse Road, North Finchley, N12 ORG.

Pawnbrokers and Loan Shops

Cash Converters, 62 Ballards Lane, N3 2BU.

Medical Centres, Care Homes and Mental Health facilities

Lichfield Grove Surgery, 64 Lichfield Grove, N3 2JP Supreme Medical Centre, 300 Regents Park Road, N3 2JX Finchley Memorial Hospital, Granville Road, N12 0JE Rosemary Medical Centre, 2 Rosemary Ave, N3 2QN.

Gambling premises

Betfred, 34 Ballards Lane, N3 2HB William Hill, 36 Ballards Lane, N3 2BJ Coral Bookmakers, 67 Ballards Lane, N3 1XP Paddy Power, 76 Ballards Lane, N3 2BU

Public Houses and Alcohol Licensed Premise

The area is known to have a busy nightlife with a high number of pubs, wine bars and licensed premises.
The Coconut Tree, 5 Ballards Lane, N3 1UX
Dignity (Taylors of Finchley), 363 Regents Park Road, N3 1DH
Ahir Lorenzos, 298 Nether Street, N3 1RJ
The Central Pub, 5 Ballards Lane, N3 1UX
Olivers Wine Bar, 168 Ballards Lane, N3 2PA

verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.

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.

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.

Results of age verification checks and third-party results are shared with the Gambling Commission.

Proof of Age scheme in place with application forms available in the venue.

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.

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

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.

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).

All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.

The Catcher in the Rye, 317, Regents Park Rd, N3 1DP The Joiners Arms, 51 Ballards Lane, N3 1XP The Innisfree, 85, Ballards Lane, N3 1XT The Queens Head, 248, Regents Park Rd, N3 3HN Winter's, 168, Ballards Lane, N3 2PA Red Filly, 3, Thornfield Parade, Holders Hill Rd, NW7 1LN The Dick Turpin, 383 Long Lane, N2 8JW Elephant Inn. 283. Ballard's Lane. N12 8NR The Mill. Holders Hill Road. Mill Hill East. NW7 1DN Erris Tavern, 359 Ballards Lane, N12 8LJ The Railway Engineer, 1, Sanders Lane, Mill Hill, NW7 1BJ Finchley United Services Club, 307 Ballards Lane, N12 8LY The Tally Ho. 749 High Road, N12 OBP Autumn House, 744 High Rd, N12 9QG Malt and Hops, 91 High Road, N12 8QA The Torrington House, 4 Lodge Lane, N12 8PR. The Old White Lion, The Causeway, Barnet N2 ONW The Windsor Castle Pub, The Walks, N2 8DL The Finchley Tavern, 686 High Road, N12 9PT.

Residential Areas

Classification for the area containing N3 2BX is Ethnicity Central – Aspirational Techies – New EU Tech Workers. The most common recorded business type is Bank. The area containing Ballards Lane, Barnet, London contains higher than average level of rented housing from private Landlord (excluding social housing) – 75% of household spaces. Housing types are mostly flats 50% and 40,6% Residence in commercial Buildings.

Bus stops and other Transport links

Finchley Central underground station is 0.1 mile away West Finchley underground station is 0.5 mile away Mill Hill East underground station is 0.9 mile away Bus stop located opposite the venue in front of Tesco.

Locally Identified Premises

Regular Festivals and Town Events/Mass Gatherings

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.

Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enabled an informed choice and take a risk-based approach to harm minimization.

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 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.

Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling. Socially Responsible messaging is implemented on all digital B3 and Cat C machines.

All machines display Gamble Responsibly stickers with helpline contact details.

Senior Management are members of the BACTA Divisional and Socially Responsible Committees and Bingo Association Executive 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.

The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls where received from people within the on-line sector.

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

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.

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.

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.

Staff are trained how to manage situations with homeless people seeking refuge.

A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.

MERKUR staff are aware of where rough sleepers sleep and beggars loiter in the local area and actively prevent them from entering the premise, including close monitoring of individuals spending coins/low level amounts on a frequent basis.

Should loitering increase due to extended hours additional notices will be added about loitering without play not being tolerated.

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

Crime statistics:

During December 2022 98 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were 22 Violence and sexual offences, 19 Anti-social behaviour, 13 Drug crimes, 11 Vehicle crime, 11 Burglary, 11 Shoplifting, 8 Criminal damage & arson and 5 Public order offences. (streetcheck.uk)

During the previous 12 months the venue have recorded 35 incidents, only 2 of which required police attendance: 20 related to aggressive behaviour; 7 in regard to barred persons; 4 relating to disturbances outside the premise; and 4 relating to alcohol. The premise operates a policy of banning any customers who engage in crime, disorder or anti-social behaviour within or outside the premise.

