

**MERKUR SLOTS, 9-10 ST JAMES STREET, BRIGHTON**  
**LICENSING SUB-COMMITTEE HEARING -27 JUNE 2023**

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**Merkur Slots, 9-10 St James Street, Brighton, BN2 1RE**

**Existing Premises Licence Conditions to remain on the Licence**

1. The premises shall install and maintain a comprehensive CCTV system, which shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days. Viewing of recordings shall be made available upon the request of Police or an authorised officer of the Licensing Authority, subject to data protection legislative requirements.
2. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
3. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:
  - a. all crimes reported to the venue
  - b. all ejections of patrons
  - c. any complaints received concerning crime and disorder
  - d. any incidents of disorder
  - e. all seizures of drugs or offensive weapons
  - f. any visit by a relevant authority or emergency service.
  - g. any attempts by children and young persons to gain access to the premises to gamble
  - h. any Challenge 25 Refusals.
4. A think 25 proof of age scheme shall be operated at the premises where any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
5. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
6. The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice.
7. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.
8. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained at the premises and be available for use.

**Additional conditions proposed within the application**

9. The Licensee shall provide all staff with a copy of the Local Area Risk Assessment to advise them on the specific issues in the local area. Any advice or information on the local area provided to the licensee by the Licensing Authority or Police shall be included within the Local Area Risk Assessment and a copy kept on site at all times.
10. The licensee shall take reasonable steps to prevent street drinking of alcohol directly outside the premises and implement a policy of banning any customers who engage in crime or disorder or cause nuisance within or outside the premises. Notices visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.
11. For 6 months from the date of the grant of the premises licence variation, the date to be confirmed in writing to the Licensing Authority, If trading past midnight the Maglock will always be in use. Following the initial 6-month period, the Maglock will always be available for use, and consistent use shall be risk assessed and cognisance taken of police advice.
12. The Company's staff guard system or similar shall be installed and maintained at the premises, which allows direct communication with a central monitoring station permitting audio and CCTV communication.
13. There shall be no pre-planned single staffing at the premises from 22:00.

**Additional conditions proposed to the Police in March 2023**

14. The licensee shall participate in a local Betwatch or similar scheme, where available.
15. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in the training shall be formally recorded and the records produced to the police or licensing authority upon request.
16. The requirement for door staff shall be risk assessed and cognisance taken of police advice.
17. Should the premises be single staffed at any one time between 8pm and 6am, the magnetic door locking system must be in constant use.

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## LICENSING SUB - COMMITTEE HEARING – 27 JUNE 2023

### 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 variation to bingo premises licence application, the local Police Licensing Team and Licensing Authority were initially contacted in January 2023.
13. A site visit was planned with the local Police licensing team to visit the premises with myself and our legal advisors, however due to operational reasons this was cancelled by the Police.
14. Following submission of the application, a teams meeting was held by our legal advisors with the Police Licensing officer, Clare Abdelkaer and the Licensing Authority officer, Emily Fountain. Clare explained that since the opening of the premises in early 2022, there has been two police call outs to the venue, both of which were in the summer of 2022 and around 6:30pm.
15. Following the call, the application was submitted, and additional conditions were included within the application to appease any concerns of the Police.
16. In March 2023, our legal advisor was advised by PC Mark Thorogood that due to operational reasons he would be dealing with this matter going forward, and that the police had made the decision they would be submitting a representation.
17. Correspondence was had with PC Thorogood and a call organised to discuss their concerns with PC Thorogood and PC Mark Redbourn. I was in attendance at this call with my colleague Joe Seaden and our legal advisors.
18. During the call it was raised that the premise called Admiral Casino, 125-127 St James Street operates 24 hours, of which neither officer raised any specific concerns directly relating to the premises.
19. The meeting was ended amicably and the Police confirmed that this application would be required to be heard by the licensing sub-committee.
20. Following the call, an additional four conditions were offered to the Police, and they confirmed in writing their objection will still remain.

21. The Licensing Authority did not provide any opinionated comment following the initial due diligence, or objection to the application.
22. All other responsible authorities, including 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.
23. 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.
24. 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.
25. 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**

26. 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.
27. 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'.
28. 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.

29. 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.
30. 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.
31. 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.
32. 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.
33. 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.
34. Examples of some of Merkur's responsible gambling information have been provided in the supporting documents.
35. 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.
36. 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.

37. 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.
38. 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**

39. A detailed and updated 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.
40. 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.
41. 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.
42. 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.
43. In February 2023, Merkur Slots Brighton joined Business Crime Reduction Partnership for Brighton & Hove.

### **Underage Gambling**

44. 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.
45. 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.
46. 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.
47. Merkur Slots customer demographics are up to 50% female with an average age over 30.

48. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
49. 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.
50. 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.
51. 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.

### **Crime and Vulnerability**

52. 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.
53. 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.
54. 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.
55. 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.
56. 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.
57. 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.
58. 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.

59. 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**

60. The representations received from the Police identify the potential for increased anti-social behavior and the increased risk to vulnerable people and children in the area should the Licensing Sub-Committee be minded to grant the current premises licence application.
61. All comments made within the representations were reviewed and appropriate safeguards, conditions and comments were made to alleviate these concerns, including the proposal of additional safeguarding conditions.
62. Merkur has provided a detailed local area risk assessment, reviewed local area statistics and demographics, discussed the application with the local police licensing team and reviewed the Council's detailed policies in order to effectively identify any potential risks to the proposed operation.
63. Merkur will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to individuals who may be under the influence of alcohol or drugs and work in partnership with the local police in the unlikely event that any incidents of crime or disorder occur.
64. Merkur 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.
65. 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.
66. 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.
67. Should the Committee members be minded to grant the new licence application we believe all potential operational risks will be effectively mitigated.
68. 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.
69. 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.

70. 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**

71. The premises is currently, and will continue to be so, managed by an experienced shop manager who has been the premises manager since its opening, and 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.
72. 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.
73. 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.
74. 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.
75. 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.
76. 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.
77. Merkur Slots premises do not play any music above background level, and in addition due to the low footfall of customers at any one time, are rarely a cause of neighborhood nuisance. No complaints have been made directly to the premises from local residents, nor has the premises been notified of any nuisance complaints by the Environmental Health noise team.

### **Conclusion**

78. The current premises has been operating successfully and with little serious crime and disorder, which is evidenced through the comments made by Clare Abdelkaer and the absence of any evidence of direct crime and disorder issues relating to Merkur Slots from the Police Licensing team.

79. 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.
80. 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.
81. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
82. 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.
83. 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: 14/06/2023

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## LICENSING SUB - COMMITTEE HEARING – 27 JUNE 2023

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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. The entrance to all venues are fitted with a magnetic door locking system. This allows staff members working to manage the entrants to the venue when in use.
20. The use of door supervision at any premises is decided on a risk assessment basis based on a multitude of factors per premises, with cognisance always taken of local Police and Licensing knowledge and advice.
21. We have considered the local concerns raised by the Interested Parties 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 provision of the additional conditions provided in the application and future correspondence with the Police.
22. 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.

23. 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.
24. The current premises has been operating successfully and with minimal serious crime and disorder.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 14/06/2023

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**LICENSING SUB-COMMITTEE HEARING – 27 JUNE 2023**

**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
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: 14/06/2023

**LICENSING SUB-COMMITTEE HEARING – 27 JUNE 2023**

**SUPPLEMENTAL STATEMENT – JOE SEADEN**

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1. I am currently the Area Manager for Merkur Slots venues across the Kent and Southeast London district. This area includes the St James, Brighton premises. This position includes responsibility for all operations across the Bing Premises and Adult Gaming Centres within this district.
2. I originally joined Merkur Slots in January 2019 as a business development manager. This position entailed writing compliance policies and practices whilst ensuring implementation across the entire Merkur Slots UK Limited estate.
3. In October 2019 I changed position to become an area manager within Merkur Slots. I am currently undertaking my Level 5 apprenticeship along side my role manager role.
4. I have spent several months previously in Brighton overseeing the premises and getting to know the locality of the site. The premise is situated on a local high street with a variety of retail shops, coffee shops and restaurants within a close proximity of the site.
5. Throughout my years of my working in the gambling industry and for Merkur Slots, I can confidently state that it is a rare for a Merkur Slots UK Limited's site, and specifically the high street bingo premises, to be associated with local nuisance, crime and disorder or anti-social behaviour.
6. In relation to this site specifically, in my role as an Area Manager covering the St James Street premises I have not experienced regular major crime and disorder at this site.
7. Prior to my joining Merkur Slots UK Limited I worked in a variety of retail outlets, managing various known shopping outlets. I would anticipate more issues in relation to crime and disorder and public nuisance in these shops than any gambling premises run by Merkur Slots Gaming UK Limited.
8. In our premises, customers are free to move around the site playing bingo on portable electronic terminals as well as the option for paper participation. Additionally, players are able to play on terminal gaming machines provided in accordance with government legislation.
9. The Brighton premise operates a combination of category B3 and C gaming terminal with stakes ranging from 10p through to £2.
10. Due to the nature of the gaming services provided at our high street bingo venues, customer interaction is high. Many of the staff in the Brighton premises have relationships with regular local customers.
11. The premises manager has worked at the site since it opened in February 2022 and has built a significant rapport with local customers and thoroughly understands the local area and the special nature of Brighton.
12. The Brighton venue team has aimed to form genuine relationships with local police, town centre groups and support services. Currently the site has an active membership in the Brighton Business Crime Reduction Partnership and Brighton & Hove shop safe scheme.
13. I attended a meeting with our legal advisors, Amanda Kiernan, Head of Compliance, and Police Licensing officers PC Thorogood and PC Mark Redbourn. During this call, the officers highlighted no direct specific concerns with the operation of the St James Street venue, nor the nearby Admiral, however requested the application be heard by the committee.
14. Across the Merkur UK Limited estate there are numerous safety and security features in place for the protection of staff and customers. The premises are equipped with a Maglock safety

feature, as well as a panic button for staff. The maglock safety feature has not been required to be used so far this year at the Brighton site, however the use of this has been offered as a condition during the extended hours.

15. The Brighton venue operates CCTV throughout, which is designed to assist staff with monitoring all customer facing areas but also covers the area immediately outside the venue, which provides the additional safety feature in the need of an emergency evacuation or invacuation.
16. Previously the sites CCTV has been able to assist the police following an incident in the neighboring Morrisons in May 2023.
17. Due to the presentation and nature of the venue, the site does not see a significant number of underage individuals seeking to gain access to the premises. In my experience the Merkur gaming experience does not appeal to a younger audience.
18. Merkur Slots many compliance policies for example the Think 25 policy are used as effective tools to ensure that the venue operate responsibly. The venue does not allow intoxicated individuals into the venue or those who have been drinking. Additionally, no alcohol is allowed within the venue.
19. Staff on site are trained in de-escalation, identification of vulnerable customers and customer monitoring. So far this year the premise has not recorded any incident on site and has received no nuisance complaints.
20. The site aims 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.
21. All of features offered by the Brighton site means that the premises provides safe and congenial environment to customer and do not impact on their localities.
22. The current premises has been operating successfully and without major incident.

Mr Joe Seaden, Area Manager, Merkur Slots UK Limited.

Date: 15.06.23



## **Full Observation Report**

**Mr Nicholas Mason – Consultant**

**Leveche Associates Limited**

**Merkur Slots**

**9-10 St James's Street  
Brighton BN2 1RE**

### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 9-10 St James's Street Brighton BN2 1RE and the surrounding area. The premises are situated in a side road less than a mile from Brighton Main Line Rail Station. The timing of these observations was relevant to the application to vary the premises licence under the Gambling Act 2005 to extend the opening hours of the premises daily from 09:00 – 00:00 hours to opening 24-hours a day 7- days a week.
2. There are concerns that allowing the premises to operate 24-hours will attract alcohol related incidents, drugs offences and anti-social behaviour requiring police attendance during unsociable hours.
3. The local bars and restaurants in this area increased the pedestrian footfall but this was not excessive and appeared to be the transient community leaving local licensed premises and heading for the transport hubs or other places of entertainment closer to Brighton Town Centre and the Seafront.

4. Covert visits were made to the Merkur Slots premises and another gaming venue in the vicinity of the Merkur premises known as Admiral Casino that operates 24-hours a day, 7-days a week. Observations showed both premises to be well run and operating correctly with no issues. No anti-social behaviour or crime was observed.
5. Once the licensed bars and restaurants closed the area was very quiet. From the observations it is clear that for the Merkur Slots premises at 9-10 St James's Street Brighton BN2 1RE operating 24-hours a day will not increase anti-social behaviour, noise or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure or wider local community.
6. Photographic images support these observations and the conclusions reached.

## **Introduction**

7. We are instructed to conduct independent observations at Merkur Slots premises at 9-10 St James's Street Brighton BN2 1RE and the surrounding area.
8. Merkur Slots UK operate the venue which has a licence under the Gambling Act 2005 to trade from 9 -10 St James's Street Brighton BN2 1RE. The current premises licence restricts opening hours to between 09:00 - 00:00 hours.
9. The premises come under the jurisdiction of Brighton and Hove City Council.

## **Personal Summary – Nicholas Mason**

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

15. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
16. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
17. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

## **Observations**

18. Observations were carried out at Merkur Slots premises at 9-10 St James's Street Brighton BN2 1RE and the defined area around these premises on Friday 19<sup>th</sup> May from 21:00hrs to Saturday 20<sup>th</sup> May 2023 at 06:00hrs – Image A1.
19. Observations concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk, noise and the general environment including identifying the presence of waste alcohol cans/bottles and drug related paraphernalia.
20. St James's Street runs west to east and is a single lane road for one-way traffic that can pass the front of the venue. During the period of observations traffic was varied with buses, taxis and private vehicles though not busy.
21. Boundaries of observations were set along St James's Street at Old Steine to the west – Image A9, up to Camelford Street to the east – Image A4. This encompassed the area with its many commercial premises, that included mini supermarkets, bookmakers, cafes, estate agents, restaurants, bars and fast-food shops. There are residential flats above many of the commercial premises – Image A2, A3, A4, A5 .
22. North and south of St James's Street and close to the Merkur premises are numerous residential roads with houses, flats and some other bars. Much of this appears to be student accommodation that serves the local University. Additionally there are residential hotels / bed and breakfast establishments.
23. The Merkur Slots premises has a main access door on the north side of St James's Street where there is a wide footway – Image A12. Adjacent to the premises to the east is the Twin Pines Coffee Shop and to the west a Morrisons Supermarket.– Image A18.
24. The area is well served for public transport with Brighton Main Line Rail Station less than a mile away. In the immediate vicinity are numerous bus routes advertised as travelling towards Brighton Marina, Rottingdean and Queens Park with a bus service provided throughout the night. There is a bus stop close to and west of the Merkur Slots premises. During the period of observations numerous taxis were available seen travelling along St James's Street. This abundance of public transport facilities provided an easy option for those wishing to leave the

area for onward travel. Car parking is provided for by local 'Pay and Display' parking areas.

25. There is one other Adult Gaming Centre in the vicinity of the Merkur Slots premises, Admiral Casino 126-127 St James's Street. This premises has a similar business model to Merkur Slots UK and operates 24-hrs a day 7 days a week. Adjacent to the Admiral Casino is a Betfred Bookmakers at 124-125 St James's Street. The Betfred premises were open during the course of observations but closed as advertised at 22:00hrs – Image A7. Opposite and slightly west of the Admiral Casino is a Ladbrokes Bookmakers at 1E St James's Street. The Ladbrokes premises were open during the course of observations but closed as advertised at 22:00hrs – Image A10.
26. These premises can be divided into two main types:
  - a. Betting premises not licensed to serve alcohol.
  - b. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.
27. There are some religious premises in the area with St Mary's Church located at 61 St James's Street but this was well east of the Merkur Slots premises and not in the immediate vicinity. There are no schools in the immediate vicinity and no children were seen in the area at the time of these overnight observations.
28. The area is illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
29. Photographic images of what was seen were obtained to support my findings. These images are documented in Appendix A.

## **Deployment**

30. On Friday 19<sup>th</sup> May at 21:00hrs observations commenced and went through the night until 06:00 hours on Saturday 20<sup>th</sup> May 2023.
31. At 21:00hrs the Merkur Slots premises were open as were the bars, restaurants, coffee shops and fast food shops in the area. The Merkur premises had a smart corporate and professional looking frontage that was well maintained and clean. There was a flow of pedestrians passing the Merkur Slots premises, there was no evidence of anti-social behaviour and both the Merkur Slots premises and Admiral Casino appeared quiet – Image A1, A7.
32. The area was busy with young people using the pubs, bars, restaurants and fast food facilities. A number of groups of 'Hen' nights were seen passing through the area but none stopped at the bars and pubs located in St James's Street or the surrounding Streets.
33. The Bulldog Bar is located at 31 St James's Street west of the Merkur Slots premises and is advertised as a 'Landmark LGBT pub and hangout'. The premises

is highly visible with its bright pink external fluorescent lighting. During the course of observations the premises had 2 external door security staff managing entry to these premises. Both were dressed in black clothing and displayed Security Industry Association (SIA) badges on their arms. There was no anti-social behaviour or disturbance at this location – Image A4.

34. There were a number of other bar and public house premises located in St James's Street;
  - i. Affinity Bar – 129 St James's Street – advertised opening times Monday – Sunday 12:00-00:00hrs.
  - ii. Nautilus Wine Bar – 129-130 St James's Street – advertised a variety of opening times.
  - iii. St James Pub – Located on the junction with St James's Street and Madeira Place east of the Merkur Slots premises – advertised opening times Monday – Thursday and Sunday 12:00-00:00hrs, Friday and Saturday 12:00-01:00hrs.
35. During the course of observations there was no evidence of any anti-social behaviour at these premises. The St James pub was busy with people standing outside on the pavement drinking. Aside from the congestion to the footway this did not cause any other issues.
36. 'Green City' at 95 St James's Street was trading at the time of observations and offers paraphernalia associated with the use of recreational drugs. The premises were well lit but not busy. There was no anti-social behaviour in the vicinity of these premises.
37. During the course of observations at the western end of St James's Street in and around the junction with Steine Street a number of homeless people and street drinkers were seen. At 22:15hrs Street drinkers were observed shouting and drinking from cans at this location though this was not for a prolonged period – Image A14. None of these people were connected to or used the Adult Gaming Centres or Bookmakers in St James's Street. At the same time there was an apparently drunk and homeless male walking east along St James's Street though he was not causing a disturbance – Image A15.
38. At 23:05hrs two uniform police officers were walking east along St James's Street near to The Bulldog Bar. They spoke to a colleague who was driving past in a marked police vehicle and all then continued along St James's Street. There was no obvious reason for their presence and the assumption is that this was part of a routine patrol - Image A20.
39. Between 23:07hrs and 23:29hrs I conducted a covert visit to the Merkur Slots premises at 9-10 St James's Street – Image A21. As I approached I could see signage on the front door that stated no smoking on the premises, over 18's only, no alcohol and that CCTV was in use. The front door was not locked and I entered.

