

SUPPLEMENTARY 1 OF 2

LICENSING SUB-COMMITTEE

Tuesday, 18 January 2022

**Agenda Item 3. Gambling Act 2005 - Application for Bingo Premises
Licence - Merkur Slots, 247 Heathway, Dagenham
RM9 5BG (Pages 1 - 218)**

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MERKUR SLOTS, 247 HEATHWAY, DAGENHAM, RM9 5BG**LICENSING SUB-COMMITTEE HEARING****18th JANUARY 2022****REMOTE HEARING – BUNDLE INDEX**

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LONDON BOROUGH OF BARKING AND DAGENHAM

APPLICATION FOR BINGO PREMISES LICENCE

247 HEATHWAY, DAGENHAM RM9 5BG

SKELETON ARGUMENT ON BEHALF OF APPLICANT

INTRODUCTION

1. This is an application by Merkur Slots UK Limited (“the applicant”) for a new bingo premises licence.
2. The purpose of this skeleton argument is to help the Sub-Committee navigate the material by setting out some of the background to the application, explaining the legal context under the Gambling Act 2005, and making brief submissions dealing with the representations.
3. In considering the application, the Committee may be particularly assisted by looking at the following documents:
 - Witness statements:
 - Amanda Kiernan, Head of Compliance (pages 3-11)
 - Steve Ambrose, Operations Director (pages 12-14)
 - Andy Tipple, Head of Product (pages 15)
 - Stuart Jenkins, Licensing Consultant (pages 16-23)
 - Nicholas Mason, Licensing Consultant (pages 51-63)
 - Legal obligations to promote licensing objectives:

- Gambling Commission’s Licence Conditions and Codes of Practice applicable to non-remote bingo licences (pages 303-456)
 - Mandatory and default conditions attaching to bingo premises licences (pages 476-478)
 - Proposed licence conditions for 247 Heathway (pages 1-2)
- Operational standards (pages 250-252)

SUMMARY

4. The applicant is a national provider of bingo and adult gaming centres which operates to the highest standards of social responsibility and compliance.
5. It has over 190 premises. It has been granted licences at every site at which it has applied and has never suffered a regulatory intervention or review. Its sites are across a range of areas, geographically and socially, including areas of high deprivation.
6. In accordance with the expectation in LBBD’s statement of gambling principles, the applicant has applied for and been granted planning permission in respect of this site (page 156-161)
7. The applicant has prepared a detailed local area risk assessment, which has been updated and revised following consultation. It has also had the opportunity to meet with the licensing authority and police to discuss the application.
8. As a result, it has proposed a list of 18 individual licence conditions. These conditions go far beyond any other gambling premises locally, only one of which – Paddy Power – has any at all.
9. Furthermore, it has reduced its application so that the premises would close at midnight every night of the week. There is only one other machine-led premises locally – Gaming Fun - which has a 24 hour licence and trades without individual conditions.
10. The applicant’s premises would therefore be the most tightly regulated of any premises in the locality, and would trade for far fewer hours than Gaming Fun.

11. As such, there is no evidence that the applicant's premises would cause harm to the licensing objectives.
12. As a result of the conditions and hours proposed, the Metropolitan Police were satisfied that the application was consistent with the licensing objectives and withdrew their representation. As the Sub-Committee will be aware, the Police are its main sources of advice on crime and disorder and community protection locally, including harm from low level street disorder. The Police view is consistent with the applicant's widespread experience, independently confirmed by Mr. Jenkins and Mr. Mason, who have covertly observed many Merkur premises.
13. There is no representation from the child protection authority or any agency or organisation concerned with the protection of vulnerable people, or the planning or environmental health authority.
14. The licensing officer has made a representation in reliance on the Council's statement of gambling principles (policy). The applicant has met with the officer, shown him the proposed premises and has shared the proposed conditions with him. It is hoped that the extensive evidence served in this case goes some way to assuaging his concerns.

BACKGROUND

15. The applicant is part of the Gauselmann group, which is one of the most experienced providers of gaming premises on the high street across the UK, including adult gaming centres and bingo premises. Players in high street bingo premises access bingo games through the use of tablets, which are increasingly replacing paper bingo cards as provided in large, flat-floor bingo halls. It is because the applicant wishes to offer bingo in its premises that it is required to apply for a bingo premises licence.
16. As one would expect, the applicant and its sister companies have detailed systems for compliance with the law and promotion of the licensing objectives, which they implement through staff training and management programmes and supervise through area and national management oversight and independent audit.
17. Bingo premises are subject to a high degree of regulation in order to support the licensing objectives, including the following:

- Premises and their management and operation are subject to the Gambling Commission's extensive Licence Conditions and Codes of Practice applicable to non-remote bingo operating licences.
- Premises licences are subject to mandatory and default conditions set by the Secretary of State with the approval of Parliament.
- The number of machines, the way they operate and their stake and prize limits, are strictly regulated through the Gambling Act 2005 (by Parliament), regulations (by the Secretary of State) and technical standards (by the Gambling Commission). For example, at least 80% of the machines in bingo premises have the same stake and prize limits as pub fruit machines, with 20% governed by the same limits as other high street gambling establishments, such as Adult Gaming Centres.
- In addition, the applicant has offered individual licence conditions as mentioned above.

The nature of high street bingo premises

18. Gambling on the high street in Great Britain is dominated by betting offices, both numerically and in terms of environmental impact. As to numbers, betting offices outnumber bingo premises 11:1 (6,735 v 601¹). As to impact, betting offices can bring with them social issues. Hence, when an application is made for a bingo premises licence, it is sometimes thought that it will bring with it the same kind of issues as arise at high street betting offices.
19. In fact, high street bingo premises in general and the applicant's in particular are completely different from betting offices in terms of local impact.
20. It is therefore important to try to convey why the applicant's premises trade without regulatory concern.

¹ Gambling Commission industry statistics.

21. *On arrival.* It is noticeable that groups do not loiter or gather outside high street bingo premises smoking, drinking, littering and importuning passers-by. The absence of such activity is not only observable but is explained by several facts:

- The customer demographic is different from betting offices. It is older and 50% female with customers coming in alone or with partners rather than in groups.
- There are no “events” in bingo premises such as football matches or horse races and therefore no reason to hang around, and nowhere to cluster or socialise.
- There are no general seating areas for people to gather inside. The premises are not fitted out for groups.
- Alcohol is not only not sold but strictly prohibited.
- Those under the influence of drugs or alcohol are not admitted.
- Unlike in betting offices, staff are not behind the counter taking or paying out bets. They are there to greet customers as they enter, which also means controlling who is permitted to enter and effectively supervising the premises.
- Good quality CCTV systems are fitted to the exterior of the premises and are monitored. Those outside know they are under surveillance. If loitering occurs, it is dealt with.

22. The effect on the streetscape is important. Those passing high street bingo premises do not have to walk past groups of people standing or misbehaving in the street, whether during the school run, the evening or otherwise. Consistent and authoritative evidence on this topic is given by company witnesses and Leveche Associates,

23. *Exterior appearance.* The facades of high street bingo premises are smart, well-maintained and spotlessly clean. It is not possible to see gambling taking place inside, unlike (for example) betting offices or pubs which admit children. There is no advertising on the exterior which might be attractive to children: this is strictly controlled by the Advertising Standard Authority’s Codes of Practice which are translated into legally enforceable regulation by the Gambling Commission’s Licence Conditions and Codes of Practice. The exterior contains signage explaining that Think 25 is operated, that alcohol is not permitted and that CCTV is in operation, alongside responsible gambling messaging.

24. *Upon entry.* Those entering will be greeted face to face by a uniformed member of staff. This is an opportunity to observe whether the customer appears to be under 25 (in which

case Think 25 is operated), or whether there may be any other issue such as inebriation, in which case the customer will politely be asked to leave. The staff member will check whether the customer needs any other form of assistance. This interaction means that staff are aware of who is using their premises. Again, this is unlike betting offices where staff are behind a counter taking and paying out bets.

25. *Appearance.* The interior of premises is clean, well-lit, comfortable and carpeted. Toilet facilities are provided. Responsible gambling messaging is prominently displayed throughout the premises and on the machines. Customer information leaflets are also prominently displayed, explaining where and how to obtain help with problem gambling.

26. *Participation.* Customers have an opportunity to play bingo on tablets, which includes being linked to a national game, and to play machines, the limits for which are set by law. During their stay they will be offered tea/coffee and snacks, and will often chat with the friendly staff. When they are finished playing they wander off with zero impact on the locality.

27. *Protection of vulnerable people from being harmed or exploited by gambling.* So far as vulnerable persons are concerned:

- Alcohol is not permitted in the applicant's bingo premises.
- Those who are intoxicated through alcohol or drugs are not permitted on the premises.
- As required by the Gambling Commission's Licence Conditions and Codes of Practice, the applicant's systems include processes for customer interaction and self-exclusion, operated by trained staff. Interventions are recorded electronically so that they can be overseen by independent compliance auditors.
- Customers are encouraged to use a self-help, app-based tool named Play Right to assist them with managing their gambling behaviour.
- "Stay in Control" posters and leaflets with the GamCare helpline number are located prominently in the premises, including the WC.

- All machines display responsible gambling messages with helpline contact details.

28. *Protection of children from being harmed or exploited by gambling.* As regards this objective:

- Although children are entitled to enter bingo premises as a matter of law, children are not allowed in the applicant's premises.
- The exterior contains no advertising or marketing which might be attractive to children.
- Gambling cannot be seen from the outside unlike, say, in betting offices and sometimes pubs.
- The exterior (and the interior) contains prominent messaging stating that Think 25 is applied.
- Those entering are greeted by staff members, so that their appearance is checked immediately.
- Staff are required to log all Think 25 events on their tablets, with premises data checked by the applicant's audit department to ensure that the system is being properly operated.
- Third party age verification testing is conducted. In this case, the applicant has offered a condition of bi-annual testing with results supplied to the licensing authority upon request.

It is fair to report that the outward appearance, interior ambience, supervision, layout and product in bingo premises are not attractive to children, and the applicant's systems have proved more than effective to ensure that underage gambling is not an issue in its premises. It is also right to mention that, trading on busy high streets nationally, premises are almost always in close proximity to fast food outlets attractive to children, but this has not proved problematic.

29. *Security.* As stated above, the applicant does not suffer significant issues with crime and disorder. This is a function of the customer demographic, the ban on alcohol and the nature of the product, but is also because of the measures taken by the applicant to prevent it:

- Staffing levels are set following a security risk assessment. In this case, the applicant has offered a licence condition to that effect. In any case, the premises will be double-staffed after 8 p.m. (condition 2).
- There will be SIA provision from 9 p.m. for the first 3 months, with the need for such provision assessed following police advice thereafter (condition 3).
- Customer numbers are low, with usually only a handful of customers in the premises. Double digit numbers occur very rarely. This means that miscreant behaviour is immediately identified, recorded and dealt with.
- The layout of the premises facilitates effective supervision. There is no space for groups to gather.
- Staff members are on the trading floor, not behind a counter.
- Good quality CCTV is used throughout and customers are aware they are monitored.
- The use of Staff Guard which enables staff to use a portable alarm to liaise with a central security hub and SIA-licensed staff with audio and visual feeds, and for hub staff to speak directly with customers who therefore know they are being overseen. Staff Guard personnel can liaise directly with local Police if necessary.
- Staff members do not carry floats.
- Safes are time-delayed.
- Anti-money laundering systems are used on the machines.
- The locational and social context is part of induction training for all staff.

- Staff are also trained in how to deal with difficult customers (there is a 6 week training course at the outset followed by regular refresher training).
- Any incidents are logged on the tablet and reviewed at national level.
- Premises are fitted with maglocks, enabling entry to be controlled when necessary.
- The applicant maintains good liaison with local Police. The premises will ban any individuals notified to it by the Police or licensing authority (condition 5) and itself ban any miscreant customers (condition 6).
- It will also join any available Betwatch scheme.

THE REGULATORY RECORD OF THE APPLICANT

30. In the previous section, we have briefly described the standard controls used by the applicant to provide a safe, welcoming and pleasant environment for customers while also promoting the licensing objectives.

31. **That it does all of this to a standard of excellence is demonstrable:**

- **It has over 190 licences. It has been granted licences in every premises it has applied for.²**
- **None of its trading licence has ever been reviewed.³**

32. This is despite the range of areas in which the applicant operates, including those with high social deprivation and other social issues.⁴ Its systems, staff training, compliance

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

³ In 2021, reviews were commenced in Enfield but were rejected without a hearing by the licensing authority under section 198 Gambling Act 2005 since they were in substance objections to gambling in general rather than to the operator or the premises.

⁴ Its ten closest sites include five in the same decile on the index of multiple deprivation: 403-405 Green Street, Plaistow; 368-370 Barking Road, Plaistow; 40 Deptford High Street, Deptford; 70-72 Cranbrook Road, Ilford, and 122 Kingsland High Street, Dalston.

monitoring and audit have proved sufficient to ensure that the licensing objectives are promoted.

33. It is a record of which the applicant is proud and guards with care. In the very rare event of any kind of issue, it will always liaise with relevant authorities to ensure that it is resolved promptly and effectively.

THE LAW

34. As the Committee will be aware, each piece of licensing legislation sets out a different approach to the question of grant. The approach relevant to gambling is in section 153 of the Gambling Act 2005:

In exercising their functions under this Part, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:

(a) in accordance with any relevant code of practice [issued by the Gambling Commission]

(b) in accordance with any relevant guidance issued by the Commission

(c) reasonably consistent with the licensing objectives (subject to (a) and (b))

(d) in accordance with the [authority's statement of licensing policy] (subject to (a) to (c)).

35. The following points should be noted:

- a. The test is mandatory: “*a licensing authority shall*”
- b. The obligation to “*aim to permit*” where (a) – (d) are satisfied is described by the Gambling Commission in its Guidance as “*the licensing authority's primary obligation*”
- c. The “*aim to permit*” is explained in the leading textbook Patersons:

“... it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully

be used for gambling. But the duty seems to go further than that. The verb 'to aim' is defined by the OED as meaning 'To calculate one's course with a view to arrive (at a point); to direct one's course, to make it one's object to attain. Hence to have it as an object, to endeavour earnestly....' A person who 'aims' to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling."

As the Gambling Commission Guidance says:

"Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through use of conditions"

- d. In the hierarchy of considerations in section 153, the licensing objectives come third and the policy comes fourth, expressly subject to the considerations in (a), (b) and (c). As the Guidance states (para 5.21): *"In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this guidance, and its own policy statement or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this guidance take precedence."*
- e. Conditions should only be added where it is necessary to do so, and even then such conditions need to be proportionate to the circumstances requiring a response, relevant, directly related, fair and reasonable.
- f. As the Guidance states: *"Any refusal should be for reasons which demonstrate that the licensing objectives will not or are unlikely to be met"* That means demonstrate by evidence.
- g. Conversely, the following considerations are legally irrelevant to the determination of an application for a premises licence:

- i. Planning considerations. Planning and licensing are separate systems. However, an applicant which cannot obtain planning permission cannot open.
- ii. Nuisance (see Guidance by Gambling Commission).
- iii. A dislike of gambling.
- iv. A general notion that it is undesirable to allow gambling premises in an area.
- v. Moral or ethical objections to gambling.
- vi. The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.

SUBMISSIONS

36. The Gambling Act 2005 is concerned with protection of the licensing objectives which are:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,*
- (b) ensuring that gambling is conducted in a fair and open way, and*
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.*

37. The effect of the aim to permit in section 153 makes the Gambling Act 2005 different from the Licensing Act 2003. This is explained by the Gambling Commission in its Guidance to licensing authorities as follows:

1.20 The Act places a legal duty on both the Commission and licensing authorities to aim to permit gambling, in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives. The effect of this duty is that both the Commission and licensing authorities must approach their functions in a way that seeks to regulate gambling by using their powers,

for example, powers to attach conditions to licences, to moderate its impact on the licensing objectives rather than by starting out to prevent it altogether.

38. It is not open to an authority to refuse a licence on the basis that it is inappropriate to licence an operation or a further operation, in an area. As the Guidance says:

5.34 Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

39. Rather, as the paragraph makes clear, there would need to be reasons which demonstrate that the licensing objectives would not be met. That means demonstrate by evidence.

40. It is therefore necessary to consider whether there is evidence which demonstrates that the licensing objectives would not be met by granting a licence. This is not the same as demonstrating that an area does, or does not, have social or economic challenges. It is a question of asking whether the evidence demonstrates that this operator, with the operating model and conditions proposed, would harm the licensing objectives in a way which cannot be mitigated by conditions.