Local Police:

Ballards Lane, Barnet, London, N3 2BX is within the West Finchley policing neighbourhood, under the Metropolitan Police Service force area, 1069 Finchley Road, London, NW11 0PU.

Public Houses and Alcohol Licensed Premise

The Coconut Tree, 5 Ballards Lane, N3 1UX Dignity (Taylors of Finchley), 363 Regents Park Road, N3 1DH Ahir Lorenzos, 298 Nether Street, N3 1RJ The Central Pub, 5 Ballards Lane, N3 1UX Olivers Wine Bar, 168 Ballards Lane, N3 2PA The Catcher in the Rye, 317, Regents Park Rd, N3 1DP The Joiners Arms, 51 Ballards Lane, N3 1XP The Innisfree, 85, Ballards Lane, N3 1XT The Queens Head, 248, Regents Park Rd, N3 3HN Winter's, 168, Ballards Lane, N3 2PA Red Filly, 3, Thornfield Parade, Holders Hill Rd, NW7 1LN The Dick Turpin, 383 Long Lane, N2 8JW Elephant Inn, 283, Ballard's Lane, N12 8NR The Mill. Holders Hill Road. Mill Hill East. NW7 1DN Erris Tavern, 359 Ballards Lane, N12 8LJ The Railway Engineer, 1, Sanders Lane, Mill Hill, NW7 1BJ Finchley United Services Club, 307 Ballards Lane, N12 8LY The Tally Ho, 749 High Road, N12 OBP Autumn House, 744 High Rd, N12 90G Malt and Hops, 91 High Road, N12 80A The Torrington House, 4 Lodge Lane, N12 8PR. The Old White Lion, The Causeway, Barnet N2 ONW The Windsor Castle Pub, The Walks, N2 8DL The Finchley Tavern, 686 High Road, N12 9PT.

Pawnbrokers and Loan Shops

Cash Converters, 62 Ballards Lane, N3 2BU.

Premise Security and violence in the workplace

Poor security control measures which may increase vulnerability to crime Failure to protect employee and customers from harm during the hours of late-night opening

Merkur Slots Ballards Lane is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.

Merkur Slots Ballards Lane is 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.

Floor layout is 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.

General Crime and Disorder

To identify aggressive customers to prevent crime and disorder Awareness of local crime issues in the local area

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.

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.

All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.

Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.

Staff are trained on robbery awareness and cash handling.

The company operate an internal security alert system and are registered with trade associations for crime bulletins (BACTA and Association).

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.

Gambling premises

Betfred, 34 Ballards Lane, N3 2HB William Hill, 36 Ballards Lane, N3 2BJ Coral Bookmakers, 67 Ballards Lane, N3 1XP Paddy Power, 76 Ballards Lane, N3 2BU

Local/town centre scheme - membership

Merkur Slots Ballards Lane participates 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.

Anti-social behaviour outside the premise

Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

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

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.

Should there be an increase in people congregating outside the premise due to extended trading hours, appropriate signage will be displayed to deter people from loitering.

Additional signage 'leave quietly' signage will be added to advise customers to respect local residents.

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.

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 10pm until 6am.

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

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

Merkur Slots Ballards Lane operates TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.

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

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

Operating 24hrs removes the risk of venue staff opening and closing the venue. MERKUR operate a 'refresh period' in all 24hr venues that allows for any cash empties and refills to take place when the venues is closed to the public.

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

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

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

Alcohol and Drugs

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

'No Alcohol Allowed' signage on the door.

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

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

Customer toilets remain locked with access managed by staff.

Regular toilet checks conducted for evidence of drug taking.

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.

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

Money Lending

Money lending is not tolerated within our premises.

Suspicions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.

Late Night Operation

Maglock systems are available for staff to deploy at any point in time to protect against crime or disorder and are always deployed during times of public houses closing.

Dedicated Regional Night Managers are employed to support venues with security incidents.

Area Manager's operate a late night rota system to ensure the 'late night contact number' is monitored so venues always have an Operational Manager to call upon for support with any issues during late night operation.

Ensuring that gambling is conducted in a fair and open way

Gaming Machine and Supervision

The premise operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).

Bingo is available by means of Bingo tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.

Customer Complaints

Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.

Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.

The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.

Complaints portal used to collate and manage responses.
4 stage complaints procedure with ADR entity Independent Betting
Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained
and encouraged to use positive discretion to resolve customer complaints in
venue.