40. As I entered I saw that there were two members of staff, one male and one female, both wearing black Merkur liveried clothing who both greeted me. On the wall to the left the premises licence, policies and other literature were clearly available for customers to view and read.
41. Throughout the premises the floor was carpeted and there were a variety of gaming machines available for customers use and a reception area for preparing drinks that was clean and tidy. There were toilets located at the rear of the premises.
42. As I walked through the premises I noted that there were no other customers on the premises. I went to the rear and right hand side of the premises, selected a machine and sat down to play.
43. After a couple of minutes, the female staff member approached and asked if I wanted a drink. I asked if I could have a beer but was told no alcoholic drinks were available. I asked for a coffee but was told that the coffee machine was turned off and that it was only cold drinks that were available so I requested a coke which was brought to me a short time later.
44. I continued to play the machine and was approached by the male member of staff who was carrying a tray of sweet snacks that he offered to me. I selected a snack and then continued playing the machine.
45. A short time later the female member of staff approached and offered a promotional offer and explained the detail which I declined.
46. During my visit I did not see any customers enter the venue. However, a male that was clearly a friend of the male member of staff entered, used the toilet facilities and then engaged in conversation.
47. Whilst inside the premises I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy. I was not pressurised or encouraged to spend money. Whilst I was using the machine the female member of staff was vacuuming the carpet in the premises
48. Before leaving I went to use the toilet facilities. The door was locked and the male member of staff unlocked it at my request. On entering I found it to be clean and tidy. On the wall I saw a toilet check sheet that showed the toilets were checked on an hourly basis– Image A22. Gambling Safeguarding literature and GamCare leaflets were displayed on the wall – Image A23. I used the toilet and then left the premises at 23:29hrs, as I went out through the door there was no one loitering outside or looking to gain entry. There was no anti-social behaviour inside, or in the vicinity of the premises.
49. At 23:37hrs a liveried private security company vehicle displaying the name Padoda Secure drove along St James's Street. There was no interaction with this vehicle and no obvious reason for its presence.

50. At 23:38hrs a second private security company vehicle displaying the words 'Mobile Response Unit' drove past, though again there was no obvious reason for its presence.
51. At 23:32hrs an apparently homeless male was sat on the pavement outside Sainsburys Store at the west end of St James's Street and was begging – Image A26.
52. At 23:46hrs the external shutters to the left of the front door of the Merkur Slots premises were rolled down prior to closing – Image A27.
53. At 00:02hrs the two members of staff that were seen during the covert visit to the premises exited, locked the front door and walked away with all internal lights of the Merkur Slots premises now turned off.– Image A29.
54. From 00:02hrs the majority of premises had closed and the area was quiet with light pedestrian and vehicle traffic – Image A29, A30, A31, A32, A33.
55. Between 01:10hrs and 01:25hrs I conducted a covert visit to the Admiral Casino premises at 126-127 St James's Street – Image A34. As I approached I could see signage on the left hand door that stated entry was restricted to persons over 18 years of age. I pushed at the front door to enter but the door was controlled by a Mag-Lock. I pressed the bell for entry and the door was opened by a male member of staff wearing a black suit.
56. As I entered there was a board that displayed the premises policies, trading rules, licences, action to be taken in the event of a fire, 'Challenge 25' notice, 'Gamcare' information and that no smoking was allowed on the premises.
57. In the main floor area there were numerous gaming machines available for customers use. located around the walls of the premises and through the middle floor. The floor was carpeted providing a lounge effect. On the right-hand side of the premises was a reception area where refreshments could be prepared, this area was clean and tidy. There were no other obvious members of staff with the male member of staff who had opened the door being the only person supervising the premises. I selected a machine to the right of the premises and sat down to play.
58. Other customers were on the premises with two men aged about thirty five years old using machines located close to the front door. Further inside the premises there were five other customers all using machines, four males and one female. All were aged late thirties to early forties in age and casually dressed.
59. The customer toilets for the premises were located at the rear and after playing the machine for a short while I went to use them. The door was controlled by a combination lock and I asked the male member of the staff for the code to enter which he provided.
60. The toilets were found to be clean and tidy. On the rear of the door was a sign stating that the toilets were checked regularly but there was no 'Check Sheet' –

Image A35. On the wall next to the hot air hand dryer a poster and leaflets were displayed relating to 'GamCare' – Image A36. I used the toilet and then returned to the machine I had been playing.

61. Whilst in the premises I was not offered any refreshments or assistance in using the various different machines as is often the case in Adult Gaming Centres of this type. The only staff member remained near the front of the premises available to open the access door if required.
62. During my visit I noted that the other customers were all quietly enjoying playing the machines. They were clearly not being pressurised or encouraged to spend money and they were not vulnerable or drunk. Whilst inside the premises I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
63. I left the premises at 01:25hrs, as I went out through the door there was no one loitering outside or looking to gain entry. There was no anti-social behaviour inside or outside in the vicinity of the premises – Image A37.
64. As the night progressed there was some pedestrian footfall as members of the public walked along St James's Street, there was very little vehicular traffic – Image A38.
65. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the immediate vicinity of the Merkur Slots premises, the Admiral Casino premises or St James's Street itself. – Image A2, A3, A5, A6, A7, A8, A9, A11, A16, A18, A19, A21, A24, A25, A27, A28, A30, A32, A33, A34, A37, A38, A39, A40, A41, A42, A43, A44, A45, A46, A47, A48, A49, A50, A51.
66. During the course of observations the only police officers I saw were those who appeared to be on a routine patrol observed at 23:05hrs.
67. At 06:02hrs I obtained a further image of the area around the Merkur Slots premises demonstrating that there was no evidence of anti-social behaviour or criminality – Image A52. Observations were then concluded.

## **Summary**

68. During the observation periods I found some evidence of anti-social behaviour and begging by the apparently homeless people observed at the West End of St James's Street. However there was no evidence of crime and disorder, drug use / dealing or groups of youths loitering in the area at or near to the Merkur premises and the surrounding area of St James's Street with its other licensed premises.
69. There was no evidence of discarded alcohol bottles or nitrous oxide gas canisters. Waste bins were deployed along St James's Street and refuse disposal operatives were observed working overnight that attended to any street rubbish from the takeaway food facilities.

70. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week including the following Merkur Slots premises on dates shown:

	Merkur Slots Premises Address	Date of visit
i	157 High Street North, East Ham E6 1JB	01/06/2021
ii	12 The Broadway Southall UB1 1PS	27/10/2021
iii	23 High Street Sutton SM1 1DJ	14/02/2022
iv	37-39 St Sepulchre Gate Doncaster DN1 1TD	17/02/2022
v	7 Abington Street Northampton NN1 2AN	18/02/2022
vi	89 Above Bar Street Southampton SO14 7FG	26/04/2022
vii	146 High Street Hounslow TW3 1LR	25/06/2022
viii	33 Town Centre Hatfield AL10 0JX	10/08/2022
ix	110 Streatham Hill London SW2 4RD	28/08/2022
x	87 Burnt Oak Broadway Edgware HA8 5EP	10/09/2022

71. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the Gambling Act objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.

72. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.

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

74. In conclusion, from my visits it is my opinion these types of 24-hour gaming premises are well run and do not increase anti-social behaviour, or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure or wider local community.

75. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nick Mason - Consultant**  
**Leveche Associates Limited**  
**21<sup>st</sup> May 2023**



**LEVECHE**  
**ASSOCIATES LIMITED**

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## **Appendix A**

Observation Images  
19th - 20th May 2023

### **Mercur Slots**

9-10 St James's Street  
Brighton  
BN2 1RE

### **Leveche Associates Ltd**

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

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A1**

21:20hrs

Merkur Slots Brighton



**Image A2**

21:20hrs

St James's Street looking west

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A3**

21:21hrs

St James's Street looking east

**Image A4**

21:40hrs

St James's Street looking west from Camelford Street

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A5**

21:43hrs

St James's Street looking west towards Merkur Slots

**Image A6**

21:44hrs

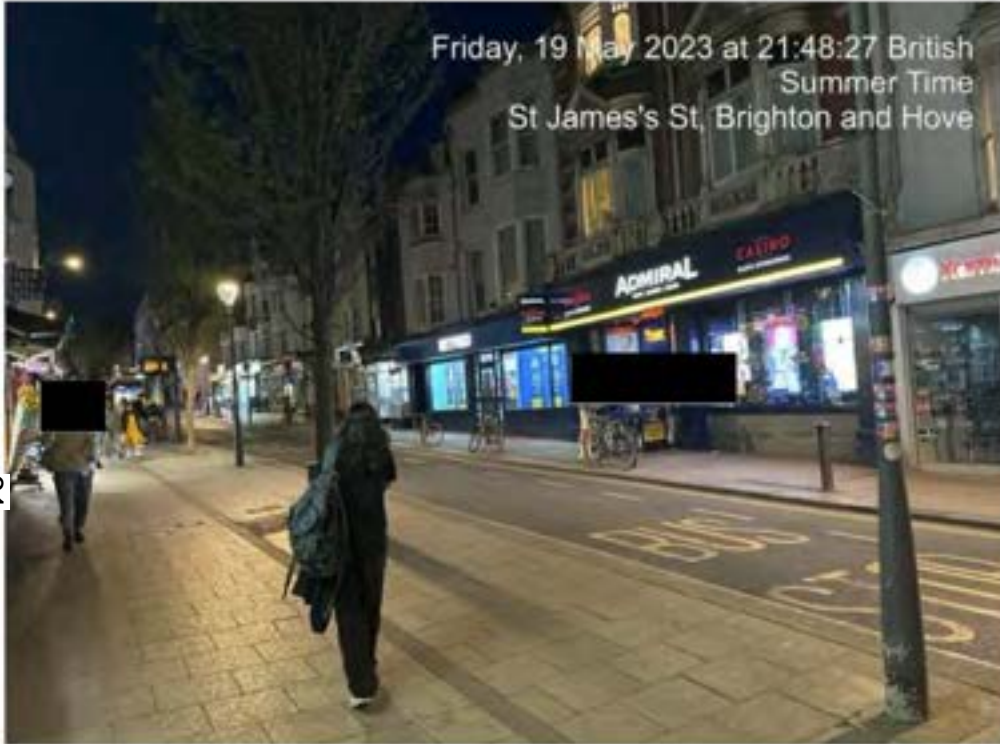
Merkur Slots Brighton

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023

Friday, 19 May 2023 at 21:48:27 British  
Summer Time  
St James's St, Brighton and Hove



**Image A7**

21:48hrs

Admiral Casino 126-127 & Betfred Bookmakers 124-125  
St James's Street

Friday, 19 May 2023 at 21:49:03 British  
Summer Time  
St James's St, Brighton and Hove



**Image A8**

21:49hrs

St James's Street looking east from Old Steine

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A9**

21:49hrs

St James's Street looking east from Old Steine

**Image A10**

21:49hrs

Ladbrokes Bookmakers 1E St James's Street Brighton

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A11**

22:09hrs

Merkur Slots Brighton



**Image A12**

22:10hrs

Entrance to Merkur Slots Brighton

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A13**

22:11hrs

Admiral Casino



**Image A14**

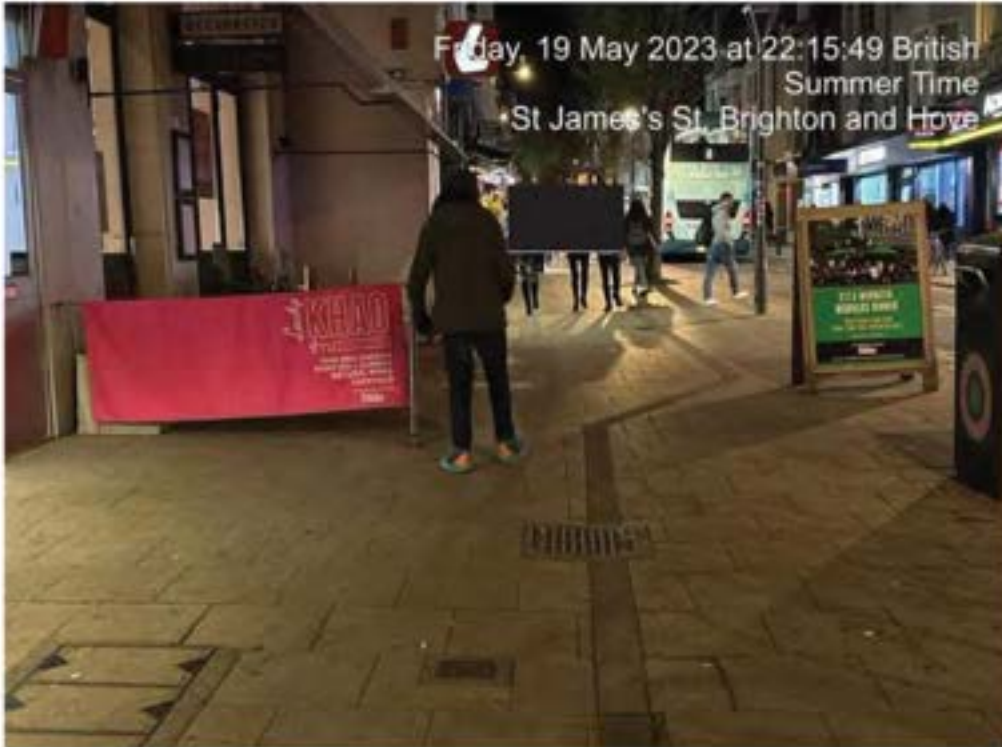
22:15hrs

Street Drinkers & apparently Homeless persons  
Steine Street

## Appendix A

9 10 St James's Street, Brighton, BN2 1RE

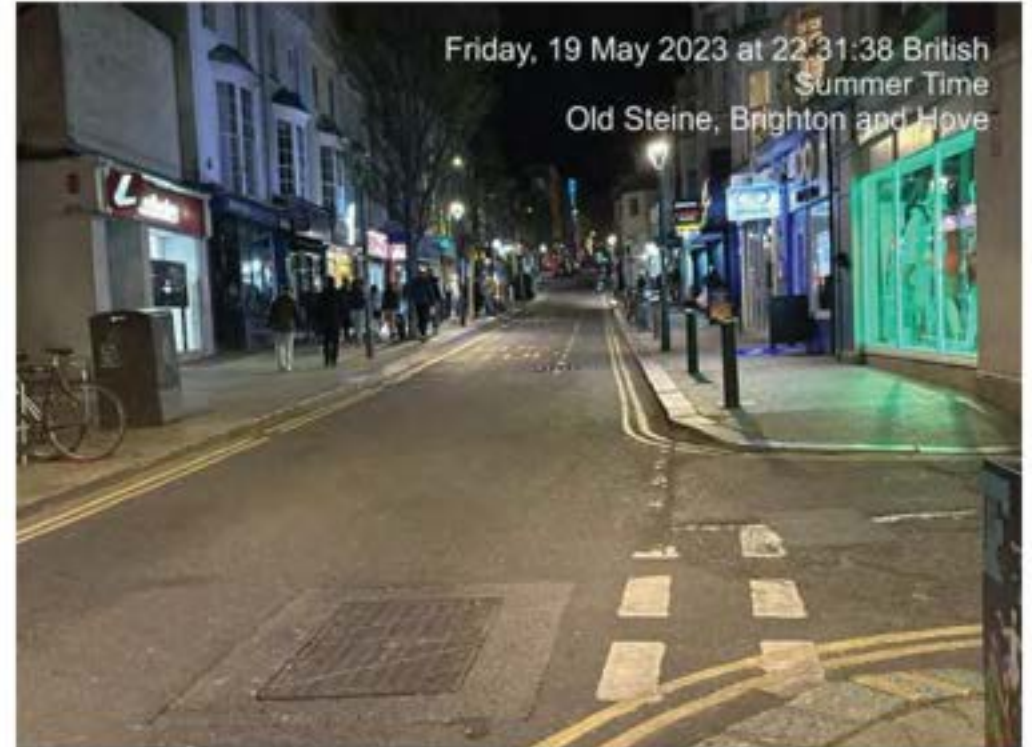
19th 20th May 2023



**Image A15**

22:15hrs

Drunk Male St James's Street



**Image A16**

22:31hrs

St James's Street looking east from Old Steine

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A17**

22:32hrs

Admiral Casino



**Image A18**

22:33hrs

Merkur Slots

## Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A19**

22:36hrs

St James's Street looking west from Camelford Street



**Image A20**

23:05hrs

Police Officers - St James's Street

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A21**

23:07hrs

Merkur Slots



**Image A22**

23:26hrs

Toilet Check Sheet - Merkur Slots

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023

Friday, 19 May 2023 at 23:26:18 British Summer Time  
St James's St, Brighton and Hove



Image A23

23:26hrs

Gamcare Leaflets - Merkur Slots

Friday, 19 May 2023 at 23:29:55 British Summer Time  
St James's St, Brighton and Hove



Image A24

23:29hrs

Merkur Slots

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



Friday, 19 May 2023 at 23:31:58 British Summer Time  
St James's St, Brighton and Hove, UK



Friday, 19 May 2023 at 23:32:50 British Summer Time  
St James's St, Brighton and Hove, UK