41. The direction to consider conditions in preference to refusal is set out in paragraph 5.31 of the Guidance:

5.31 Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

42. Has any objector demonstrated by evidence that the licensing objectives would be harmed, and that such harm cannot be mitigated by conditions? The objectives are taken in turn.

Crime and disorder

43. The nearest comparator premises is Gaming Fun, 250 Heathway. The applicant requested crime data associated with those premises from the Police. The response (page 198) showed that over the 3 year period to 1st September 2021 those premises experienced a total of 2 recorded crimes, i.e. fewer than one crime per year. Even then, those premises trade 24 hours per day without individual licence conditions, while the applicant has agreed with the Police that it will close at midnight and be subject to the most extensive raft of conditions in the locality. The Police have withdrawn their representation accordingly. Furthermore, the applicant has submitted copious evidence, including from company experience, independent observation and analysis, showing that the applicant's premises are not associated with crime and disorder.
44. As such, there is no evidential basis for a suggestion that the applicant's premises will harm the crime and disorder licensing objective.

Fairness and openness

45. As the Commission advises in its guidance to authorities, fairness is a matter dealt with by the Commission:

5.11 Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.

46. Nothing in this case suggests that gambling would not be fair or open.

Children and vulnerable people

47. There is no evidence of existing problems on Heathway with children trying to enter gambling establishments. In any case, the applicant has provided evidence that children

are not interested in trying to enter its premises. They cannot see in. There is no marketing directed at them in any case. If they did try to get in, they would be challenged, using Challenge 25. The applicant has in any event offered a condition requiring independent age verification testing.

48. Regarding protection of vulnerable persons, the applicant operates best practice principles which have not been the subject of concern in any of its 190 other premises across the UK, by any authority. It trains its staff to a high standard, manages them effectively and audits their performance to ensure that they are protecting the licensing objectives appropriately. The applicant would be operating for fewer hours than the existing adult gaming centre, and would import a set of 17 licence conditions, with the existing centre having none. No agency working with vulnerable persons has made any representation in this case. Nor is reference to the number of gambling premises locally relevant, since demand is an irrelevant consideration (section 153, Gambling Act 2005).
49. Most importantly, there is no evidence at all (from here or elsewhere) that the addition of a new premises, operated by a highly competent operator to fewer hours, and with more conditions (proposed following risk assessment) than its nearest competitor, will harm the licensing objective of protecting children or vulnerable people from being harmed or exploited by gambling.
50. For these reasons, it is submitted that there is no evidence which demonstrates that the grant of this licence to this operator on these conditions will cause harm to vulnerable people. The authority's policy states: "*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.*" This licence will not do so.⁵
51. Finally, all staff working in these premises will be thoroughly trained before the premises opens, if it is licensed. The applicant would welcome the involvement of the

⁵ It might be added that if the policy were to mean that licences should be refused without evidence of harm, it would be unlawful, as contrary to the aim to permit in section 153. Furthermore, in any case, the policy is subordinate to the codes of practice, the guidance and the licensing objectives, as section 153(1)(d) makes clear.

police and licensing authority in such training, so as to reinforce the local characteristics of Dagenham, should this be thought helpful.

CONCLUSION

52. In conclusion:

- The applicant is a highly competent organisation, regulated by the Gambling Commission, and one whose corporate systems, staff training, management and audit are directed towards promotion of the licensing objectives.
- It is part of a group which operates 190 licensed gambling premises in a wide variety of locations of higher and lower crime, deprivation and population density.
- Despite that, it has never experienced a regulatory complaint, review of a trading venue or prosecution.
- There is no evidence before the Council that it has failed to promote the licensing objectives elsewhere.
- The type of premises, their layout, their customer demographic, the low numbers of customers simultaneously using premises and the quality of management mean that issues of crime and disorder are rare.
- The premises, if licensed, will be subject to strict regulatory requirements, deriving from: the Licence Conditions and Codes of Practice; machine stake, prize and numbers limits, and mandatory and default premises licence conditions.
- Following a risk assessment, the applicant has offered a set of individual licence conditions which are designed to protect the licensing objectives at this site in this location.
- Based on those conditions, the Police withdrew their representation in this case.

- The applicant has a strong track record of co-operation with local statutory bodies. In the unlikely event of an untoward consequence, it will work to resolve the issue promptly and efficiently.

53. For these reasons, it is submitted that the test in section 153 is fully met. Conversely, taking into account the competence and track record of the applicant (nationally and locally), its legal obligations under the Act, Regulations and codes, and the comprehensive suite of individual licence conditions to which it is proposing to submit, it has not been demonstrated that the licensing objectives are unlikely to be met.

54. Accordingly, the Council is respectfully invited to grant the application as asked.

PHILIP KOLVIN QC
10th January 2021

11 KBW
Temple EC4

Proposed Operational Conditions

Conditions proposed and agreed with Metropolitan Police

1. Premises to close and cease all gambling activities: Monday to Sunday at midnight.
2. 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
3. For 3 months from the date the premises is open to the public, the date to be confirmed in writing to the Licensing Authority, a 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.
4. 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.
5. 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.
6. The Licensee shall implement a policy of banning any customers who engage in crime, disorder or anti-social behaviour within or outside the premises.
7. The licensee shall participate in a local Betwatch or similar scheme, where available.
8. Key staff members will receive first aid training.
9. 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.

Conditions included within original licence application:

10. ~~Premises to close and cease all gambling activities: Monday to Sunday at 02:00 hours~~ *Superseded by condition 1 above*
11. 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.

12. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
13. 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.
14. 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.
15. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
16. The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice
17. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.
18. 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.

LICENSING SUB - COMMITTEE HEARING – 18TH JANUARY 2022

SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

Merkur Slots

1. I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries, including High Street Retail and Optical Health. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe (the parent company of Merkur Slots UK Limited), responsible for all internal and external audit policies and procedures. During 2018 a merge of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the Merkur organisation.
2. Merkur operates a national estate of over 190 licensed bingo, adult gaming centre and family entertainment centre premises.
3. Merkur is a leading national operator of bingo premises with clear and proactive policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with Responsible Authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
4. Merkur has full authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which Merkur has put in place to ensure that it implements effective player protection, anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Licence Conditions and Codes of Practice.
5. Merkur Slots UK Limited, has never had a review of a trading premises licence, which evidences the high standard of operation applied across the Company's licensed estate. Two premises licences were subject to review applications last year in Enfield, but both applications were rejected by the Authority without a hearing, as the substance of both applications was based on objections to gambling in principle rather than identifying any concerns with the proposed operation at the premises.
6. Merkur holds key positions within the Bingo Association and BACTA (the trade association for the amusement and gaming machine industry in the UK) Executive and Social Responsibility Committees, working closely with these groups to innovate and promote Compliance and Social Responsibility within the industry.
7. Merkur has over 50 Personal Management Licence Holders throughout its operational structure, all of whom are aware of their roles and responsibilities in regard to the Licence Conditions and Codes of Practice (LCCP). Legal obligations are placed upon personal licence holders to promote the Licensing Objectives whilst undertaking their respective duties.
8. Merkur has appointed a dedicated team of compliance auditors that work independently of its Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. The Company conducts a minimum of two compliance audits per year in each venue. Audits include Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification records. During the audits, premises staff are tested on their level of knowledge and understanding of all relevant criteria. Venues may be re-visited and any additional training

needs addressed. Records of incidents, interactions, self-exclusion breaches and age verification checks are collated on a central hub, which is regularly reviewed and monthly reports are provided to Operations Teams.

9. Merkur operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the Gambling Commission's Licence Conditions and Codes of Practice and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice and sample window displays can be seen in the supporting documents.
10. Venue window displays are designed in consideration of premises' location, particularly in busy high street areas where Children and Young Persons may pass by, and maintain the Company's focus that all gambling should be carried out in a socially responsible manner. Direct line of sight into premises is blocked by appropriate window displays and barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.

Relationship with the Responsible Authorities and Interested Parties

11. Merkur takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
12. For the purposes of the original bingo premises licence application, the local Police Licensing Team were initially approached on the 21st July 2021.
13. The local Police licensing team advised that there are issues with anti-social behaviour, street drinking, crime and disorder within the Heathway area. An objection was subsequently submitted by the Police to the application, which following extensive discussions, meetings on the 29th September 2021 and 2nd December 2021, and a set of bespoke conditions, this representation was withdrawn on the 4th January 2022.
14. An objection was also received from the Licensing Authority as a Responsible authority. The Licensing Authority attended the meeting with our representatives on the 2nd December 2021 to discuss their concerns.
15. It is rare for our venues that operate throughout the night to attract customers leaving alcohol licensed venues as the entertainment offering is significantly different. Merkur Slots UK Limited's late night operation appeals to shift workers and employees of the late night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
16. All Merkur venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools are designed to ensure minimal conflict and successful implementation of our strict policies. In our experience, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate regardless of premises location.
17. The Gambling Commission, Environmental Health and Child Protection teams did not raise any concerns regarding Merkur's bingo premises licence proposals and did not object to the application.
18. Merkur's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are

Continually promoted.

19. Merkur has considered local police crime statistics and the premises location along with the Council's Statement of Licensing Principles under the Gambling Act 2005. We understand that the local area may suffer with general crime and disorder and nuisance, albeit not specifically associated with gambling premises. It has been our consistent experience in the majority of circumstances that we do not experience the kind of difficulties sometimes experienced by betting offices in terms of crime and disorder and nuisance, due to our different clientele, product, layout and management. A position which is supported by the police comments. Nevertheless, lines of communication will be maintained with the local police and the Licensing Authority to ensure that local knowledge is continuously shared and that the premises adapt to any emerging risks or local concerns identified.
20. We have identified local providers of vulnerability support services within the local area risk assessment and we will contact those organisations and invite feedback on any local concerns that can be incorporated into premises training and evaluation. The Company is also committed to working with all Responsible Authorities to ensure that any emerging risks are identified, incorporated into the premises risk assessment and effectively addressed.

Merkur Compliance – Protection of Children and Vulnerable

21. Merkur was selected by the Gambling Commission as one of the first top 40 licensees to prepare an annual assurance statement due to its size and scale of operation. Annual Assurance Statements enable an annual comprehensive review of the business, completed at Board level, in consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.
22. In August 2020, Praesepe Limited, Merkur's parent Company, and Merkur's brand premises obtained G4 Global Gambling Guidance Group accreditation, which can be seen in the supporting documents. G4 is a group of international experts in the field of problem gambling and responsible gambling and accreditation is awarded to responsible operators. Audit reports identified that 'Customer care is of an exemplary standard in all Merkur Venues, regulatory compliance policies and procedures are excellent...and provide a strong foundation for consistent approaches to Responsible Gambling across the (Company's) estate'.
23. Merkur operates training upon recruitment and then 6-monthly refresher training programmes for all employees. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, Licence Conditions and Codes of Practice, the Licensing Objectives under the Gambling Act 2005 and 'Safeguarding Children & Vulnerable People', which focus on assisting staff to recognise and respond to indicative behaviours of potential problem gambling and vulnerability and how to conduct effective customer interaction. Initial six-week, classroom based, induction training is completed for all new venue teams and includes customer interaction role play and exposure to operation and customers in live venues. Following site opening, new teams are provided regular follow up and support. The Company also incorporates accredited Social Responsibility and Interaction training for its premises management teams. Excerpts from the Company's training platform are provided in the supporting documents.
24. Merkur has two National Training Centres where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are rigorously trained to take appropriate action, such as

- where to offer gambling control support including managing time spent playing (time outs), controlling stake limits, providing information on gambling support agencies such as GambleAware, offering participation in the Bingo Association's national self-exclusion scheme and refusing service, where deemed necessary.
25. Merkur ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction. As part of this process, customer play, duration and spend is monitored and customer interactions are triggered to ensure play remains responsible.
 26. Following a customer interaction, customers may be offered a variety of self-help measures, where appropriate, such as the Playright App to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst ensuring that the Company's policies and procedures are effectively implemented.
 27. Merkur has undergone Gambling Commission inspection and Company training and compliance policies and procedures comply with the Licence Conditions and Codes of Practice attached to the Company's Operating Licence.
 28. Examples of some of Merkur's responsible gambling information have been provided in the supporting documents.
 29. As part of Merkur's continuing commitment to high standards of staff training and compliance, the Company engaged the services of the charities YGAM (Young Gamers & Gamblers Education Trust) and Betknowmore to assist with the development and provision of additional Safer Gambling training and resources for venue and area managers. This training has been designed to complement our existing face to face training, is City and Guilds accredited and has been delivered to over 200 venue and area managers to date.
 30. In October 2020, Merkur launched its 360 Safer Gambling Program, which was developed in consultation with the Global Gambling Guidance Group (G4) and comprises an Advisory Board of Senior Executives and external specialists. The program cements the Company's commitment to safer gambling and includes the establishment of a Customer Experience Group, which provides customer feedback on the effectiveness of the Company's customer interaction, safer gambling tools, messaging and support services.
 31. Merkur promotes the use of the customer self-help tool called Playright. All venues have the capability for customers to sign up to the App and staff are fully trained and able to advise on its use. This responsible gambling tool enables customers to set time limits on their machine play. Subject to the customers' set permissions, the system has the ability to send an alert to the venue should the customer enter at a time they have chosen not to gamble. This alert would then trigger a customer interaction.
 32. All Merkur's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Age verification test purchasing and mystery shopper visits are frequently carried out by third party companies (Check Policy and Store Checker) and test results can be provided to the Licensing Authority upon request. Merkur prides itself on its high standard of venue compliance and its test purchase success rates nationally.
 33. A copy of Merkur Slots Social Responsibility, Operational Compliance and Training Documents have been included within our hearing documentation, which highlight the priority given to responsible gambling and the provision of responsible gambling information to our customers and staff members.

Site location

34. The premises is a former Santander Bank.
35. An updated detailed local area risk assessment has been supplied in the supporting documentation, designed in consideration of Barking and Dagenham Council's Gambling Statement of Licensing principles, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
36. Local analysis is an invaluable tool to direct local resources and assists with the identification of potential risks and the development of local training and partnership to ensure that potential risks are mitigated and that gaming in Merkur Slots premises remains responsible.
37. Merkur is an experienced operator with premises in many large cities and towns across the country, each with their own local profiles and risk. Merkur effectively and responsibly operates in these areas, some of which are subject to greater and lower levels of general crime and disorder and deprivation. The Company's responsible gambling safeguards, security measures and strictly controlled marketing practices are proven to be effective and management will always adapt to local circumstances.
38. As a result of the Company's commitment to responsible operation and the resources directed to responsible play, none of Merkur's 190 operational premises licences have been subject to review proceedings or revocation.
39. Merkur Slots UK Limited operates another licensed bingo premises within the Council's jurisdiction at Cashino, 62 East Street, Barking, which has recently undergone a successful Licensing Authority inspection.

Underage Gambling

40. Merkur's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
41. By law, licensed bingo premises can permit under 18s on the premises and can also apply for a premises licence under the Licensing Act 2003. However, Merkur's premises are strictly adult only, operate Think 25 and will not obtain a licence under the Licensing Act 2003.
42. Unlike many other licensed operators, such as some licensed betting premises and adult gaming centres, the Merkur Slots venue will apply our strict marketing and advertising policy, ensuring that advertising is not appealing to underage individuals and that line of site into the venue is restricted. This will ensure that children and young persons cannot see into the premises, preventing exposure to ambient gambling with all gaming activities hidden from view.
43. Merkur Slots customer demographics are up to 50% female with an average age over 30.
44. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
45. To ensure the effectiveness of the Company's Think 25 policy, venues regularly undergo random test purchasing and details can be provided to local authorities upon request.
46. In our experience venues are not more susceptible to access by underage individuals due to the nature of our gaming services and customer demographics. This is consistently

seen across our licensed estate and Merkur's products do not appeal to underage individuals.

47. The Company's partnership approach and high standard of staff training, customer monitoring and interaction has continued to ensure that all potential risks are mitigated and the occurrence of incidents remains minimal.

Crime and Vulnerability

48. It is rare for our premises to be associated with anti-social behaviour or crime and disorder but our staff training procedures and security measures, including external CCTV, are designed to monitor customer behaviour and external areas for anti-social behaviour. Company policy ensures that appropriate steps are taken to minimise any risks and we record and report any incidents or concerns to Company management, for internal review and assessment, and local authorities.
49. Merkur is an experienced operator with a proven history of operating premises in some challenging areas and incidents relating to crime and disorder are rare.
50. All staff training is developed to consider local area characteristics and Merkur Slots operates on the basis that its controls and best practice are adopted at all times.
51. Local premises management will always work with local authorities under the Act, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.
52. It is rare for our venues that operate late at night to attract customers leaving alcohol licensed venues as the entertainment offering is significantly different. Merkur's late night operation appeals to shift workers and employees of the late night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
53. Merkur operate a business-wide Anti-Money Laundering (AML) policy, which is reviewed annually, and ensures that the risks of money laundering in these premises are low. The premise layout is designed to allow customer supervision at all times. All machines within the premises are linked to a central machine data capture system, which allows the venues to individually analyse live transactional activity for money laundering. All AML incidents, rare as they are, are reported by the venue staff via a tablet which also provides an automated email alert to myself, as the dedicated AML manager.
54. All Merkur Slots venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools are designed to ensure minimal conflict and successful implementation of our strict policies. In our experience, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate regardless of premises location.
55. As an Operating Licence holder, Merkur Slots UK Limited provides details of incident records and self-exclusion to the Gambling Commission as part of its Regulatory Returns and compliance process. Whilst incidents across our licensed estate are rare, all records are regularly evaluated to ensure that premises operate safely and responsibly.

Local Concerns

56. The representations received from the Interested Parties identify the potential for increased anti-social behavior, crime and disorder and the risk to local individuals that may be at risk

- of gambling harm should the Licensing Sub-Committee be minded to grant the current premises licence application.
57. Merkur has provided an updated, detailed local area risk assessment, reviewed local area statistics and demographics, consulted with the local police licensing team and reviewed the Council's detailed policies in order to effectively identify any potential risks to the proposed operation.
 58. Merkur will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to individuals who may be under the influence of alcohol or drugs and work in partnership with the local police in the unlikely event that any incidents of crime or disorder occur.
 59. The Company's detailed training procedures and evaluation tools have been designed to mitigate any local risk to the Licensing Objectives, with a particular focus on the protection of children and the vulnerable from harms associated with gambling. As part of Merkur's Socially Responsible Gambling Policy, customers are continually monitored and interactions completed where concerns are identified. As part of the interaction process, customer play is assessed to trigger customer affordability and source of funds enquiries to ensure that all gaming remains controlled. I have described the Company's approach above, and it will of course be implemented in these premises.
 60. Having considered the concerns raised and following consultation and meetings with the Police and Licensing Authority, 8 additional licence conditions have been proposed, which have been specifically designed to apply additional safeguards to the premises operation. Conditions include limiting the premises hours of operation to a closing time of midnight each day, providing minimum staff numbers during later hours of operation, the provision of SIA registered staff members for an initial trading period, subject to future review and assessment along with a commitment to a minimum number of test purchases per year with details made available to the Licensing Authority upon request.
 61. Should the Committee members be minded to grant the new licence application subject to the 17 bespoke licence conditions, we believe all potential operational risks will be effectively mitigated. Upon grant, the premises would be one of, if not the most, heavily conditioned licences issued by the Authority under the Gambling Act 2005. This is in contrast with other nearby gambling venues, one of which currently trades for 24 hours per day, which do not have any additional licence conditions beyond those provided by the governing legislation.
 62. Merkur understands that local risk assessment and staff training is a live matter, which is regularly assessed and adapts to any emerging or changing risks in the locations in which it operates. Merkur Dagenham will be no exception.
 63. Due to the nature of the gaming that is provided at Merkur venues, it is rare for customers to congregate outside, unlike betting premises, as there is no ongoing entertainment such as a sporting event. It is also rare for our venues to have significant customer numbers at any one time with total customer numbers almost always in single figures. Customers leaving our premises rarely cause concern to our local neighbours.
 64. Merkur is committed to partnership working and will always engage with local Betwatch, Pubwatch, or other similar schemes to share best practice and local knowledge of venue operation or identified risks, whether or not they strictly relate to gambling premises.

Premises Operation

65. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the

Licensing Objectives and a copy our Policies and Procedures has been provided as part of our hearing bundle.

66. The Merkur Slots premises layout has been developed to facilitate customer observation and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate continuous observation and customer interaction.
67. Merkur Slots staff members are not restricted to counter positions that may be found in other licensed venues, such as betting premises. Our staff are actively encouraged to move throughout the premises and proactively engage with all customers, particularly on entry, not only to implement our Think 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.
68. All Merkur's staff members actively monitor and manage the area immediately outside their premises and record all incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.
69. All Merkur premises operate extensive CCTV throughout customer facing areas and also external areas to assist with monitoring customer behaviour and that of other individuals in the immediate vicinity of the premises. CCTV displays are appropriately situated to ensure that all customer areas are monitored.
70. Staff numbers and premises operation are regularly risk assessed, incorporating monitoring of premises operation, internal compliance audit completed by our field based compliance team, evaluation of customer numbers and feedback from Responsible Authorities and Interested Parties. These effective measures ensure that premises are able to quickly adapt to any emerging risk or local concern.
71. It is very rare for our premises to employ dedicated SIA registered door staff as, in our experience, this is almost never necessary. However, staff numbers and rotas are continuously reviewed to adapt to customer numbers and cognisance is taken of police advice. Following discussions with the local police licensing team we have offered, by way of a licence condition, to employ SIA door staff during the premises initial trading period to provide assurance that premises staff and customer security remains key to premises successful operation.

Conclusion

72. The business of Merkur is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and welcome in Merkur Slots premises. This principle is fundamental to Company management strategy from head office to premises level. It is a principle which as a company we have achieved in all of our venues, which provide safe, welcoming and congenial environments for our customers.
73. In the rare case that issues do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, Merkur does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.
74. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
75. I can state that it is rare for our premises to be the cause of, or otherwise associated with, crime, disorder or nuisance to nearby premises due to the nature of our gaming premises and our customer base.

76. Merkur continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

Ms Amanda Kiernan, Head of Compliance, Merkur Slots UK Limited

Date: 06/01/2022

LICENSING SUB - COMMITTEE HEARING – 18TH JANUARY 2022

SUPPLEMENTAL STATEMENT – STEVE AMBROSE

1. I am the Operations Director for Merkur having held this position since December 2016 responsible for all day to day operations across our estate of Adult Gaming Centres, High Street Bingo premises and Bingo Halls.
2. I am a Director of the Bingo Trade Association "The Bingo Association" and the Division 3 Chairman of the Amusement Trade Association "BACTA" covering Adult Gaming Centres across Great Britain.
3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position of Operations Director, this experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, in rural and city centre locations.
4. Through my years of working in the gambling industry I can state categorically that it is rare for Merkur Slots UK Limited's venues, and specifically its high street bingo premises, to be associated with crime and disorder, anti-social behaviour or local nuisance.
5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this reflects the type of gaming operated by Merkur and its customer demographic, which is approximately 50% female with an average age of over 30.
6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues, there is no 'event' taking place.
7. Across the high street bingo estate, average customer numbers at any one time remain relatively low, in single figures, and customer numbers between 5 and 10 at any one time, would be considered an exceptionally busy period.
8. Customer numbers do not vary significantly throughout the hours of premises operation and due to the relatively low numbers, later hours of operation are often sought, with the majority of Merkur premises operating into the early hours. Later hours of opening appeal to shift workers and employees of the late-night economy and Merkur Slots policies, procedures, safeguards, and security measures are designed to ensure that premises operate securely and safely at all hours of operation.
9. We operate premises throughout the UK in busy high street locations that have a high footfall of Children and Young persons. Due to the nature of our gambling premises, customer demographic and presentation of our venues on the high street, we do not see a significant number of underage individuals seeking to gain access to our premises regardless of location. In our experience, Merkur's product does not appeal to the younger generation.
10. Merkur's Think 25 policy and its implementation are effective tools ensuring that our venues operate responsibly. By strictly controlling our marketing and advertising and limiting line of site into venues, individuals that pass by our venues are not exposed to ambient gambling, which may be visible in other operator's venues, such as some betting premises and public houses that provide gaming machines.
11. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.

10. Our venue teams seek to form genuine relationships with local police, town centre groups, support services and Betwatch or Pubwatch schemes should they be available. Our staff are proud of the areas in which they live and work and do not wish to see any level of anti-social behaviour.
11. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers and offering tea and snacks.
12. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained not only to enable effective premises management but also to ensure that customers can be continually monitored and assisted where necessary. As part of our commitment to working with local authorities, we will always liaise with local police licensing teams to ensure that where local police concerns are identified, sufficient staff members are on site during premises hours of operation,
13. Customer monitoring, interaction and any incidents including implementation of our Think 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Merkur Slots UK Limited's independent audit team can regularly monitor all records.
14. The Company's audit department collates and evaluates monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.
15. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours.
16. Machine emptying is only carried out when customer numbers are low and security systems implemented, which include activating the premises maglock and ensuring sufficient staff remain on duty.
17. Merkur Slots UK Limited's venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor.
18. Venues are equipped with our staff guard system. The system allows direct communication with a central monitoring station through audio and CCTV. The central monitoring station would then contact the relevant emergency services in case of incident.
19. During the consultation period, I attended a meeting on the 29th September 2021 with PC Owen Dunn at a nearby Merkur Slots premises. During this meeting I discussed with PC Dunn the existing operations and safeguards in place at our premises. PC Dunn did not raise any particular concerns or identify issues with the gambling premises, but moreover with the late-night economy. His fears largely centered around the proposed late-night operation.
20. Having considered the representations received and local concerns identified, we proposed a new premises closing time in line with the default permitted bingo hours, that being midnight Monday to Sunday. Should the premises licence be granted, all proposed gambling activities (bingo and gaming machines) will be available throughout operational hours.
21. Following receipt of the objections from Licensing and Police, I attended a further meeting by Microsoft Teams on the 2nd December 2021 alongside our legal representatives. This meeting was very beneficial, and neither the police nor the Licensing Authority identified any specific concerns connected to or associated with any existing licensed gambling venues. The Police acknowledged that Merkur Slots UK had detailed operational policies and procedures designed and implemented to promote the Licensing Objectives. However, the police requested that additional safeguards be put in place by way of suitable and proportionate licence conditions

be considered, to address the general local concerns that may arise due to the proposed late-night operation.

22. We considered the queries raised by the Licensing Authority and the Police comments and an additional 8 conditions were proposed to PC Owen Dunn, which have been provided in the supporting documentation. Conditions have been designed to provide assurance regarding minimum staffing and premises security, including the provision of SIA registered door staff for an initial trading period along with a commitment that the premises will undergo a minimum of two test purchases a year and details made available to the Licensing Authority upon request
23. On the 4th January 2022 the Police withdrew their representation.
24. On the 6th January 2022, Merkur Slots Barking had a visit from Mr Parkins, Licensing officer at Barking & Dagenham. The Venue manager showed Mr Parkins around the premises and discussed at length the operation of the premises and the safeguards in place with regards to self-exclusions and staff training. Mr Parkins stated that this wasn't an official 'grading visit', however if it was the venue would have passed.
25. We have considered the local concerns raised by the Interested Parties and believe that should the Committee members be minded to grant the new premises licence subject to the 17 bespoke licence conditions proposed, all perceived operational risks and fears should have been effectively addressed.
26. The Licensing Authority has confirmed that none of the other gambling premises identified in our local area risk assessment are subject to any licence conditions beyond those applied by the Gambling Act itself. Should the current application be granted, Merkur Dagenham would be one of, if not the most, heavily conditioned gambling licence in the authority's jurisdiction and one of Merkur Slots UK Limited's most heavily conditioned licences currently in effect.
27. In our local area risk assessment we have identified a number of organisations that provide support services to local vulnerable individuals. Merkur is committed to working in partnership with local authorities and any organisations identified to discuss local concerns, ensuring that local risks are identified and incorporated into our risk assessment and management training.
28. All of these features mean that our premises provide safe and congenial environments and do not impact on their localities. In my experience, while concerns are sometimes expressed by local residents and some authorities with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises actually open.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 06/01/2022

LICENSING SUB-COMMITTEE HEARING – 18TH JANUARY 2022

SUPPLEMENTAL STATEMENT - ANDY TIPPLE

Merkur Slots UK Limited, formerly Cashino Gaming Limited

1. I am Currently Head of Product for Merkur Casino UK and have over 35 years' experience in the Gaming Industry and have held a multitude of positions ranging from Arcade Manager, Service Manager to Gaming Manager. This experience has enabled me to gain an understanding of the intricacies of operating across all our gaming platforms.
2. Merkur Slots UK Limited operates over 90 'High Street Bingo' premises, 5 bingo clubs, 5 Family Entertainment Centres and 87 Adult Gaming Centres throughout Great Britain.
3. The development of High Street Bingo has occurred because customers are becoming less interested in attending large, sub-regional bingo halls and increasingly wish to play bingo with a portable electronic terminal rather than marking numbers off a card. Accordingly the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals, as well as on paper, with gaming machines in accordance with the permission provided by a bingo premises licence. The Gambling Commission is fully aware of the presentation of bingo in our high street premises.
4. In our premises, customers can move around with the terminal, choosing to play while standing or in seating provided around the premises.
5. As for gaming machines, the governing legislation provides strict limits on the types of machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.
6. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
7. Across Merkur Slots UK Limited's venues the average stake placed is between 30p and 40p. Only 20% of the gaming machines provided may be category B3s. The remainder, being the category C gaming machines, have the same stake and prize levels as those offered in pubs.
8. Following successful grant of the new bingo premises licence, we have proposed that there will be 20 G-Tab bingo tablets and 30 'traditional' gaming machines. Details of the gaming content provided in the bingo tablets has been provided in the supporting documentation. In line with the proposed premises closing time, both bingo and gaming machine activities will be available until midnight each day.
9. All Merkur Slots UK Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling. Full written details of the training and the Company's operating procedures have been provided in the hearing bundle.
10. As stated above, electronic bingo is a natural evolution of 'traditional bingo' and has been operated nationally for many years since the inception of the Gambling Act 2005 and is approved and understood by the Gambling Commission.

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

Date: 06/01/2022



Full Observation Report

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

Merkur Slots

247 Heathway Dagenham RM9 5BG

Introduction

1. I have been instructed to conduct independent observations on the proposed Merkur Slots venue at 247 Heathway, Dagenham RM9 5BG and the surrounding area.
2. Merkur Slots UK have made an application for a Premises Licence under Section 159 of the Gambling Act 2005 in relation to these premises.
3. Concerns have been expressed by local residents and police that a premises of this type will become a 'focal point for offending' encouraging anti-social behaviour, drug offences, other criminality, street drinking and will cause children to become gambling addicts.
4. The premises come under the jurisdiction of River Ward in the London Borough of Barking and Dagenham.

Personal – Stuart Jenkins

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

Observations

10. I carried out my observations of 247 Heathway, Dagenham RM9 5BG and the surrounding area between 14:00 hours on Friday 3rd December 2021 and 02:30 hours on Saturday 4th December 2021.
11. The commercial unit at 247 Heathway is currently closed and not trading. The premises used to be operated by Santander Bank. It is on a busy commercial high street, on the A1240 which runs north to south and has two-way vehicular traffic passing the venue.
12. During the observations vehicular and pedestrian traffic was varied. The road remained consistently busy with vehicular traffic, but this was greatly reduced in the early hours of the morning.
13. The weather was mild and overcast for most of the evening and night before fog descended on the area in the early hours of the morning.
14. The area felt safe with members of the public going about their business, working, shopping, and socialising.

15. The area is well lit and illuminated from street lighting and shop front lights. I had good and unobstructed views throughout the observations.
16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, littering, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. The area of observations is densely populated with many retail premises, that include large supermarkets, mini supermarkets, pubs, butchers, cafes, hairdressers, estate agents, bookmakers, restaurants, and fast-food shops which service the many nearby residential streets.
18. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
19. The area is well serviced by public transport with several bus routes on the Heathway. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads.
20. I concentrated my observations on Heathway from the junction with Reeds Road and Parsloes Avenue to the north of the premises and Hedgemans Road and Church Elm Lane to the south. This is the main commercial centre for the area as beyond this are residential properties in both directions.
21. The Heathway Shopping Centre is situated opposite the premises at number 247. The centre has two entrances, one to the north and one to the south. There is a library situated on Heathway near the junction with Church Elm Lane.
22. There are four bookmakers in the immediate vicinity of 247 Heathway. Paddy Power Bookmakers at 245 Heathway and Coral Bookmakers 251 - 253 Heathway which are either side of the venue. William Hill Bookmakers 220 Heathway and Betfred on the corner of the Heathway Shopping Centre are both opposite the venue. All four premises operate Monday to Saturday 08:00 hours - 22:00 hours and Sunday 08:30 hours – 22:00 hours apart from William Hill's which operates from 09:00 hours - 22:00 hours on Sunday's.
23. Opposite Dagenham Heathway Underground Station is an Adult Gaming Centre (AGC) called Gaming Fun at 250 Heathway. The premises offers a similar service and operation to the one operated by Merkur Slots UK. Gaming Fun operates 24 hours a day, 7 days a week.
24. The Lord Denman Public House 270 -272 Heathway is situated north of Dagenham Heathway Station. It is the only public house in the immediate area.
25. Throughout my observations I saw no begging taking place in the street, no street drinkers, vagrants, littering, or drug dealing. I saw Metropolitan Police uniform officers on foot patrol and engaging with the public in Heathway Shopping Centre and on Heathway itself.

26. Photographic images of what was seen during the observations at Heathway, Dagenham were taken to support my findings and recommendations and are documented in Appendix B.

Covert Observations

27. I completed my observations of 247 Heathway, Dagenham RM9 5BG and the surrounding area between 14:00 hours on Friday 3rd December 2021 and 02:30 hours on Saturday 4th December 2021.
28. At 14:30 hours I found the whole area to be busy with pedestrian traffic and vehicular traffic alike. The area felt safe with members of the public going about their business, working, shopping, and socialising.
29. Between 15:30 hours - 16:30 hours the pedestrian numbers in the area increased with parents and their young children and older children travelling home from local schools. They were travelling on foot and / or using the local bus routes and underground train station. I did not see any children of any age hanging around or trying to enter local bookmakers or the adult gaming centre.
30. During this time, I saw two uniform officers on foot patrol in high visibility jackets in the Heathway Shopping Centre and on Heathway. The shopping centre was relatively quiet at the time of my visit. Some of the shops were closed and other retail units not trading. The shopping centre closed at 17:30 hours.
31. Whilst in the area I carried out covert visits to the bookmaker premises and adult gaming centre to see how these premises operated in comparison to Merkur Slots premises.
32. At 17:30 hours I entered Paddy Power Bookmakers, 245 Heathway which is next to 247 and carried out a covert visit. As I approached the venue, I saw the front of the premises looked tired as the glass in the front door was badly cracked and the Paddy Power front fascia was faulty with only the letters 'PADDYP' illuminated. There was advertising in the window which restricted the view into the premises, though not completely.
33. The inside of the premises was scruffy and dirty. There were about twelve television screens that were mounted on the wall showing various types of racing. In front of the screens were table and chairs for customers to use. There were several gaming machines in the venue too.
34. At the time of my visit there were twelve casually dressed mature male customers in the premises either watching the racing or playing the gaming machines without incident.
35. I did not see any evidence of drunkenness, anti-social behaviour, vulnerable or underage persons in the premises. I left the premises at 17:45 hours.

36. At 18:00 hours I entered Betfred on the corner of the south entrance to Heathway Shopping Centre. The premises had smart corporate well-maintained frontage. There was advertising in the window which restricted the view into the premises, though not completely.
37. Inside I saw there were about 20 screens mounted on the wall and several gaming machines in the premises. There was a staff reception counter at the back of the premises where two members of staff were seated.
38. At the time of my visit there were only four casually dressed mature males in the premises. All four men quietly enjoyed the betting and gaming available on the premises without incident.
39. The premises were clean, tidy, and well run. I did not see any evidence of drunkenness, anti-social behaviour, vulnerable or underage persons in the premises. I left the premises at 18:11 hours.
40. At 20:20 hours I entered William Hill Bookmakers 220 Heathway. I saw the venue had a smart corporate well-maintained frontage. There was advertising in the window which restricted the view into the premises, though not completely.
41. Inside I saw that along the left-hand wall there were a series of wall mounted screens, and a staff counter was at the end of the premises. There were also a small number of gaming machines. There was one female member of staff at the staff counter behind a glass screen.
42. There were five casually dressed mature male customers in the venue at the time of my visit. All five men quietly enjoyed the betting and gaming available on the premises without incident.
43. The premises were clean, tidy, and well run. I did not see any evidence of drunkenness, anti-social behaviour, vulnerable or underage persons in the premises. I left the premises at 20:43 hours.
44. At 21.10 hours I entered Coral Bookmakers 251-253 Heathway. The front of the premises had a smart corporate well-maintained frontage. There was advertising in the window which restricted the view into the premises, though not completely.
45. Inside I saw along the left-hand wall there were six wall mounted screens with a staff counter at the end on the right-hand side behind a screen. The gaming machines were at the far end of the premises.
46. At the time of my visit the premises had seven casually dressed male customers, all over 25 years of age. All seven men quietly enjoyed the betting and gaming available on the premises without incident.
47. The premises were clean, tidy, and well run. I did not see any evidence of drunkenness, anti-social behaviour, vulnerable or underage persons in the premises. I left the premises at 21:30 hours.

48. From 22:40 hours until 23:00 hours I was observing The Lord Denman Public House 270 - 272 Heathway. As customers were leaving the pub, a group of about twelve males from the pub gathered outside and started arguing. There appeared to be two distinct groups some of whom clearly knew each other. Their shouting and inability to stand still or upright gave me the clear impression many of them were heavily intoxicated from alcohol or drugs or a combination of both. Without warning a fight started between the two groups with two males falling into the road. After a few minutes the two groups dispersed and ran off, one group south and the other north bound. Police were called and arrived shortly after the groups had run off. The operators of the pub closed the venue very quickly and pulled the shutters down as police arrived.
49. I had checked on the Lord Denham Public House throughout my time in the area and from the outside there appeared to be no issues prior to this incident.
50. At 00:49 hours I entered Gaming Fun, the adult gaming centre at 250 Heathway. The premises are owned and operated by Game Nation. The premises are licensed to operate 24 hours a day.
51. As I approached the venue, I saw it had smart well-lit, bright, corporate, and well-maintained frontage with advertising in the windows. The windows themselves were obscured preventing anyone from seeing into the venue. I saw there were three males outside the venue engaged in conversation.
52. As I got closer, I could see one of these males was smartly dressed in dark clothing and was wearing an SIA badge on his arm. This male was clearly the door supervisor on duty for the venue and was speaking to two potential customers or ones that were in the process of leaving. As I got to the door, which was closed, I asked the door supervisor if I could go into the premises. The door supervisor looked at me, opened the door and directed me into the venue.
53. On entry I saw there were gaming machines from front to back on both side walls and further gaming machines in the middle of the premises. There was very little space to move around the premises especially when customers were seated at the machines. At the back was a screened staff reception desk and a toilet.
54. When I entered there were three customers in the premises playing the gaming machines, two males and one female, all of whom were aged between 25 and 50 years.
55. I sat down at one of the machines on the right-hand side and began playing it. I noticed that there were two female members of staff, one in her late 50's and the other her late 20's. The younger female approached me and asked if I would like a hot or soft drink. I accepted a black coffee which was quickly brought to me.
56. Whilst in the venue a further four customers arrived, two females and two males all aged around 30 years of age and who appeared to know each other.
57. There were no alcoholic drinks available. The hot and soft drinks were prepared behind the reception desk which was clean and tidy.

58. The customers were all quietly enjoying playing the machines. They were clearly not being pressurised or encouraged to spend money and they were not vulnerable or drunk.
59. Whilst I was in the venue, I saw staff wiping down surfaces and completing a low-profile patrol around the premises checking on customers' needs and making sure they weren't underage or vulnerable.
60. No one was pressurised or encouraged to spend money and I did not see anyone who was vulnerable, drunk, or underage.
61. The staff were friendly, polite, informative and I found the premises clean and tidy. I left the premises at 01:18 hours.
62. I remained in the area regularly visiting different sites and continued my observations until 02:30 hours when I left the area.

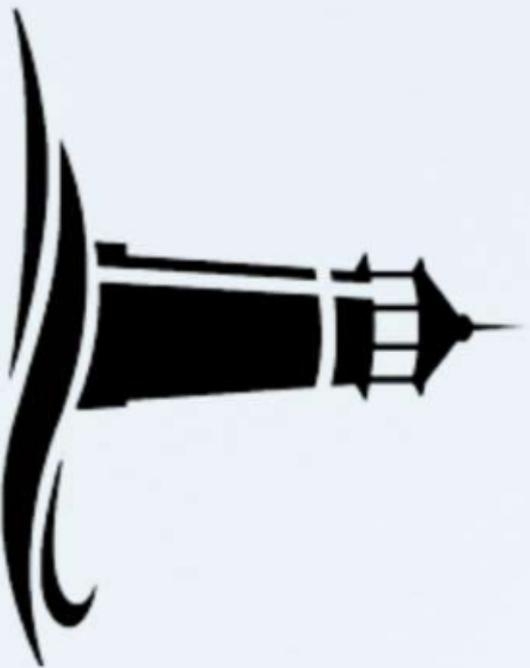
Summary

63. When I visited 247 Heathway, Dagenham RM9 5BG and the surrounding area I spent over ten hours in the locality to gauge the area.
64. I did see crime and disorder taking place outside the Lord Denham Public House involving a group of twelve male customers when they were leaving the premises. I saw no other evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths gathering in the area.
65. At all times whilst in premises and in the street, I felt safe and able to enjoy the area without being in fear.
66. I have visited many Merkur Slots and Merkur Cashino Premises in the UK. I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure they operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons.
67. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
68. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
69. In conclusion, from my visit it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.

70. From my observations I cannot see any evidence to support the concerns raised in the objections at this time. The opening of a Merkur Slots at 247 Heathway will not impact on the environment, infrastructure, police, or local community as the number of customers using these types of venue at any one time is usually small and the premises are well run.

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

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
21/12/2021



LEVECHE

ASSOCIATES LIMITED

Appendix B

Observation Images

3/12/2021 - 4/12/2021

Merkur Slots

247 Heathway

Dagenham

RM9 5BG

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

Appendix B

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B1
14:37hrs - Front of 247 Heathway adjacent to Paddy Power Bookmakers

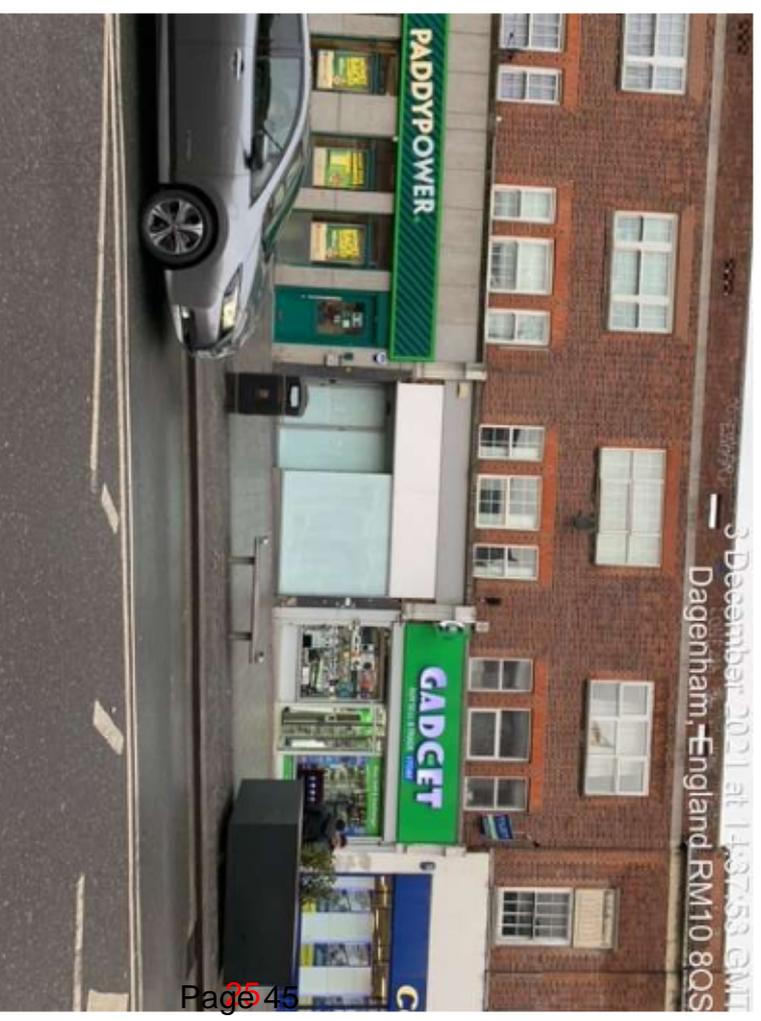


Image B2
14:37hrs - Front of 247 Heathway Dagenham

Mercur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B3
14:38hrs - William Hill Bookmakers 220 Heathway
Dagenham RM10 8QS



Image B4
14:38hrs - Coral Bookmakers 251-253 Heathway Dagenham
north of premises

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B5
14:39hrs - Heathway looking south towards premises



Image B6
14:40hrs - Dagenham Heathway Station



Image B7
14:40hrs - Dagenham Heathway Station



Image B8
14:40hrs - North of Dagenham Heathway Station

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



3 December 2021 at 14:48:15 GMT
Dagenham, England RM10 8LU



3 December 2021 at 14:53:24 GMT
Dagenham, England RM9 5AOC

Image B9
14:48hrs - Looking south Reeds Road / Parsloes Avenue
junction with Heathway

Image B10
14:53hrs - The Lord Denman PH north of Dagenham Heathway
Station

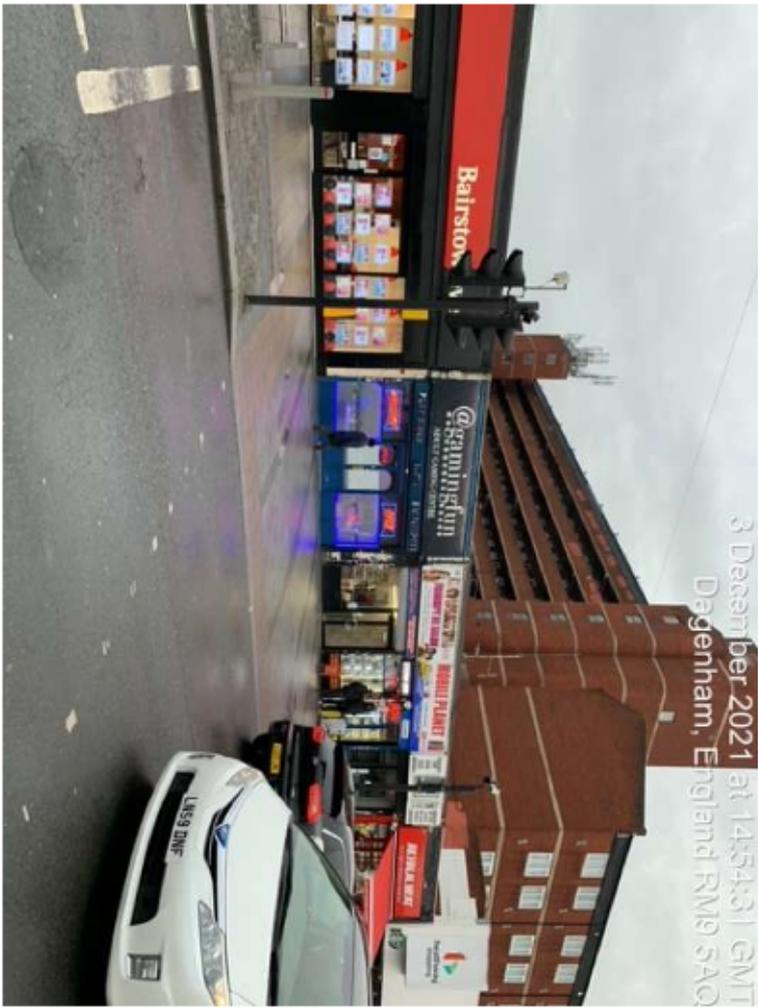


Image B11
14:54hrs - 'Gaming Fun' Gaming Centre opposite Dagenham Heathway Station

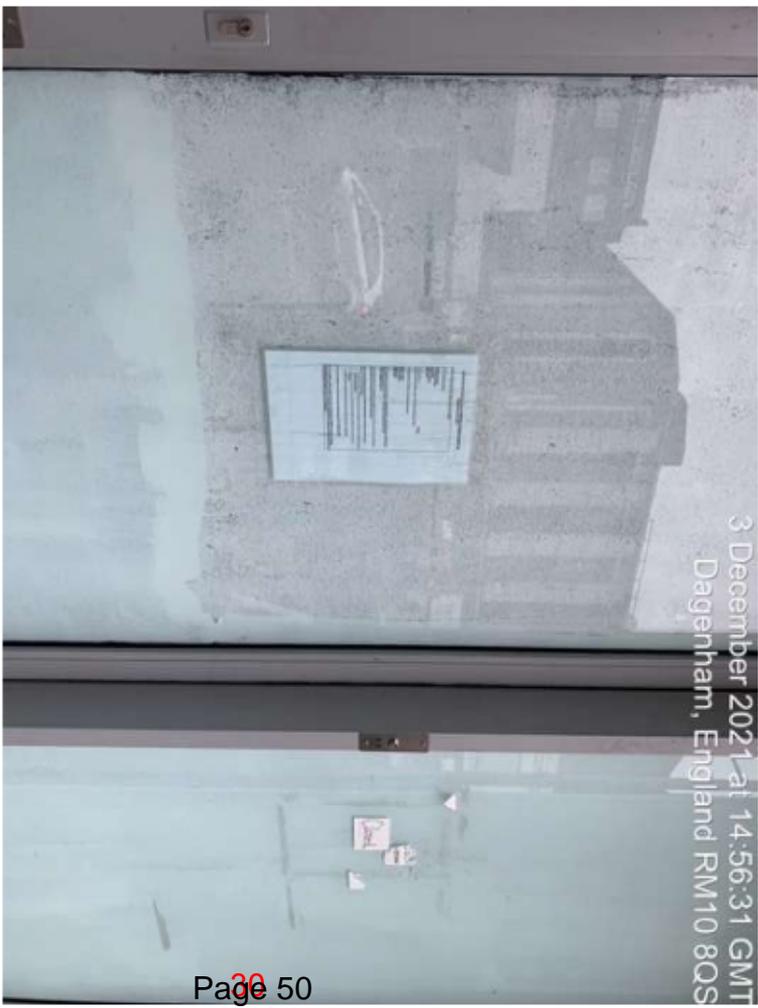


Image B12
14:56hrs - Front of 247 Heathway Dagenham



Image B13
14:57hrs - Betfred Bookmakers Unit 25 Heathway Shopping Mall

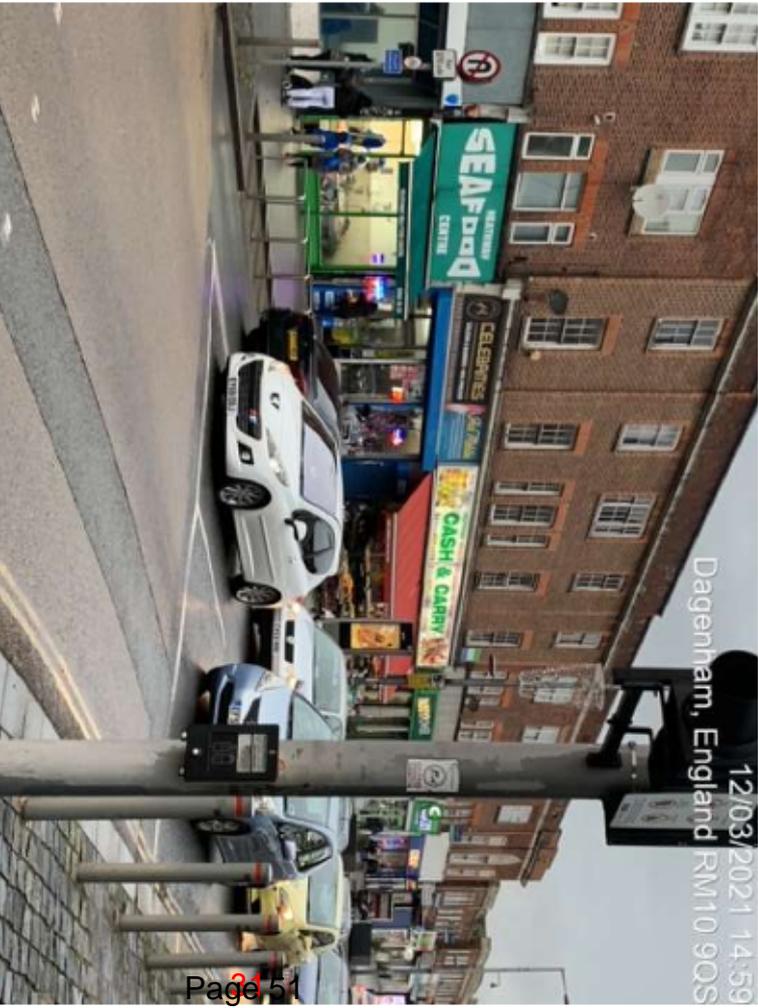


Image B14
14:59hrs - Heathway Junction with Hedgemans Road and Church Elm Lane



Image B15
15:00hrs - Hedgemans Road and Church Elm Lane
junction with Heathway south of premises looking
southwest into Dagenham Avenue



Image B16
16:05hrs - Betfred Bookmakers Unit
25 Heathway Shopping Mall



12/03/2021 16:07
Dagenham, England RM10 8QS

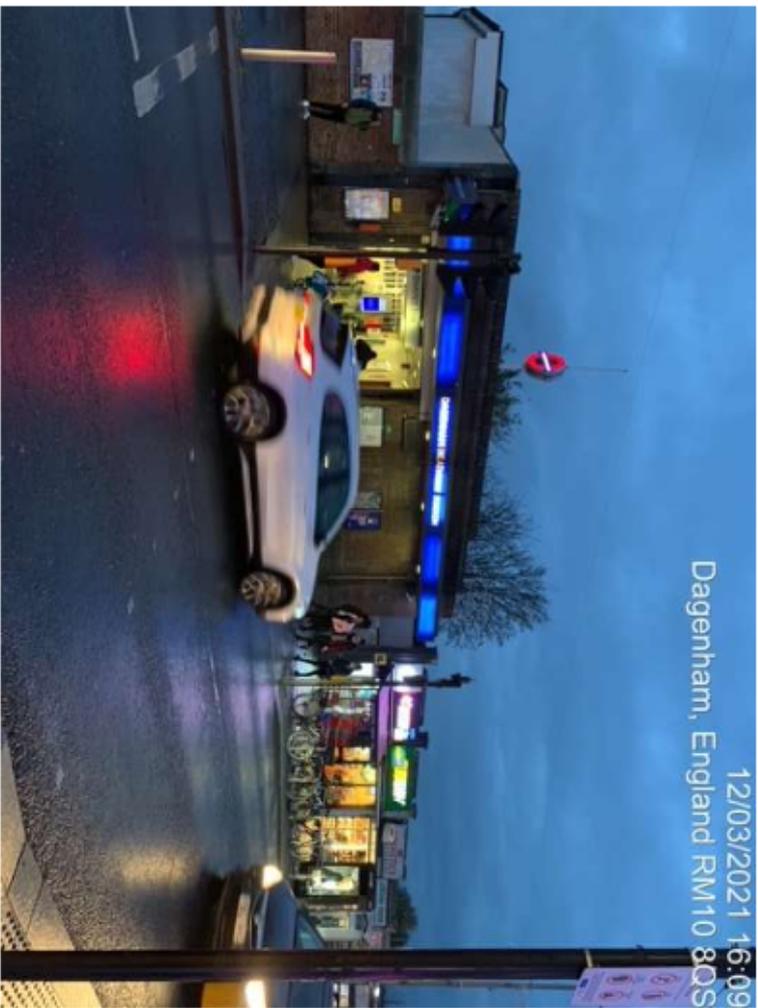


12/03/2021 16:07
Dagenham, England RM10 8QS

Image B17
16:07hrs - Front of 247 Heathway adjacent to Paddy Power Bookmakers

Image B18
16:07hrs - Coral Bookmakers 251-253 Heathway Dagenham north of premises

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



12/03/2021 16:09
Dagenham, England RM10 8QS



12/03/2021 16:12
Dagenham, England RM10 8QS

Image B19
16:09hrs - Dagenham Heathway Station

Image B20
16:12hrs - The Lord Denman PH south of Dagenham Heathway Station



Image B21
16:29hrs - Starbucks at the northern entrance to
Heathway Shopping Centre



Image B22
17:24hrs - Inside Heathway Shopping Centre

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B23
17:42hrs - Front of 247 Heathway Dagenham



Image B24
18:11hrs - Betfred Bookmakers Unit 25 Heathway Shopping Mall

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B25
20:17hrs - Heathway looking north towards 247



Image B26
20:17hrs - Heathway south of premises looking east
into Church Elm Lane

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B27
20:43hrs - William Hill Bookmakers 220 Heathway
Dagenham



Image B28
20:45hrs - Heathway Dagenham looking south
towards premises

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021

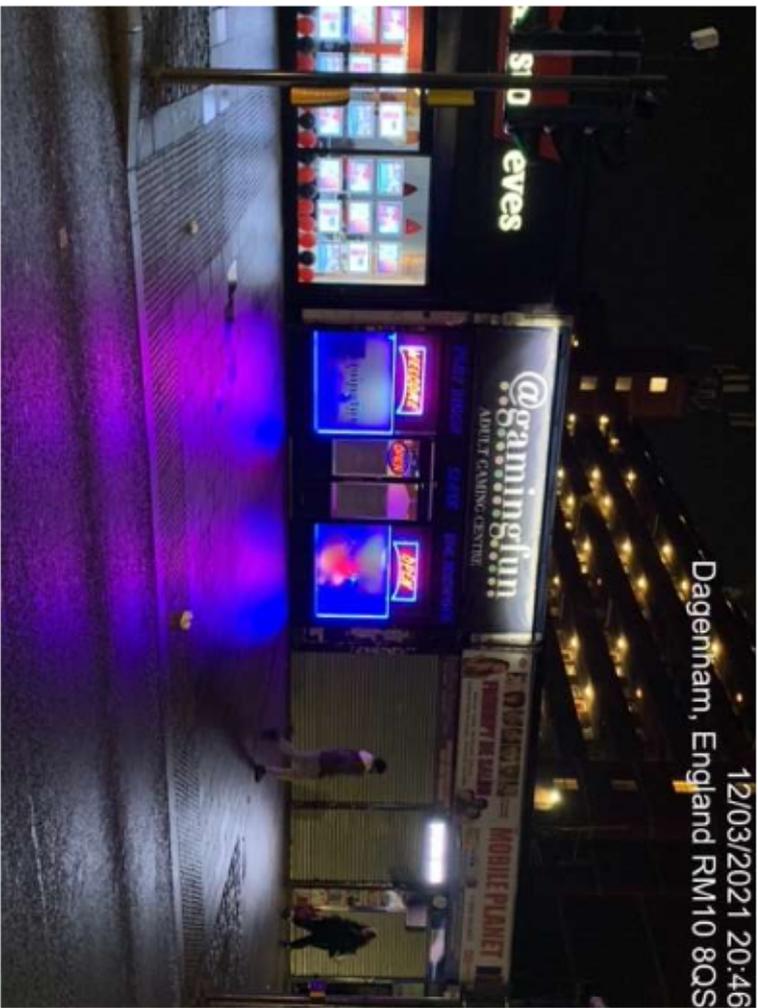


Image B29
20:46hrs - 'Gaming Fun' Gaming Centre opposite
Dagenham Heathway Station

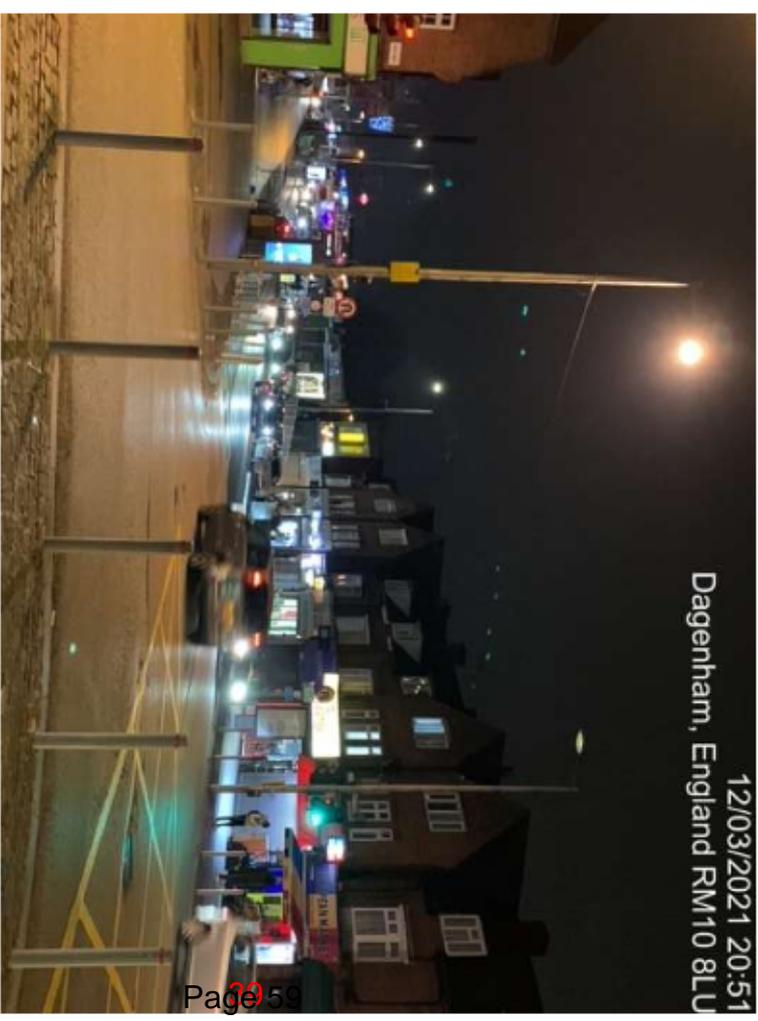
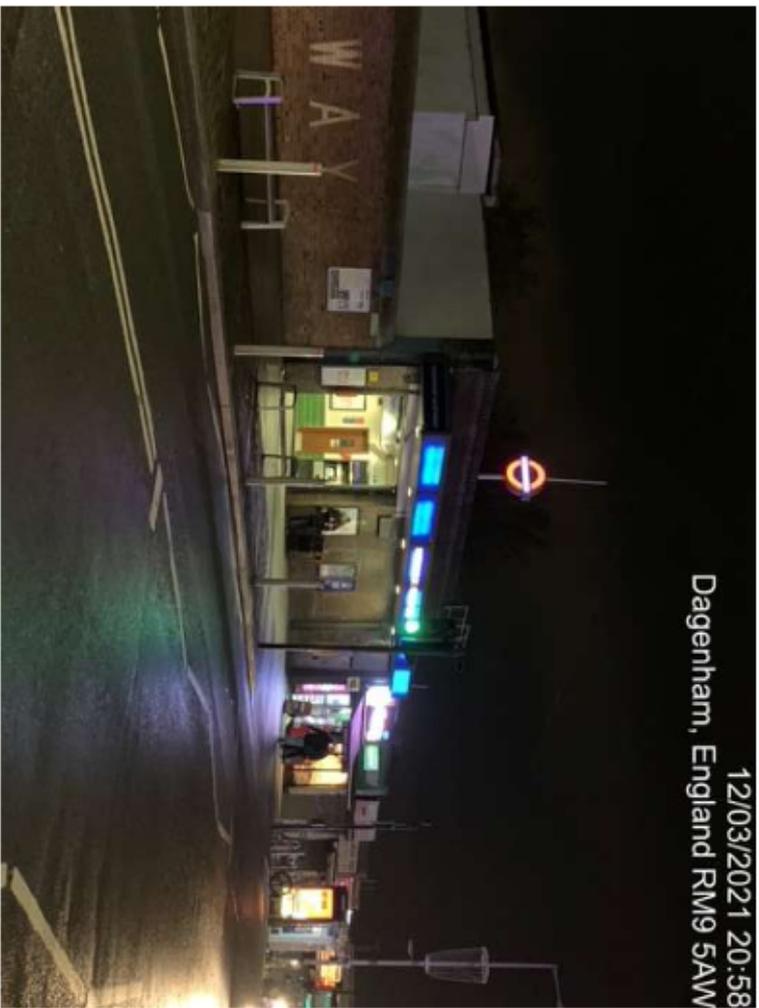


Image B30
20:51hrs - Looking south Reeds Road / Parsloes
Avenue junction with Heathway

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



12/03/2021 20:58
Dagenham, England RM9 5AW

Image B31
20:58hrs - Dagenham Heathway Station



12/03/2021 21:30
Dagenham, England RM9 5AN

Image B32
21:30hrs - Coral Bookmakers north of premises

Mercur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B33
22:34hrs - William Hill Bookmakers 220 Heathway
Dagenham



Image B34
22:36hrs - Coral Bookmakers north of premises

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B35
William Hill Bookmakers 220 Heathway
Dagenham



Image B36
The Lord Denman PH north of Dagenham
Heathway Station

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B37
22:49hrs - Betfred Bookmakers Unit 25 Heathway
Shopping Mall



Image B38
22:49hrs - Front of 247 Heathway Dagenham



Image B39
22:49hrs - Front of 247 and Coral Bookmakers Heathway



Image B40
22:50hrs - Tesco Express and bus stop opposite premises



Image B41
23:11hrs - Heathway looking north junction with
Hedgemans Road and Church Elm Lane

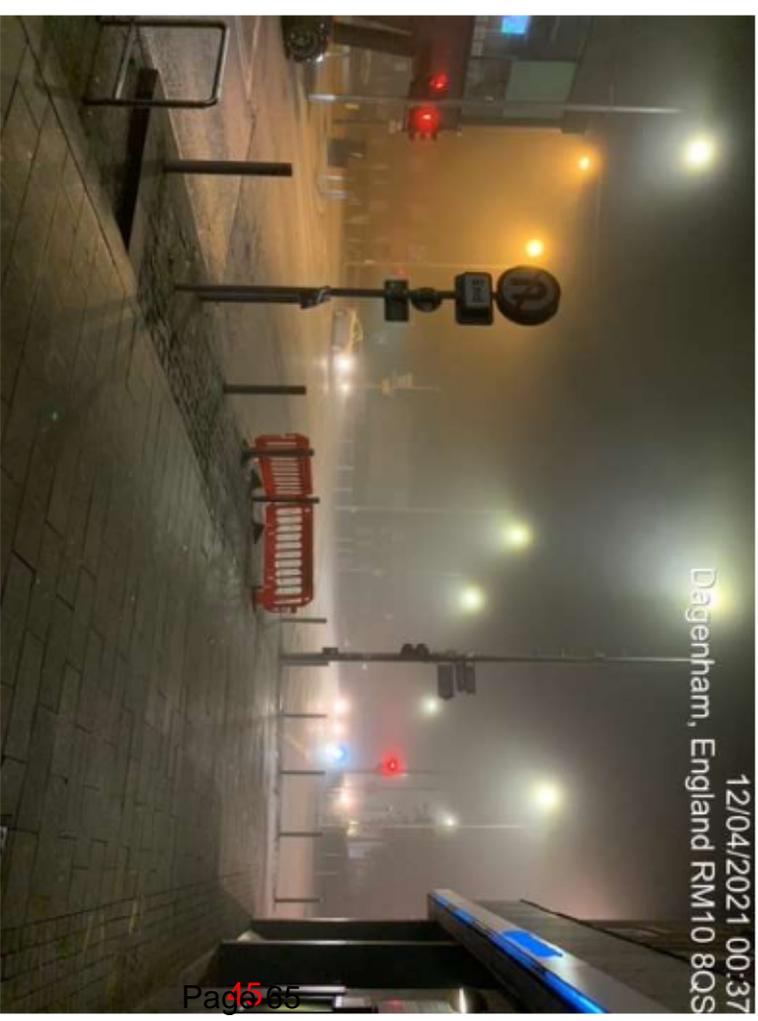


Image B42
00:37hrs - Heathway looking south junction with
Hedgemans Road and Church Elm Lane

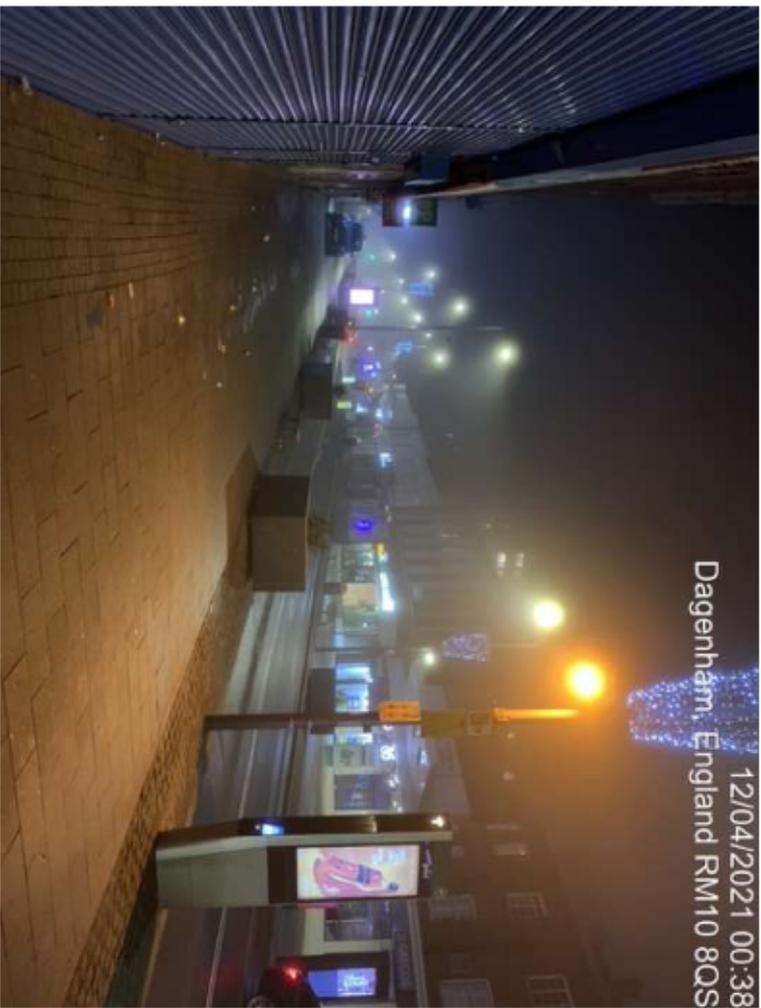


Image B43
00:38hrs - Heathway looking north towards Dagenham
Heathway Station



Image B44
00:38hrs - Betfred Bookmakers at southern entrance
to Heathway Shopping Centre



Image B45
00:39hrs - Front of 247 Heathway Dagenham



Image B46
00:42hrs - Dagenham Heathway Station

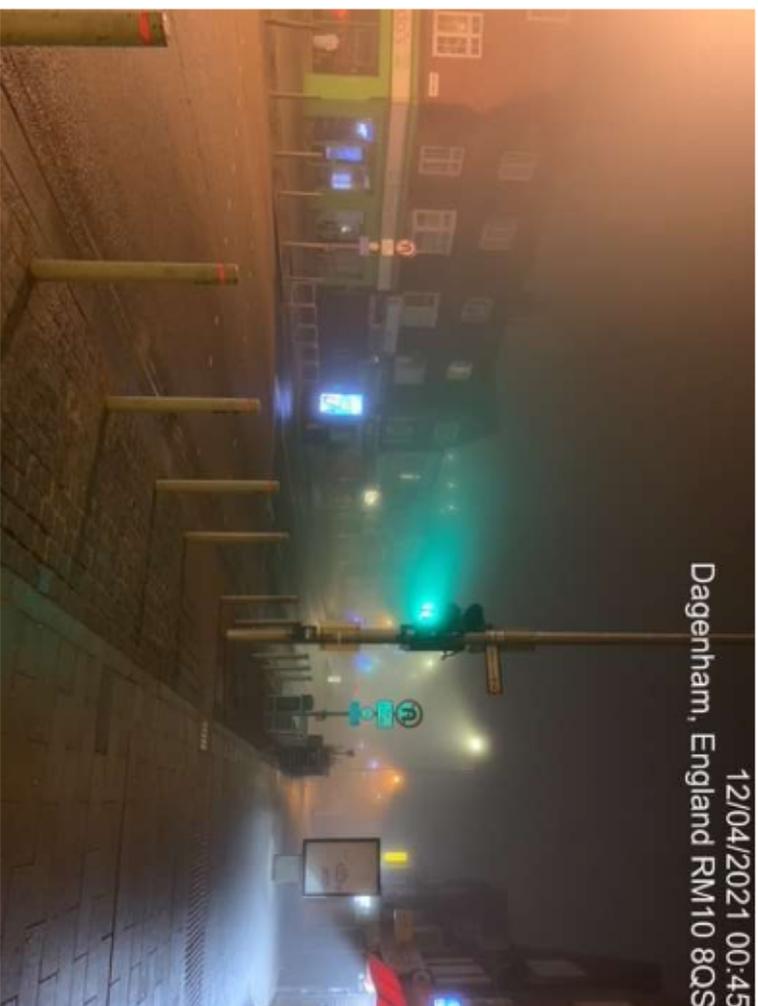


Image B47
00:45hrs - Heathway looking south junction with Reeds Road / Parsloes Avenue

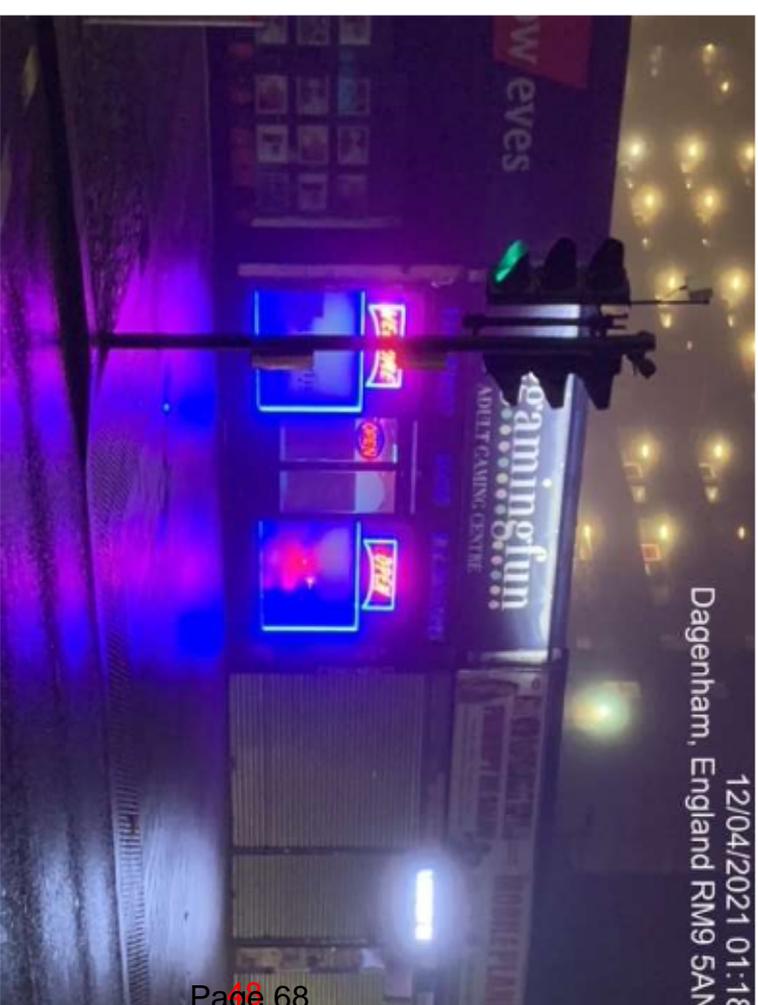


Image B48
01:18hrs - 'Gaming Fun' Gaming Centre opposite Dagenham Heathway Station

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B49
01:18hrs - Looking north from Dagenham Heathway Station



Image B50
01:18hrs - Looking south from Dagenham Heathway Station

Merkur Slots - 247 Heathway Dagenham RM9 5BG
3rd - 4th December 2021



Image B51
02:18hrs - Heathway looking north towards 247
END OF OBSERVATION



Independent Observation and Crime Data Analysis Report

Mr Nicholas Mason – Consultant

Leveche Associates Limited

Merkur Slots

247 Heathway Dagenham RM9 5BG

Introduction

1. I have been instructed to conduct independent observations on the proposed Merkur Slots venue at 247, Heathway, Dagenham RM9 5BG and the area around these premises, to include a review of local crime reporting data.
2. Merkur Slots UK have made an application for a premises licence under section 159 of the Gambling Act 2005 in relation to these premises.
3. I am instructed that perceived concerns have been expressed by local residents and police that a premises of this type will become a 'focal point for offending' encouraging anti-social behaviour, drug offences, other criminality, street drinking and will cause children to become gambling addicts.
4. The premises come under the jurisdiction of River Ward, London Borough of Barking and Dagenham Council.

Personal Summary – Nicholas Mason

5. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.

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

Site Observations

13. I attended the location of Merkur Slots proposed site at 247, Heathway, Dagenham RM9 5BG on Thursday 2nd December 2021 and carried out observations from 14:30hrs to 00:00hrs.
14. The premises were formerly occupied as a Santander Building Society and are situated on Heathway, part of the A1240 which generally runs north to south with two-way vehicular traffic passing the venue.
15. My observations concentrated on the commercial area of Heathway which is naturally defined where it meets the junction with Reeds Road and Parsloes Avenue to the north and Hedgemans Road and Church Elm Lane to the south. Beyond these junctions the area is residential.
16. The area of observations is densely populated with a large number of retail premises, that include mini supermarkets, butchers, cafes, hairdressers, pawn brokers, estate agents, restaurants and fast-food shops which service the surrounding residential area.
17. The Heathway Shopping Centre is also at this location and situated on the opposite side of the road to the premises. This has a north and south entrance. Dagenham

Library is situated at the southern end of Heathway near the junction with Church Elm Lane.

18. There are four traditional Betting Shops in the immediate vicinity of the subject premises. Paddy Power Bookmakers at 245 Heathway and Coral Bookmakers 251-253 Heathway are situated either side of the premises. William Hill Bookmakers 220 Heathway and Betfred on the corner of the Heathway Shopping Centre are on the opposite side of the road. These premises are licensed to operate Monday to Saturday, 08:00hrs - 22:00hrs and Sunday 08:30hrs - 22:00hrs. On a Sunday the William Hill premises operates from 09:00hrs - 22:00hrs.
19. At 250 Heathway opposite Dagenham Heathway Underground Station there is an Adult Gaming Centre known as 'Gaming Fun' which is similar in style to those operated by Merkur Slots UK. These premises are licensed to operate 24 hours a day, 7 days a week.
20. There is one public house in the vicinity of the premises, The Lord Denman situated north of Dagenham Heathway Station at 270-272 Heathway.
21. The area is well served by public transport with bus routes 173, 174 and 175 in Heathway. There was ample car parking available in nearby pay and display car parks with restricted parking in the surrounding roads.
22. The area is well lit and illuminated from street lighting and shop front lights. Photographic images of what was seen during my observations were obtained to support my findings. These images are documented in Appendix A.

Covert Observations

23. On Thursday 2nd December 2021 my observations commenced at 14:30hrs and concluded at 00:00hrs. I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
24. On commencing observations I noted that the area was very busy with both pedestrians and vehicular traffic. This was the case until much later in the evening.
25. The area felt safe with members of the public going about their business, working, shopping and socialising.
26. At 15:00hrs I visited the Heathway Shopping Centre which was quiet with no evidence of anti-social behaviour or criminality (Image A16 / A17).
27. From approximately 15:30hrs - 16:30hrs the area was busy with young people travelling home from local schools using the local bus and Underground Train service. I did not see any of the young people make an attempt to enter the various Bookmakers or the Adult Gaming Centre (Image A19).

28. At 16:21hrs I observed two members of a local authority security patrol walking past Dagenham Library. Both were wearing high visibility jackets and had body worn cameras (Image A21). Later in the evening I saw the same patrol in the multi-storey car park situated behind Heathway Shopping Centre.
29. At 16:30hrs hours I entered William Hill Bookmakers at 220 Heathway to observe how the premises were operating. As I approached the front of the premises I saw the venue had a smart corporate well-maintained frontage. There was some advertising in the window but this did not prevent passers by being able to look into the premises.
30. Along the left-hand wall there were five wall mounted televisions. The staff counter was at the end of the premises and there was one female member of staff seated behind a glass screen, I did not see any other members of staff. Opposite the staff counter were 4 gaming machines.
31. There were two customers in the venue at the time of my visit, one playing the gaming machines and one seated watching the racing on the televisions. Both customers were elderly and casually dressed.
32. The premises were clean, tidy and appeared well run. There was no evidence of anyone being drunk or other anti-social behaviour and there were no young people in the venue. I left the premises at 16:45hrs.
33. At 17:36hrs outside Tesco Express Heathway on the opposite side of the road to the premises I observed an apparently homeless male begging (Image A24).
34. At 17:45hrs hours I entered Coral Bookmakers 251-253 Heathway to observe how the premises were operating. The front of the premises had a smart corporate well-maintained frontage. There was some advertising in the window and this did restrict viewing into the premises, though not completely
35. Along the left-hand wall there were six wall mounted televisions and the staff counter was at the end on the right hand-side. There was one male member of staff present seated behind the counter and I did not see any other members of staff. There were 4 gaming machines at the rear of the premises.
36. There were six customers in the venue at the time of my visit, four were playing the gaming machines and two were watching the racing on the televisions. Two of the customers were dressed in 'builder' type clothing and were aged in their late twenties. The other customers were middle aged and casually dressed.
37. The premises were clean, tidy and appeared well run. There was no evidence of anyone being drunk or other anti-social behaviour and there were no young people in the venue. I left the premises at 17:55hrs.
38. At 18:10hrs I visited the Adult Gaming Centre known as 'Gaming Fun'. These premises are operated by a company known as Game Nation who advertise themselves as the UK's fastest growing operator of slots, clubs and lounges with

venues across London and the South East of England. The premises are licensed to operate 24 hours a day.

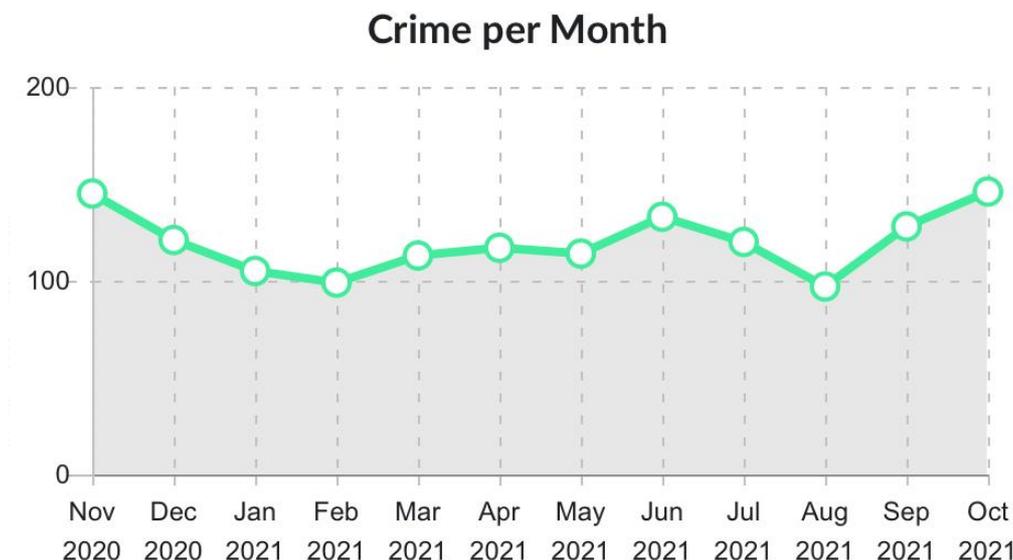
39. I entered the premises through the unsupervised front door. There was only one other customer in the premises, a woman, aged approximately 60 years who was casually dressed and playing a gaming machine near the front door.
40. I sat down in front of a gaming machine situated along the right-hand wall and started to play. There was one female member of staff on the premises who approached me and asked if I would like a tea or a coffee which I declined. There was no SIA security staff present.
41. I played the machine for a short period of time then asked the female member of staff if I could use the toilet. I was shown the toilet at the rear of the premises to the right of the reception desk.
42. The toilet was a uni-sex facility and unlocked. Once inside I saw that the toilet area was clean and tidy though the floor was worn wood giving the impression it had not been replaced for some time. On the wall I saw a poster relating to GamCare and on the toilet cistern were leaflets relating to the same. I used the toilet then returned to the main area of the premises.
43. At the time of my visit no other customers entered the premises. It was clean and tidy and there was no evidence of anti-social behaviour, drunkenness or criminality. I did not see any vulnerable person attempt to enter the premises and I left at 18:30hrs.
44. At 19:50hrs hours I entered Betfred on the corner of the south entrance to Heathway Shopping Centre to observe how the premises were operating. Like other similar premises I visited on the same day the front of the premises had a smart corporate well-maintained frontage. Similarly, there was advertising in the window and this did restrict viewing into the premises, though not completely.
45. This was a larger premises than others I visited with 20 televisions mounted on the wall and a number of betting and gaming machines. The staff reception counter was at the back of the premises where two members of staff were seated.
46. There was one middle-aged male customer who was playing a gaming machine. He was casually dressed and was not drunk. A short time later two more customers entered the premises, both wearing clothing associated with working on a building site. They both approached the reception and appeared to collect winnings from a betting transaction from the staff behind the counter. These two customers then played a gaming machine adjacent to the wall mounted televisions.
47. The premises were clean, tidy and appeared well run. There was no evidence of anyone being drunk or other anti-social behaviour and there were no young people in the venue. I left the premises at 20:05hrs.

48. At 20:12hrs I observed an apparently homeless male standing in the north entrance of Heathway Shopping Centre. He had a plastic bottle of cider at his feet though I did not see him drink from it (Image A26).
49. At 20:45hrs I entered the Paddy Power Bookmakers located at 245 Heathway next door to the premises at 247 to observe how the premises were operating. The front of this bookmakers was in poor condition with the front door window being cracked in multiple places. The Paddy Power front fascia was faulty with only the letters 'PADDYP' being illuminated. There was advertising in the window and this did restrict viewing into the premises, though not completely
50. The inside of the premises was dirty with used drinks cups and numerous betting slips scattered across the floor with tables located in front of twelve television screens that were mounted on the wall.
51. There were five customers in the premises all sat around the tables in front the television screens. They were casually dressed and did not appear drunk. I placed a bet with the two staff members who were behind the reception counter then watched the racing on the televisions.
52. After serving me one of the staff members came out into the public area of the premises and cleared some, though not all of the scrap paper and used betting slips that were scattered about the premises.
53. There was no evidence of anyone being drunk or other anti-social behaviour and there were no young people in the venue. I left the premises at 21:05hrs.
54. At 21:18hrs I positioned myself outside the Lord Denham PH north of Dagenham Heathway Station (Image A36). There was entertainment in the premises with Karaoke being performed in the front right window. The karaoke music did not cause a disturbance outside of the premises though the music could be heard when the front door was opened.
55. At 21:20hrs I observed a male and female standing by the front of the Dagenham Heathway Station. Both were drinking alcohol, were scruffily dressed and appeared drunk (Image A37). I walked away and when I returned at 21:40hrs both had left the area.
56. From 21:45hrs I maintained observation on the 'Gaming Fun' Adult Gaming premises specifically to identify if there was any anti-social behaviour or vulnerable persons entering the premises.
57. At 21:48hrs a male customer approached the front door, paused then entered the premises.
58. At 22:00hrs another male customer approached the premises and stood outside smoking a cigarette. He subsequently discarded his cigarette butt and appeared to press a bell to gain entry to the premises. The front door was opened from within and he entered.

59. At 22:15hrs 2 male customers exited the premises and stood outside smoking cigarettes and talking . Having disgarded their cigarettes they appeared to ring the door bell, the door was opened and they re-entered the premises.
60. At 22:40hrs a male carrying an electric scooter approached the front door which was opened for him and he entered.
61. For those customers I observed entering these premises and standing outside I did not witness any drunken or anti-social behaviour. No young people approached the premises and I did not see any other vulnerable persons.
62. At 22:47hrs I positioned myself outside the Lord Denham PH north of Dagenham Heathway Station. Customers were leaving the premises carrying their drinks in plastic glasses and making their way towards Dagenham Heathway Station
63. At 23:00hrs the Tesco Express store closed its doors for the evening as was the case with other retail premises at this location (Image A42).
64. At 23:30hrs all commercial premises, with the exception of the Alphabet Cab Office and the Adult Gaming Centre, were closed and the area was quiet.
65. At 00:00hrs I concluded my observations and left the area.

Local Crime Data - River Ward Dagenham

66. I am instructed to review the local reported crime data for the area relevant to the premises at 247 Heathway Dagenham which comes under the local authority River Ward.
67. Police data (Source - www.police.uk) shows that there were no marked spikes in reported crime in this area from November 2020 to October 2021 and this is represented in the following graph.



68. In November 2020 there were 145 crimes reported. This figure reduced to its lowest point in February 2021 with 99 crimes reported then rising back to the levels seen in November with 146 offences reported in October 2021

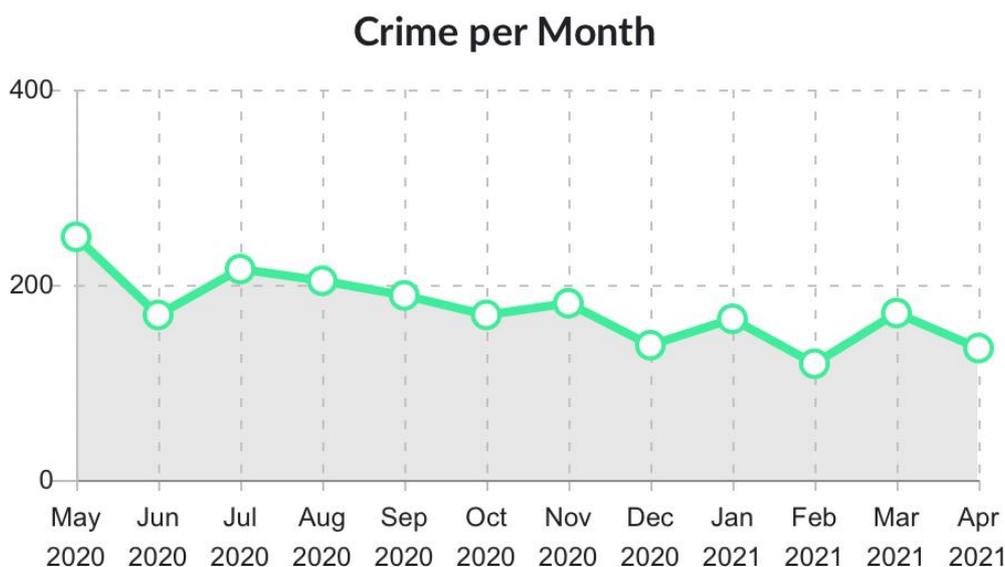
69. Police data for each month highlights the four most prolific offence types reported. For this area in October 2021 these offences were:

- i. Violence and Sexual Offences - 32
- ii. Vehicle Crime - 27
- iii. Anti-social behaviour - 23
- iv. Criminal Damage and Arson - 13

Comparison premises - King Street Southall

70. For comparison purposes I have reviewed local crime data where a Merkur Slots premises has opened for business in an area of similar demographic make-up to the River Ward area of Dagenham.

71. Merkur Slots premises at 37-39 King Street, Southall UB2 4DQ commenced trading at this location on 29th June 2020 with the easing of UK Government Covid-19 restrictions. Police data recorded a general reduction in crime since the opening of these premises through to April 2021 as shown in the following graph showing the crime level overview.



72. This area has a similar crime pattern in reported crime numbers and type, though it is correct to say the reported crime numbers in Southall are higher than those recorded for the Dagenham premises.

73. Looking at the data for the Southall premises in more detail it can be seen that in May 2020, just prior to the reopening of the Merkur Slots premises King Street following the lifting of Covid-19 restrictions, there were 249 reported crimes in this area.

74. From October 2020 to September 2021 there was a fluctuating trend in reported crime. In October 2020 the reported crime figures were 169. In September 2021 the total reported offences was 165.

75. In the Police Data produced the four most prolific offence types in the Southall area for September 2021 were:

- i. Violence and Sexual Offences - 64
- ii. Anti-Social Behaviour - 41
- iii. Other theft- 15
- iv. Criminal Damage and arson - 9

76. Police data recorded a general reduction in crime since the opening of the Southall Merkur premises, 249 Offences reported in May 2020 compared to 165 reported offences in September 2021. The crime reporting trends for October 2020 to September 2021 are represented in the following graph showing the crime level overview.



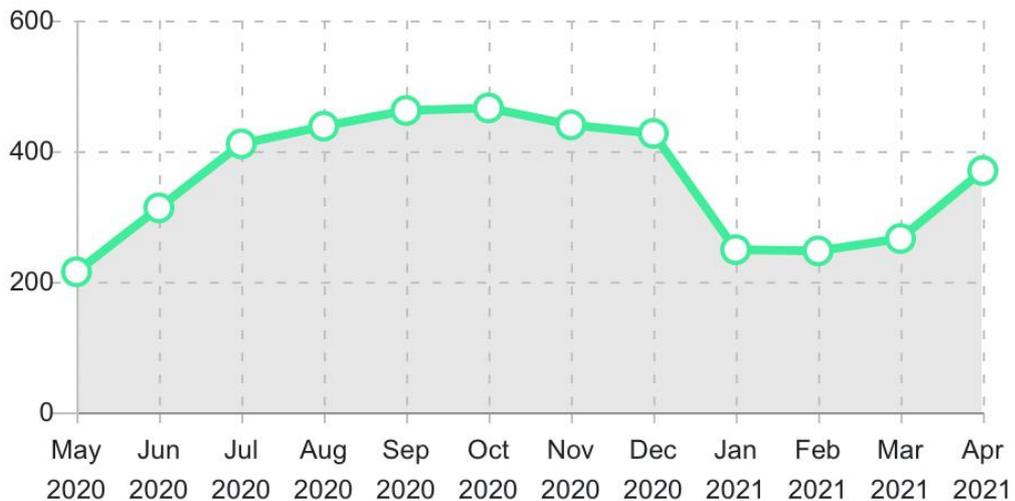
77. Ealing Borough Council recently granted authority for these premises to extend their trading hours from 00:00hrs to 02:00hrs.

Other Merkur Slots UK premises - Crime Data

78. There are other examples where Merkur Slots premises have opened and there has been no increase in reported crime.

79. Merkur Slots, 123-124 Lower Marsh SE1 7AE commenced trading on 2nd November 2020. There was a general reduction in reported crime since the opening of these premises but that could be attributed to COVID-19 restrictions.

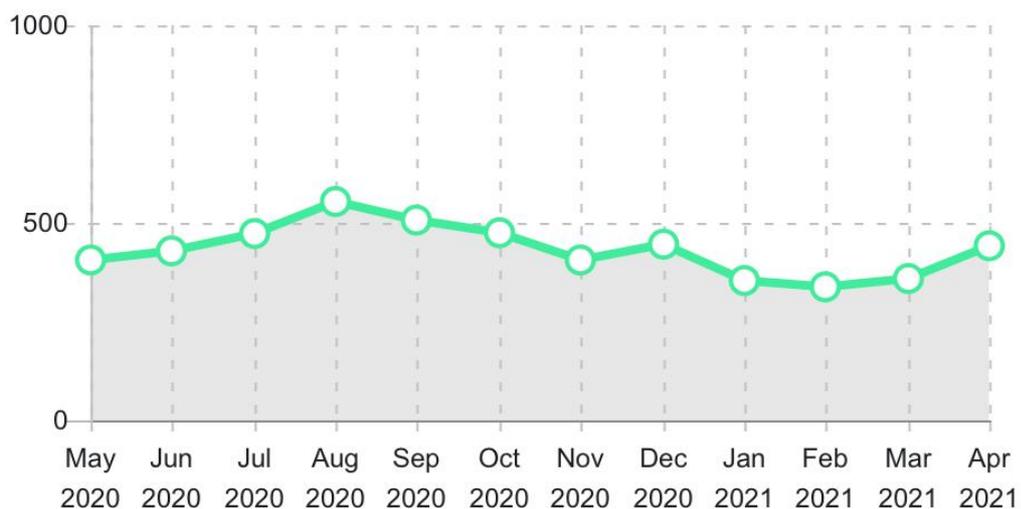
Crime per Month



80. Merkur Slots, 12, High Street Croydon CR0 1YA premises reopened on 3rd July 2020 after the COVID-19 national lockdown and continued trading until 4th November 2020 when another lockdown forced its closure.

81. This is an area of higher reported crime located under the Fairfield Ward of Croydon Council. Police data recorded a slight increase in crime when the premises reopened on 3rd July 2020 after National Lockdown. The premises continued trading until 4th November 2020 and there was a downward trend of reported crime figures with no marked spike in reported offences.

Crime per Month



82. Merkur Slots, 237-239 High Street Hounslow TW3 1EA premises reopened on 3rd July 2020 after National Lockdown and continued trading until 4th November 2020 when another lockdown forced its closure.

83. Police data recorded a slight decrease in crime when the premises reopened on 3rd July 2020 after National Lockdown. The premises continued trading until 4th November 2020 when another lockdown forced its closure. There was a downward trend of reported crime figures with no marked spike in reported offences.



