



Licensing Authority
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Telephone:
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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.

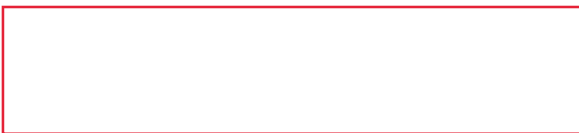
If the subcommittee are minded to grant this licence in full or part, police would recommend that additional conditions be attached to the licence, as set out below, to further promote the licensing objectives.

	Proposed Conditions	Recommendation
1	<p>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.</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	Premises to close and cease all gambling activities: Monday to Sunday at 02:00 hours	The premises should operate from 0900 hours until 2200 hours
3		<p>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.</p> <p>Between 1200 and 2200, one staff member must be an SIA registered security officer.</p>

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**