

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

**LICENSING SUB-COMMITTEE HEARING**

**10 OCTOBER 2022**

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**BARNET COUNCIL**

**LICENSING SUB-COMMITTEE**

**25<sup>TH</sup> OCTOBER 2022**

**APPLICATION FOR BINGO PREMISES LICENCE**

**118 HIGH STREET, BARNET EN5 5XQ**

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**SKELETON ARGUMENT ON BEHALF OF APPLICANT**

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**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 648<sup>1</sup>). 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.

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<sup>1</sup> 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.<sup>2</sup>**
- **None of its trading licence has ever been reviewed.<sup>3</sup>**

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)).*

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

<sup>3</sup> 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**  
**12<sup>th</sup> 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.

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## LICENSING SUB - COMMITTEE HEARING – 25 OCTOBER 2022

### SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

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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 5<sup>th</sup> January 2022.
13. The local Police Licensing Team confirmed on the 6<sup>th</sup> 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

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SUPPLEMENTAL STATEMENT – STEVE AMBROSE

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

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**LICENSING SUB-COMMITTEE HEARING – 25 OCTOBER 2022**

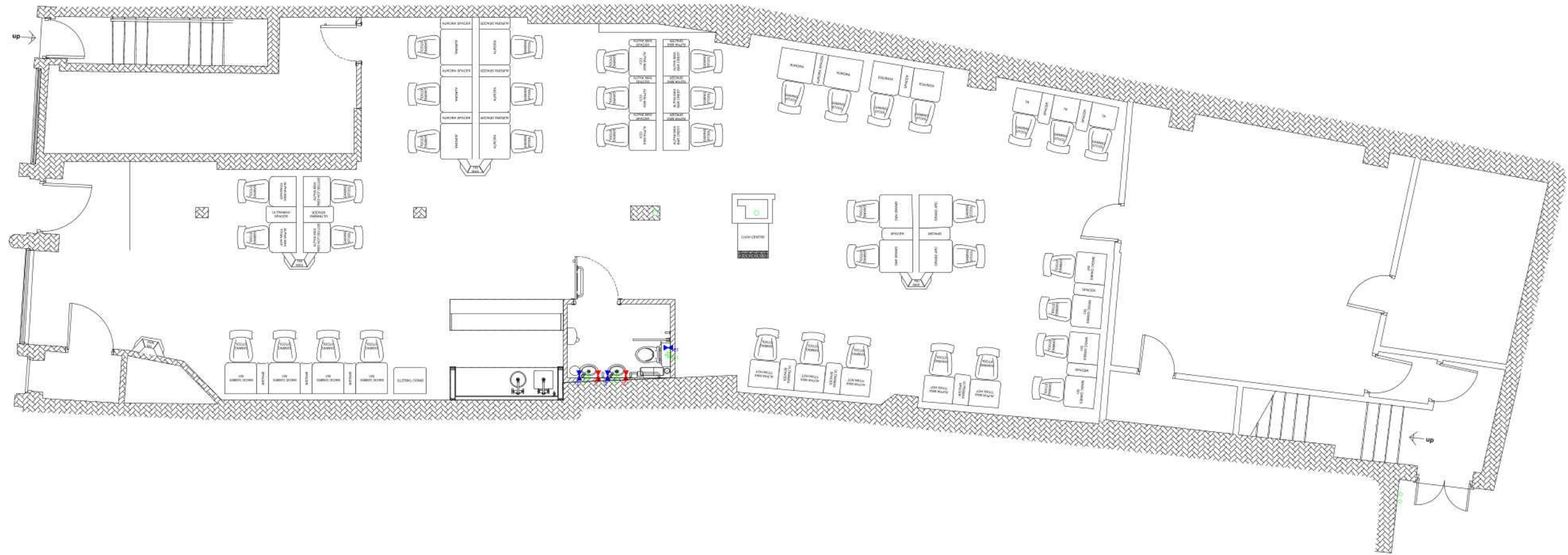
**SUPPLEMENTAL STATEMENT - ANDY TIPPLE**

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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.

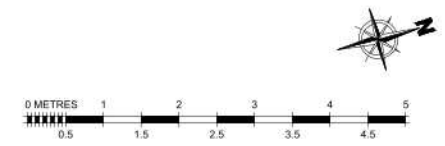
Mr Andy Tipple, Head of Product, Merkur Slots UK Limited

Date: 12/10/2022



TOTAL GROUND FLOOR AREA PROPOSED USE: AGC	
211.8m <sup>2</sup>	2279.9ft <sup>2</sup>