Marketing

Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, opening times and promotional activity.

All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.

Other

Places of worship and Religious Buildings

Masorti Judaism, 3 Shakespeare Rd, N3 1XE
St Margaret's URC Church, Victoria Ave, N3 1BD
St Mary's Hall, 26 Hendon Lane, Finchley, N3 1RT
Catholic Church of St. Philip The Apostle, Gravel Hill, N3 3RJ
Church End Baptist Church, 1 Stanhope Ave, N3 3LX
North London Iranian Church, 50 Long Lane, London N3 2PU
St Paul's Finchley, Church of England, 50 Long Ln, N3 2PU
Eco Synagogue, 80 E End Rd, London N3 2SY
New North London Synagogue, 80 E End Rd, London N3 2SY
Reform Synagogue of Great Britain, 80 E End Rd, N3 2SY
Saint Luke's Church of England, Montgomery Court, 66 Mountfield
Rd. N3 3NP.

Ethnicity and Local Area Demographic

Merkur Slots does not discriminate on the ground of ethnic or social demographic.

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.

Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.

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.

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.

Merkur Casino have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.

Merkur Casino work with YGAM (Young Gamers and Gamblers Education Trust) and Betknowmore to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.

There is a National Training Centre and a dedicated Learning and Development Team.

Gamcare Accredited training completed by members of management.

All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.

Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.

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 annually.

Premise level:	The venue is a ground floor premise, ancillary space above (Yoga Studio)
Premise frontage:	Merkur Slots Ballards Lane is a property is 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:	Merkur Slots Ballards Lane floor layout is of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons. The central service area serves as the main support area for staff to manage the venue without having to leave the floor: - TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with duress code facility and build 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 Ballards Lane floor layout is 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 regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets are located in prominent locations within the premise.
Machine Positions:	Merkur Slots Ballards Lane operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p). Bingo is 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.
Hidden Areas:	Merkur Slots Ballards Lane is fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV is clearly advertised to customers with screens visible by employees when working in the service area.

The venue manager is Idalberto Branca who is experienced in the Gambling Industry and familiar with Gambling Compliance and supporting with people who may be vulnerable, possibly at risk of having a problem with their gambling and may need interaction. Idalberto is aware of the need to support and train their team in Compliance and is happy to seek guidance should they need further help.

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

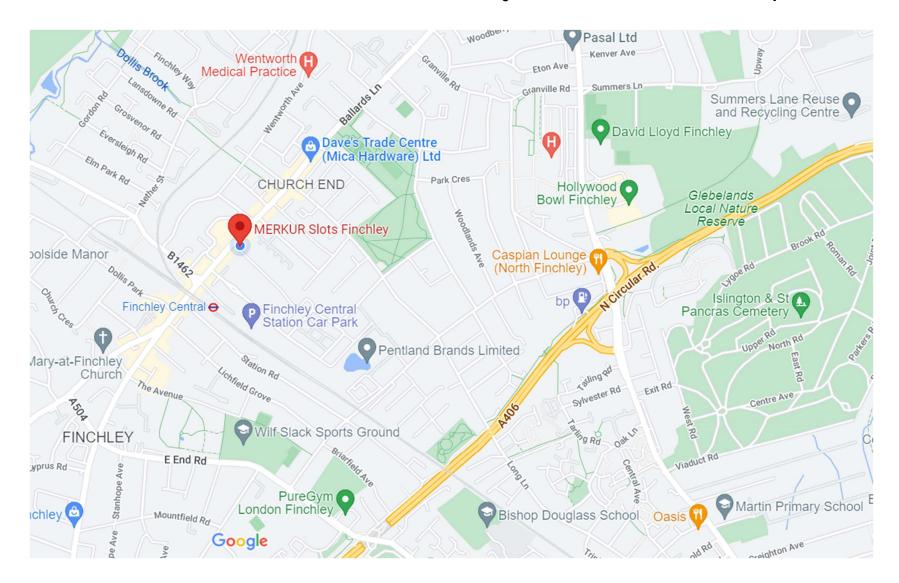
I am an IIA Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk based customer facing environments within various industries. The last 10 years I have been working solely in the Gambling Industry (Amanda Kiernan, Head of Compliance).

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

Assessors Name:	Amanda Kiernan
Signature:	L
Date:	25/3/2022

Merkur Slots, 48 Ballards Lane, Finchley, London, N3 2BX map:



Merkur Slots, 48 Ballards Lane, Finchley, London, N3 2BX:

