

**Notice of Meeting**

**LICENSING SUB-COMMITTEE**

**Tuesday, 18 January 2022 - 11:15 am  
Meeting to be held virtually**

**Members:** Cllr Moin Quadri (Chair); Cllr Adegboyega Oluwole and Cllr Glenda Paddle

Date of publication: 10 January 2022

Claire Symonds  
Chief Executive

Contact Officer: Claudia Wakefield  
Tel. 020 8227 5276  
E-mail: claudia.wakefield@lbbd.gov.uk

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Please note that this meeting will be webcast, which is a transmission of audio and video over the internet. To view the webcast click [here](#) and select the relevant meeting (the weblink will be available at least 24-hours before the meeting).

**AGENDA**

- 1. Apologies for Absence**
- 2. Declaration of Members' Interests**

In accordance with the Council's Constitution, Members are asked to declare any interest they may have in any matter which is to be considered at this meeting.

**GAMBLING MATTERS**

The following are to be heard under the Gambling Act 2005.

**Applications**

- |  | <b>Ward</b> |
|--|-------------|
| <b>3. Gambling Act 2005 - Application for Bingo Premises Licence - Merkur Slots, 247 Heathway, Dagenham RM9 5BG (Pages 5 - 73)</b> | River       |
| <b>4. Any other public items which the Chair decides are urgent</b>  |             |

5. **To consider whether it would be appropriate to pass a resolution to exclude the public and press from the remainder of the meeting due to the nature of the business to be transacted.**

### **Private Business**

The public and press have a legal right to attend Council meetings such as the Licensing Sub-Committee, except where business is confidential or certain other sensitive information is to be discussed. The list below shows why items are in the private part of the agenda, with reference to the relevant legislation (the relevant paragraph of Part 1 of Schedule 12A of the Local Government Act 1972 as amended). ***There are no such items at the time of preparing this agenda.***

6. **Any other confidential or exempt items which the Chair decides are urgent**

## Our Vision for Barking and Dagenham

# **ONE BOROUGH; ONE COMMUNITY; NO-ONE LEFT BEHIND**

## Our Priorities

### **Participation and Engagement**

- To collaboratively build the foundations, platforms and networks that enable greater participation by:
  - Building capacity in and with the social sector to improve cross-sector collaboration
  - Developing opportunities to meaningfully participate across the Borough to improve individual agency and social networks
  - Facilitating democratic participation to create a more engaged, trusted and responsive democracy
- To design relational practices into the Council's activity and to focus that activity on the root causes of poverty and deprivation by:
  - Embedding our participatory principles across the Council's activity
  - Focusing our participatory activity on some of the root causes of poverty

### **Prevention, Independence and Resilience**

- Working together with partners to deliver improved outcomes for children, families and adults
- Providing safe, innovative, strength-based and sustainable practice in all preventative and statutory services
- Every child gets the best start in life
- All children can attend and achieve in inclusive, good quality local schools
- More young people are supported to achieve success in adulthood through higher, further education and access to employment
- More children and young people in care find permanent, safe and stable homes
- All care leavers can access a good, enhanced local offer that meets their health, education, housing and employment needs
- Young people and vulnerable adults are safeguarded in the context of their families, peers, schools and communities

- Our children, young people, and their communities' benefit from a whole systems approach to tackling the impact of knife crime
- Zero tolerance to domestic abuse drives local action that tackles underlying causes, challenges perpetrators and empowers survivors
- All residents with a disability can access from birth, transition to, and in adulthood support that is seamless, personalised and enables them to thrive and contribute to their communities. Families with children who have Special Educational Needs or Disabilities (SEND) can access a good local offer in their communities that enables them independence and to live their lives to the full
- Children, young people and adults can better access social, emotional and mental wellbeing support - including loneliness reduction - in their communities
- All vulnerable adults are supported to access good quality, sustainable care that enables safety, independence, choice and control
- All vulnerable older people can access timely, purposeful integrated care in their communities that helps keep them safe and independent for longer, and in their own homes
- Effective use of public health interventions to reduce health inequalities

## **Inclusive Growth**

- Homes: For local people and other working Londoners
- Jobs: A thriving and inclusive local economy
- Places: Aspirational and resilient places
- Environment: Becoming the green capital of the capital

## **Well Run Organisation**

- Delivers value for money for the taxpayer
- Employs capable and values-driven staff, demonstrating excellent people management
- Enables democratic participation, works relationally and is transparent
- Puts the customer at the heart of what it does
- Is equipped and has the capability to deliver its vision

**Procedure Gambling Act 2005  
Order of Proceedings**

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**Step 1:**

The Chair will ask for the Procedure to be explained

**Step 2:**

Receive the application and report by Officers.

**Step 3**

Consider if the representations received from persons responding to the application are made by interested parties and validly establish the requirement for a hearing in accordance with the Gambling Act.

**Step 4**

Inform the persons whether they have established valid representations as interested parties. If there are no valid representations the application may proceed without a hearing

**Step 5**

Receive the representations from parties

They may:

- Address the Board
- call witnesses

Note: Although no specific time limit is applied to each individual objection the Board will look not to hear repetitive objections  
In addition, if necessary the Chair will apply time limits.

**Step 6:**

The Board/Officers will have the opportunity to raise questions or seek clarification with parties.

**Step 7:**

Any party including the Applicant can question or seek clarification of the other parties with leave of the Board.

**Step 8:**

The Applicant or their representative will present their case and if necessary call witnesses and will also if appropriate respond to the objections raised under Step 3, 4 & 5.

**Step 9:**

The Board/Officers will have the opportunity to raise questions or seek clarification with the Applicant or their representative

**Step 10:**

The other parties with leave of the Board will be given the opportunity through the Chair to raise questions or seek clarification of the Applicant or their representative.

Step 11:

The Parties shall be offered the opportunity to sum up their case subject to the provisos they must not introduce fresh evidence or arguments and shall be no longer than 5 minutes. The Applicant shall sum up last.

Step 12:

The Board will retire to consider their decision.

Step 13:

The Board will return and the Chair will announce the decision.

**Note: The Board may adjourn proceedings at any time and retire to consider any matters relating to the application.**

## LICENSING SUB COMMITTEE

18 January 2022

<b>Title:</b> Gambling Act 2005 – Application for Bingo Premises Licence - Merkur Slots, 247 Heathway, Dagenham RM9 5BG	
<b>Open Report</b>	<b>For Decision</b>
<b>Ward Affected:</b> River	<b>Key Decision:</b> No
<b>Report Author:</b> Theo Lamptey, Service Manager Public Protection	<b>Contact Details:</b> E-mail: <a href="mailto:theo.lamptey@lbbd.gov.uk">theo.lamptey@lbbd.gov.uk</a>
<b>Accountable Director:</b> Andy Opie, Operational Director, Enforcement and Community Safety	
<b>Accountable Strategic Director:</b> Fiona Taylor, Director, Law and Governance	
<p><b>Summary</b></p> <p>This report considers an application for a Bingo Premises Licence under the Gambling Act 2005 in respect of Merkur Slots ( UK ) Ltd at 247 Heathway, Dagenham, RM9 5BG.</p> <p>The application is opposed by one (1) responsible authority namely the Council's Licensing Authority Responsible Authority Officer and three (3) local residents.</p> <p>The matter is put to the Licensing Sub-Committee for determination at a public hearing, accordingly.</p>	
<p><b>Recommendation</b></p> <p>That the Sub-Committee considers this report and appendices together with any oral submissions given at the hearing and determines the application.</p>	

## 1. Introduction and Background

- 1.1 The Gambling Act 2005 established the national licensing regime for gaming and betting. It introduced a two-tier system of regulation with the Gambling Commission made responsible for operators' licences and personal licences, while local licensing authorities were made responsible for premises licences in their area.
- 1.2 While carrying out their licensing duties both the Commission and the local licensing authorities must promote the three licensing objectives. These 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; and
  - Protecting children and other vulnerable persons from being harmed or exploited by gambling.

- 1.3 The Act places a legal duty on both the Commission and licensing authorities to aim to permit gambling, in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives.
- 1.4 Applications for premises licences made to this Council, as the local licensing authority, are required to go out to consultation, during which time a range of 'responsible persons' named under the Act, together with other interested persons, may make representations. Opposed applications, which cannot be concluded through conciliation, are referred to the Licensing Sub-Committee for determination at a public hearing.
- 1.5 When determining applications for premises licences, local licensing authorities must have regard to:
- The Act and secondary regulations
  - Guidance produced by the Gambling Commission for local licensing authorities (current edition April 2021)
  - The statutory aim to permit
  - The licensing objectives
  - The Council's own Statement of Licensing Policy (current edition 2019-22)
- 1.6 Premises licences generally continue for the life of the business or operation concerned but they may be reviewed at any time by any one of the named responsible authorities under the Act or an 'other person'.

## **2. Matters for consideration**

### **The application**

- 2.1 On 8 September 2021, an application was made by Merkur Slots (UK) Ltd for a bingo premises licence in respect of the ground floor of the premises proposed to be known as Merkur Slots at 247 Heathway, Dagenham, RM9 5BG. A copy of the application is attached as Appendix A.
- 2.2 The application proposes that the premises will provide:
- Bingo by way of 20 G-Tab bingo tablets (Tablet type photo attached as Appendix B); and
  - Thirty (30) gaming machines, with 20% being Category B machines and the remaining machines with either Category C or D content.
- 2.3 The application proposes that the premises will operate seven (7) days a week between the hours of 09:00am and 02.00am. Bingo is permitted between the hours of 09:00am and to Midnight only.
- 2.4 The application was accompanied by a range of additional documents. These comprise of:
- A machine plan, which is attached as Appendix C;
  - A premises plan, which is attached as Appendix D;



- Merkur Slots (UK) Limited's Operational Standards, which are attached as Appendix E;
- 'Working Together' document, which is attached as Appendix F; and
- Merkur Local area risk-assessment, which is attached as Appendix G.

2.5 The application also proposes a range of additional licence conditions, as follows:

- 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;
- Notices shall be prominently displayed within the premises stating that CCTV is in operation;
- 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; and
  - H. any Challenge 25 Refusals.
- 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;
- Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises;
- The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice;
- The licensee shall take reasonable steps to prevent nuisance directly outside the Premises; and
- A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by staff members.

## **Representations**

2.6 During the consultation period, five representations were lodged. These were received from the Licensing Authority Responsible Authority Officer (LRAO), the Metropolitan Police Licensing Officer and three local residents.

2.7 The representation from the LRAO is made under two (2) of the three (3) licensing objectives which are:

- Preventing gambling from being a source of crime and disorder, being associated with crime & disorder or being used to support crime; and
- Protecting children and other vulnerable people from harm or from being exploited by gambling.

- 2.8 The representation also references this Authority's own Statement of Licensing Policy which recognises the potential of gambling-related harm in areas of deprivation and the impact that the further increase in the number of gambling premises may have in the most vulnerable and at-risk areas. The representation states that while both the policy and the applicant company's own risk-assessment recognises Heathway to be an area of concern, the management steps put forward as mitigation appear to comprise primarily centralised company policy. A copy of the representation is attached as Appendix H.
- 2.9 The representation from the Metropolitan Police Licensing Officer is also made under two (2) of the three (3) licensing objectives:
- Preventing gambling from being a source of crime and disorder, being associated with crime & disorder or being used to support crime; and
  - Protecting children and other vulnerable people from harm or from being exploited by gambling.
- 2.10 The representation raises concerns that allowing a premises to operate until 02:00am will attract Anti-Social Behaviour (ASB) within the area and there are a number of similar venues already in operation. A meeting took place on 29 September 2021 with the Police Licensing Officer and the Merkur Slots LTD Operational Director. Details of the meeting are noted within the Police Representation attached as Appendix I.
- 2.11 Three (3) representations from local residents are received and raised under all three (3) licensing objectives: 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; and protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 2.12 The representations raise concerns that the area is currently already saturated with other gambling premises. Concern is also raised that the addition of further gambling premises is going to do nothing to stop children becoming gambling addicts and that flooding deprived areas with more gambling premises will cause more addiction and disorder.
- 2.13 Two of the resident objections are located within two miles (2) of the premises. A copy of the representations is attached as Appendix J.

### **Progress of the Application and Conciliation**

- 2.14 Following receipt of all representations, arrangements commenced for a potential public hearing of the application. On 29 October 2021, the applicant's representative Poppleston Allen sought a delay of the hearing until a date to be confirmed in January 2022 in order to allow for key personnel to be available to appear. This request was agreed and the period for determination of the application extended

accordingly. The date of this hearing has thereby been set in agreement with all parties.

- 2.15 On 2 December 2021, a 'conciliation' meeting was arranged between officers from the applicant's company, the applicant's representative, the Council's Licensing Authority Responsible Authority Officer (LRAO) and the Metropolitan Police Licensing Officer.
- 2.16 This conciliation did not result in the withdrawal of any representation but has resulted in a reduction of the operating hours sought under the application, providing for a midnight closure each day of the week.
- 2.17 Further conciliation between the Police Licensing Officer and the applicant's representative has now taken place via email and has resulted in the representation being withdrawn on the basis of reduced operating times and further additional conditions as below:
- Premises to close and cease all gambling activities: Monday to Sunday at midnight;
  - There shall be no pre-planned single staffing at the premises from 20:00 until closing. Should the premises be single staffed after this time, the magnetic door locking system must be in constant use;
  - For 3 months from the date the premises is open to the public, the date to be confirmed in writing to the Licensing Authority, an SIA licensed door supervisor shall be on duty from 21:00 until close every day. Following the initial 3-month period, the requirement for door staff shall be risk assessed and cognisance taken of police advice;
  - Third party testing on age-restricted sales systems shall be carried out on the premises at least 2 times a year and the results shall be provided to the Licensing Authority upon request;
  - If at any time (whether before or after the opening of the premises), the police or licensing authority supply to the premises names and/or photographs of individuals which it wishes to be banned from the premises, the licensee shall use all reasonable endeavours to implement the ban through staff training;
  - The licensee shall implement a policy of banning any customers who engage in crime, disorder or anti-social behaviour within or outside the premises;
  - The licensee shall participate in a local Betwatch or similar scheme, where available;
  - Key staff members will receive first aid training; and
  - 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.

### **Prior Operating History**

- 2.18 The premises has previously operated as Santander Bank and there is no prior licensed operating history at this address to report.
- 2.19 However, the company does operate under a similar bingo premises licence from Cashino Gaming LTD, 62 East Street, Barking IG11 8RQ.

2.20 Mandatory and Default conditions for Bingo premises are attached as Appendix L.

### **Local Area**

2.21 The premises are situated at 247 Heathway Dagenham, RM9 5BG and is in close proximity to Dagenham Heathway station, local shops and residential areas. A map of the local area and premises unit are attached as Appendix K.

2.22 There are five (5) other gambling licensed premises in close proximity to the premises subject of the application. These are:

- William Hill, 220 Heathway, Dagenham RM10 8QS;
- Coral Bookmakers, 251-253 Heathway, Dagenham RM9 5AN;
- Paddy Power, 243 - 245 Heathway, Dagenham RM9 5AN;
- Gaming Fun, 250 Heathway, Dagenham RM10 8SQ; and
- Betfred, Unit 25, The Mall, Heathway Dagenham RM10 8RE.

## **3. The Statement of Gambling Licensing Policy and Local Area Profile**

3.1 This Authority's Statement of Gambling Licensing Policy 2019-22 is informed by the Local Area Risk-Assessment of Gambling Related Harm. Sections 40-41 of the policy state that:

The assessment of the 37 separate indicators that make up the IMD (Index of Multiple Deprivation) indicates that this borough is subject to widespread deprivation to which gambling related harm contributes.

This position gives rise to serious concerns of the impact of any further increase in the number of gambling premises may have for the most vulnerable and 'at risk' areas of the borough. This Authority considers that it is necessary to seek to strictly control the number of facilities for gambling in areas where its most vulnerable residents may be placed at increasing risk, and in line with the duty, to aim to permit gambling insofar as it is reasonably consistent with the pursuit of the licensing objectives. All areas shown within the local area profile as being at high overall risk of gambling related harm, are generally considered inappropriate for further gambling establishments, which would tend to raise the risk of gambling-related harm to vulnerable people living in those areas. Operators are asked to consider very carefully whether seeking to locate new premises or relocating existing premises within these areas would be consistent with the licensing objectives.'

3.2 The Assessment identifies Heathway as one of the most at risk areas.

## **4. Consultation**

4.1 The application has been advertised in accordance with the normal procedures. This includes a copy of a public notice being placed in a local newspaper; a similar notice displayed at the premises and information on the Council's website.

## **5. The Options open to the Sub-Committee**

5.1 Having had regard to all relevant matters and taken all relevant information into account, the Sub-Committee may decide to:

- Grant the licence; or
- Reject it.

5.2 Any licence granted must be made subject to the mandatory conditions for bingo premises (Appendix L) set out in the Act and the default conditions (Appendix L) unless modified by the Authority. The licence may also be made subject to other relevant appropriate additional conditions intended to promote the licensing objectives.

## **6. Legal Implications**

Implications completed by Simon Scrowther, Litigation Lawyer, Corporate Legal

6.1 The London Borough of Barking and Dagenham as Licensing Authority under the Gambling Act 2005 and subordinate legislation, is empowered to determine applications of this nature.

### **Public Background Papers Used in the Preparation of the Report:**

- Gambling Act 2005 and associated regulations
- Gambling Commission Guidance to local licensing authorities
- Barking and Dagenham Statement of Licensing Policy 2019-22
- Local Area Risk Assessment of Gambling Related Harm

### **Appendices to this Report:**

Appendix A: Application

Appendix B: G-Tab Bingo Device

Appendix C: Machine Plan

Appendix D: Premises Plan

Appendix E: Merkur Slots (UK) Limited's Operational Standards

Appendix F: 'Working Together' Document

Appendix G: Merkur Local Area Risk-Assessment

Appendix H: Representation from the Licensing Authority Responsible Authority Officer (LRAO)

Appendix I: Representation from the Metropolitan Police Licensing Officer

Appendix J: Representations from Residents

Appendix K: Map & Premises Unit

Appendix L: Bingo Premises Licences - Mandatory and Default Conditions

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**Application for a premises licence  
under the Gambling Act 2005 (standard form)**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

**Part 1 – Type of premises licence applied for**

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes  No

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

**Part 2 – Applicant Details**

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

**Section A**

**Individual applicant**

1. Title: Mr  Mrs  Miss  Ms  Dr  Other (please specify)

2. Surname: \_\_\_\_\_ Other name(s): \_\_\_\_\_

*[Use the names given in the applicant’s operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]*

3. Applicant’s address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant’s operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

*[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked “Details of further applicants”.]*

## Section B

### Application on behalf of an organisation

6. Name of applicant business or organisation: **Merkur Slots UK Limited**

*[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]*

7. The applicant's registered or principal address:

**Seebeck House  
1A Seebeck Place  
Knowlhill  
Milton Keynes**

Postcode: **MK5 8FR**

8(a) The number of the applicant's operating licence (as given in the operating licence):

**003266-N-103444**

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: **N/A**

9. Tick the box if the application is being made by more than one organisation.

*[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

## Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): **Merkur Slots**

11. Address of the premises (or, if none, give a description of the premises and their location):

**247 Heathway  
Dagenham**

Postcode: **RM9 5BG**

12. Telephone number at premises (if known):

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

**Ground floor premises, high street location**

14(a) Are the premises situated in more than one licensing authority area?

**No** *[delete as appropriate]*



14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made: N/A**

**Part 4 – Times of operation**

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **No** *[delete as appropriate]* *[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]*

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence. **N/A**

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates: **N/A**

**Part 5 – Miscellaneous**

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): *(dd/mm/yyyy)*

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **No** *[delete as appropriate]*

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority? **Yes** *[delete as appropriate]*

19(b). If the answer to question 19(a) is yes, please provide full details:

62 East Street, Barking	IG11 8EQ	BINGO	20594
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20. Please set out any other matters which you consider to be relevant to your application:

**The Applicant operates a national estate of licensed bingo premises which include the provision of bingo tablets and Bingo Plus and Bingo Express terminals. Substantive facilities for non-remote bingo will be made available in accordance with legislative provisions.**

**The operator has full authority to provide licensed bingo by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are implemented and policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.**

**A copy of Merkur Slots UK Limited's Operational Standards has been provided in support of the application and full copies of the Applicant's policies and procedures are available, if required.**

**A copy of Merkur Slots UK Limited's 'Working Together' document has also been supplied in support of the application, which provides an overview of the licensee's proposed operation.**

**Merkur Slots UK Limited has established development standards for its premises and will incorporate Secured By Design measures. Further details are available on request.**

**The Applicant believes the following operational conditions are appropriate to the proposed operation:**

- 1. Premises to close and cease all gambling activities: Monday to Sunday at 02:00 hours**
- 2. 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.**
- 3. Notices shall be prominently displayed within the premises stating that CCTV is in operation.**
- 4. 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.**
- 5. 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.

6. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
7. The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice
8. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.
9. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by staff members.

**Part 6 – Declarations and Checklist (Please tick)**

I confirm that, to the best of my knowledge, the information contained in this application is true. I understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

I confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- I understand that if the above requirements are not complied with the application may be rejected
- I understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

**Part 7 – Signatures**

21. Signature of applicant or applicant’s solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: Poppleston Allen

Date: 07/09/2021

Capacity: Solicitors for & on behalf of the applicant

22. For joint applications, signature of 2nd applicant, or 2nd applicant’s solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name:

Date: \_\_\_\_\_

Capacity: \_\_\_\_\_

*[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]*

*[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]*

### **Part 8 – Contact Details**

23(a) Please give the name of a person who can be contacted about the application:

**Richard Bradley**

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

**0115 948 7424**

24. Postal address for correspondence associated with this application:

**Richard Bradley**

**Poppleston Allen**

**37 Stoney Street**

**The Lace Market**

**Nottingham**

Postcode: **NG1 1LS**

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

# G-TAB Bingo



**Bringing Traditional Bingo  
to the High Street**

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

## Standalone Tablet Terminal

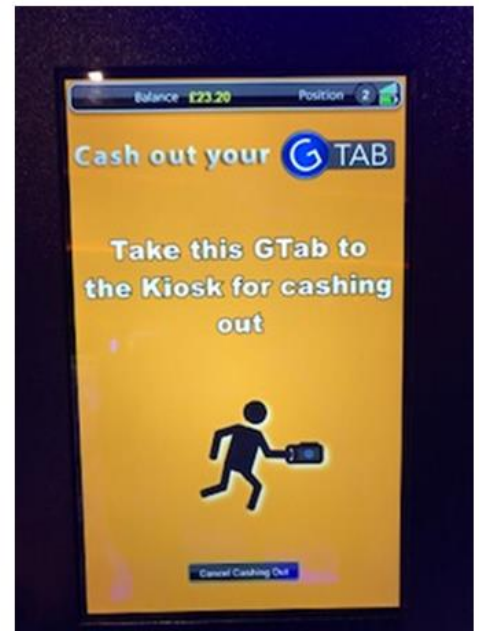
Bingo numbers announced and shown live on the top display



Charges to play clearly displayed



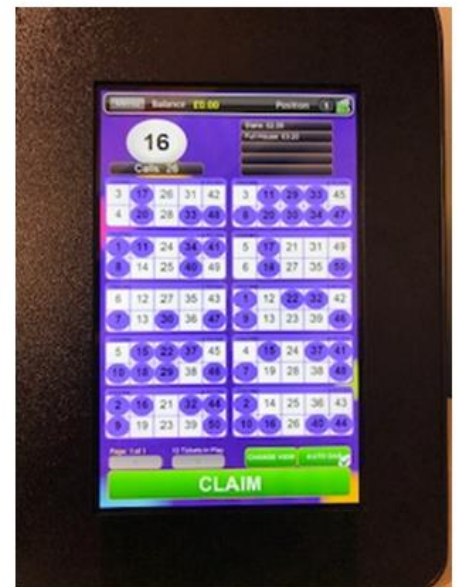
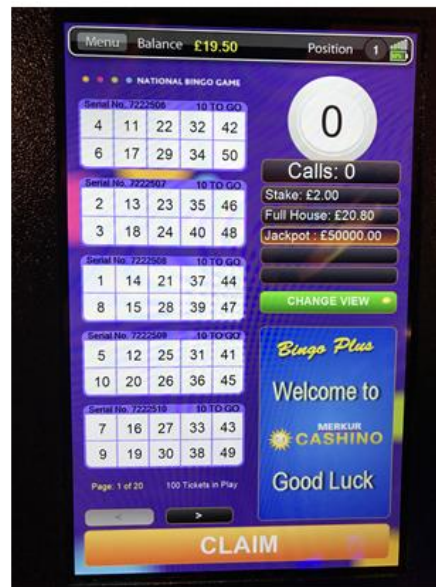
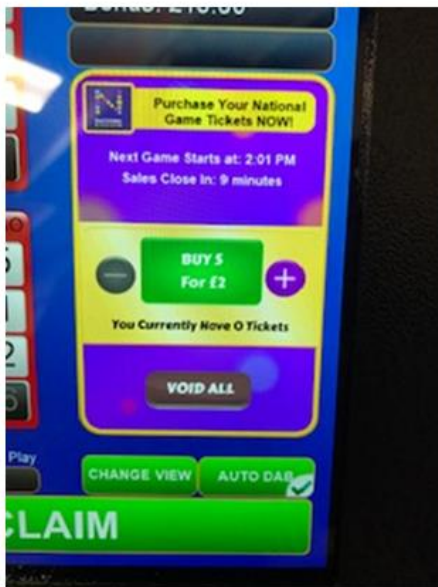
Requires customer interaction to credit the device and cash out



Customers cannot stake-up once game has commenced

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

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

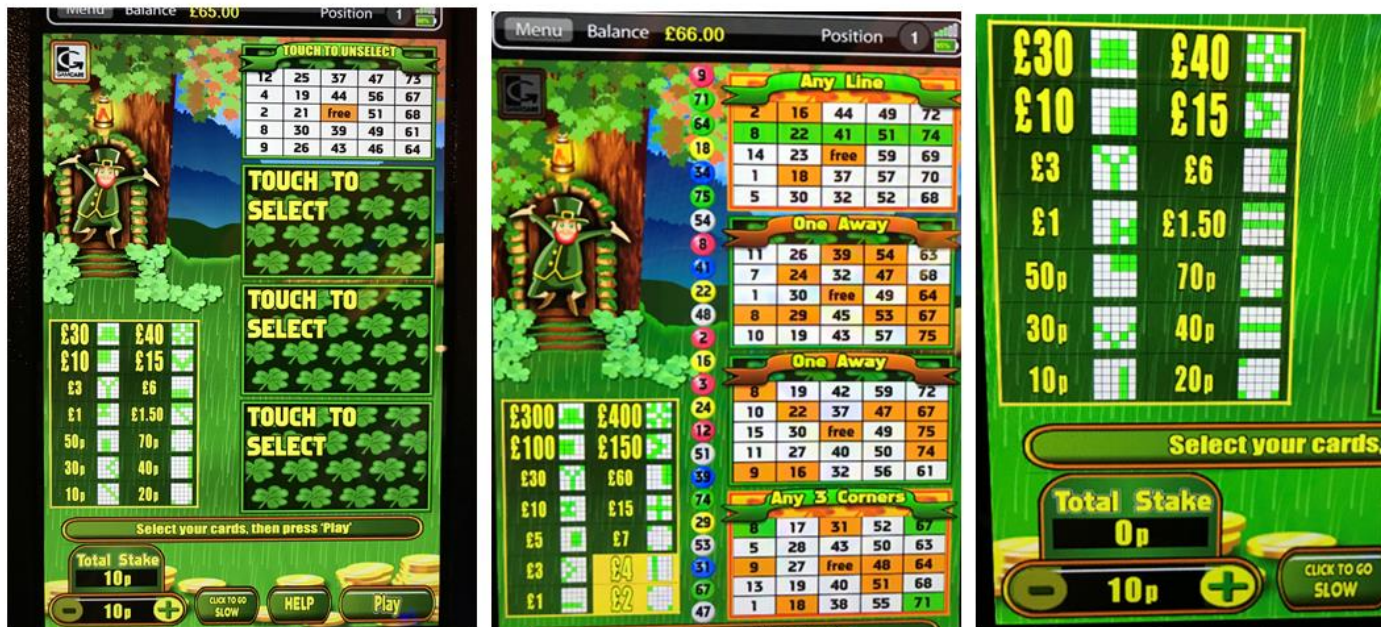


**Live Link Bingo** played throughout the day from 50p for 3 cards, maximum 15 cards per position, making maximum stake of £2.50 per game. The prize money, based on number of cards in play, including bonus lines is clearly displayed on the main display caller's unit, prior to the game commencing, and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

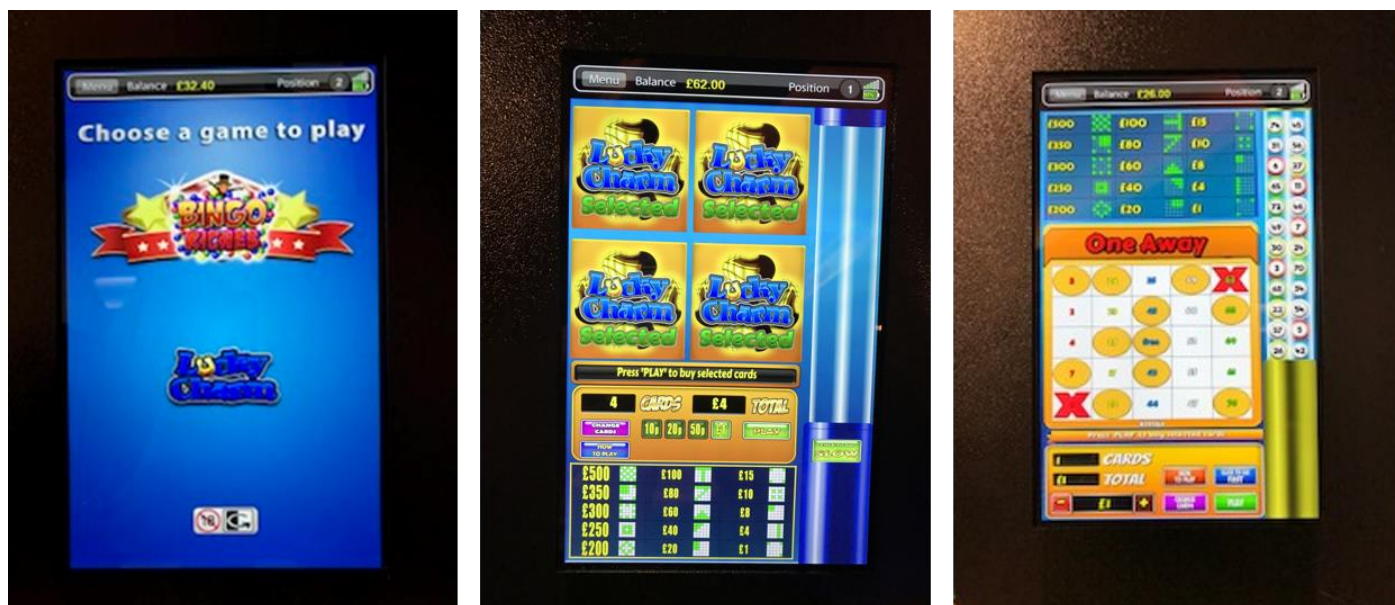


**Bingo Variant (BV) Games** are available 9:00 till midnight. The game of bingo stands alone on the tablet and does not connect via remote communication to a server or link to games across premises.