**Image A25**

23:31hrs

Admiral Casino

**Image A26**

23:32hrs

Homeless male outside Sainsbury's St James's Street

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A27**

23:46hrs

Shutters roll down Merkur Slots



**Image A28**

23:47hrs

St James's Street looking towards Admiral Casino

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A29**

00:02hrs

Merkur Slots - Closed & staff leave premises

**Image A30**

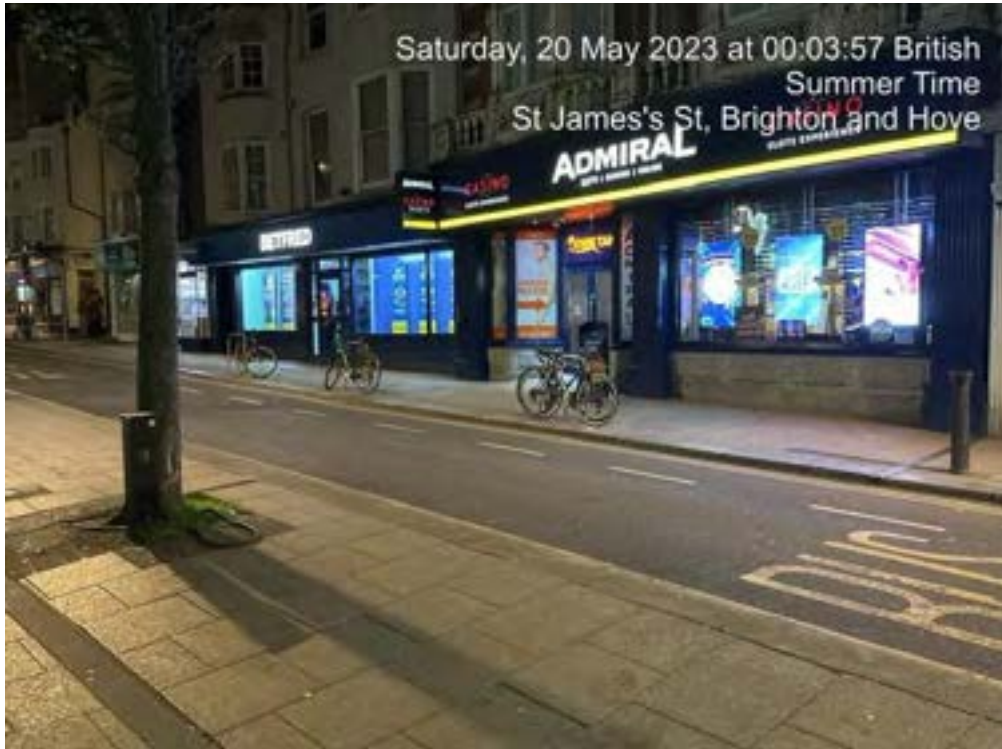
00:03hrs

St James's Street looking east from Old Steine

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



Saturday, 20 May 2023 at 00:03:57 British Summer Time  
St James's St, Brighton and Hove



Saturday, 20 May 2023 at 01:08:40 British Summer Time  
Manchester St, Brighton and Hove

**Image A31**

00:03hrs

Admiral Casino

**Image A32**

01:08hrs

St James's Street j/w Manchester Street looking west

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



Saturday, 20 May 2023 at 01:09:35 British Summer Time  
George St, Brighton and Hove



Saturday, 20 May 2023 at 01:10:24 British Summer Time  
St James's St, Brighton and Hove

**Image A33**

01:09hrs

St James's Street looking towards Merkur Slots

**Image A34**

01:10hrs

Admiral Casino

**Appendix A**

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A35**

01:20hrs

Admiral Casino - Toilet Notice



**Image A36**

01:20hrs

Admiral Casino - Gamcare Leaflets

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A37**

01:26hrs

St James's Street looking east from Old Steine

**Image A38**

01:27hrs

St James's Street looking west towards Merkur Slots

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A39**

01:30hrs

St James's Street looking west from Camelford Street



**Image A40**

02:06hrs

Merkur Slots

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A41**

02:09hrs

Admiral Casino



**Image 42**

02:10hrs

St James's Street looking east towards Admiral Casino

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A43**

02:54hrs

St James's Street looking west towards Merkur Slots



**Image A44**

02:56hrs

Admiral Casino

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A45**

04:02hrs

St James's Street looking west towards Merkur Slots



**Image A46**

04:04hrs

Admiral Casino

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A47**

04:04hrs

St James's Street looking east



**Image A48**

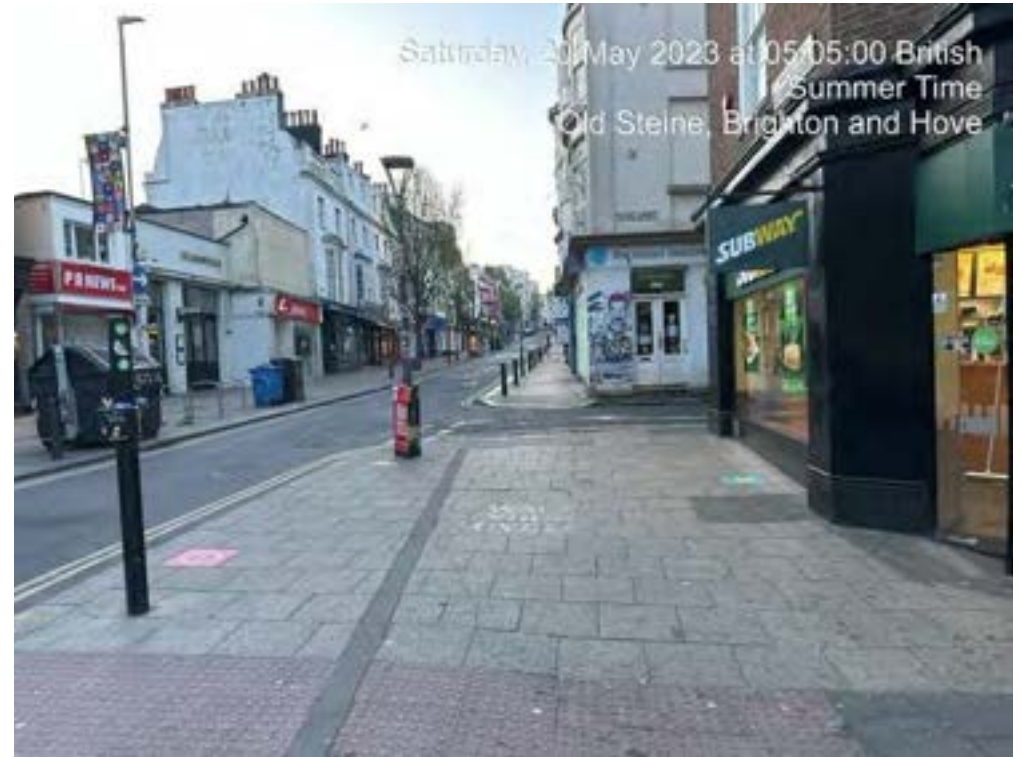
05:02hrs

St James's Street looking west towards Merkur Slots

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A49**

05:03hrs

Admiral Casino

**Image A50**

05:05hrs

St James's Street looking east from Old Steine

# Appendix A

9 10 St James's Street, Brighton, BN2 1RE

19th 20th May 2023



**Image A51**

06:02hrs

St James's Street looking west towards Merkur Slots



**Image A52**

06:03hrs

St James's Street looking east towards Admiral Casino



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant**

**Leveche Associates Limited**

### **Merkur Slots**

**182-184 Edgware Road London W2 2DS**

#### **Executive Summary**

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

#### **Introduction**

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

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

### **Personal – Stuart Jenkins**

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

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

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

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

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

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

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

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

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

## **Covert Observations**

### **Deployment One**

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

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

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

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

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

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

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

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

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

## **Deployment Two**

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

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

## **Summary**

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

71. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
72. It is clear the presence of Merkur Slots in Edgware Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
73. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
74. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
75. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
76. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
77. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

78. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**20/09/2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix A**

Observation Images

1st - 2nd September 2022

**Merkur Slots**

182-184 Edgware Road  
London  
W2 2DS

**Leveche Associates Ltd**

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

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



**Image A1**

21:21hrs

Merkur Slots 182-184 Edgware Road London W2 2DS



**Image A2**

21:21hrs

Edgware Road looking south

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



**Image A3**  
21:21hrs  
Edgware Road looking north



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

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



**Image A5**

21:26hrs

Waitrose Supermarket  
168 - 176 Edgware Road W2 2DX



**Image A6**

21:27hrs

Edgware Road looking north



**Image A7**

21:27hrs

Pharmacentre 149 Edgware Road  
(opposite Merkur Slots)



**Image A8**

21:28hrs

Female engaged in begging Edgware Road  
looking north

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



**Image A9**  
21:30hrs

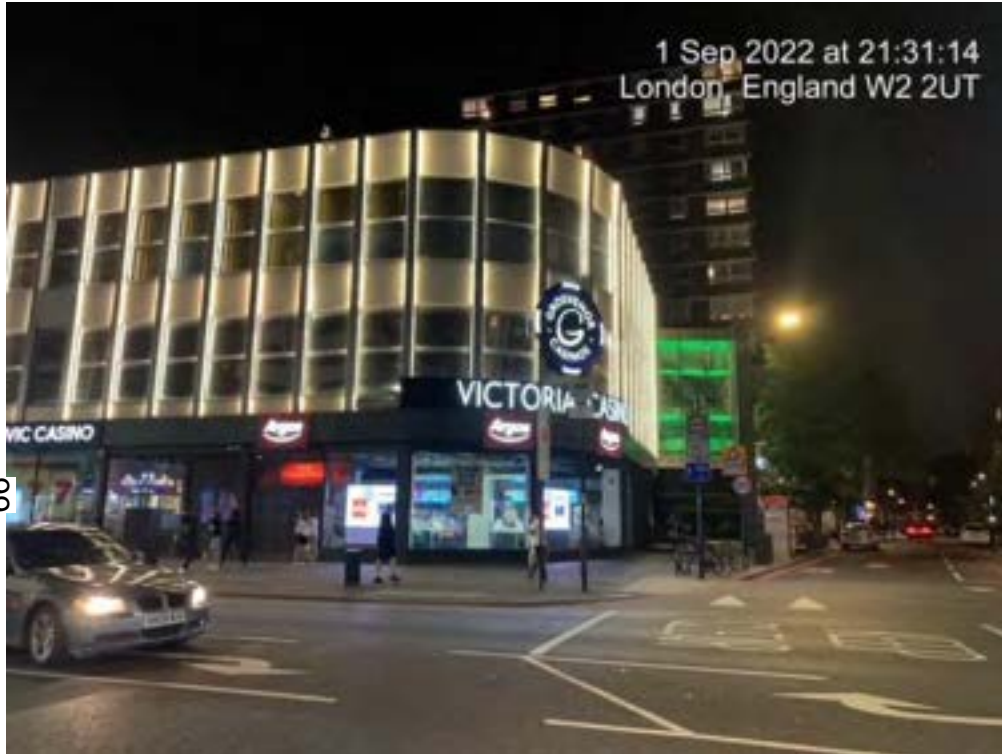
Rough Sleeper Edgware Road looking north



**Image A10**  
21:30hrs

The Little Vic Casino 156 Edgware Road W2 2DS

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



**Image A11**

21:31hrs

Victoria Casino 150 -162 Edgware Road W2 2DT



**Image A12**

21:32hrs

Female engaged in begging Edgware Road



**Image A13**

21:32hrs

Congestion Charge Restrictions Signage Edgware Road



**Image A14**

21:40hrs

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

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



**Image A15**

21:40hrs

Paddy Power 242 Edgware Road W2 1DS



**Image A16**

21:42hrs

Coral Bookmakers 214 Edgware Road W2 1DH

**Merkur Slots**

Merkur Slots 182 184 Edgware Road London W2 2DS

1st - 2nd September 2022

102



**Image A17**

21:43hrs

Reel Time 212 Edgware Road W2 1DH



**Image A18**

21:47hrs

Ladbrokes Bookmakers  
113 - 115 Edgware Road W2 2HX

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



**Image A19**

21:49hrs

William Hill Bookmakers 95 Edgware Road W2 2HX



**Image A20**

21:50hrs

Edgware Road looking north

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



**Image A21**

23:53hrs

Merkur Slots 182 - 184 Edgware Road W2



**Image A22**

23:55hrs

Edgware Road j/w Sussex Gardens looking north

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

105



**Image A23**

23:55hrs

Edgware Road looking south



**Image A24**

23:58hrs

Edgware Road looking north

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



**Image A25**

00:10hrs

Merkur Slots 182 - 184 Edgware Road



**Image A26**

00:22hrs

Merkur Slots 182 - 184 Edgware Road

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



**Image A27**

02:40hrs

Merkur Slots 182 - 184 Edgware Road



**Image A28**

02:40hrs

Edgware Road looking south

# Merkur Slots

Merkur Slots 182 184 Edgware Road London W2 2DS

1st - 2nd September 2022



**Image A29**

02:40hrs

Edgware Road looking north



**Image A30**

02:41hrs

Al Mustafa Express 135 Edgware Road W2 2HR



**Image A31**

02:42hrs

Little Vic Casino Edgware Road



**Image A32**

02:42hrs

Edgware Road looking south

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



**Image A33**

04:37hrs

Merkur Slots 182 - 184 Edgware Road



**Image A34**

04:37hrs

Edgware Road looking north

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



**Image A35**

04:37hrs

Edgware Road looking south



**Image A36**

04:38hrs

Rough Sleepers Edgware Road looking north

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



**Image A37**

04:39hrs

The Little Vic Casino Edgware Road



**Image A38**

06:04hrs

Merlur Slots 182 - 184 Edgware Road

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



**Image A39**

06:04hrs

McDonalds Edgware Road



**Image A40**

06:05hrs

Edgware Road looking north

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



**Image A41**

06:05hrs

Edgware Road looking south



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix B**

Observation Images  
15th September 2022

**Merkur Slots**

182 -184 Edgware Road  
London  
W2 2DS

**Leveche Associates Ltd**

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

**Merkur Slots**  
182 184 Edgware Road London W2 2DS  
15th September 2022

116



**Image B1**

22:54hrs

Edgware Road looking north



**Image B2**

22:55hrs

Merkur Slots 182 -184 Edgware Road W2 2DS

15th September 2022



**Image B3**

23:22hrs

Toilet Check Sheet  
Merkur Slots 182 - 184 Edgware Road



**Image B4**

23:22hrs

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

117

**Merkur Slots**  
182 184 Edgware Road London W2 2DS  
15th September 2022



**Image B5**

23:28hrs

Merkur Slots 182 - 184 Edgware Road

**Image B6**

23:28hrs

Edgware Road looking south



## **Full Observation Report**

**Mr Nicholas Mason – Consultant**

**Leveche Associates Limited**

**Merkur Slots**

**19 The Concourse**

**Edmonton Green N9 0TQ**

### **Executive Summary**

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

## **Introduction**

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

## **Personal Summary – Nicholas Mason**

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

## **Observations**

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

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

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

### **Covert Observations**

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

39. At 23:25hrs I saw a white male in a blue casual track-suit approach the front door of the Merkur premises. I heard the buzz of the security bell and the man then walked into the premises and out of sight – Image A19.
40. At 00:47hrs I was in the vicinity of the Merkur Slots premises and surrounding area, there was no evidence of additional noise or anti-social behaviour – Image A20, A21, A22.
41. Between 01:00hrs and 01:40hrs I conducted a covert visit to the Merkur Slots premises at 19, The Concourse. As I approached I could see signage on the front door that stated no smoking on the premises, over 18' only, no alcohol and that CCTV was in use.
42. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open for 24-hrs per day.
43. The front door was locked, there was a CCTV camera to my left with a push button that I pressed. The door was unlocked and opened by a member of security staff who was wearing a blue blazer saying security and had a lanyard around his neck that held an SIA badge. He greeted me and I walked in.
44. Once inside the entrance I saw there was an information board on my right. On this board were Merkur Slots information documents, premises rules, policies and licenses. The documents displayed included:
- i. The premises licence.
  - ii. The company codes of practice.
  - iii. It was a no smoking venue.
  - iv. Think 25 poster.
  - v. GamCare poster.
45. I walked through the premises and could see there was a series of gaming machines going from the front to the back of the premises along both walls. The floor was carpeted providing a lounge style effect and at the rear of the premises was a reception area. Behind a Perspex shield was an area for preparing drinks, this area appeared clean and tidy. Two other members of staff, wearing Merkur liveried black shirts with black trousers were standing there.
46. I walked around the premises looking for a machine to play. There were 3 other customers playing machines, each was about 35 years old, they were all male casually addressed and each appeared to be on their own. I selected a machine along the left-hand wall near the front of the premises and sat down.
47. I began to play a machine when I was approached by a member of staff who I had seen at the rear of the premises. He asked if I would like a drink and I asked what

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

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

## **Summary**

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

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

65. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nick Mason - Consultant**  
**Leveche Associates Limited**  
**23rd September 2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix A**

Observation Images  
22nd - 23rd September 2022

**Merkur Slots**

19 The Concourse  
Edmonton Green  
N9 0TQ

**Leveche Associates Ltd**

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

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

128



**Image A1**

20:55hrs

Merkur Slots 19 The Concourse Edmonton Green



**Image A2**

20:57hrs

Edmonton Green Market

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



**Image A3**

20:57hrs

Edmonton Green Market looking towards Merkur Slots

**Image A4**

20:57hrs

Edmonton Green Market looking towards Shopping Centre

130



**Image A5**  
21:00hrs  
Edmonton Bus Station



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

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



**Image A7**

21:02hrs

Deliveroo riders outside BIMS Burger shop

**Image A8**

21:04hrs

Edmonton Green Rail Station

**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ

22nd 23rd September 2022



**Image A9**

21:08hrs

Merkur Slots 19 The Concourse Edmonton Green

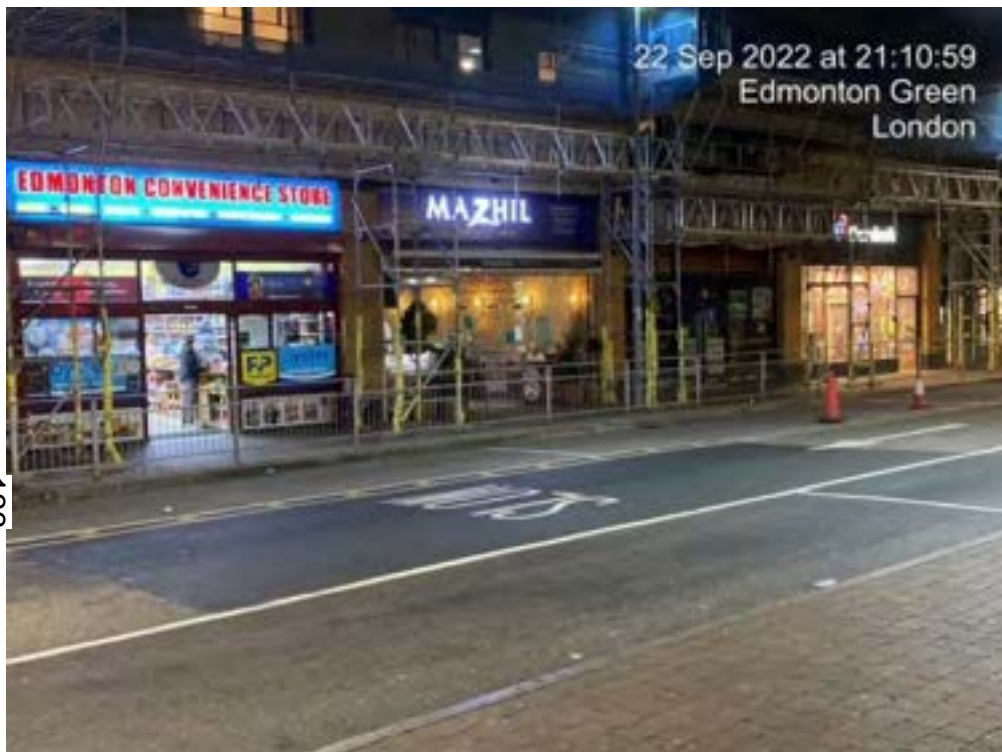


**Image A10**

21:10hrs

24hr Mini Cabs opposite Bus Station

22nd 23rd September 2022



**Image A11**

21:10hrs

Food premises / Mini Supermarket opposite Bus Station



**Image A12**

21:53hrs

Residential Tower Blocks Edmonton Green

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



**Image A13**

21:56hrs

Betfred Bookmakers

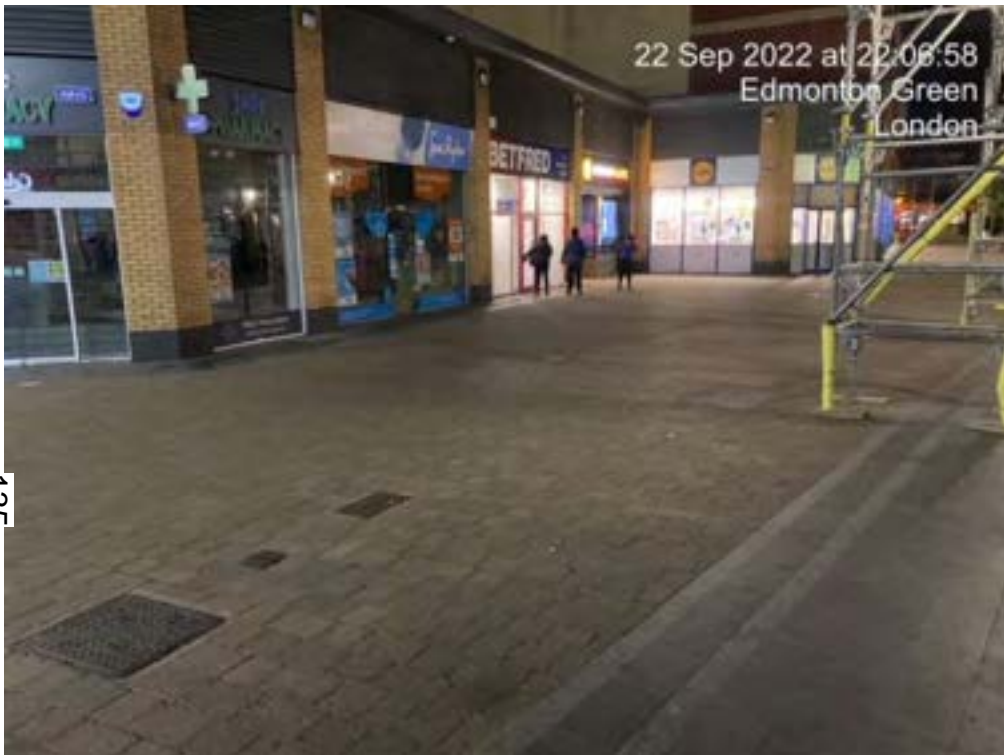


**Image A14**

22:01hrs

Customers leave Merkur Slots Edmonton Green

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



**Image A15**

22:06hrs

Betfred Bookmakers closing time



**Image A16**

22:11hrs

Paved area outside Lidl Supermarket

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



**Image A17**

23:24hrs

Paved area outside Lidl Supermarket



**Image A18**

23:24hrs

Edmonton Bus Station

**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ

22nd 23rd September 2022



**Image A19**

23:25hrs

Merkur Slots 19 The Concourse Edmonton Green



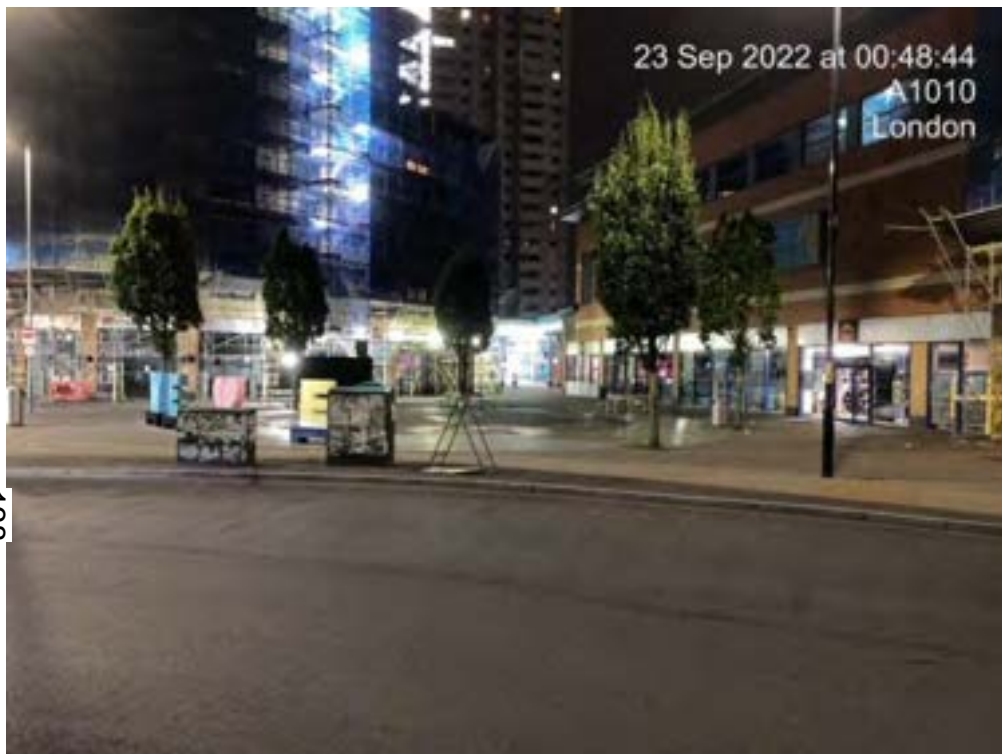
**Image A20**

00:47hrs

Food premises / Mini Supermarket opposite Bus Station

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

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**Image A21**

00:48hrs

Paved area outside Lidl Supermarket



**Image A22**

00:52hrs

Merkur Slots 19 The Concourse Edmonton Green

**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ

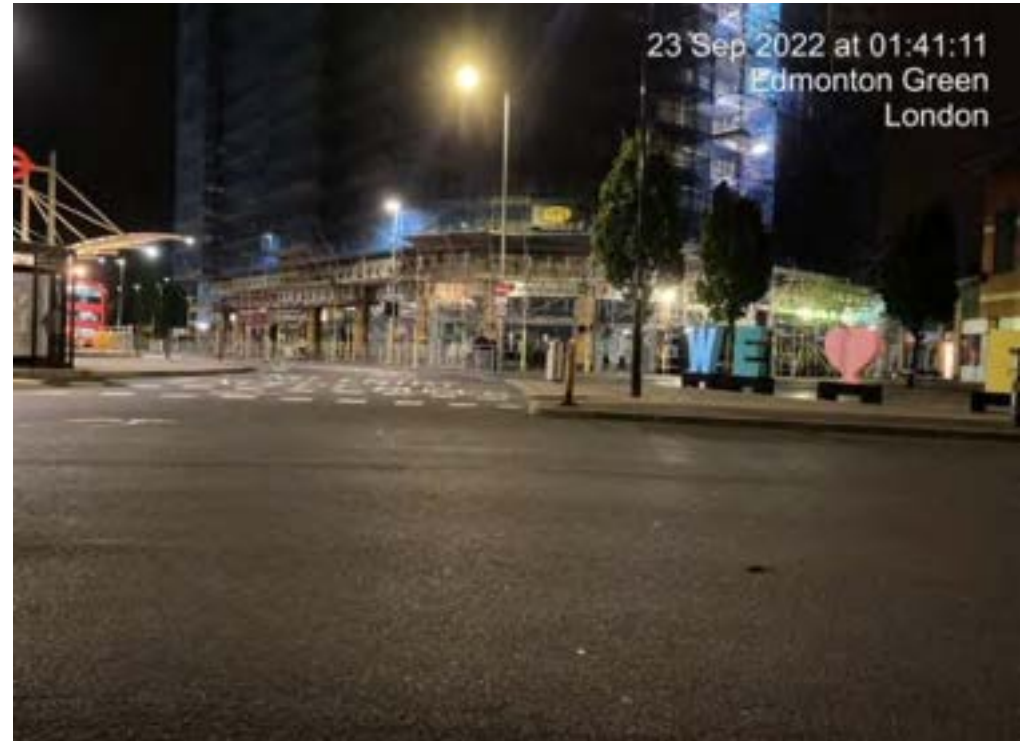
22nd 23rd September 2022



**Image A23**

01:19hrs

Merkur Slots 19 The Concourse Edmonton Green



**Image A24**

01:41hrs

Paved area outside Lidl Supermarket

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



**Image A25**

02:11hrs

Paved area outside Lidl Supermarket

**Image A26**

02:11hrs

Merkur Slots 19 The Concourse Edmonton Green

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



**Image A27**

03:30hrs

Merkur Slots Edmonton Green



**Image A28**

03:30hrs

Paved area outside Lidl Supermarket

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



**Image A29**

04:42hrs

Paved area outside Lidl Supermarket



**Image A30**

04:42hrs

Merkur Slots Edmonton Green

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



**Image A31**

05:44hrs

Merkur Slots Edmonton Green



**Image A32**

05:44hrs

Paved area outside Lidl Supermarket



## **Full Observation Report**

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

### **Merkur Slots**

### **33 Town Centre Hatfield AL10 0JX**

#### **Executive Summary**

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

## **Introduction**

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

## **Personal – Stuart Jenkins**

5. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
6. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
7. I was a Home Office qualified Crime Prevention Design Advisor.
8. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
9. I am the holder of a Personal Licence under the Licensing Act 2003.

## **Observations**

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

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

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

## **Covert Observations**

### **Deployment**

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

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

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

## Summary

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

54. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
55. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
56. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
57. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
58. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
59. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**20/08/2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix A**

Observation Images  
10th August 2022

**Merkur Slots**

33 Town Centre  
Hatfield  
AL10 0JX

**Leveche Associates Ltd**

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

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



**Image A1**

20:02hrs

33 Town Centre Hatfield AL10 0JX



**Image A2**

20:02hrs

Merkur Slots looking east along  
Town Centre Pedestrian Street

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A3**

20:03hrs

Merkur Slots looking east towards  
Town Centre Square

**Image A4**

20:03hrs

Betfred 19 Town Centre Hatfield AL10 0JT

154



**Image A5**

20:05hrs

Hatfield Town Centre Pedestrian Square



**Image A6**

20:06hrs

Hatfield Town Centre Pedestrian Square  
looking north



**Image A7**

20:08hrs

Hatfield Town Centre Pedestrian Square looking west



**Image A8**

20:08hrs

Hatfield Town Centre looking west  
towards Merkur Slots



**Image A9**

20:16hrs

Hatfield Town Centre looking east  
towards Mercur Slots



**Image A10**

20:17hrs

Asda Supermarket Hatfield Town Centre

157



**Image A11**

20:17hrs

Asda Supermarket Car Park Hatfield Town Centre



**Image A12**

21:31hrs

Ladbrokes 44 The Common Hatfield AL10 0LU

Wednesday 10th August 2022

158



**Image A13**

21:32hrs

The Common looking towards Asda Supermarket



**Image A14**

21:33hrs

The Common looking towards Asda Car Park

159



**Image A15**

21:55hrs

Hatfield Town Centre Square looking west  
towards Merkur Slots



**Image A16**

21:55hrs

Hatfield Town Centre Square looking north

Wednesday 10th August 2022



**Image A17**

21:56hrs

Hatfield Town Centre Square looking south



**Image A18**

21:56hrs

Shops off Hatfield Town Centre Square southern end looking south

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



**Image A19**

21:57hrs

Merkur Slots Hatfield Town Centre



**Image A20**

21:59hrs

Hatfield Town Centre looking east



**Image A21**

23:55hrs

Merkur Slots Hatfield Town Centre

**Image A22**

23:55hrs

Town Centre Hatfield looking east

Wednesday 10th August 2022



**Image A23**

23:55hrs

Town Centre Hatfield looking west



**Image A24**

00:08hrs

Rear of Merkur Slots Hatfield



**Image A25**

00:11hrs

Hatfield Town Centre Square looking north



**Image A26**

00:20hrs

Hatfield Town Centre Square looking north

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



**Image A27**

02:14hrs

Hatfield Town Centre looking east



**Image A28**

02:15hrs

Merkur Slots Hatfield

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



**Image A29**

02:41hrs

Merkur Slots Hatfield



**Image A30**

02:42hrs

Hatfield Town Centre Square looking north

Wednesday 10th August 2022



**Image A31**

02:42hrs

Hatfield Town Centre Square looking east



**Image A32**

04:06hrs

Hatfield Town Centre looking east  
towards Merkur Slots

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



**Image A33**  
04:08hrs  
Merkur Slots Hatfield



**Image A34**  
04:09hrs  
Hatfield Town Centre Square looking north



**Image A35**

04:09hrs

Hatfield Town Centre Square looking west  
towards Merkur Slots



**Image A36**

04:09hrs

Shops off Hatfield Town Centre Square  
southern end looking south

Wednesday 10th August 2022



**Image A37**

04:11hrs

Shops in Market Place Hatfield



**Image A38**

04:12hrs

The White Hart Public House Queensway  
Hatfield AL10 0LW

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A39**

06:20hrs

Hatfield Town Centre looking east



**Image A40**

06:21hrs

Merkur Slots Hatfield



**Image A41**

06:23hrs

Hatfield Town Centre Square looking west



**Image A42**

06:23hrs

Hatfield Town Centre Square looking north



## **Full Observation Report**

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

### **Merkur Slots**

**456 Holloway Road London N7 6QA**

#### **Executive Summary**

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

#### **Introduction**

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

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

### **Personal – Stuart Jenkins**

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

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

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

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

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

## **Covert Observations**

### **Deployment**

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

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

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

## Summary

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

62. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
63. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
64. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of and it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
65. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**28/09/2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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## **Appendix A**

Observation Images

3rd - 4th September 2022

### **Mercur Slots**

456 Holloway Road  
N7 6QA

### **Leveche Associates Ltd**

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

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



**Image A1**

21:52hrs

Merkur Slots 456 Holloway Road N7 6QA



**Image A2**

21:54hrs

Merkur Slots 456 Holloway Road N7 6QA

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



**Image A3**

22:12hrs

Admiral Casino 3 Seven Sisters Road N7 6AJ

**Image A4**

22:12hrs

H & T Pawnbrokers 9 Seven Sisters Road N7 6AJ

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



184

**Image A5**

22:12hrs

McDonalds 13-15 Seven Sisters Road N7 6AJ

**Image A6**

22:13hrs

Betfred 10-12 Seven Sisters Road N7 6AH

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



**Image A7**

22:14hrs

The Enkel Arms 34 Seven Sisters Road N7 6AA

**Image A8**

22:15hrs

Paddy Power 42-44 Seven Sisters Road N7 6AA

185

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



**Image A9**

22:16hrs

William Hill 37 Seven Sisters Road N7 6AX



**Image A10**

22:17hrs

Seven Sisters Road looking west

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



**Image A11**

22:21hrs

Merkur Slots 456 Holloway Road



**Image A12**

22:21hrs

Holloway Road looking south

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



**Image A13**

22:21hrs

Holloway Road looking north



**Image A14**

22:25hrs

Waitrose 366 Holloway Road j/w Tollington Road

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



**Image A15**

22:27hrs

Shopping Arcade off Holloway Road leading to Morrisons Supermarket



**Image A16**

22:28hrs

Lidl 422-434 Holloway Road looking north

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

190



**Image A17**  
22:29hrs  
Holloway Road looking north



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

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



**Image A19**

22:31hrs

Odeon Lux Cinema 419 - 727 Holloway Road N7 6LJ



**Image A20**

22:32hrs

Holloway Road looking south

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

192



**Image A21**

22:33hrs

Ladbrokes Bookmakers 502 Holloway Road N7 6JA



**Image A22**

22:34hrs

The Hercules Public House 504 Holloway Road N7 6JA

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

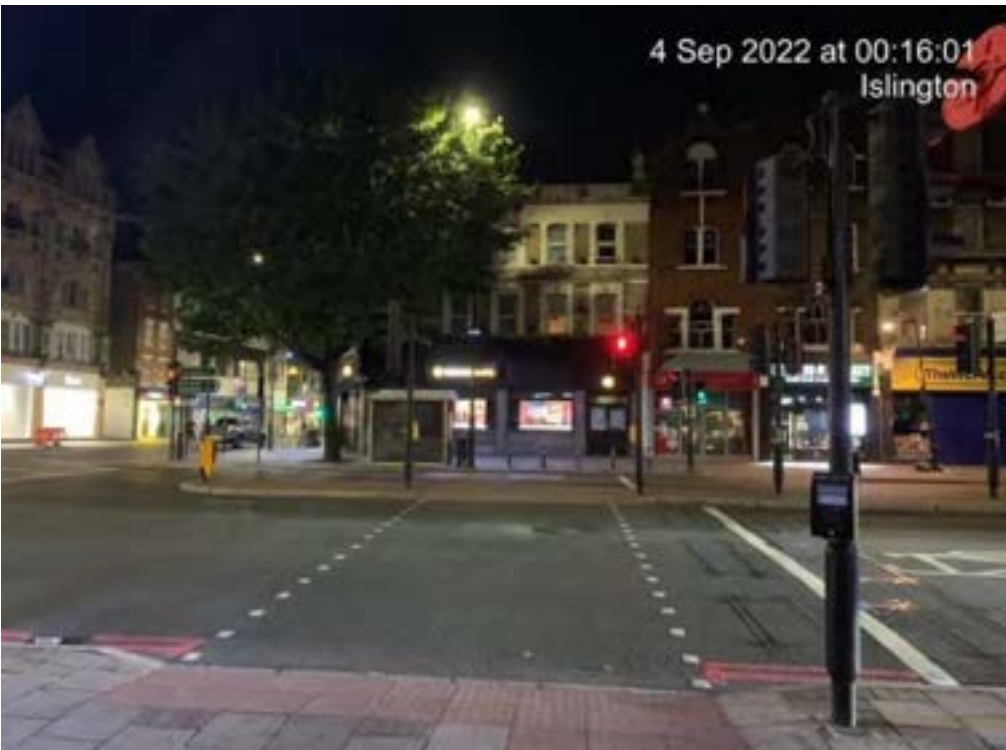
193



**Image A23**

22:42hrs

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



**Image A24**

00:16hrs

Merlur Slots 456 Holloway Road

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



194

**Image A25**

00:16hrs

Holloway Road looking north



**Image A26**

00:16hrs

Holloway Road looking south

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

195



**Image A27**

00:19hrs

Looking towards Merkur Slots 456 Holloway Road



**Image A28**

00:21hrs

Seven Sisters Road looking east

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

196



**Image A29**

00:22hrs

Seven Sisters Road looking east



**Image A30**

02:41hrs

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

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



**Image A31**

02:42hrs

Merkur Slots 456 Holloway Road



**Image A32**

02:42hrs

Holloway Road looking south

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



**Image A33**

02:42hrs

Holloway Road looking north



**Image A34**

02:44hrs

Seven Sisters Road looking west

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022

199



**Image A35**

02:46hrs

Merkur Slots Holloway Road looking south



**Image A36**

03:15hrs

Toilet Check Sheet Merkur Slots Holloway Road

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

200



**Image A37**

03:18hrs

Merkur Slots Holloway Road



**Image A38**

05:10hrs

Holloway Road looking north

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022

201



**Image A39**

05:10hrs

Holloway Road looking south towards Merkur Slots



**Image A40**

05:37hrs

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

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

202



**Image A41**

05:38hrs

Merkur Slots 456 Holloway Road

**Image A42**

05:38hrs

Holloway Road looking north



## **Full Observation Report**

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

### **Merkur Slots**

**146 High Street Hounslow Middlesex TW3 1LR**

#### **Executive Summary**

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

#### **Introduction**

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

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

### **Personal – Stuart Jenkins**

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

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

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

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

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

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

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

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

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

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

## **Covert Observations**

### **Deployment**

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

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

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

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

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

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

## Summary

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

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

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

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

58. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.

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

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

61. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**27/09/2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix A**

Observation Images

25th -26th August 2022

**Mercur Slots**

146 High Street

Hounslow

Middlesex

TW3 1LR

**Leveche Associates Ltd**

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

# Merkur Slots

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



**Image A1**

21:19hrs

Merkur Slots 146 High Street Hounslow TW3 1LR



**Image A2**

21:19hrs

High Street Hounslow looking west

# Mercur Slots

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



**Image A3**

21:20hrs

High Street Hounslow looking east

**Image A4**

21:20hrs

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

# Merkur Slots

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

213



**Image A5**

21:22hrs

Paddy Power 162 High Street Hounslow TW3 1BQ



**Image A6**

21.25hrs

Admiral Casino Slots 192 High Street  
Hounslow TW3 1HL

# Mercur Slots

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

214



**Image A7**

21:26hrs

McDonalds 200-202 High Street Hounslow TW3 1HE



**Image A8**

21:28hrs

Coral Bookmakers 208 High Street Hounslow TW3 1HE

# Merkur Slots

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



**Image A9**

21:29hrs

Entrance to Treaty Centre High Street Hounslow

**Image A10**

21:31hrs

Holy Trinity Church High Street Hounslow

# Merkur Slots

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



**Image A11**

21:32hrs

H&T Pawnbrokers 253 High Street Hounslow TW3 1EA



**Image A12**

21:32hrs

2 - 7 Montague Road Hounslow TW3 1LD

# Mercur Slots

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



**Image A13**

21:34hrs

Market Place 281-287 High Street Hounslow TW3 1EF



**Image A14**

21:34hrs

High Street Hounslow looking east

# Mercur Slots

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



**Image A15**

21:35hrs

Paddy Power 295 High Street Hounslow TW3 1EF



**Image A16**

21:36hrs

The Bell Public House  
2 Staines Road Hounslow TW3 3JS

# Mercur Slots

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



**Image A17**

21:38hrs

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



**Image A18**

21:38hrs

Bath Road Hounslow looking west

# Merkur Slots

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



**Image A19**

21:44 hrs

Merkur Slots 237 -239 High Street Hounslow TW3 1EA



**Image A20**

21:44hrs

Merkur Slots 237 -239 High Street Hounslow TW3 1EA

# Mercur Slots

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



**Image A21**

21:54hrs

Cineworld Cinema Hounslow



**Image A22**

22:33hrs

High Street Hounslow looking west

# Merkur Slots

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



**Image A23**

22:34hrs

Ladbrokes 113 A & B High Street Hounslow TW3 1QT



**Image A24**

22:37hrs

High Street Hounslow looking west  
towards Merkur Slots

# Mercur Slots

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

223



**Image A25**

22:41hrs

Douglas Street j/w High Street Hounslow looking south

**Image A26**

00:30hrs

High Street Hounslow looking west

# Merkur Slots

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



**Image A27**

00:33hrs

High Street Hounslow looking west



**Image A28**

00:34hrs

Merkur Slots 148 High Street Hounslow

# Mercur Slots

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

225



**Image A29**

00:36hrs

High Street Hounslow looking west



**Image A30**

00:38hrs

High Street Hounslow looking west

# Mercur Slots

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



**Image A31**

00:38hrs

McDonalds High Street Hounslow looking east



**Image A32**

00:41hrs

Mercur Slots 146 High Street Hounslow looking east

# Mercur Slots

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



**Image A33**

02:43hrs

High Street Hounslow Looking west



**Image A34**

02:45hrs

Gio's Bar 113B High Street Hounslow 1QT

# Mercur Slots

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

228



**Image A35**

02:46hrs

High Street Hounslow looking west



**Image A36**

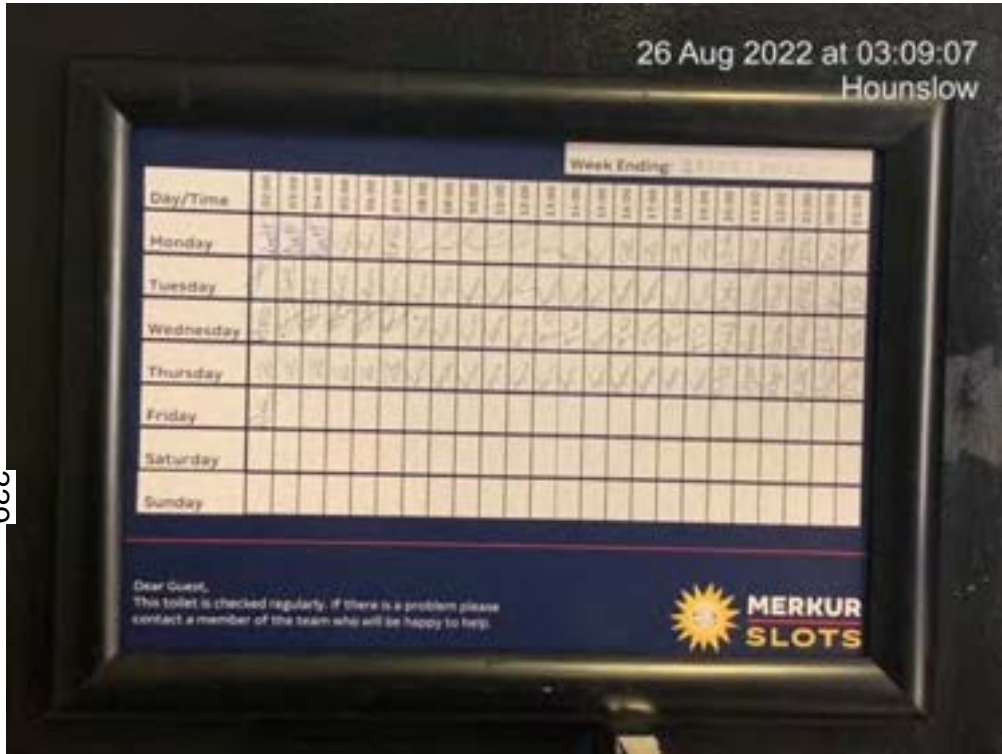
02:47hrs

Mercur Slots 146 High Street Hounslow

# Merkur Slots

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

229



**Image A37**

03:09hrs

Toilet Check Sheet Merkur Slots 146 High Street Hounslow.



**Image A38**

03:09hrs

Staying in Control Poster and Gam Care Leaflets in Toilet

# Merkur Slots

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



**Image A39**

03:10hrs

Merkur Slots 146 High Street Hounslow

**Image A40**

03:10hrs

High Street Hounslow looking west

# Merkur Slots

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



**Image A41**

05:04hrs

High Street Hounslow looking west



**Image A42**

05:04hrs

High Street Hounslow looking east

# Merkur Slots

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



**Image A43**

05:09hrs

Merkur Slots 146 High Street Hounslow



**Image A44**

05:12hrs

High Street Hounslow looking east

# Mercur Slots

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



**Image A45**

05:12hrs

High Street Hounslow looking west



**Image A46**

05:14hrs

Mercur Slots 146 High Street Hounslow

233



## **Full Observation Report**

**Nicholas Mason – Licensing Consultant**  
**Leveche Associates Limited**

### **Merkur Slots**

**377-379 Harehills Lane Leeds LS9 6AP**

#### **Executive Summary**

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

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

## **Introduction**

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

## **Personal Summary – Nicholas Mason**

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

## Observations

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

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

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

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

### **Covert Observations - Deployment**

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

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

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

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

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

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

## Summary

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

60. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
61. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
62. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
63. In conclusion, from my visit it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
64. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
65. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Nick Mason**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**8<sup>th</sup> September 2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix A**

Observation Images

1st - 2nd September 2022

**Merkur Slots**

377-379 Harehills Lane

Leeds

LS9 6AP

**Leveche Associates Ltd**

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

# Merkur Slots

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



**Image A1**

19:52hrs

Merkur Slots 377-379 Harehills Lane LS9 6AP



**Image A2**

20:10hrs

Compton Crescent looking towards  
Merkur Slots Harehills

# Merkur Slots

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



**Image A3**

20:12hrs

Merkur Slots Harehills Lane



**Image A4**

20:13hrs

Looking east opposite Merkur Slots Harehills Lane

# Merkur Slots

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



**Image A5**

20:13hrs

Looking west opposite Merkur Slots Harehills Lane



**Image A6**

20:15hrs

Looking west Harehills Lane from Asda Store

# Merkur Slots

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



**Image A7**

20:16hrs

Asda Store Harehills Lane

**Image A8**

20:18hrs

The Brown Hare Public House Harehills Lane

# Merkur Slots

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



Image A9

20:22hrs

Merkur Slots Harehills Lane

Image A10

20:22hrs

Compton Crescent opposite Merkur  
Slots Harehills Lane

# Merkur Slots

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



**Image A11**

20:22hrs

Compton Row opposite Merkur Slots Harehills Lane



**Image A12**

20:23hrs

Harehills Lane j/w Compton Road

# Merkur Slots

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



**Image A13**

20:36hrs

William Hill Bookmakers  
310-312 Harehills Lane

**Image A14**

20:37hrs

Paddy Power Bookmakers  
284-286 Harehills Lane

# Merkur Slots

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



**Image A15**

20:38hrs

Betfred Bookmakers  
287 Harehills Lane

**Image A16**

20:42hrs

Morrisons Supermarket  
Harehills Lane

250

# Merkur Slots

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



Leeds, England LS9 7BD  
1 Sep 2022 at 21:58:03



Leeds, England LS9 7BG  
1 Sep 2022 at 22:00:40

Image A17

21:58hrs

Betfred Bookmakers  
287 Harehills Lane

Image A18

22:00hrs

William Hill Bookmakers  
310-312 Harehills Lane

# Merkur Slots

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



**Image A19**

22:02hrs

Paddy Power Bookmakers  
284-286 Harehills Lane



**Image A20**

22:15hrs

Harehills Lane looking west towards Merkur premises

# Merkur Slots

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



Image A21

22:15hrs

Harehills Lane looking west towards Merkur premises



Image A22

22:31hrs

Gamcare leaflets Merkur Slots Harehills Lane

# Merkur Slots

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

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**Image A23**

22:31hrs

Toilet Check Sheet Merkur Slots Harehills Lane



**Image A24**

22:56hrs

Customers leaving Merkur Slots Harehills Lane

# Merkur Slots

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



**Image A25**

23:05hrs

Exterior lights turn off Merkur Slots Harehills Lane



**Image A26**

23:07hrs

Staff leaving Merkur Slots Harehills Lane

# Merkur Slots

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



**Image A27**

23:09hrs

Harehills Lane looking west



**Image A28**

23:09hrs

Harehills Lane looking west towards  
Merkur Slots premises

# Mercur Slots

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



**Image A29**

23:10hrs

The Brown Hare Public House Harehills Lane



**Image A30**

23:14hrs

Harehills Lane west towards Morrisons Supermarket

# Mercur Slots

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

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Leeds, England LS8 3RG  
1 Sep 2022 at 23:18:15

**Image A31**

23:18hrs

Harehills Lane looking east



Leeds, England LS9 6AX  
1 Sep 2022 at 23:18:43

**Image A32**

23:18hrs

Harehills Lane looking east

# Merkur Slots

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

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**Image A33**

23:44hrs

The Brown Hare Public House Harehills Lane



**Image A34**

01:30hrs

Harehills Lane looking east towards Merkur Slots premises

# Merkur Slots

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



**Image A35**

01:31hrs

Harehills Lane looking east towards  
Merkur Slots premises



**Image A36**

01:32hrs

Harehills Lane looking east towards  
Merkur Slots premises

# Merkur Slots

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



**Image A37**

01:33hrs

Harehills Lane looking east towards Merkur Slots premises

**Image A38**

01:35hrs

Merkur Slots Harehills Lane

# Merkur Slots

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



**Image A39**

01:35hrs

Opposite Merkur Slots Harehills Lane looking west

**Image A40**

01:35hrs

Opposite Merkur Slots Harehills Lane looking east

# Merkur Slots

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

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**Image A41**

01:35hrs

Compton Crescent opposite Merkur Slots  
Harehills Lane



**Image A42**

03:01hrs

Harehills Lane looking east towards  
Merkur Slots premises

# Merkur Slots

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



**Image A43**

03:03hrs

Merkur Slots Harehills Lane



**Image A44**

03:03hrs

Opposite Merkur Slots Harehills Lane looking west

# Merkur Slots

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



**Image A45**

03:03hrs

Opposite Merkur Slots Harehills Lane looking east



**Image A46**

03:06hrs

Harehills Lane looking west

# Merkur Slots

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



**Image A47**

04:57hrs

Premier 24-hour Supermarket Harehills Lane



**Image A48**

05:02hrs

Rubbish collection Merkur Slots Harehills Lane

# Merkur Slots

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



**Image A49**

05:41hrs

Merkur Slots Harehills Lane



**Image A50**

06:00hrs

Merkur Slots Harehills Lane



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant**

**Leveche Associates Limited**

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

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

### **Executive Summary**

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

## **Introduction**

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

## **Personal – Stuart Jenkins**

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

## **Observations**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **Covert Observations**

### **Deployment One**

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

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

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

## **Deployment Two**

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

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

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

## Summary

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

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

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

89. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**18/09/2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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## **Appendix A**

Observation Images  
27th - 28th August 2022

### **Merkur Slots**

3 Central Parade  
Streatham High Road  
SW16 1HT

### **Leveche Associates Ltd**

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

# Merkur Slots

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



Image A1

21:13hrs

Merkur Slots 3 Central Parade Streatham SW16 1HT



Image A2

21:13hrs

Merkur Slots 3 Central Parade Streatham High Road  
looking south

# Merkur Slots

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



**Image A3**

21:14hrs

H&T Pawnbrokers 254 Streatham High Road SW16 1HT



**Image A4**

21:15hrs

Admiral Casino 119 Streatham High Road SW16 1HJ

# Mercur Slots

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



**Image A5**

21:16hrs

Paddy Power 115 Streatham High Road SW16 1HJ

**Image A6**

21:16hrs

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

# Mercur Slots

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



**Image A7**

21:17hrs

Pratts & Payne Bar 103 Streatham High Road SW16 1HJ



**Image A8**

21:19hrs

William Hill Bookmakers  
250 Streatham High Road SW16 1HS

# Merkur Slots

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



**Image A9**

21:22hrs

The White Lion 232 Streatham High Road SW16 1BB

**Image A10**

23:26hrs

Merkur Slots 3 Central Parade  
High Road Streatham

# Merkur Slots

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



Image A11

23:26hrs

Merkur Slots 3 Central Parade Streatham High Road



Image A12

23:27hrs

Streatham High Road looking south

# Mercur Slots

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



**Image A13**

23:27hrs

Streatham High Road looking north



**Image A14**

23:28hrs

Streatham High Road looking north

# Merkur Slots

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



**Image A15**

01:52hrs

Streatham High Road looking south



**Image A16**

01:53hrs

Streatham High Road looking north

# Merkur Slots

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



**Image A17**

01:53hrs

The White Lion Streatham High Road



**Image A18**

01:59hrs

Merkur Slots 3 Central Parade Streatham High Road

# Mercur Slots

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



**Image A19**

01:59hrs

Streatham High Road looking south

**Image A20**

01:59hrs

Streatham High Road looking north



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix B**

Observation Images  
28th August 2022

**Merkur Slots**

110 Streatham Hill  
London  
SW2 4TD

**Leveche Associates Ltd**

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

# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022

290



**Image B1**

02:21hrs

Merkur Slots 110 Streatham Hill London SW2 4TD



**Image B2**

02:22hrs

Streatham Hill looking north

# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



**Image B3**

02:23hrs

Betfred 132 - 134 Streatham Hill SW2 4RS

**Image B4**

02:28hrs

Ladbrokes 79 - 81 Streatham Hill SW2 4UB





# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



**Image B9**

04:59hrs

Merkur Slots 110 Streatham Hill SW2 4TD



**Image B10**

04:59hrs

Streatham Hill looking north

# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022

295



**Image B11**

05:00hrs

Streatham Hill looking south



**Image B12**

06:03hrs

Streatham Hill looking north

# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



**Image B13**

06:03hrs

Streatham Hill looking south



**Image B14**

06:08hrs

Merkur Slots 110 Streatham Hill SW2 4TD



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix C**

Observation Images  
15th September 2022

**Merkur Slots**

3 Central Parade  
Streatham High Road  
SW16 1HT

**Leveche Associates Ltd**

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

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

298



**Image C1**

21:33hrs

Streatham High Road looking south



**Image C2**

21:34hrs

Streatham High Road looking north



**Image C3**

21:34hrs

Merkur Slots 3 Central Parade Streatham SW16 1HT



**Image C4**

21:58hrs

Staying in Control Literature - Gamcare Leaflets

299

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

300



**Image C5**

21:58hrs

Toilet Check Sheet  
Merkur Slots Streatham High Road



**Image C6**

22:01hrs

Merkur Slots 3 Central Parade



**Image C7**  
22:01hrs

Streatham High Road looking south

**Image C8**  
22:01hrs

Streatham High Road looking north

301



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant**

**Leveche Associates Limited**

**Merkur Slots Cashino**

**69 Tottenham Court Road London W1T 2HA**

### **Executive Summary**

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

### **Introduction**

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

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

### **Personal – Stuart Jenkins**

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

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

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

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

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

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

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

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

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

## **Covert Observations**

### **Deployment One**

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

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

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

## **Deployment Two**

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

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

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

## **Summary**

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

65. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
66. It is clear the presence of Merkur Slots in Tottenham Court Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
67. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
68. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
69. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
70. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
71. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
72. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

73. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**17/09/2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix A**

Observation Images  
17th - 18th August 2022

**Mercur Slots Casino**

69 Tottenham Court Road  
London  
W1T 2HA

**Leveche Associates Ltd**

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

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th 18th August 2022



**Image A1**

20:48hrs

Merkur Slots Cashino  
69 Tottenham Court Road W1T 2HA



**Image A2**

20:48hrs

Tottenham Court Road looking south

17th 18th August 2022



**Image A3**

20:48hrs

Tottenham Court Road looking north

**Image A4**

20:51hrs

Tottenham Court Road j/w Chenies Street looking north

17th 18th August 2022



**Image A5**

20:51hrs

Tottenham Court Road looking north

**Image A6**

20:52hrs

Tottenham Court Road j/w Goodge Street looking west

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

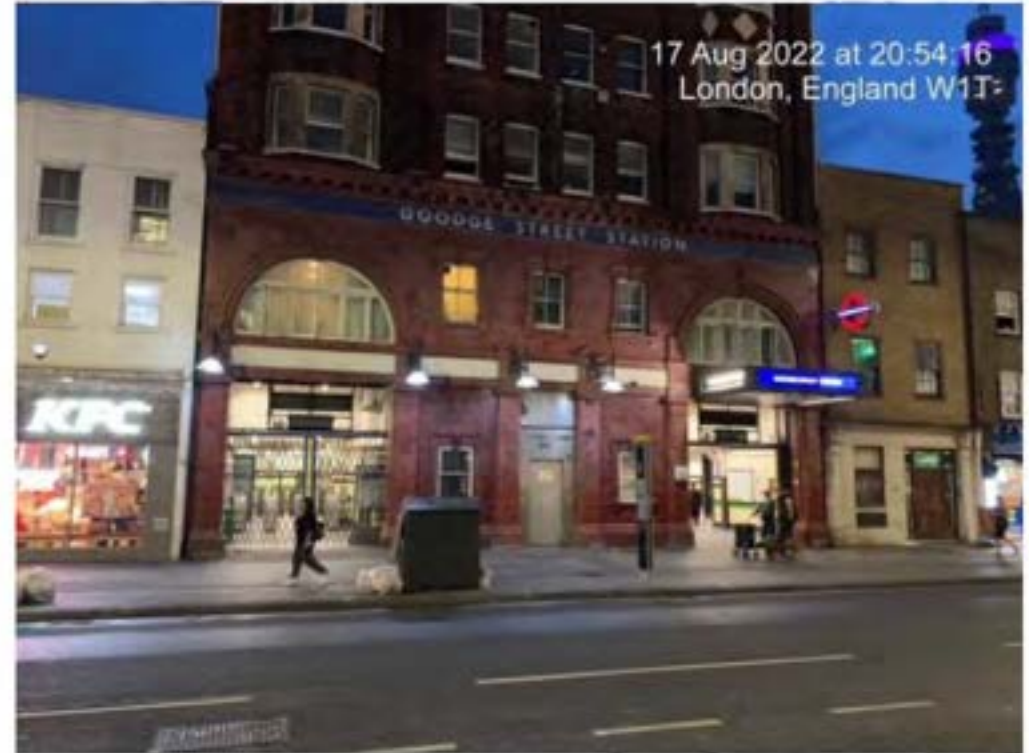
17th 18th August 2022



**Image A7**

20:53hrs

Merkur Slots Cashino  
69 Tottenham Court Road W1T 2HA



**Image A8**

20:54hrs

Goode Street Underground Station  
Tottenham Court Road

17th 18th August 2022



**Image A9**

20:54hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street

**Image A10**

20:55hrs

Heals Furniture Store  
196 Tottenham Court Road

17th 18th August 2022



**Image A11**

21:00hrs

Betfred 116 Tottenham Court Road W1T 5AJ



**Image A12**

21:02hrs

Warren Street Underground Station  
Tottenham Court Road

317

17th 18th August 2022



**Image A13**

21:23hrs

Tottenham Court Road j/w Store Street looking north



**Image A14**

21:23hrs

Rising Sun Public House  
46 Tottenham Court Road W1T 2EL

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th 18th August 2022



**Image A15**

22:32hrs

Merkur Slots Cashino Tottenham Court Road



**Image A16**

22:33hrs

Tottenham Court Road looking south

17th 18th August 2022



**Image A17**

22:33hrs

Tottenham Court Road looking north



**Image A18**

22:34hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street

17th 18th August 2022



**Image A19**

23:54hrs

Tottenham Court Road looking south

**Image A20**

23:54hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street

321

17th 18th August 2022



**Image A21**

23:54hrs

Gode Street Unground Station  
Tottenham Court Road



**Image A22**

23:55hrs

Merkur Slots Cashino Tottenham Court Road

17th 18th August 2022



**Image A23**

23:55hrs

Tottenham Court Road looking south



**Image A24**

00:12hrs

Coral Bookmakers 75 Warren Street NW1 3AD

17th 18th August 2022



**Image A25**

00:16hrs

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



**Image A26**

00:17hrs

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

17th 18th August 2022



**Image A27**

00:18hrs

TCR Bar 183 Tottenham Court Road W1T 7PE



**Image A28**

00:22hrs

Pa Station 76 Tottenham Court Road W1T 2HG

17th 18th August 2022



**Image A29**

03:10hrs

Tottenham Court Road looking north



**Image A30**

03:12hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street

326

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th 18th August 2022



**Image A31**

03:12hrs

Tottenham Court Road looking south



**Image A32**

03:13hrs

Merkur Slots Cashino Tottenham Court Road

17th 18th August 2022

328



**Image A33**

03:24hrs

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

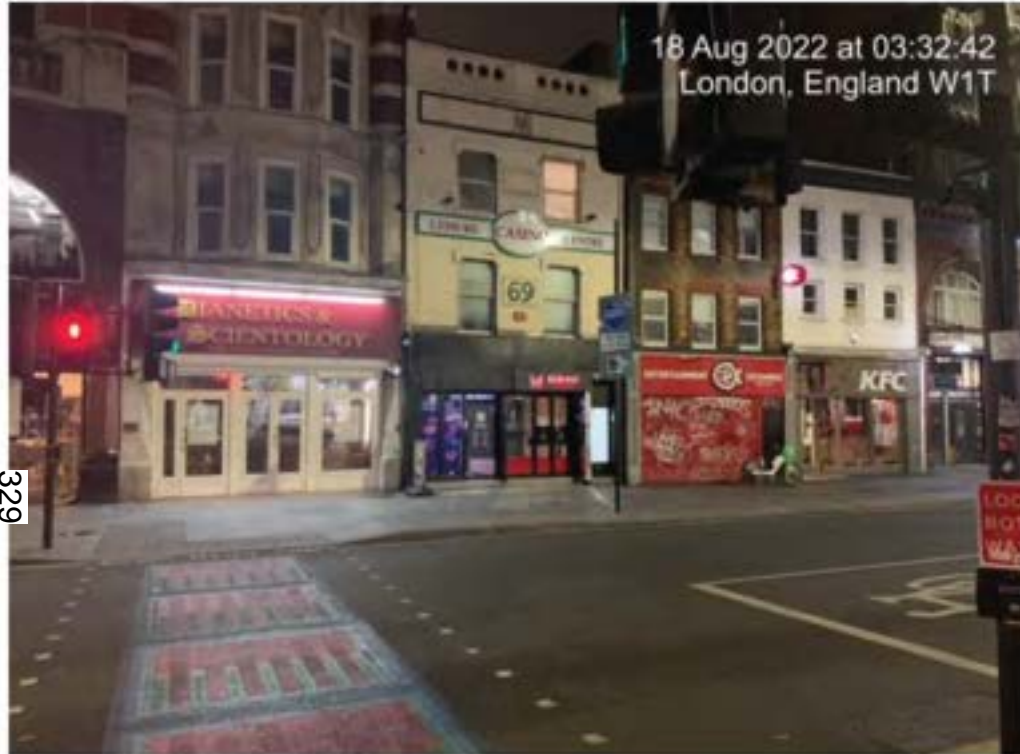


**Image A34**

03:25hrs

Toilet Check Sheet Merkur Slots Cashino  
Tottenham Court Road

17th 18th August 2022



**Image A35**

03:32hrs

Merkur Slots Cashino Tottenham Court Road



**Image A36**

03:36hrs

Godge Street Underground Station  
Tottenham Court Road

17th 18th August 2022



**Image A37**

03:37hrs

Tottenham Court Road looking north



**Image A38**

03:37hrs

Tottenham Court Road looking south

17th 18th August 2022



**Image A39**

03:39hrs

Tottenham Court Road looking south



**Image A40**

05:51hrs

Tottenham Court Road looking north

17th 18th August 2022



**Image A41**

05:52hrs

Tottenham Court Road looking south



**Image A42**

05:54hrs

Merkur Slots Cashino Tottenham Court Road

17th 18th August 2022



**Image A43**

05:57hrs

Goode Street Underground Station  
Tottenham Court Road



**Image A44**

05:58hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street

333



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix B**

Observation Images  
16th September 2022

**Mercur Slots Casino**

69 Tottenham Court Road  
London  
W1T 2HA

**Leveche Associates Ltd**

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

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

16th September 2022



**Image B1**

00:06hrs

Merkur Slots Cashino  
69 Tottenham Court Road W1T 2HA



**Image B2**

00:06hrs

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

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

16th September 2022



**Image B3**

00:17hrs

Merkur Slots Cashino  
69 Tottenham Court Road W1T 2HA



**Image B4**

00:17hrs

Tottenham Court Road looking north

336



## **Full Observation Report**

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

### **Merkur Slots**

**403 – 405 Green Street Upton Park Plaistow E13 9AU**

#### **Executive Summary**

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

#### **Introduction**

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

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

### **Personal – Stuart Jenkins**

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

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

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

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

## **Covert Observations**

### **Deployment**

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

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

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

## Summary

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

- ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
59. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hours a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
60. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
61. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
62. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
63. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**16/09/2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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## **Appendix A**

Observation Images  
8th-9th September 2022

### **Mercur Slots**

403 - 405 Green Street  
Upton Park  
Plaistow  
E13 9AU

### **Leveche Associates Ltd**

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

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

345



**Image A1**

21:03hrs

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



**Image A2**

21:03hrs

Green Street Upton Park looking south

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A3**

21:04hrs

Green Street Upton Park looking north

**Image A4**

21:04hrs

The Queens Public House  
410 Green Street E13 9JJ

**Mercur Slots**

403 405 Green Street Upton Park Plaistow, E13 9AU

8th 9th September 2022

347



**Image A5**

21:05hrs

Queens Market Green Street E13 9BA

**Image A6**

21:06hrs

Upton Park Underground Station  
Green Street E13 9AP

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A7**

21:08hrs

Paddy Power Bookmakers

**Image A8**

21:09hrs

Ladbrokes 305 Green Street

348

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A9**

21:10hrs

Paddy Power Bookmakers  
297 Green Street j/w Plashet Grove

**Image A10**

21:29hrs

Green Street Upton Park looking south

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022

350



**Image A11**

21:35hrs

Side / rear view Merkur Slots Redclyffe Road



**Image A12**

23:26hrs

Green Street Upton Park looking south

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A13**

23:27hrs

Merkur Slots Green Street Upton Park

**Image A14**

23:28hrs

Front Aspect Merkur Slots  
Green Street Upton Park

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A15**

23:30hrs

Green Street Upton Park looking south



**Image A16**

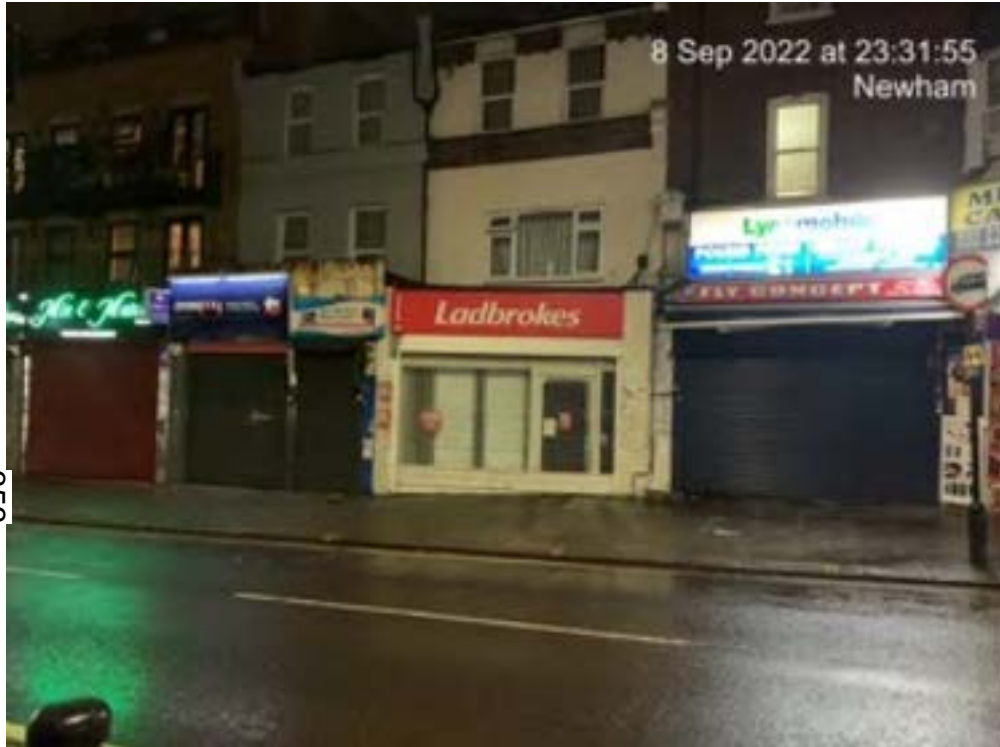
23:30hrs

Green Street Upton Park looking north

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A17**

23:31hrs

Ladbrokes 365 Green Street Upton Park



**Image A18**

23:32hrs

Green Street Upton Park looking north

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022

354



**Image A19**

23:36hrs

Merkur Slots Green Street Upton Park



**Image A20**

23:37hrs

Side Aspect Merkur Slots Green Street Upton Park

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022

355



**Image A21**

23:58hrs

Rear Aspect Merkur Slots Upton Park



**Image A22**

02:03hrs

Green Street Upton Park looking north

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022

356



**Image A23**

02:05hrs

Green Street Upton Park looking south



**Image A24**

02:06hrs

Merkur Slots Green Street Upton Park

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022

357



**Image A25**

02:07hrs

Green Street Upton Park looking north



**Image A26**

02:08hrs

Queens Market Green Street Upton Park

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A27**

02:08hrs

Papa's 337 Green Street E13 9AU



**Image A28**

02:09hrs

Upton Park Underground Station  
Green Street looking north

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A29**

02:11hrs

Game Nation 353 Green Street E13 9AR



**Image A30**

02:13hrs

H&T Pawnbrokers 342 Green Street E13 9AP

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A31**

02:17hrs

Green Street Upton Park looking south



**Image A32**

02:17hrs

Green Street looking south towards  
Upton Park Underground Station

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A33**

02:18hrs

Upton Park Underground Station Green Street



**Image A34**

02:30hrs

Merkur Slots Green Street Upton Park

362



**Image A35**

02:58hrs

Toilet Check Sheet Merkur Slots Green Street



**Image A36**

02:58hrs

Staying in Control Gam Care Literature  
Merkur Slots Green Street

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A37**

03:01hrs

Rear and Side Aspect of Merkur Slots Upton Park



**Image A38**

04:47hrs

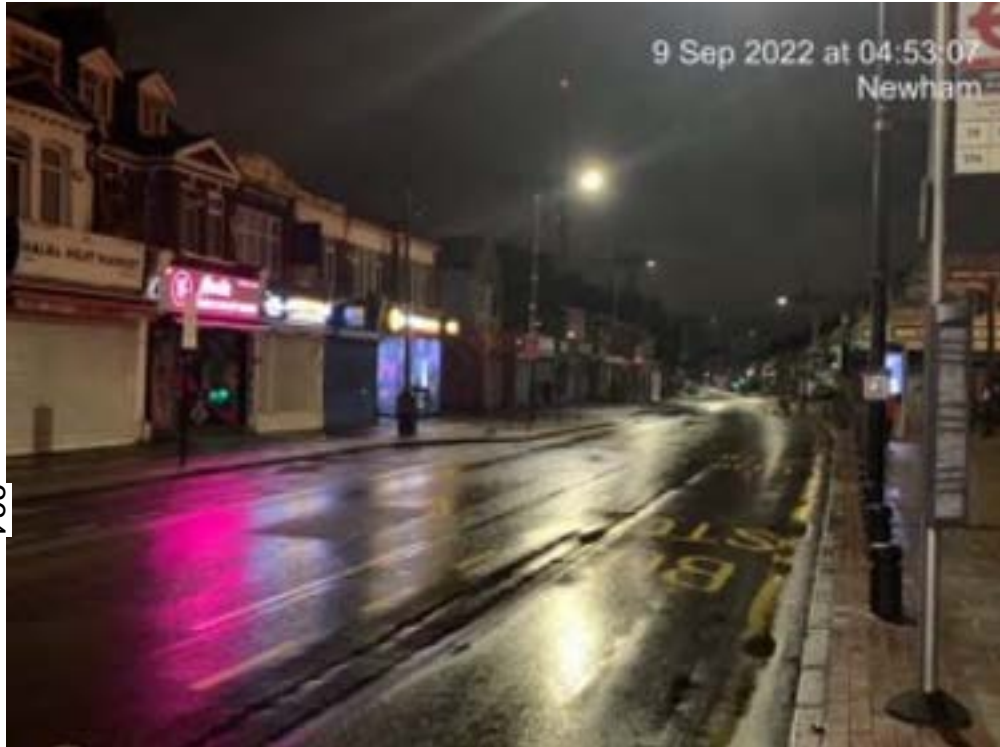
Green Street Upton Park looking south

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022

364



**Image A39**

04:53hrs

Merkur Slots Green Street Upton Park



**Image A40**

04:54hrs

Shopping Area and Shops opposite  
Merkur Slots Green Street

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

365



**Image A41**

06:00hrs

Rear / side aspect Merkur Slots Upton Park



**Image A42**

06:01hrs

Green Street Upton Park looking north

**Merkur Slots**

403 405 Green Street Upton Park Plaistow E13 9AU

8th 9th September 2022



**Image A43**

06:01hrs

Merkur Slots Green Street Upton Park



**Image A44**

06:01hrs

Green Street Upton Park looking south



## **Full Observation Report**

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

### **Merkur Slots**

**91 High Road Wood Green N22 6BB**

#### **Executive Summary**

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

#### **Introduction**

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

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

### **Personal – Stuart Jenkins**

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

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

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

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

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

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

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

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

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

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

## **Covert Observations**

### **Deployment**

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

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

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

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

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

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

## Summary

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

- iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
56. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
57. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
58. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
59. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
60. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**26/09/2022**



**LEVECHE**  
**ASSOCIATES LIMITED**

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**Appendix A**

Observation Images  
26th - 27th August 2022

**Merkur Slots**

91 High Road  
Wood Green  
London  
N22 6BB

**Leveche Associates Ltd**

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

# Merkur Slots

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



Image A1

21:06hrs

Merkur Slots  
91 High Road Wood Green London N22 6BB



Image A2

21:07hrs

Merkur Slots  
91 High Road Wood Green London N22 6BB

# Mercur Slots

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



**Image A3**

21:14hrs

High Road Wood Green looking north

**Image A4**

21:14hrs

High Road Wood Green looking south

# Merkur Slots

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

377



26 Aug 2022 at 21:15:00  
Haringey

**Image A5**

21:15hrs

High Road Wood Green looking north



26 Aug 2022 at 21:15:27  
Haringey

**Image A6**

21:15hrs

High Road opposite Merkur Slots looking north

# Mercur Slots

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

378



**Image A7**

21:17hrs

Betfred 64 High Road Wood Green N22 6HL



**Image A8**

21:20hrs

Game Nation 49 High Road Wood Green N22 6BH

# Mercur Slots

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



**Image A9**

21:21hrs

High Road Wood Green looking south

**Image A10**

21:21hrs

High Road Wood Green looking south

# Merkur Slots

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



**Image A11**

21:22hrs

Little Vegas 17 High Road Wood Green N22 6BH



**Image A12**

21:23hrs

Ladbrokes 13 High Road Wood Green N22 6BH

# Mercur Slots

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



**Image A13**

21:23hrs

Admiral Casino Slots  
9 High Road Wood Green N22 6BH



**Image A14**

21:24hrs

High Road Wood Green j/w Turnpike Lane

# Merkur Slots

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



Image A15

21:26hrs

Paddy Power 33 High Road Wood Green N22 6BH



Image A16

22:29hrs

Admiral Casino Slots  
117 High Road Wood Green N22 6BB

# Mercur Slots

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



**Image A17**

22:35hrs

High Road Wood Green looking north



**Image A18**

22:38hrs

William Hill The Broadway  
High Road Wood Green N22 6DS

# Mercur Slots

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



**Image A19**

22.38hrs

Ladbrokes12 The Broadway  
High Road Wood Green N22 6DS



**Image A20**

22:41hrs

Looking south towards The Mall  
Shopping Centre High Road

# Merkur Slots

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



**Image A21**

22:42hrs

High Road Wood Green looking north



**Image A22**

23:47hrs

McDonalds  
97 - 101 High Road Wood Green N22 6BB

# Merkur Slots

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



**Image A23**

22:48hrs

Merkur Slots 91 High Road Wood Green



**Image A24**

00:31hrs

High Road Wood Green looking north

# Merkur Slots

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



**Image A25**

00:31hrs

High Road Wood Green looking south



**Image A26**

00:32hrs

Merkur Slots 91 High Road Wood Green

# Mercur Slots

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



**Image A27**

00:33hrs

High Road Wood Green looking south

**Image A28**

04:03hrs

High Street Wood Green

# Merkur Slots

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



**Image A29**

04:03hrs

High Road Wood Green looking north



**Image A30**

04:05hrs

Merkur Slots 91 High Road Wood Green



# Merkur Slots

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



**Image A33**

04:37hrs

Merkur Slots High Road Wood Green



**Image A34**

04:38hrs

High Road Wood Green looking north

# Mercur Slots

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



**Image A35**

05:53hrs

High Road Wood Green looking south



**Image A36**

05:53hrs

High Road Wood Green looking north

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# Merkur Slots

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



**Image A37**

05:54hrs

Merkur Slots 91 High Road Wood Green



**Image A38**

05:54hrs

McDonalds High Road Wood Green



## Merkur Slots, 9-10 St. James Street, Brighton, BN2 1RE

### Local Area Risk Assessment

<b>Trading Name:</b>	Merkur Slots
<b>Premise</b>	9-10 St. James Street, Brighton, BN2 1RE
<b>Local Authority:</b>	Brighton and Hove City Council
<b>Premise Licence No:</b>	2021/00929/GABN- Bingo Premises
<b>Operator Licence No:</b>	000-003266-N-103444-028 (Merkur Slots UK Limited)
<b>Company Details:</b>	Merkur Slots UK, (formerly Cashino Gaming LTD) 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
<b>Name and Title of Assessor:</b>	Jolanta Mackowska - Internal Compliance Auditor. Amanda Kiernan – Head of Compliance
<b>Date of Assessment:</b>	16/03/2022 updated 14/06/23
<b>Review Date:</b>	Annually on Compliance Audit Visit

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## Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots is located on the busy St. James Street, there is residential accommodation above and it is surrounded by a mix of retail and non-retail outlets that are mainly occupied. Brighton is well known as holiday destination therefore tourism and entertainment are important sectors for the city, which has many hotels and amusements, as well as Brighton Pier and Shoreham/Portslade Harbour. Night Clubs, Bars, Pubs and Restaurant are present in a close distance from the venue. Brighton Train Station is less than mile away from the venue. Excellent connection between London and Brighton – including fast train stopping at Gatwick International Airport. Many Brighton residents commute to work in London. Parking restrictions apply due to high congestion during the busy summer season. Car Parks are situated near shopping centres and Seafront area – pay and display or residents only.
Establishments of note:	Notified buildings in the close area: Royal Pavilion Museum, 4/5 Pavilion Buildings, Brighton BN1 1EE, Brighton Dome, Church St, Brighton BN1 1UE, Theatre Royal Brighton, New Rd, Brighton BN1 1SD, Churchill Square Shopping Centre, Russell Pl, Brighton BN1 2RG, SEA LIFE Brighton, Marine Parade, Brighton BN2 1TB, Royal Sussex County Hospital, Barry Building, Eastern Rd, Brighton BN2 5BE. There are designated bays for the commercial bins located in the front of the venue.
Adjoining premises:	The premise is situated between Twinpines Speciality Coffee and Morrisons.
Crime statistics:	Merkur Slot Brighton is situated within Kemp Town- The Village policing neighborhood. In the year ending December 2022, the crime rate in Brighton & Hove was about the same as the average crime rate across similar areas and higher than average for the Sussex force area. During December 2022, 82 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were, Violence and sexual offences -23, Anti - social behaviour -15, Shoplifting -11, Public Order -15, Criminal damage and arson -9. During the last 12 months violence and sexual offences and anti-social behaviour have accounted for the highest percentage of crimes reported in the area. ( <i>police.uk</i> )
Population:	18.7% of the households are employed in Retail Inc. Wholesale, 17.9% in Accommodation and Food, 10.8% in Health Inc. Social Work, 8% in Financial Services Inc. Insurance, 7.5% in Education, 7.1% in Other Inc. Arts, Recreation etc., 5.6% in Public Administration and Defence, 5.1% in Professional, Scientific and Technical, 5.1% in Information and Communication, 4.2% in Administration, 3.1% in Transportation Inc. Storage and Logistics, 2.7% in Construction and 2.3% in Real Estate. 57% of the area population are male which is higher than the UK average of 46%. The majority of the population are in the age (30-44), (20-24) and the majority 70% are single. ( <i>streetcheck.uk</i> )
Culture:	The ethnic composition of Brighton and Hove is 89.1% white (80.5% white British, 1.4% white Irish, 7.1% other white), 4.1% Asian (1.1% Chinese, 1.1% Indian, 0.5% Bangladeshi, 1.2% other Asian), 3.8% mixed race (1.5% mixed black/white, 1.2% mixed white/Asian, 1.0% other mix), 1.5% black and 0.8% Arab. Brighton and Hove is an area where 42.90% of people consider themselves to be of Christian religion, 42.42% nonreligious, 2.23% Muslim, 1.00% Buddhist, 0.98% Jewish. 1.66% were adherents of some other religion, while 8.81% did not state their religion. ONS 2015 reported 24.7% (3711) of the ward population as BAME which ranked it as 5 out of 21 wards. ( <i>Census 2011, local area profile</i> )
Unemployment:	According to (Nomis) in 2019 Brighton and Hove had an unemployment rate of 4.1%. which is lower than UK average 4.8%. There was 81.4% of the population economically active, 75.2% in employment. From October 2019 to September 2020 – 12.5% of employed individuals worked in Managers, Directors and Senior Officials Sectors, -31.8% Professional Occupation and - 16% Associate Professional & Technical. In 2015 the claimant count for the ward was 3.3% of those aged 16 and over compared to 0.1% average for the city. ( <i>nomisweb.co.uk, local area profile</i> )
Deprivation:	In the latest Index of Multiple Deprivation (IMD) this area was ranked 3,581 out of 32,844 in England, where 1 was the most deprived and 32,844 the least (11%). Overall deprivation in Brighton and Hove is better than 10% of areas in England, Income deprivation is better than 26% of areas in England, Employment Deprivation is better than 22% of areas in England, Health Deprivation is better than 11% of areas in England, Education Deprivation is better than 43% of areas in England, Barriers to Services Deprivation is better than 21% of areas in England, Living Environment Deprivation is better than 0% of areas in England, Crime Deprivation is better than 1% of areas in England. ( <i>UK local Area.com</i> )
Local Police:	Sussex Police, Kemp Town -The Village, Brighton Police Station, John St, Brighton BN2 0LA Merkur Slots is a member of the Brighton & Hove Business Crime Reduction Partnership.
Incidents reported by venue:	Since opening in February 2022 the venue have recorded 20 incidents: 9 incidents relating to aggressive behaviour; 3 incidents relating to alcohol where the person was told to leave the venue; 7 incidents relating to disturbances inside/outside or near the premises and 1 incident related to a barred person. On 18 of the incidents the culprit were known to the venue. 2 incidents required police attendance.

Independent Security Reviews	<p>MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area.</p> <p>Key comments from the reports include:</p> <p>‘Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.’</p> <p>‘MERKUR Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards’.</p> <p>‘The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to’.</p>
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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 Brighton and Hove City Council local authority Statement of Gambling Principles 2022-2024, reference Part B Promotion of the licensing objectives under the Gambling Act 2005 and Part C section 17 for Bingo Centres and the Kemp Town – The Village and Queens Park Ward Profile.

### Environmental Factors

In preparing this assessment Merkur Casino has considered the relevance of environmental factors. In this context, environmental factors include the physical location of schools, playgrounds, residential areas, other retail premises and locations (bus stations, tube stations) which influence footfall. We have set out below our position on risk in this area:

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p><b>Unemployment:</b> There are estimated to be 11,800 unemployed people in the city. This is 8.2% of those who are economically active. – (Census 2011) According to (Nomis) in 2019 Brighton and Hove had an unemployment rate of 4.1%. which is lower than UK average 4.8%. There was 81.4% of the population economically active, 75.2% in employment. From October 2019 to September 2020 – 12.5% of employed individuals worked in Managers, Directors and Senior Officials Sectors, –31.8% Professional Occupation and – 16% Associate Professional &amp; Technical. In 2015 the claimant count for the ward was 3.3% of those aged 16 and over compared to 0.1% average for the city. (<i>nomisweb.co.uk, local area profile</i>)</p> <p><b>Deprivation:</b> In the latest Index of Multiple Deprivation (IMD) this area was ranked 3,581 out of 32,844 in England, where 1 was the most deprived and 32,844 the least (11%).</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 Brighton Premise frontage is of a style which obscures the interior with no advertising depicting images that may appeal to children.</p>

Overall deprivation in Brighton and Hove is better than 10% of areas in England, Income deprivation is better than 26% of areas in England, Employment Deprivation is better than 22% of areas in England, Health Deprivation is better than 11% of areas in England, Education Deprivation is better than 43% of areas in England, Barriers to Services Deprivation is better than 21% of areas in England, Living Environment Deprivation is better than 0% of areas in England, Crime Deprivation is better than 1% of areas in England. *(UK local Area.com)*

**Schools and Education**

Carlton Hill Primary School, Sussex Street, BN2 9HS  
 Middle Street Primary School, 37 Middle Street, BN1 1AL  
 Queen's Park Primary School, Park Street, BN2 0BN  
 St Paul's CofE Primary School, St Nicholas Road, BN1 3LP  
 Brighton College, Eastern Road, BN2 0AL  
 St Mary Magdalen Catholic Primary School, Spring Street, BN1 3EF  
 Kings Brighton, 27-33 Ditchling Road, BN1 4SB  
 Bellerbys College Brighton, 1 Billinton Way, BN1 4LF  
 Brighton College Nursery, Pre-Prep & Prep School, Walpole Lodge, BN2 0EU  
 St Bartholomew's CofE Primary School, Ann Street, BN1 4GP  
 Hamilton Lodge School and College for Deaf Children, Walpole Road, BN2 0LS  
 St Luke's Primary School, Queens Park Rise, BN2 9ZF  
 Brighton Girls GDST, Montpelier Road, BN1 3AT  
 St John the Baptist Catholic Primary School, Whitehawk Hill Road, BN2 0AH  
 Brighton College Bursary, College Rd, Kemptown, BN2 1EB  
 Brighton College Mountague Place, 20 St George's Terrace, Kemptown, BN2 1JH  
 St Mary's Catholic primary school, Church Rd, BN1 1EH  
 Elm Grove Primary School, Elm Grove, BN2 3ES  
 EC Brighton English Language School, Dolphin House, Manchester St, Kemptown, BN2 1TF  
 Language in Action Ltd, 21-22 Old Steine, Kemptown, BN1 1EL  
 Language Umbrella, 56 Old Steine, BN1 1NH  
 Brighton Language College, 7 Old Steine, Kemptown, BN1 1EJ  
 Edward Street, University of Brighton, 154-155 Edward St, Kemptown, BN2 0JG  
 Brighton School of Beauty, 25 Old Steine, Kemptown, BN1 1EL  
 Make Up School & Shop Bmu, 2 George St, Kemptown, BN2 1RX  
 University of Sussex, Sussex House, Kemptown, BN1 9RH

**Community Centres and Youth Centres**

Brighton Youth Centre, 64 Edward St, BN2 0JR  
 Young Peoples Centre, 69 Ship St, BN1 1AE  
 YAC Youth Advice Centre, 11 St George's Pl, BN1 4GB  
 The Rainbow Hub, 93 St James's St, Kemptown, BN2 1TP  
 The Clare Project, c, Methodist Church, Dorset Gardens, Kemptown, BN2 1RL

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).

Merkur Casino 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.

Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the industry average, all venues receive 3 or 4 random test visits per year.

Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.

All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.

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

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

The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.

We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' <https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019>

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Millwood Community Centre, Nelson Row, BN2 9QH  
 Brighthelm Church and Community Centre, North Rd, BN1 1YD  
 Hanover Community Centre, 33 Southover St, BN2 9UD  
 The Phoenix Community Centre, 2 Phoenix Pl, BN2 9ND  
 The Edge Community Centre, Brighton BN2 9AD

**Parks, play grounds and sports/leisure facilities**  
 Old Steine Gardens and North Steine – Memorial Park55 Old Steine, BN1 1NH,  
 Aids Memorial, New Steine, St James's St, Kemptown, BN2 1PA  
 Dorset Gardens, Kemptown, BN2 1RL  
 Pavilion Gardens, North St, New Rd, BN1  
 Marine Square, 6 Marine Square, Kemptown, BN2 1DL  
 Queen's Park, 25 West Dr, BN2 OQU  
 Turner Park, BN2 OAR  
 Brighton Beach, 4 Madeira Dr, BN2 1ET  
 Valley Gardens, to Palace Pier, St Peter's Pl, BN2 9QB  
 St. Nicholas Rest Garden, 41 Dyke Rd, Hove  
 Regency Square, BN1 2FG  
 Prince Regent Swimming Complex, Church St, BN1 1YA  
 Pure Gym Brighton Central, Tower Point, North Rd, BN1 1YR  
 Juvenile Health & Leisure, Kings Rd, BN1 2GS  
 The Lanes Health Club, 1-3 Kings Rd, BN1 1NS  
 The Gym Brighton Madeira Drive, Unit 9, The Terraces, Madeira Dr, BN2 1AY  
 Yoga2shape, 119-120 Edward St, Kemptown, BN2 0JL  
 King's Road Playground, 28 Kings Rd, BN1 2LN  
 Peter Pan Playground, 299 Madeira Dr, BN2 1EN  
 Brighton Palace Pier, Palace Play Madeira Dr, BN2 1TW

**Vulnerable and addiction support services**  
 B H T Detox Support Project, 5 Egremont Pl, BN2 OGA  
 Refuge Recovery, 164 North St, BN1 1E  
 Allen Carr's Easyway to Stop Smoking - Metropole, Kings Rd, BN1 2FU  
 Brighton Oasis Project, 11 Richmond Pl, BN2 9NA  
 Serenity, 95 Ditchling Rd, Brighton BN1 4ST

**Homeless shelters and food banks**  
 Brighton Mobile Night Shelter, Brighton Marina, BN2 1FY  
 Brighton YMCA, 55 Old Steine, BN1 1NX  
 St Anne's Day Centre, 61 St James's St, Kemptown, BN2 1PR  
 The Clock Tower Sanctuary Day Centre, Wenlock House, 41-43 North St, BN1 1RH  
 Brighton Women's Centre, 22 Richmond Pl, BN2 9NA  
 St Patrick's Church, 1 Cambridge Rd, Hove BN3 1DE  
 First Base Day Centre, St Stephens Hall/Montpelier Pl, BN1 3BF  
 Voices in Exile, 36 Upper Bedford St, Kemptown, BN2 1JP  
 Brighton Food Bank, Calvary Church Building, Stanley Rd, BN1 4NJ

**Vulnerability**  
 Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.

Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

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

Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.

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

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

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

Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.

Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.

Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as Self-Exclusion.

All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.

**Player Protection**  
*To identify signs associated with problem gambling and people who may be at risk of gambling related harm*  
*Failure to provide information to customers on responsible gambling*

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**Pawnbrokers and Loan Shops**  
H&T Pawnbrokers, 4 Castle Square, Brighton BN1 1EG  
Prestige Pawnbrokers, 47 Market St, BN1 1HH  
Brighton Payday Loans, 35 Old Steine, BN1 1NT  
GA Pawnbrokers – Lanes, 8 Brighton Pl, BN1 1HJ  
CeX, 144 western Rd, BN1 2DA

**Medical Centres, Care Homes and Mental Health facilities**  
Pavilion Surgery, 2-3 Old Steine, Kemptown, BN1 1EJ  
Acupuncture & Herbs Brighton, 122 St James's St, BN2 1TH  
Ardingly Court Surgery, 1 Ardingly St, Kemptown, BN2 1SS  
Ship Street Surgery, 65-67 Ship St, BN1 1AE  
Arch Healthcare, Homeless GP Surgery, The School Clinic,  
Morley St, BN2 9DH  
Anahata Health Clinic, 119, 120 Edward St, Kemptown, BN2 0JL  
Brighton Laser & Skin Clinic, 56A Marine Parade, BN2 1PN  
Sundial Clinic Kemptown, 52 St James's St, Kemptown, BN2 1QG  
Elton John Centre - Brighton And Sussex Uni Hospitals, 1 Abbey  
Rd, Kemptown, BN2 1DH  
Thomas Kemp Tower, North Rd, BN2 5BE

**Gambling premises**  
Betfred, 124/125 St James's St, Kemptown, BN2 1TH  
Ladbroke's, 1E St James's St, Kemptown, BN2 1RE  
Admiral Casino: Brighton, 126-127 St James's St, BN2 1TH  
Paddy Power, 163 North St, BN1 1EA  
Ladbroke's, 32 West St, BN1 2RT  
Betfred, 56 Western Rd, BN1 2HA  
William Hill, 39 Queens Rd, BN1 3XB  
Golden Touch Amusements, 97 St James's St, Brighton BN2 1TP  
Pier Nine, 9 Grand Jct Rd, Brighton BN1 1PP

**Public Houses and Alcohol Licensed Premise**  
Volles Club, 3 Madeira Dr, BN2 1PS  
FunkyFish Bar, 19-23 Marine Parade, Kemptown, BN2 1TL  
Apocalypse Brighton, 8 Marine Parade, Kemptown, BN2 1TA  
Latest Music Bar, 14-17 Manchester St, Kemptown, BN2 1TF  
Club Revenge, 32-34 Old Steine, Kemptown, BN1 1EL  
Affinity Bar, 129 St James's St, Kemptown, BN2 1TH  
The Zone Bar, 33 St James's St, Kemptown, BN2 1RF  
CHALK Night Club, 13 Pool Valley, BN1 1NJ  
Shooshh Night Club, 214 Kings Rd, BN1 1NB  
The Hub Night Club, King's, 193 Kings Rd, BN1 1NB  
The Arch Night Club, 187-193 Kings Rd, BN1 1NB  
Brighton Coalition Night Club, 171-181, Kings Rd Arches, BN1 1NB  
PRYZM Night Club, Kingswest, West St, BN1 2RE  
Boutique Night Club, 2 Boyce's St, West St, BN1 1AN  
Charles Street Tap Pub, 8 Marine Parade, Kemptown, BN2 1TA  
The Amsterdam Bar & Kitchen, 11 Marine Parade, BN2 1TL  
The Plotting Parlour, 6 Steine St, Kemptown, BN2 1TE  
Camelford Arms, 30-31 Camelford St, Kemptown, BN2 1TQ

*Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews*

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

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

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

All machines display Gamble Responsibly stickers with helpline contact details.

Senior Management are members of the BACTA Divisional and Socially Responsible Committees and Bingo Association Executive and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.

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

**Deprivation**

Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm

Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.

**Homelessness**

Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.

Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.

Brighton Rocks, Cocktail Bar, 6 Rock Pl, Kemptown, BN2 1PF  
 Le Village- Gay Bar, 2-3 High St, Kemptown, BN2 1RP  
 The Zone Bar, 33 St James's St, Kemptown, BN2 1RF  
 Bulldog Pub, 31 St James's Street Mews, Kemptown, BN2 1RF  
 Block- Bar and Grill, 101 St James's St, Kemptown, BN2 1TP  
 The Saint James Tavern - Pub, 16 Madeira Pl, Kemptown, BN2 1TN  
 The Marine Tavern -Pub, 13 Broad St, Kemptown, BN2 1TJ  
 The Queens Arms Brighton - Gay Bar, 7-8 George St, BN2 1RH  
 The Mucky Duck, 7-9 Manchester St, Kemptown, BN2 1TF  
 Bar Broadway, 10 Steine St, Kemptown, BN2 1TY  
 Affinity Bar, 129 St James's St, Kemptown, BN2 1TH  
 The Marlborough Pub & Theatre, 4 Prince's St, BN2 1RD  
 Horatios Bar, Pier, Madeira Dr, BN2 1TW  
 The Fiddlers Elbow- Pub, 11-12 Boyce's St, BN1 1AN  
 The Cricketers- Pub, The Cricketers, Black Lion St, BN1 1ND  
 Sussex -Pub, 33-34 East St, BN1 1HL  
 East Street Tap - Bar, 74 East St, BN1 1HQ  
 The Madeira Harvester, 1-2 Madeira Dr, BN2 1AY  
 Brighton Bierhaus, 161 Edward St, Kemptown, BN2 0JB  
 Black Dove - Pub, 74 St James's St, Kemptown, BN2 1PA  
 The Sidewinder - Pub, 65 Upper St James's St, BN2 1PJ  
 Hand in Hand, 33 Upper St James's St, Kemptown, BN2 1JN  
 The Black Horse - Pub, 112 Church St, BN1 1UD  
 Sunset Garden - Bar, Unnamed Road, BN2 1TW

**Bus stops and other Transport links**

St James's Street (Stop J), St James's St, Kemptown, BN2 1RE  
 Sea Life Centre (Stop L), Marine Parade, BN2 1TB  
 New Steine, Marine Parade, BN2 1PS  
 Palace Pier (Stop N), Grand Jet Rd, BN2 1TD  
 Pool Valley Coach Station (Stop P), BN1 1NJ  
 Brighton Bus and Coach Station, BN1 1PN  
 North Street (Stop Y), North St, BN1 1RE  
 Brighton Station (Stop D), Queens Rd, BN1 3XE  
 Brighton Station (Stop A), Junction Rd, BN1 3DP  
 Brighton Train Station, Queens Rd, BN1 3XP

**Locally Identified Premises**

Royal Pavilion Museum, 4/5 Pavilion Buildings, BN1 1EE, Dome,  
 Church St, Brighton BN1 1UE, Theatre Royal Brighton, New Rd, BN1  
 1SD, Churchill Square Shopping Centre, Russell Pl, BN1 2RG, SEA  
 LIFE Brighton, Marine Parade, BN2 1TB,  
 Royal Sussex County Hospital, Barry Building, Eastern Rd, BN2 5BE

**Regular Festivals and Town Events/Mass Gatherings**

Brighton Pride 2022 - August  
 Land Beyond Festival 2022- Waterhall Road - May  
 Brighton Fringe - Pier Werks - May to June  
 Brighton Festival- Various Locations - May  
 This is the Modern World - Valley Gardens - July to Sept

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

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

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

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

<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p><b>Crime statistics:</b> Merkur Slots Brighton is situated within Kemp Town- The Village policing neighborhood. In the year ending December 2022, the crime rate in Brighton &amp; Hove was about the same as the average crime rate across similar areas and higher than average for the Sussex force area. During December 2022, 82 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were, Violence and sexual offences - 23, Anti - social behaviour -15, Shoplifting -11, Public Order -15, Criminal damage and arson -9. During the last 12 months violence and sexual offences and anti-social behaviour have accounted for the highest percentage of crimes reported in the area. (police.uk)</p> <p>Since opening in February 2022 the venue have recorded 20 incidents: 9 incidents relating to aggressive behaviour; 3 incidents relating to alcohol where the person was told to leave the venue; 7 incidents relating to disturbances inside/outside or near the premises and 1 incident related to a barred person. On 18 of the incidents the culprit were known to the venue. 2 incidents required police attendance.</p> <p><b>Local Police:</b> Sussex Police, Kemp Town -The Village, Brighton Police Station, John St, Brighton BN2 0LA</p> <p><b>Local/town centre scheme – membership</b> Merkur Slots is a member of the Brighton &amp; Hove Business Crime Reduction Partnership.</p> <p><i>The Brighton and Hove Business Crime Reduction Partnership is one of the leading BCRPs in the country and stands on the frontline of the fight against business crime.</i></p> <p><i>We represent both daytime and night-time economies and we will support your business by giving you the tools you need to help prevent crime and disorder in and around your business.</i></p> <p><i>The BCRP works with businesses and partner agencies to reduce business crime in the city. It operates a city-wide state-of-the-art digital radio network and secure password-protected website which provides accurate intelligence and up-to-date images of individuals offending in the area.</i></p> <p><i>The BCRP also provides crime prevention training, runs restorative justice sessions and operates an Exclusion Notice Scheme which bans prolific offenders from all BCRP member premises. A breach of an exclusion notice can lead to a Community Protection Order or contribute towards a Criminal Behaviour Order.</i></p> <p><i>Using intelligence gathered from members and the police, the BCRP also refers offenders to partner agencies to secure support</i></p>	<p><b>Premise Security and violence in the workplace</b> <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Brighton 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 Brighton is fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout is designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p><b>General Crime and Disorder</b> <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for 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 (BACTA and Association).</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 Brighton participates with the Brighton &amp; Hove Business Crime Reduction Partnership and actively seek to support and be involved with any</p>
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to address their offending behaviour and reduce the chances of re-offending.

**Public Houses and Alcohol Licensed Premise**

Volks Club, 3 Madeira Dr, BN2 1PS  
FunkyFish Bar, 19-23 Marine Parade, Kemptown, BN2 1TL  
Apocalypse Brighton, 8 Marine Parade, Kemptown, BN2 1TA  
Latest Music Bar, 14-17 Manchester St, Kemptown, BN2 1TF  
Club Revenge, 32-34 Old Steine, Kemptown, BN1 1EL  
Affinity Bar, 129 St James's St, Kemptown, BN2 1TH  
The Zone Bar, 33 St James's St, Kemptown, BN2 1RF  
CHALK Night Club, 13 Pool Valley, BN1 1NJ  
Shooshh Night Club, 214 Kings Rd, BN1 1NB  
The Hub Night Club, King's, 193 Kings Rd, BN1 1NB  
The Arch Night Club, 187-193 Kings Rd, BN1 1NB  
Brighton Coalition Night Club, 171-181, Kings Road Arches, BN1 1NB  
PRYZM Night Club, Kingswest, West St, BN1 2RE  
Boutique Night Club, 2 Boyce's St, West St, BN1 1AN  
Charles Street Tap Pub, 8 Marine Parade, Kemptown, BN2 1TA  
The Amsterdam Bar & Kitchen, 11 Marine Parade, BN2 1TL  
The Plotting Parlour, 6 Steine St, Kemptown, BN2 1TE  
Camelford Arms, 30-31 Camelford St, Kemptown, BN2 1TQ  
Brighton Rocks, Cocktail Bar, 6 Rock Pl, Kemptown, BN2 1PF  
Le Village- Gay Bar, 2-3 High St, Kemptown, BN2 1RP  
The Zone Bar, 33 St James's St, Kemptown, BN2 1RF  
Bulldog Pub, 31 St James's Street Mews, Kemptown, BN2 1RF  
Block- Bar and Grill, 101 St James's St, Kemptown, BN2 1TP  
The Saint James Tavern - Pub, 16 Madeira Pl, Kemptown, BN2 1TN  
The Marine Tavern -Pub, 13 Broad St, Kemptown, BN2 1TJ  
The Queens Arms Brighton - Gay Bar, 7-8 George St, BN2 1RH  
The Mucky Duck, 7-9 Manchester St, Kemptown, BN2 1TF  
Bar Broadway, 10 Steine St, Kemptown, BN2 1TY  
Affinity Bar, 129 St James's St, Kemptown, BN2 1TH  
The Marlborough Pub & Theatre, 4 Prince's St, BN2 1RD  
Horatios Bar, Pier, Madeira Dr, BN2 1TW  
The Fiddlers Elbow- Pub, 11-12 Boyce's St, BN1 1AN  
The Cricketers- Pub, The Cricketers, Black Lion St, BN1 1ND  
Sussex -Pub, 33-34 East St, BN1 1HL  
East Street Tap - Bar, 74 East St, BN1 1HQ  
The Madeira Harvester, 1-2 Madeira Dr, BN2 1AY  
Brighton Bierhaus, 161 Edward St, Kemptown, BN2 0JB  
Black Dove - Pub, 74 St James's St, Kemptown, BN2 1PA  
The Sidewinder - Pub, 65 Upper St James's St, BN2 1PJ  
Hand in Hand, 33 Upper St James's St, Kemptown, BN2 1JN  
The Black Horse - Pub, 112 Church St, BN1 1UD  
Sunset Garden - Bar, Unnamed Road, BN2 1TW

**Pawnbrokers and Loan Shops**

H&T Pawnbrokers, 4 Castle Square, Brighton BN1 1EG  
Prestige Pawnbrokers, 47 Market St, BN1 1HH

local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.

**Anti-social behaviour outside the premise**

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

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

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

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

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

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

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

**Money Laundering**

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

Merkur Casino 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.

Brighton Payday Loans, 35 Old Steine, BN1 1NT  
 GA Pawnbrokers – Lanes, 8 Brighton Pl, BN1 1HJ  
 CeX, 144 western Rd, BN1 2DA

**Gambling premises**  
 Betfred, 124/125 St James's St, Kemptown, BN2 1TH  
 Ladbrokes, 1E St James's St, Kemptown, BN2 1RE  
 Admiral Casino: Brighton, 126-127 St James's St, BN2 1TH  
 Paddy Power, 163 North St, BN1 1EA  
 Ladbrokes, 32 West St, BN1 2RT  
 Betfred, 56 Western Rd, BN1 2HA  
 William Hill, 39 Queens Rd, BN1 3XB  
 Golden Touch Amusements, 97 St James's St, Brighton BN2 1TP  
 Pier Nine, 9 Grand Jct Rd, Brighton BN1 1PP

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

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

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

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

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 10pm until 6am.

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

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

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

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

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

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

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

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		<p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p><b>Alcohol and Drugs</b> Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.</p> <p>'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p><b>Money Lending</b> Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p> <p><b>Late Night Operation</b> Maglock systems are made available for staff to deploy at any point in time to protect against crime or disorder and are always deployed during times of public houses closing.</p> <p>Dedicated Regional Night Managers are employed to support venues with security incidents.</p> <p>Area Manager's operate a late night rota system to ensure the 'late night contact number' is monitored so venues always have an Operational Manager to call upon for support with any issues during late night operation.</p>
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<p>Ensuring that gambling is conducted in a fair and open way</p>		<p><b>Gaming Machine and Supervision</b>          The premise operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo is available by means of Bingo tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p><b>Customer Complaints</b>  <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses.          4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p><b>Marketing</b>          Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, 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>
<p>Other</p>	<p>Places of worship and Religious Buildings                  Brighton National Spiritualist Church, 62 Edward St, BN2 0JR                  Park Hill Evangelical Church, Park Hill, BN2 0BT                  Potter's House Church Brighton, St Mary's Church Hall, 61 St James's St, BN2 1PR                  St. Mary's Church, Kemp Town, 61 St James's St, Kemptown, BN2 1PR                  The Village MCC – Worship, 62 St James's St, Kemptown, BN2 1PR                  St John the Baptist's Church, 2 Bristol Rd, Kemptown, BN2 1AP                  Brotherhood Gate Spiritualist Centre – SNU, 21C St James's St, Kemptown, BN2 1RF                  Dorset Gardens Methodist Church, Dorset Gardens, Kemptown, BN2 1SA                  National Spiritualist Church, 62 Edward St, BN2 0JR                  Park Hill Evangelical Church, Park Hill, BN2 0BT                  Vineyard Church, 73 Holland Rd, Hove BN3 1LB                  Church (formerly known as Trinity Chapel, 40 Duke St, BN1 1AG                  Saint Paul's Parish Church, West St, BN1 2RE                  Unitarian Church, New Rd, BN1 1UF                  City Gate Church, Brighthelm Community Centre, North Rd, BN1 1YD                  One Church Brighton, Gloucester Pl, BN1 4AA                  Ebenezer Reformed Baptist Church, Richmond Parade, BN2 9AA                  St Peter's Church, York Pl, BN1 4GU                  Quakers Religious Society of Friends, Meeting House Cottage, Ship St, BN1 1AF                  Al-Medinah Mosque Brighton, 24 Bedford Pl, BN1 2PT                  Brighton Mosque &amp; Muslim Community Centre, 150 Dyke Rd, BN1 5PA                  Brighton Mosque &amp; Muslim Community Centre, 150 Dyke Rd, BN1 5PA</p>	<p>Ethnicity and Local Area Demographic                  Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with the Brighton &amp; Hove Business Crime Reduction Partnership and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training &amp; Social Responsibility                  Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Casino have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Casino 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>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 annually.</p>

## Merkur Slots Brighton Premise Layout

<b>Premise level:</b>	Merkur Slots is a ground floor premise located on the two ways St. James Street.
<b>Premise frontage:</b>	Merkur Slots Brighton is a property is of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
<b>Counter Position:</b>	<p>Merkur Slots Brighton floor layout is 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 Brighton floor layout is designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets are located in prominent locations within the premise.
<b>Machine Positions:</b>	<p>Merkur Slots Brighton operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo is available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
<b>Hidden Areas:</b>	Merkur Slots Brighton is fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV is clearly advertised to customers with screens visible by employees when working in the service area.

Additional Comments

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

Since opening in February 2022 the venue have recorded 20 incidents: 9 incidents relating to aggressive behaviour; 3 incidents relating to alcohol where the person was told to leave the venue; 7 incidents relating to disturbances inside/outside or near the premises and 1 incident related to a barred person. On 18 of the incidents the culprit were known to the venue. 2 incidents required police attendance.

*MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area.*

*Key comments from the reports include:*


*'Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.'*

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

*'The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to'.*

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

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

Assessors Name:	Amanda Kiernan
Signature:	
Date:	14/06/2023

# Merkur Slots, 9-10 St. James Street, Brighton, BN2 1RE



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Merkur Slots, 9-10 St. James Street, Brighton, BN2 1RE



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