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

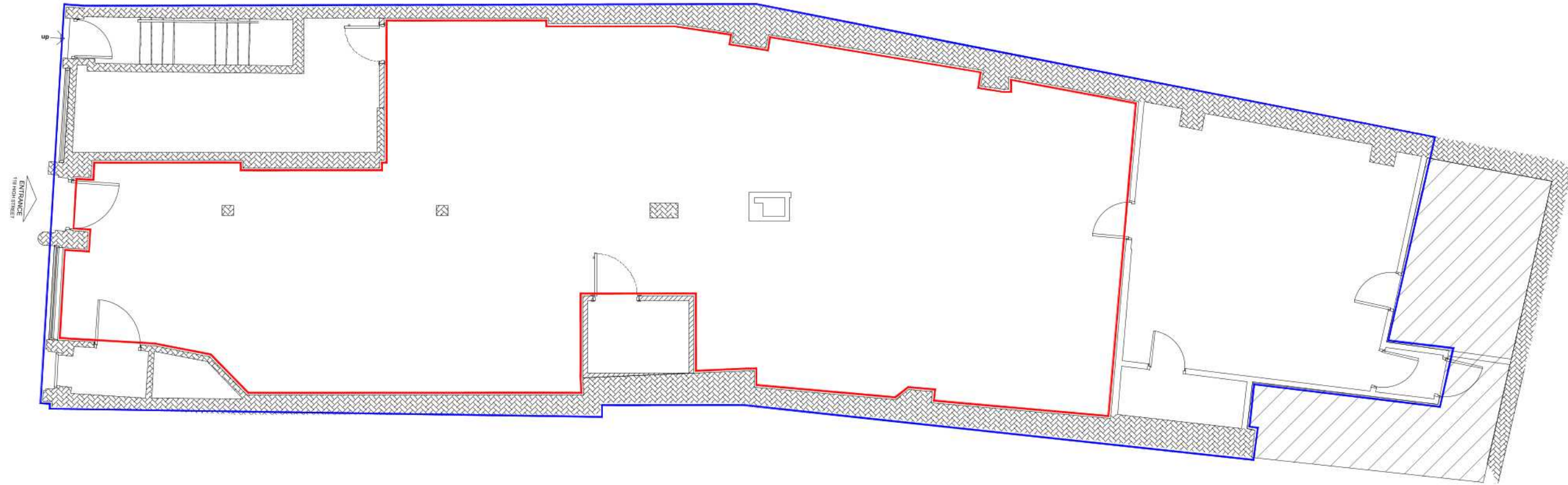
REFERENCE DRAWINGS

SCALE  
1:75

DRAWN BY

DATE  
00/00/00





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:
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FIT OUT TYPE CONCEPT 2
PROJECT MERKUR SLOTS 118 HIGH STREET BARNET EN5 5XQ
DESCRIPTION PROPOSED LICENCE PLAN
<b>13</b>

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
<p>Protecting children and other vulnerable people from being harmed or exploited by gambling</p>	<p><b>Unemployment</b> 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><b>Deprivation</b> 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><b>Schools and Education</b> Barnet and Southgate College - Wood Street Campus, Wood St, EN5 4AZ Queen Elizabeth's Girls' School, High St, EN5 5RR</p>	<p><b>Age Verification</b> <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots 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  Susi 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><b>Community Centres and Youth Centres</b>  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><b>Parks, play grounds and sports/leisure facilities</b>  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><b>Vulnerable and addiction support services</b>  TouchBase South East, 12 Hyde Cl, Hadley, EN5 5TJ</p> <p><b>Homeless shelters and food banks</b>  Christ Church Barnet, Christ Church, EN5 4LA  The Open Door Centre &amp; Cafe, St Albans Rd, EN5 4LA  The Rainbow Centre, Dollis Valley Dr, EN5 2UN</p> <p><b>Pawnbrokers and Loan Shops</b>  CeX, 10 The Spires, EN5 5XY</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b>  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' <a href="https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019">https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</a></p> <p><b>Vulnerability</b>  Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p>
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<p>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</p> <p>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 &amp; 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</p> <p><b>Gambling premises</b>  Betfred, 158 High St, Hadley, EN5 5XP  Paddy Power, 62 High St, Chipping Barnet, EN5 5SJ  Ladbroses, 168 High St, Hadley, EN5 5XP</p> <p><b>Public Houses and Alcohol Licensed Premise</b>  Ye Olde Monken Holt, 193 High St, Hadley, EN5 5SU  Hadley House restaurant &amp; 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><b>Residential Areas</b>  The area containing High Street, Barnet consists predominantly of  flats (64%), which is common in inner cities, student</p>	<p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p><b>Customer Interaction</b>  Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p><b>Player Protection</b>  <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i>  <i>Failure to provide information to customers on responsible gambling</i>  <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Playright App available for customers to self-manage their play and spend and can send alerts to Merkur Slots 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>
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	<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><b>Bus stops and other Transport links</b>  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><b>Regular Festivals, Town Events and Mass Gatherings</b>  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><b>Deprivation</b>  Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p><b>Homelessness</b>  Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p>
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being</p>	<p><b>Crime statistics</b>  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><b>Premise Security and violence in the workplace</b>  <i>Poor security control measures which may increase vulnerability to crime</i>  <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p>

<p>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><b>Local Police</b> 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><b>Public Houses and Alcohol Licensed Premise</b> Ye Olde Monken Holt, 193 High St, Hadley, EN5 5SU Hadley House restaurant &amp; 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><b>Pawnbrokers and Loan Shops</b> CeX, 10 The Spires, EN5 5XY</p> <p><b>Gambling premises</b> 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><b>Residential Areas (impacted by Anti Social Behaviour)</b> 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><b>General Crime and Disorder</b> <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><b>Anti-social behaviour outside the premise</b></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.

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

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

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

Merkur Slots 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.

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

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

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

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

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.

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

#### **Alcohol and Drugs**

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

'No Alcohol Allowed' signage on the door.



		<p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p><b>Money Lending</b> Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p><b>Bingo/Gaming Machine and Supervision</b> The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p><b>Customer Complaints</b> <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses.</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><b>Marketing</b> Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
Other	<p><b>Places of worship and Religious Buildings</b>  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 &amp; 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 &amp; 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><b>Ethnicity and Local Area Demographic</b> Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p><b>Training &amp; Social Responsibility</b> Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p>

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


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