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



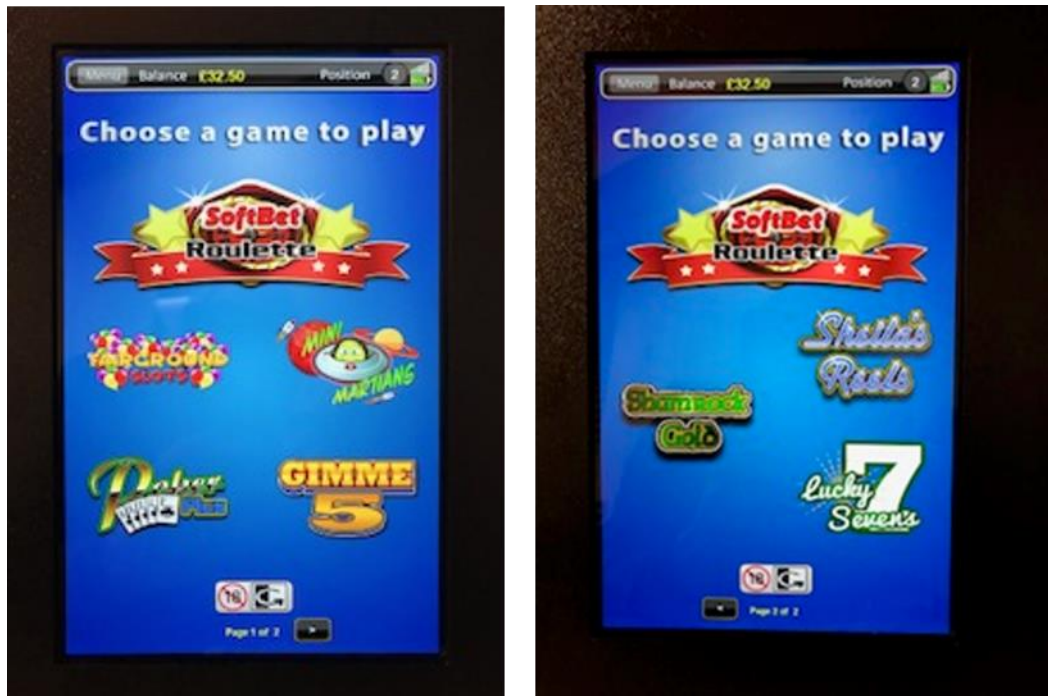
**Lucky Charm:** play from 10p (20p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, fixed odds bingo game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £50 on 10p stake.



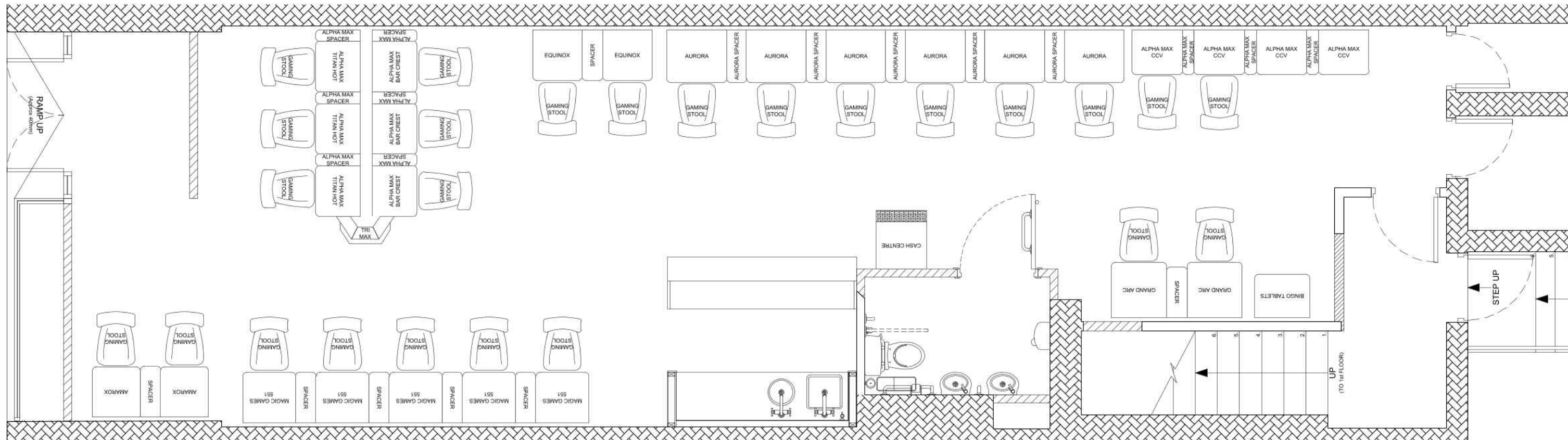


## Low stake games:

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



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

REVISIONS

FIT OUT TYPE  
CONCEPT 2

PROJECT  
**MERKUR SLOTS**  
247 HEATHWAY  
DAGENHAM  
RM9 5BG

DESCRIPTION  
PROPOSED MACHINE PLAN

REFERENCE DRAWINGS

SCALE  
1:50

DRAWN BY  
S.R.B.

DATE  
30/07/21

DRAWING No.  
**999-PR-04**

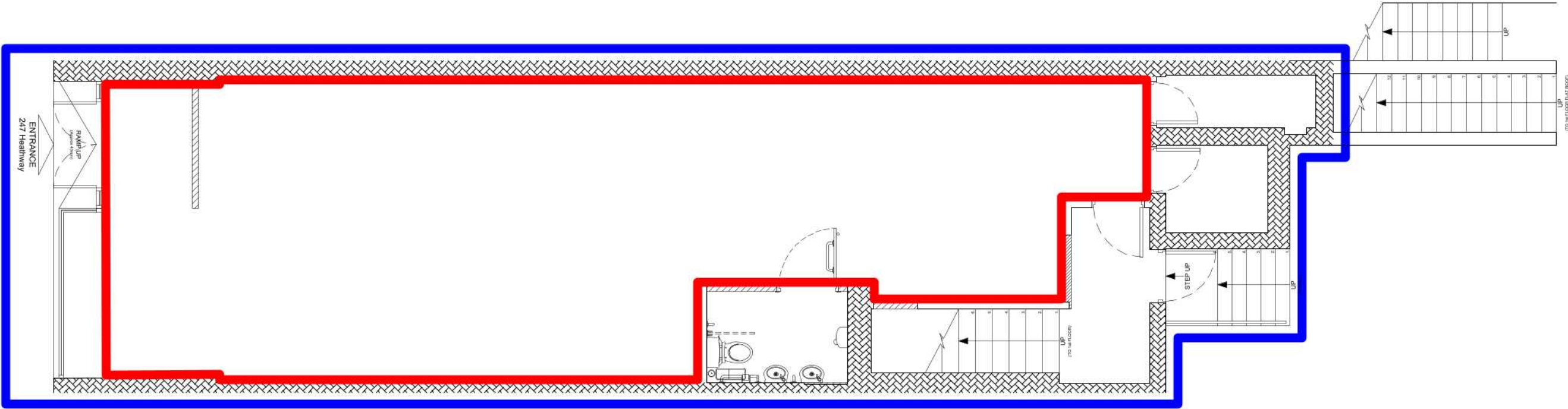
REVISION  
-



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Appendix D



LICENSE PLAN LEGEND	
LINE TYPE	LINE TYPE DESCRIPTION
	AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.
	EXTENT OF PREMISES
<b>GAMBLING ACT 2005 LICENSING PLAN</b>	
Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.	

REVISIONS

FIT OUT TYPE CONCEPT 2
PROJECT MERKUR SLOTS 247 HEATHWAY DAGENHAM RM9 5BG
DESCRIPTION PROPOSED LICENCE PLAN

REFERENCE DRAWINGS
SCALE 1:75
DRAWN BY S.R.B.
DATE 30/07/21
DRAWING No. 999-PR-05
REVISION -



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## THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

- Merkur Slots UK Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Merkur Slots UK Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Merkur Slots UK Limited premises operate digital CCTV and customer areas are supervised.
- Merkur Slots operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Merkur Slots premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Merkur Slots UK Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Merkur Slots operate a robust late night working policy, which is fully supported by a full-time Night Manager.

- Merkur Slots does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

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

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

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

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



- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

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

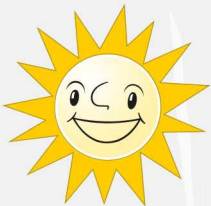
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# WORKING TOGETHER



Accredited by the Global Gambling Guidance Group

## THE MERKUR FAMILY



# PART OF THE GAUSELMANN GROUP

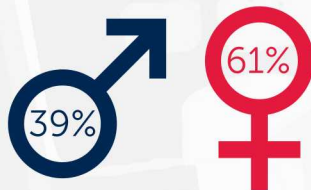
## A Strong Partner For More Than 60 Years



**MERKUR  
CASINO**

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

Merkur Casino UK employs over 1,600 people (61% Female) over 3 Bingo Clubs, over 180 High Street gaming centres and 3 Family Entertainment Centres under two main brands.



**61% of employees are female**  
**39% of employees are male**



**MERKUR  
SLOTS**

Merkur Slots is the main UK brand. All Merkur Cashino and Cashino Gaming venues will be rebranded into this new name over time. Our venues represent the very best in terms of exciting 'slot gaming' entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.



**MERKUR  
BINGO**

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

# HIGH STREET BINGO

## What is it?

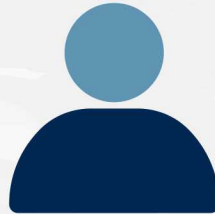
Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



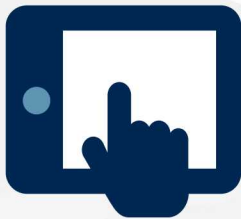
Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



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



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



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



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



Bingo is available for play from 9am until midnight.



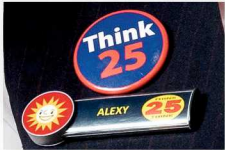
## Bingo Terminals





# RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

## Think 25 Messaging



## Players in Venue



## We Are Not A Problem

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

### GAMBLING COMMISSION

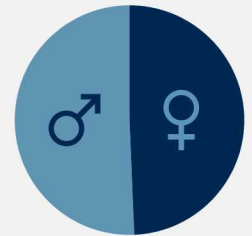
Merkur Casino is regulated by the Gambling Commission and Licensing Authorities



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



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



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



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



Our venues have 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared to other leisure and gambling sectors that sit around 80%.

# SOCIAL RESPONSIBILITY MEASURES IN PLACE



## In Venue

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



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



Dedicated Learning & Development Team and National training centres.

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



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



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

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



PlayRight app installed in all venues that is a self-help tool for customers to manage their gambling.

## Compliance



## Training Centre



## PlayRight App



## Online Training





# SOCIAL RESPONSIBILITY MEASURES IN PLACE

## Machine Messaging



## Customer Interaction Training



## All Levels

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



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



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



Merkur Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our Merkur 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business.

Merkur Casino UK also engages with the Bingo Association, Bacta and Gambling Business Group bodies.



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



# BENEFITS TO THE HIGH STREET



## Benefits for your High Street include:



Over 90% of new Merkur Slots venues occupy former vacant units.



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



Linked trips with other shops helping to support other businesses.



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



Increased footfall to the High Street.



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

# COMMUNITY & CHARITY

## Merkur Initiative

Supporting Local Charities and Good Causes

Amongst other charities, some of your donations have helped:



Merkur Casino UK has raised in excess of  
£1.2 million for good causes since 2005

### Please contact us

For press enquiries:

email [martha@sourcemc.co.uk](mailto:martha@sourcemc.co.uk)

phone +44 (0) 7796 614137

Merkur Casino UK

Seebeck House

1A Seebeck Place

Knowlhill

Milton Keynes

MK5 8FR

Page 40

phone 01908 351200

email [info@merkur-casino.com](mailto:info@merkur-casino.com)





## Merkur Slots, 247 The Heathway, Dagenham, RM9 5BG

### Local Area Risk Assessment

<b>Trading Name:</b>	Merkur Slots
<b>Premise</b>	247 The Heathway, Dagenham, RM9 5BG
<b>Local Authority:</b>	Barking and Dagenham Council
<b>Premise Licence No:</b>	New application
<b>Operator Licence No:</b>	000-003256-N-103444-027 (Merkur Slots UK Limited)
<b>Company Details:</b>	Merkur Slots UK, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
<b>Name and Title of Assessor:</b>	Amanda Kiernan – Head of Compliance
<b>Date of Assessment:</b>	25/07/21 and 12/08/21
<b>Review Date:</b>	On opening in conjunction with local staff

### Local Area Profile Risk Factors

<p>Local Risk Profile:</p>	<p>Merkur Slots Dagenham is a former Santander Bank located on The Heathway (A1240). The surrounding area is heavily populated with residential properties. There is an alleyway a short distance away that leads to a service road behind the retail outlets and further residential properties. The premise is opposite the entrance to The Heathway, Shopping Centre. The shopping centre has a multi-storey carpark which has residential flats and properties above and behind with communal areas where people congregate. There are a variety of retail and non-retail premises along the Heathway both national and independent, these are predominately fast food outlets, small independent retailers and charity shops. There are four Bookmakers in very close proximity along The Heathway, Betfred, William Hill and Coral are directly opposite on the edge of the shopping centre and there are a high number of pawnbrokers and loan shops within the local area. There are six primary schools including one for learning difficulties within half mile.</p> <p>There are a number of local vulnerable and addiction support services nearby: St Luke's Service, 813 Dagenham Road, RM10 7UP is a free and confidential drug and alcohol service for adults in Barking and Dagenham; WDP Subwize, The Vibe, 195-211 Becontree Ave, RM8 2UT, a free, confidential young people's drug and alcohol service; Look Ahead Housing &amp; Care, 1-11 Vineries Close, RM9 5DA, offering sheltered accommodation to single homeless people; and The Trussell Trust Food Bank, a nationwide support network of food banks providing emergency food and support to people locked in poverty has two Foodbanks located in Dagenham.</p>
<p>Establishments of note:</p>	<p>Dagenham Library, 1 Church Elm Lane, RM10 9QS, Citizens Advice, 339 Heathway, RM9 5AF. The Library is opposite the premise on the edge of the shopping centre adjacent to residential properties, approx. 1 minute walk away. Lord Denman public house is located a short distance away on The Heathway, the pub offers Game Nights (sports) and Music events on a regular basis and trades until midnight on Fridays and Saturdays (11pm other days). The underground train station (District Line) is located approx. 5 minutes' walk away. There is an Adult Gaming Centre opposite the station, @gamingfun.</p>
<p>Adjoining premises:</p>	<p>Paddy Power, 243-245 Heathway, RM9 5AN and Gadcet, 249 Heathway, RM9 5AN</p>
<p>Crime statistics:</p>	<p>This postcode is classified as a high crime area. 189 crimes were recorded in June 2021 within half a mile of the centre of RM9 5BG, the majority were - Violence and sexual offences (49), Anti-social behaviour (47). (<i>streetcheck.uk</i>) In the year ending December 2020, the crime rate in Barking &amp; Dagenham was 90.53/1000 which was lower than the average crime rate across similar areas such as Newham, Birmingham and Leicester. In the quarter ending December 2020, crime rates were down in Barking &amp; Dagenham, down in the Metropolitan Police force area compared with the corresponding quarter in 2019.</p>
<p>Population:</p>	<p>The UK population as a whole is 44% male, in this area the split is 49% male, 51% female the majority of the population are in the age group 30-44 years, 41% are married and 37% are single. 34% have no GCSE or equivalent qualification and 18% have a degree or similar. 46.6% are employed as semi-skilled and unskilled manual workers; those on state benefit/unemployed, &amp; lowest grade workers. (<i>streetcheck.uk</i>)</p>
<p>Culture:</p>	<p>Heathway, Dagenham can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 86% white, with residents of this area being 67% so, 20% of the population are Black African and 4.7% of mixed ethnicity. The majority 71.7% were born in England and are Christian.</p>
<p>Unemployment:</p>	<p>74.4% of the area are economically active compared to 79.1% in GB. 67.3% are in employment, 7.9% unemployed. Of the economically inactive 29% are students, 36% look after the home/family and 26% are long term sick. 12% of households are workless. (<i>nomisweb.co.uk</i>)</p>
<p>Deprivation:</p>	<p>On the index of multiple deprivation the area of Barking and Dagenham has an average score of 32.77 it is in the 30-40% most deprived areas in England. The area has a deprivation scores of 31 for barriers to housing, 30 for health, 32 for employment, 29 for crime, 32 for education, 32 for children and young people and 15 for living environment. (<i>lbbd.emu-analytics.net</i>)</p>
<p>Local Police:</p>	<p>Heathway, Dagenham, RM9 5BG is within the River policing neighbourhood, under the Metropolitan Police Service force area. Dagenham Police Station, 561 Rainham Road, RM10 7TU.</p> <p>The local police have raised a number of concerns and apparent significant problems with existing gambling premises relating to street drinking, ASB, drug dealing and violence.</p>

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

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

**Localised Risks to the Licensing Objectives**

This Local Area Risk assessment takes into consideration London Borough of Barking & Dagenham Council local authority Statement of Gambling Licensing Policy (Section four, Premise Licences) and Dagenham Council Borough Profile 2011 for River Ward.

**Environmental Factors**

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

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p><b>Unemployment:</b> 74.4% of the area are economically active compared to 79.1% in GB. 67.3% are in employment, 7.9% unemployed. Of the economically inactive 29% are students, 36% look after the home/family and 26% are long term sick. 12% of households are workless. (nomisweb.co.uk)</p> <p><b>Deprivation:</b> On the index of multiple deprivation, the area of Barking and Dagenham has an average score of 32.77 it is in the 30-40% most deprived areas in England. The area has a deprivation scores of 31 for barriers to housing, 30 for health, 32 for employment, 29 for crime, 32 for education, 32 for children and young people and 15 for living environment. (lbbd.emu-analytics.net)</p> <p><b>Schools and Education</b> Trinity School, Heathway, RM10 7SJ Thomas Arnold Primary School, Rowdowns Rd, RM9 6NH Five Elms Primary School, 294 Wood Ln, RM9 5TB Parsloes Primary School, Spurling Rd, RM9 5RH St Peter's RC Primary School, Goresbrook Rd, RM9 6UU Madrasah, 23 Goresbrook Rd, RM9 6UX A B C Pre School, St Peters Church Hall, Goresbrook Road RM9 6UR Valence Primary, 143 Halbutt St, RM9 5AH Chestnut Nursery School, 202A Halbutt St, RM9 5AA Hopewell School, Harmony House, Baden Powell Ct, RM9 6XN Saint Joseph's Catholic, 48 Connor Rd, RM9 5UL</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. Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Dagenham Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p> <p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests</p>

<p>Marsh Green Primary, South Cl, RM10 9NJ Sydney Russell School, Parsloes Ave, RM9 5QT The Adult College, 241, 247 Parsloes Ave, RM9 5QD</p> <p><b>Community Centres and Youth Centres</b> nia Huggett Women's Centre, 321-329 Heathway, RM9 5AF Hatfield Community Centre, 71 Hatfield Rd, RM9 6JS Richmond Fellowship, 42-48 Parsloes Ave, RM9 5NU Fanshawe Community Centre, Barmmead Rd, RM9 5DX Woodward Hall, 34 Woodward Rd, RM9 4SJ Dagenham Parish Hall, Exeter Road, RM10 8TR Village Community Hall, 18 Vicarage Rd, RM10 9SD Future, Barking &amp; Dagenham Youth Zone, 201, 225 Porters Ave, RM9 5YX Darul Ummah Goresbrook, 36 Maplestead Rd, RM9 4XR</p> <p><b>Parks, play grounds and sports/leisure facilities</b> Castle Green Leisure Centre, Gale St, RM9 4UN Dagenham Park Leisure Centre, School Rd, RM10 9QH Heathway Gardens, Dagenham Ave, RM9 6LD Goresbrook Park, Dagenham Ave, RM9 6LD Heathway Cenotaph War Memorial, Church Elm Lane, RM10 9QS Old Dagenham Park Ornamental Garden, Vicarage Road, RM10 9SD Heath Park, Rusholme Ave, RM10 7ND Old Dagenham Park, Ballards Road, RM10 9AR Parsloes Park, 333 Ivyhouse Road, RM9 5SA King George's Playing Field Play Area, Baddow Close, RM10 9PS Oval Road North Play Area, Oval Rd N, RM10 9EP Pondfield Park Play Area, Reede Rd, RM10 8EH Dagenham Library, 1 Church Elm Lane, RM10 9QS</p> <p><b>Vulnerable and addiction support services</b> St Luke's Service, 813 Dagenham Road, RM10 7UP <i>CGL St Luke's Service is a free and confidential drug and alcohol service for adults in Barking and Dagenham. We provide open access support and treatment for people with alcohol and drug problems. The service aims to help you identify the impact that drugs and/or alcohol may be having on your life and to develop the motivation and confidence to make positive changes.</i> WDP Subwise, The Vibe, 195-211 Becontree Ave, RM8 2UT <i>Subwise is a free, friendly and confidential young people's drug and alcohol service. We work with young people under the age of 21 (with transitional age group of 21-24) who live in Barking and Dagenham or attend schools and colleges in the borough.</i></p>	<p>for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>The children and young person's gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified'</p> <p><a href="https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019">https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</a></p> <p><b>Vulnerability</b> Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p>
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<p>Citizens Advice, 339 Heathway, RM9 5AF Dagenham Ummah Welfare Trust, 5 Hewett Rd, RM8 2XT</p> <p><b>Homeless shelters and food banks</b> Look Ahead Housing &amp; Care, 1-11 Vineries Close, RM9 5DA <i>An organisation offering sheltered accommodation to single homeless people that have a local connection to Barking and Dagenham.</i> The Trussell Trust Food Bank, <i>A nationwide support network of food banks providing emergency food and support to people locked in poverty that campaigns for change to end the need for food banks in the UK.</i> has Foodbanks located in Dagenham: RCCG House of Faith Connections, 104 New Road, Dagenham, RM9 6PE The Old Dagenham Methodist Church, Rainham Road South, Dagenham East, RM10 8YB</p> <p><b>Pawnbrokers and Loan Shops</b> CeX, Unit 6, The Mall, Heathway, RM10 8RE Gadget, 249 Heathway, RM9 5AN Cash Convertors, 287a The, Heathway, RM9 5AQ H&amp;T Pawnbrokers, 299 Heathway, RM9 5AQ D T &amp; T Money Transfer, 222A Heathway, RM10 8QS Access Financial Services, 296 Heathway, RM10 8LU Simply Gold, 307 Heathway, RM9 5AQ</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b> Heathway Medical Centre, Broad Street Resource Centre, Morland Rd, RM10 9HU The Medical Centre, 92 Hedgemans Rd, RM9 6HT Fanshawe Health Centre, 57 Halbutt St, RM9 5AR Becontree Medical Centre, 641-645 Becontree Ave, RM8 3HP Broad Street Resource Centre, Morland Rd, RM10 9HU Church Elm Lane Health Centre, 169 Church Elm Ln, RM10 9RR Oxlow Lane Clinic, 281 Oxlow Ln, RM10 7YU Halbutt Street Surgery, 2 Halbutt St, RM9 5AS Venkat Health Centre, 370 Parsloes Ave, RM9 5QP Queen's Hospital, Rom Valley Way, RM7 0AG</p> <p><b>Gambling premises</b> William Hill, 220 Heathway, RM10 8QS Betfred, 125 Broad St, RM10 9HP @GamingFun, 250 Heathway, RM10 8QS Coral, 251, 253 Heathway, RM9 5AN Paddy Power, 243-245 Heathway, RM9 5AN</p>	<p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p><b>Customer Interaction</b> Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p><b>Player Protection</b> <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p>
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<p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Playright App available for customers to self-manage their play and spend and can send alerts to Merkur Slots Dagenham if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p><b>Deprivation</b></p> <p>Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p><b>Homelessness</b></p> <p>Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p>	<p>Coral, 24 Goresbrook Rd, RM9 6UR Hollywood Bowl, Cook Rd, RM9 6UQ Mecca, Dagenham Leisure Park, Cook Road, RM9 6UQ</p> <p><b>Residential Areas</b></p> <p>Residential areas surround The Heathway which are mainly terraced and semi-detached ex local authority housing. Around 43% are owned and 31% rented from the council. 64% are occupied by 1-4 people. (streetcheck.uk)</p> <p><b>Bus stops and other Transport links</b></p> <p>Dagenham Heathway, Underground Station, RM10 8QS Bus Stops along The Heathway</p> <p><b>Locally Identified Premises</b></p> <p>Citizens Advice, 339 Heathway, RM9 5AF Dagenham Library, 1 Church Elm Lane, RM10 9QS, Citizens Advice, 339 Heathway, RM9 5AF</p> <p><b>Public Houses and Alcohol Licensed Prem</b></p> <p>The Lord Denman, 270-272 Heathway, RM10 8QS Chequers Corner, 2 New Rd, RM9 6YS Premier Inn, Chequers Corner, 2 New Rd, RM10 6YS The Balti Cottage, 18-20 Goresbrook Rd, RM9 6UR Royal Bengal, 7 Parsloes Ave, RM9 5PA</p>	
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<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p><b>Crime statistics:</b> This postcode is classified as a high crime area. 189 crimes were recorded in June 2021 within half a mile of the centre of RM9 5BG, the majority were - Violence and sexual offences (49), Anti-social behaviour (47). (streetcheck.uk) In the year ending December 2020, the crime rate in Barking &amp; Dagenham was 90.53/1000 which was lower than the average crime rate across similar areas such as Newham, Birmingham and Leicester. In the quarter ending December 2020, crime rates were down in Barking &amp; Dagenham, down in the Metropolitan Police force area compared with the corresponding quarter in 2019. (police.uk)</p> <p><b>Local Police:</b> Heathway, Dagenham, RM9 5BG is within the River policing neighbourhood, under the Metropolitan Police Service force area. Dagenham Police Station, 561 Rainham Rd S, RM10 7TU The local police have raised a number of concerns and apparent significant problems with existing gambling premises relating to street drinking, ASB, drug dealing and violence.</p> <p><b>Public Houses and Alcohol Licensed Premise</b> The Lord Denman, 270-272 Heathway, RM10 8QS Chequers Corner, 2 New Rd, RM9 6YS Premier Inn, Chequers Corner, 2 New Rd, RM10 6YS The Balti Cottage, 18-20 Goresbrook Rd, RM9 6UR Royal Bengal, 7 Parsloes Ave, RM9 5PA</p> <p><b>Pawnbrokers and Loan Shops</b> CeX, Unit 6, The Mall, Heathway, RM10 8RE Gadcet, 249 Heathway, RM9 5AN Cash Convertors, 287a The, Heathway, RM9 5AQ H&amp;T Pawnbrokers, 299 Heathway, RM9 5AQ D T &amp; T Money Transfer, 222A Heathway, RM10 8QS Access Financial Services, 296 Heathway, RM10 8LU Simply Gold, 307 Heathway, RM9 5AQ</p> <p><b>Gambling premises</b> William Hill, 220 Heathway, RM10 8QS Betfred, 125 Broad St, RM10 9HP Gaming Fun, 250 Heathway, RM10 8QS Coral, 251, 253 Heathway, RM9 5AN Paddy Power, 243-245 Heathway, RM9 5AN Coral, 24 Goresbrook Rd, RM9 6UR</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 Dagenham 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 Dagenham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p><b>General Crime and Disorder</b> <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for Welwyn Dagenham West 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 Hertfordshire Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p>
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<p>Hollywood Bowl, Cook Rd, RM9 6UQ Mecca, Dagenham Leisure Park, Cook Road, RM9 6UQ</p> <p><b>Residential Areas (impacted by Anti-Social Behaviour)</b> The area around The Heathway is residential terraced and semi-detached housing a large number of the recorded anti-social crimes in June 2021 were in the Church Elm Road and Broad Street residential areas.</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 Dagenham will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p><b>Anti-social behaviour outside the premise</b> Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p><b>Money Laundering</b> <i>Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.</i></p> <p>Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.</p> <p>There are 4 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or</p>
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association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Alcohol and Drugs**

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

'No Alcohol Allowed' signage on the door.

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

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

Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.

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

**Money Lending**

Money lending is not tolerated within our premises.

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

Ensuring that gambling is conducted in a fair and open way

**Bingo/Gaming Machine and Supervision**

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

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

**Customer Complaints**

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

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

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

Complaint's portal used to collate and manage responses.

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

**Marketing**

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

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

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

Other	<p><b>Places of worship and Religious Buildings</b>  Dagenham Jamme Masjid, Barnmead Rd, RM9 5DX  Salvation of God Ministry Cherubim and Seraphim Church, 114 Heathway, RM10 9NX  The Redeemed Christian Church of God, 284A Heathway, RM10 8QS  RCCG - Open Heavens Sanctuary, 228a Heathway, RM10 8PE  Church Elm Court, 26 Church Elm Ln, Barking, RM10 9QS  Cherubim And Seraphim Church, 73 Arnold Rd, RM9 6AQ  St Peter's RC Church, 52 Goresbrook Rd, RM9 6UR  Saint Martin's Church, RM9 6XA  The Apostolic Movement Church, 121 Broad St, RM10 9HP  Osborne Square Church, 76A Osborne Square, RM9 5BA  St Georges C Of E Church, 86 Rogers Rd, RM10 8JX  Dagenham Baptist Church, 70 Chaplin Rd, RM9 6EP  Dagenham Community Church, 21 Charlotte Rd, RM10 8TD  Holy Family Catholic Church, The Presbytery, Oxlow Ln, RM9 5XJ  Becontree Church, 330 Hedgemans Rd, RM9 6BX  Dagenham Aishah Islamic Centre, 1 Selinas Ln, RM8 1QH  Madina Foundation Dagenham East, 539 Rainham Rd S, RM10 7XJ  Beacon Tree Masjid, 798 Green Ln, RM8 1YT</p>	<p><b>Ethnicity and Local Area Demographic</b>  Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p><b>Training &amp; Social Responsibility</b>  Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p>
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**Merkur Slots Dagenham Premise Layout**

	<p>Merkur Slots is a ground floor premise located on The Heathway area of the Dagenham Town Centre.</p>
<p><b>Premise frontage:</b></p>	<p>Merkur Slots Dagenham will be a property 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).</p>
<p><b>Counter Position:</b></p>	<p>Merkur Slots Dagenham floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> <li>- TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</li> <li>- Beverage and snacks are provided from the service area</li> <li>- IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists</li> <li>- The CCTV monitor on the central desk allows staff to view the exterior at all times.</li> </ul>
<p><b>Floor layout:</b></p>	<p>Merkur Slots Dagenham or layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.</p>
<p><b>Machine Positions:</b></p>	<p>Merkur Slots Dagenham will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
<p><b>Hidden Areas:</b></p>	<p>Merkur Slots Dagenham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.</p>



**Additional Comments**

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

I am an IIA Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk based customer facing environments within various industries. The last 9 years I have been working solely in the Gambling Industry (Amanda Kiernan, Head of Compliance).

Merkur Slots UK have operated a Bingo licensed premise within the Barking and Dagenham Local Authority, Merkur Slots, 62 East Street, Barking, IG11 8EQ since 2012. This premise has never been subject to a local authority or Gambling Commission review.

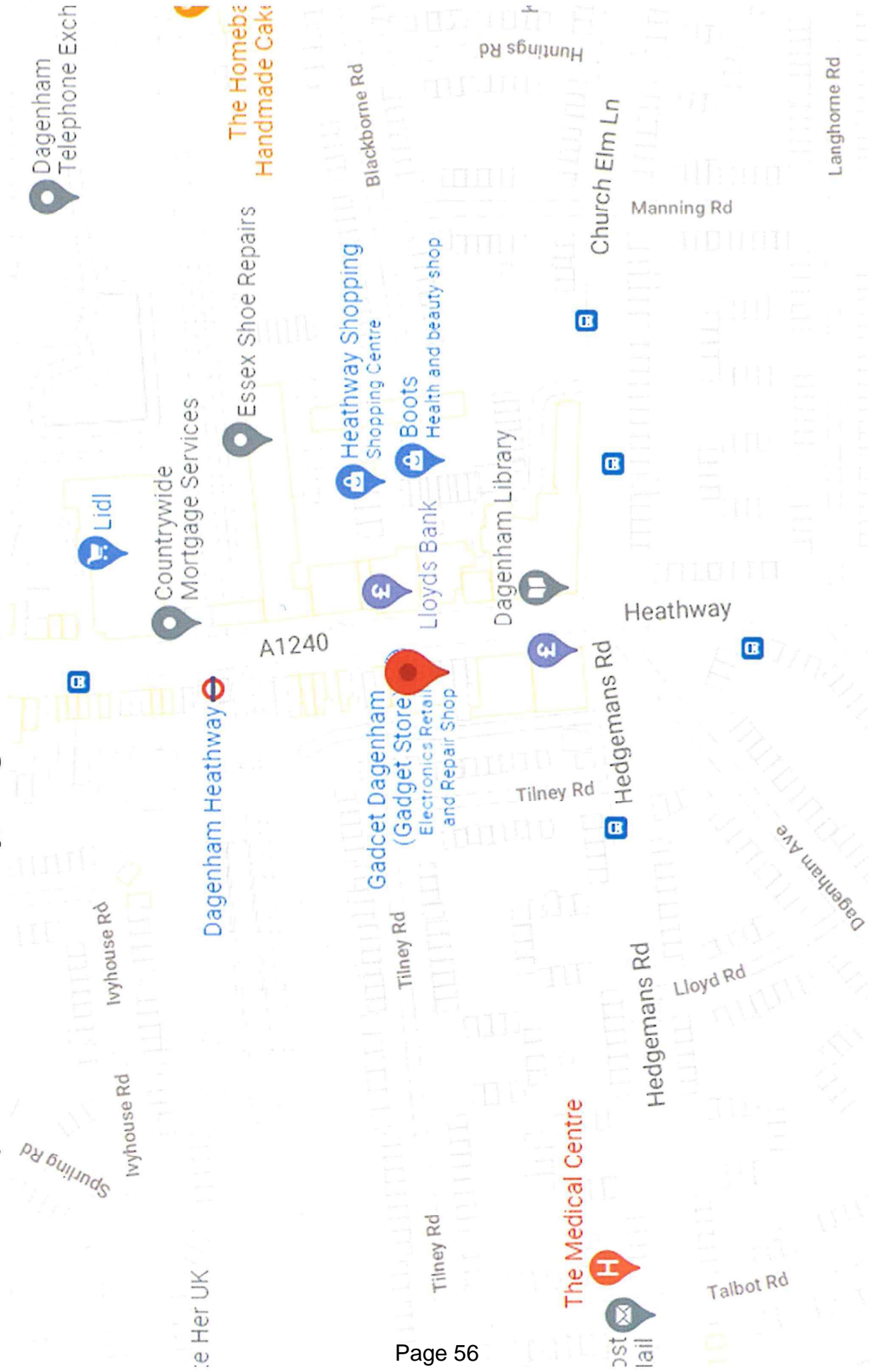
This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Merkur Slots is a national operator and employs several standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance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

Where relevant, Merkur Slots has also considered any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles

specifically related to gambling. However, the company does not operate discriminatory policies against any identified groups based on social demographic or ethnic origin. Therefore, identification of issues relating to gambling related harm are based on individual customer behaviour even where particular groups are identified through research as being at greater risk of gambling related harm.

<b>Assessors Name:</b>	Amanda Kiernan
<b>Signature:</b>	
<b>Date:</b>	31/08/21

# Merkur Slots, 247 The Heathway, Dagenham, RM9 5BG



# Merkur Slots, 247 The Heathway, Dagenham, RM9 5BG – Shop frontage example





Mon 04/10/2021 14:24

Dear Ms Taylor,

I write with regard to the application by Merkur Slots UK Ltd for a Bingo premises licence in respect of the premises intended to be traded as Merkur Slots at 247 Heathway, Dagenham, RM9 5BG in my capacity as Licensing Authority Responsible Authority Officer.

Having read through the application and accompanying documents I wish to lodge a representation against the application under the first and third licensing objectives of

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Protecting children and other vulnerable people from being harmed or exploited by gambling

At this point, my opposition derives from the Council's Statement of Gambling Licensing Principles and associated Risk-Assessment of Local Area Vulnerability to Gambling Related Harm.

The risk-assessment is introduced as the Council's local area profile in Section 3 of the policy. It comprises an analysis of local socio-economic and public health data sets together with police data sets concerning anti-social behaviour. It uses spatial analysis techniques to provide a model of vulnerability to gambling related harm across the borough.

This assessment, supported by the assessment within the analysis provided by the Index of Multiple Deprivation (IMD) (2015) gives rise to the Council's stated position within the policy (sections 40/41) that this borough is "subject to widespread deprivation to which gambling related harm contributes" and that "this position gives rise to serious concerns of the impact of any further increase in the number of gambling premises may have for the most 'vulnerable' and 'at risk' areas of the borough. The Authority considers it is necessary to strictly control the number of facilities for gambling in areas where its most vulnerable residents may be placed at increasing risk, and in line with the duty to aim to permit gambling in so far as it is reasonably consistent within the pursuit of the licensing objectives. All areas shown within the local area profile as being at high overall risk of gambling related harm, are generally considered inappropriate for further gaming establishments which would raise the risk of gambling related harm to vulnerable people living in those areas. Operators are asked consider very carefully whether seeking to locate new premises or relocating existing premises within these areas would be consistent with the licensing objectives."

Section 44 of the policy goes on to say "the local area profile is intended to help facilitate constructive engagement between operators and licensees and a more co-ordinated response to local risks".

The application under consideration intends to open a new gaming premises in Dagenham Heathway. The combined vulnerable locality index plus IMD decile map contained in the local area profile / risk-assessment shows Heathway to be in the area of concern. A Public Spaces Protection Order, banning anti-social behaviour, has been in place in the area since 2018 and this has just been extended for another three years. The addition of another premises in the area has the potential to further increase the problems experienced.

The applicant company's own comprehensive local area profile clearly recognises these local concerns. It records and notes

- The premises is intended to enjoy a high-street location directly opposite Dagenham library

- There are a number of local vulnerable (people) and addiction support services nearby
- The premises is next to a bookmakers
- There are four other bookmakers and an adult gaming centre in the area
- Dagenham Heathway London Underground Station is 5 minutes walk away
- The postcode is classified as a high crime area
- The local police have raised a number of concerns and apparent significant problems with existing gambling premises relating to street drinking, ASB, drug dealing and violence
- The number of persons that are economically active in Dagenham is below the national average
- The IMD places the borough in the 30-40% most deprived areas
- 14 schools are listed under the postcode
- 9 community centres and youth centres are located under the postcode
- 13 parks, playgrounds and sports / leisure facilities are listed under the postcode
- 7 pawnbrokers and loan shops are listed under the postcode

The level of research is commended but having researched this information and identified the numerous areas of concern the company has still considered this an appropriate locality for another gambling premises. Furthermore, it has done so without any reference or approach made to the local authority to discuss the local situation and what might be appropriate.

Instead an application has been made which presents in general a collection of centralised policies with apparently little more added in terms of additional local management controls that might help assist the position.

Additionally, I would query why the application is seeking a bingo premises licence when the premises layout at present feels as though it is principally an adult gaming centre. Indeed, the premises is intended to be called 'Merkur Slots'. The supposition must be that this is down to the potential for increasing the number of higher category machines that potentially may be made available by doing so.

There are also areas of the application that are still a little vague or where further information would be helpful.

Accordingly, I would ask for the further additional information

- The numbers and categories of gaming machines that are proposed to be made available upon the premises
- The numbers of bingo tablets that are proposed to be made available upon the premises
- Whether all bingo tablets are proposed to be charged and available for use at all times
- Whether it will be possible for all bingo tablets to be played by seated customers at one time upon the premises
- Whether bingo will be available to play throughout the whole of the proposed operating hours or whether bingo is only available for part of the proposed operating hours
- The numbers of staff intended to be employed at the premises throughout the day and their roles
- What considerations have been given to reduce or deal with local anti-social behaviour that the premises may become a focus just because of its position
- Whether any consideration has been given to the provision of security staff at the premises

- An explanation as to which of the management control proposals put forward together with this application have been offered specifically having given consideration to the local circumstances and local area profile
- Whether the company is prepared to share results of external under-age sales tests carried out other nearby company owned properties and how these compare to the national average
- Whether the company is prepared to share records of incidents recorded at other nearby company owned properties
- Why the company considers that irrespective of the Council's stance on additional gambling licensing premises and local area vulnerability to gambling related harm it is appropriate to position another licensed premises in Heathway

I shall give the application further consideration when this and any other information considered useful is provided.

With thanks.

**Richard Parkins | Senior Licensing Officer | Regulatory Services |**

Phone: 07814 216592 |

Email: [richard.parkins2@lbbd.gov.uk](mailto:richard.parkins2@lbbd.gov.uk) |

London Borough of Barking and Dagenham | [lbbd.gov.uk](http://lbbd.gov.uk)

[www.facebook.com/barkinganddagenham@lbbdcouncil](https://www.facebook.com/barkinganddagenham@lbbdcouncil)

**Barking &  
Dagenham**



**INVESTORS IN PEOPLE®**  
We invest in people Gold



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Licensing Authority  
 London Borough of Barking & Dagenham  
 1 Clockhouse Avenue  
 Town Hall Square  
 Barking  
 Essex  
 IG11 7LU

PC Owen DUNN 3326EA  
 East Area Licensing Team  
 Romford Police Station  
 19 Main Road  
 Romford  
 Essex  
 RM1 3BJ

Telephone:  
 Email:  
[www.met.police.uk](http://www.met.police.uk)  
 Your ref:

29/09/2021

**Police Objection - Merkur Slots, 247 Heathway, Dagenham, RM9 5BG**

Dear Licensing,

I acknowledge receipt of an application for a new Premises Licence under the Gambling Act 2005.

On behalf of the Commissioner of Police of the Metropolis, I wish to make a representation on the grounds of the following licensing objectives:

- **Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime.**
- **Protecting children and other vulnerable people from harm or from being exploited by gambling**

The venue have applied for a Bingo licence to allow them to operate until 0200 hours.

The area does not currently have a night time economy. Allowing this premises a licence to operate until 0200 hours will attract ASB and criminals to the location and become a focal point for offending. It will also encourage other premises to apply for a similar licence, exacerbating the problem, ultimately leading to regular and additional problems in the area.

There are a number of similar venues already operating on the Heathway, all closing by 2200 hours. There does not appear to be any form of licenced venue open on the Heathway later than 22:30 / 2300 hours. This would be the case year-round (with the exception of possible Temporary Event Notices (TEN's)).

A meeting was held between Police Licensing and Merkur Slots UK Ltd Operational Director, Steve Ambrose on 29/09/2021. During the meeting it was discussed that the venue would anticipate picking up increased trade around November-December, during Christmas shopping hours, as customers are out and about conducting their shopping and may decide to pop into the venue. If this is the case for a large portion of customer base then there isn't a requirement to be open to 0200 hours as the shopping mall the opposite side of the road closes at 1730 hours.

Local Policing Safer Neighbourhood Team have expressed concerns about this application due to the fact they already have a high demand to tackle issues in the vicinity. The area has been deemed a focal point for crime and ASB. The team are currently addressing issues arising from drug dealing, ASB and street drinking occurring around the existing gaming/gambling venues.

From engagement with the members of the public in the area they find the groups congregating outside the venues intimidating. Whilst Police are seeking to address the issue, having an additional venue for such groups to attend (and the likelihood of attracting additional groups to the area) will cause further upset to the public.

During the meeting a discussion was held in respect of staffing. Mr Ambrose advised that staffing levels at the venue would consist of lone workers or two staff members on duty at a time. Lone workers unprotected on an open shop floor will be vulnerable to infiltration from and intimidation by gangs and other criminal elements. Being the only open venue at night to 0200 hours, as they have proposed, and one that operates without door staff, will make it highly attractive to offenders.

This could in turn cause a detrimental effect to the licensing objective of;  
*"Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime".*

The Barking & Dagenham Local Authority **"Statement of Gambling Licensing Policy 2019-2022"** states;

***"The Assessment of National Gambling Behaviour published by the Gambling Commission in August 2017 and prepared by NatCen Social Research states that 1.4% of gamblers were classed as 'problem gamblers' (0.8% of the population), with 6.4% of gamblers were classed as at risk (3.9% of the population). Gambling Commission Executive Tim Miller is quoted as stating that "Whilst overall problem gambling rates in Britain have remained statistically stable, our research suggests that in excess of two million people are at-risk or classed as problem gamblers, with very many more impacted by the wider consequences of gambling-related harm.""***

***“Gambling related harm is recognised as a ‘co-morbidity’ (i.e. one of a range of conditions existing in an individual that exacerbates pre-existing conditions and contributes toward a reduced life expectancy). It is often observed in people who suffer from poor mental health; stress or anxiety; substance misuse; and financial difficulties.***

***As such, it potentially extends beyond the individual through work and study, personal, financial legal and interpersonal circumstances and affects the community around the individual and local community services. The prevalence of problem gamblers based on the Health Survey for England 2012 indicates there could be in excess of 1,400 individuals who are problem gamblers within Barking and Dagenham***

***The costs to society (i.e. the excess fiscal costs caused by people who are problem gamblers beyond those that are normally incurred otherwise by members of the public) are felt through health; housing and homelessness; unemployment; and imprisonment. Using the Health Survey as a basis the total excess costs in Barking and Dagenham could be anything up to £2.2 million.”***

This demonstrates the severity of the impact that gambling can have on a person’s life, community and local services and the wider population. Hence why an application such as this could have possible consequences and contribute to a negative impact within the community.

Whilst the applicant has submitted their own Local Area Risk Assessment which highlights that unemployment and deprivation is prevalent in the area, they have not expanded on how their venue will avoid contributing to any further downfall in the specified factors within the local area.

This in turn highlights the concerns that a gaming/gambling venue within the borough of Barking & Dagenham could have a detrimental effect on the gambling licensing objective of *“Protecting children or other vulnerable persons from being harmed or exploited by gambling.”*

On page 7 of their Local Area Risk Assessment, there has clearly been some form of “copy & paste” element to the document as it states it has taken data from mapping for *“WELEYN DAGEHAM WEST POLICING NEIGHBOURHOOD”* and that the company will make every effort to liaise with *“HERTFORDSHIRE POLICE”*.

This is obviously not the current area for the proposed site which is situated within the borough of Barking & Dagenham, within the Metropolitan Police Service borders. This brings concerns that their own Local Area Risk Assessment hasn’t actually been based on the correct location.

Lastly, the venue is situated under residential flats and the noise levels from 0200 hours opening will cause disruption to residents throughout the night.

If the subcommittee are minded to grant this licence in full or part, police would recommend that additional conditions be attached to the licence, as set out below, to further promote the licensing objectives.

	Proposed Conditions	Recommendation
1	<p><b>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.</b></p>	<p>A digital CCTV system to be installed in the premises.</p> <p>Viewing of recordings shall be made available upon request of Police or an authorised officer of the Licensing Authority.</p> <p>Cameras must be sited to observe the entrance doors from both inside and outside.</p> <p>Cameras on the entrances must capture full frame shots of the heads and shoulders of all people entering the premises i.e. capable of identification.</p> <p>Cameras must be sited to cover all areas to which the public have access including any outside smoking areas.</p> <p>Provide a linked record of the date, time of any image.</p> <p>Provide good quality images - colour during opening times.</p> <p>Have a monitor to review images and recorded quality.</p> <p>Be regularly maintained to ensure continuous quality of image capture and retention.</p> <p>Member of staff trained in operating CCTV at venue during times open to the public.</p> <p>Digital images must be kept for 31 days. The equipment must have a suitable</p>

		export method, e.g. CD/DVD writer so that Police can make an evidential copy of the data they require. Copies must be available within a reasonable time to Police on request.
2	<b>Premises to close and cease all gambling activities: Monday to Sunday at 02:00 hours</b>	The premises should operate from 0900 hours until 2200 hours
3		There must be a minimum of two staff members in the premises at all times. In addition to the training offered by the Applicant, staff must also complete First Aid training.  Between 1200 and 2200, one staff member must be an SIA registered security officer.

The police are not in a position to support this application in its current form and are therefore opposing this application.

**Regards,**



**PC Owen DUNN 3326EA  
East Area Licensing Team**

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**Objection 1**

My objection is based on

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

This is a deprived area and the council should not be encouraging such businesses to operate in the borough given the high level of unemployment and crime rates. These types of business thrive on those who are financially vulnerable.

UK Rehab state

*' When gambling addicts exhaust their own access to cash, they may borrow from family and friends and, when that source of funds dries up, turn to a life of crime. Burglaries and petty theft are common but some gambling addicts **will commit fraud** to the tune of thousands of pounds'*

I find it infuriating that the council would consider this given that there are a number of betting shops with slot machines within the area and there is no need for anymore.

Please can I be kept updated on this application and can you acknowledge receipt of this e-mail.

**Objection 2**

Dear Licensing team,

- \* Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

Criminals are already using the existing Gambling services available in the area immediately surrounding the Heathway as a base of operations to launder drug money and stolen goods. Another area to do this is only making their lives easier.

- \* Ensuring that gambling is conducted in a fair and open way

The area is already saturated with other Gambling premises, and an additional licensed area or this amendment being passed is absolutely not going to create a fairer or more open environment for Gambling. Fair and open Gambling is happening at every bookmakers kiosk on the Heathway estate, and the additional FOBT are not being added for fairness or for openness, but to abuse the victims of addiction even further.

- \* Protecting children and other vulnerable people from being harmed or exploited by gambling

The Heathway is advertised in estate agent windows as a family hub, with shops and cafés and schools nearby.

An increased presence of Gambling facilities is going to do nothing to stop local children from becoming Gambling addicts, nor will it decrease the harm to local addicts.  
It will do nothing but the opposite.

I trust that these points are adequately 'directed around The Gambling Act 2005 licensing objectives' for your team.

**Objection 3 –**

Gambling venues are concentrated in the most deprived areas of Britain, according to a report commissioned by the Standard Life Foundation charity. Despite all the 'income' gambling and gaming venues may allegedly bring to the budget, it is certain that flooding poor areas with gambling and gaming facilities bring nothing more than addiction and disorder. Gambling causes great harm to individuals and to our communities, with those with the least resources being targeted more. As a resident of Dagenham, living in the close proximity of Dagenham Heathway, commuting daily to and from Dagenham Tube Station, i strongly oppose opening yet another gambling/gaming venue.

There are 5 similar venues, located on Dagenham Heathway within only 145 meters (474feet):

Paddy Power

William Hill

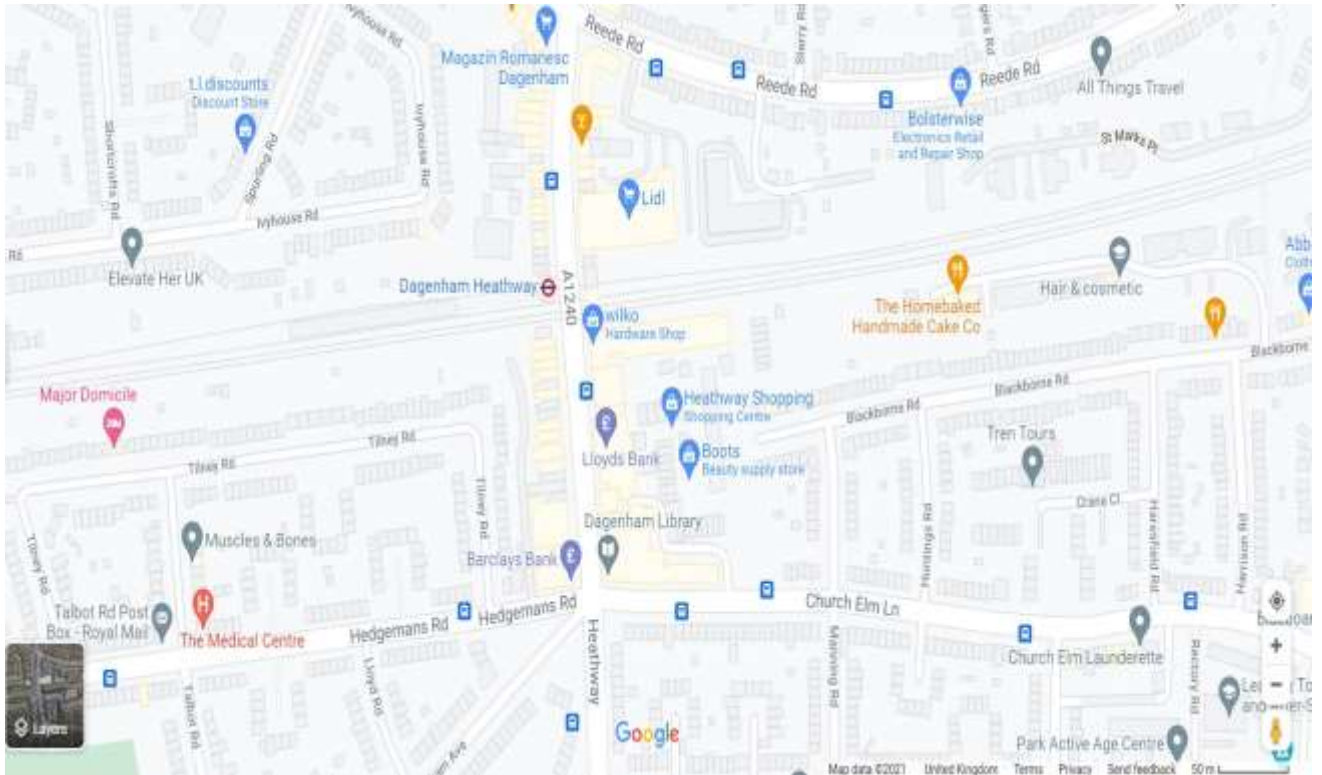
Gaming Fun

Coral

Betfred

The area is massively overcrowded and sees antisocial behaviour on the daily basis. Opening yet another gambling shop will have only detrimental effects on Dagenham.





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### Bingo Premises Licences - Mandatory and Default Conditions

#### Mandatory conditions

- \* A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.
- \* No customer shall be able to enter bingo premises directly from a casino, an adult gaming centre or betting premises (other than a track).
- \* Over 18 areas, within bingo halls that admit under-18s, must be separated by a barrier with prominently displayed notices stating that under-18s are not allowed in that area and with adequate supervision in place to ensure that children and young people are not able to access these areas or the category B or C machines. Supervision may be done either by placing the terminals within the line of sight of an official of the operator or via monitored CCTV.
- \* Any admission charges, the charges for playing bingo games and the rules of bingo must be displayed in a prominent position on the premises. Rules can be displayed on a sign, by making available leaflets or other written material containing the rules, or running an audio-visual guide to the rules prior to any bingo game being commenced.
- \* Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

#### Default conditions

- \* Bingo facilities in bingo premises may not be offered between the hours of midnight and 9am. However, there are no restrictions on access to gaming machines in bingo premises.

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