Freedom of Information Request Reference No 01/FOI/21/021009

84. In relation to this application a Freedom of Information Act request was made to the Metropolitan Police Service (MPS). The search parameters for this request were for the MPS to provide detail of the total number of incident calls (CAD) and alleged crimes reported (CRIS) for the period from the 1st September 2018 to the 1st September 2021 associated with each of the following premises:

- i. William Hill Bookmakers, 220 Heathway, Dagenham RM10 8QS
- ii. Betfred, 125 Broad Street, Dagenham RM10 9HP
- iii. Gaming Fun, 250 Heathway, Dagenham RM10 8QS
- iv. Coral Bookmakers, 251-253 Heathway, Dagenham RM9 5AN
- v. Paddy Power, 245 Heathway, Dagenham RM9 5AN
- vi. Coral, 24 Goresbrook Road, Dagenham RM9 6UR
- vii. Mecca Bingo Club, Unit 2 London East Leisure Park, Dagenham RM9 6UQ

85. The result of this request was received on 22/09/2021 and I have reviewed the data supplied for the full 3-year period. The following table shows:

- i. Identified premises for which the information was sort;
- ii. Number of offences reported in the 3-year period that related to the premises;
- iii. Annual average number of offences that related to the premises;
- iv. Number of times that police were called to the premises;
- v. Annual average number of times police were called to the premises.

Premises	Reported Offences	Annual average offences	Police called to premises	Annual average calls
William Hill Bookmakers RM10 8QS	6	2	3	1
Betfred RM10 9HP	5	1.7	10	3.3
Gaming Fun RM10 8QS	2	0.7	2	0.7
Coral Bookmakers RM9 5AN	7	2.3	3	1
Paddy Power RM9 5AN	6	2	4	1.3
Coral RM9 6UR	4	1.3	2	0.7
Mecca Bingo Club RM9 6UQ	15	5	0	0

86. The following premises (highlighted in the table) are located some distance from 247 Heathway the furthest being the Mecca Bingo Club 1.3 miles away. Their presence, operating procedures and identified crime data would appear to have no relevance to the operation of the premises at 247 and I have therefore discounted the data identified that relate to the following:

- i. Betfred, 125 Broad Street, Dagenham RM10 9HP
- ii. Coral, 24 Goresbrook Road, Dagenham RM9 6UR
- iii. Mecca Bingo Club, Unit 2 London East Leisure Park, Dagenham RM9 6UQ

87. Clearly from the data reviewed, the number of total annual offences and calls to police for these premises is lower than would be expected for busy commercial premises.

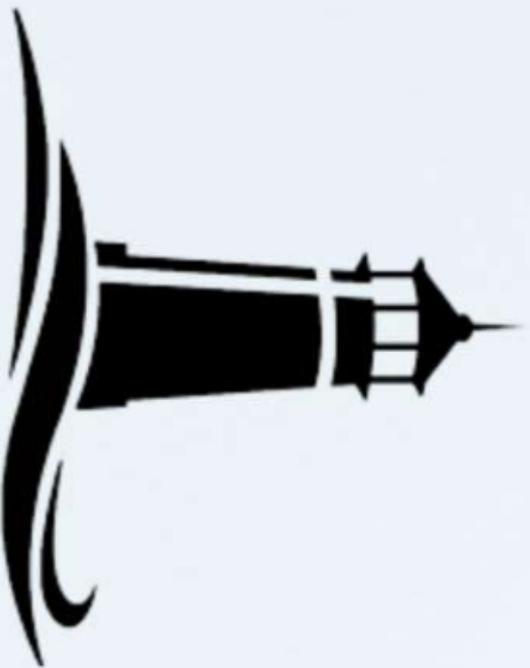
Summary

88. During the visits to the premises at 247 Heathway Dagenham RM9 5BG and the area around these premises I saw only one example of street drinking which was outside the Dagenham Heathway Station.

89. Outside the Tesco Express premises I witnessed one person begging who appeared homeless. I also observed another homeless male standing in the entrance to the Heathway Shopping Centre with a bottle of cider in front of him though he was not begging.

90. I saw no evidence of any other anti-social behaviour, crime and disorder, drug dealing or groups of youths gathering in the area.
91. I have reviewed a number of different venues to get a broad picture of the crime trends in areas that surround Merkur Slots premises.
92. One of the key concerns of UK Police authorities is the impact upon their resources should premises of this type be opened at a particular location, the perception being that it will attract anti-social behaviour and crime of various type, thereby increasing local reported crime figures.
93. This case raises important concerns regarding criminality in the area. However, the facts concerning crime trends, from my observations and the information I have identified and reviewed, do not support these concerns.
94. The crime data shows no spikes in reported crime and the comparisons I have made in areas where other Merkur premises operate show that they operate in areas of higher reported crime with no impact upon the local community.
95. The information obtained from the freedom of information request to the Metropolitan Police shows that there is little reported crime that can be attributed to either a bookmakers and more specifically a gaming premise at the Heathway location.
96. I have visited numerous licensed premises across the UK and have found the Merkur premises to be smart, well-lit with professional looking frontages. I have found professional and attentive staff who manage the premises effectively.
97. Merkur premises have clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
98. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade or a high street Bookmakers. The premises style is one of a low-key carpeted lounge with no more than a handful of mature customers in at any one time.
99. From my observations I cannot see any evidence to support the concerns raised in the objections at this time. The facts in my report are honest and true. The opinions I have expressed and my recommendations are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Nick Mason - Consultant
Leveche Associates Limited
9th December 2021



LEVECHE

ASSOCIATES LIMITED

Appendix A

Observation Images

2/12/2021

Merkur Slots

247 Heathway

Dagenham

RM9 5BG

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

Appendix A

Mercur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Image A1
14:37hrs - Front of 247 Heathway Dagenham

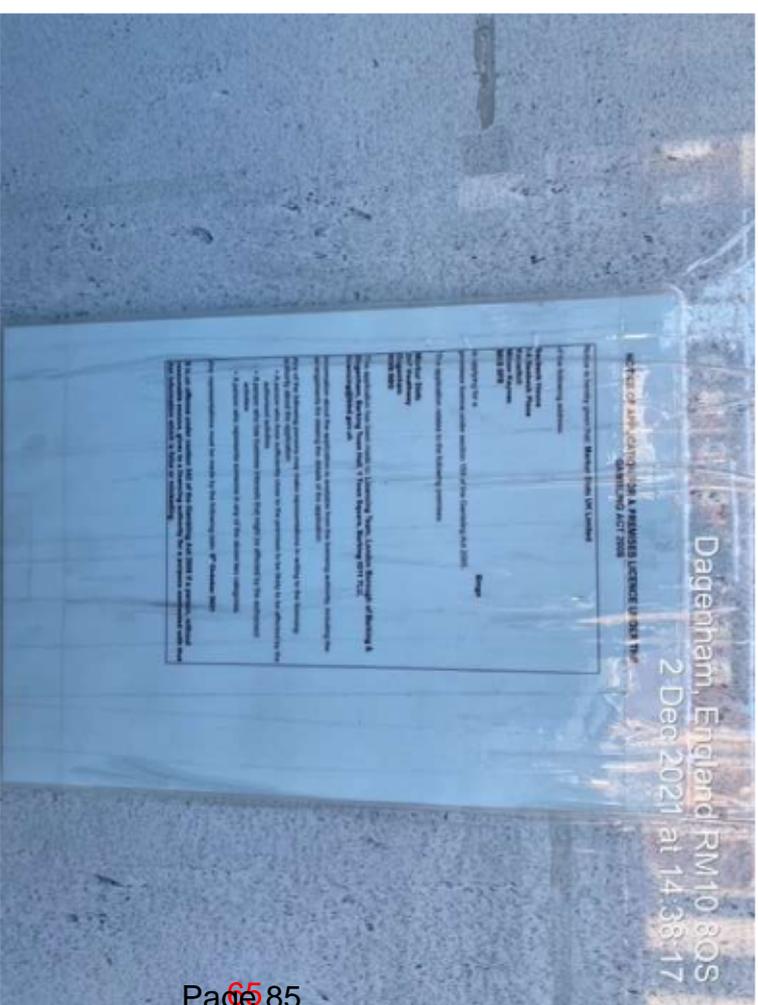


Image A2
14:38hrs - Notice of Application Bingo Premises Licence
Gambling Act 2005

Mercur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021

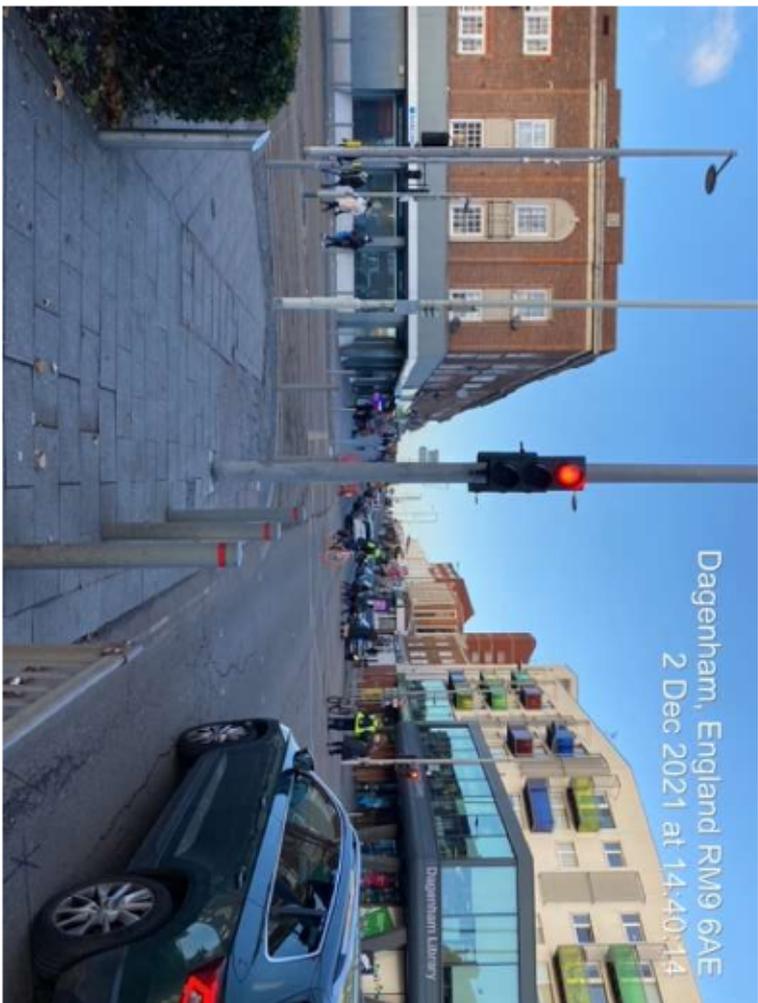


Image A3
14:40hrs - Hedgemans Road and Church Elm Lane junction
Heathway

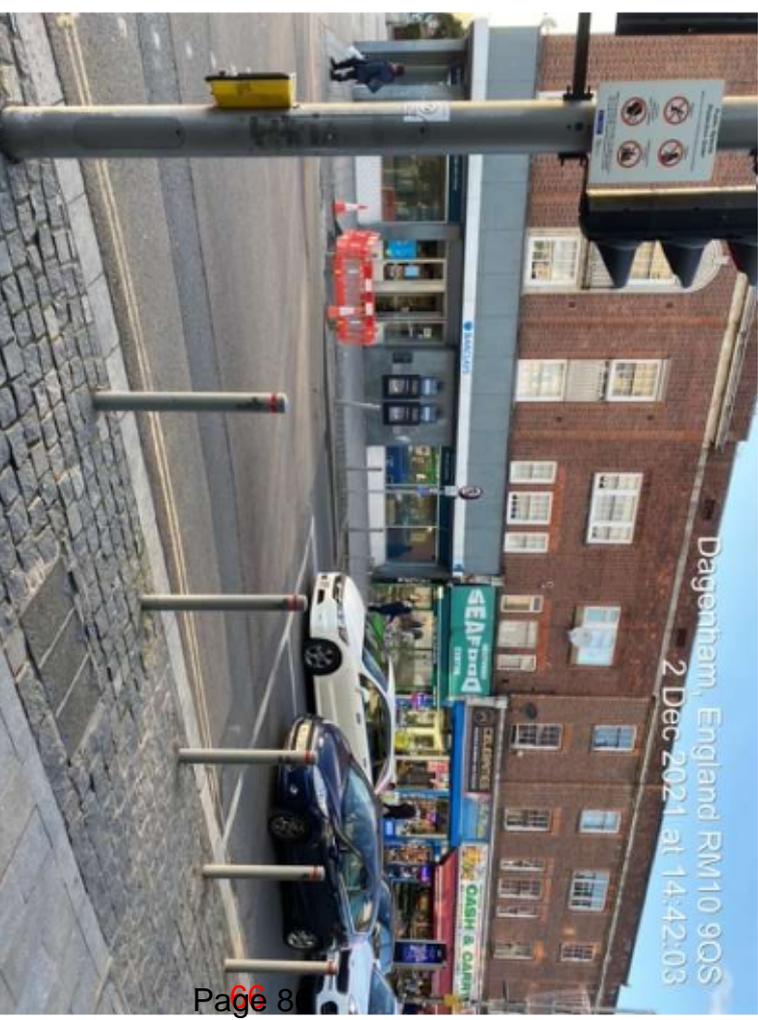


Image A4
14:42hrs - Barclays Bank and shops south of premises

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Image A5
14:43hrs - Paddy Power 245 Heathway Dagenham
adjacent to premises

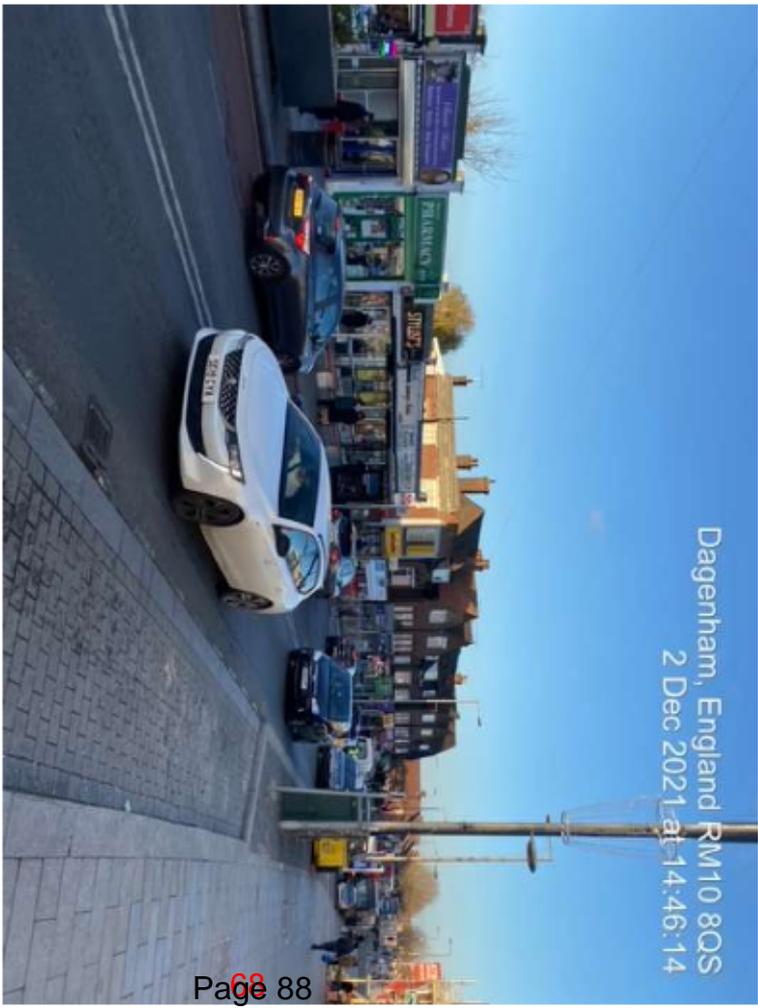


Image A6
14:43hrs - Coral Bookmakers 251-253 Heathway Dagenham
north of premises

Mercur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Dagenham, England RM10 8QS
2 Dec 2021 at 14:45:11



Dagenham, England RM10 8QS
2 Dec 2021 at 14:46:14

Image A7
14:45hrs - Dagenham Heathway Station

Image A8
14:46hrs - North of Dagenham Heathway Station

Mercur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Image A9
14:47hrs - North of Dagenham Heathway Station

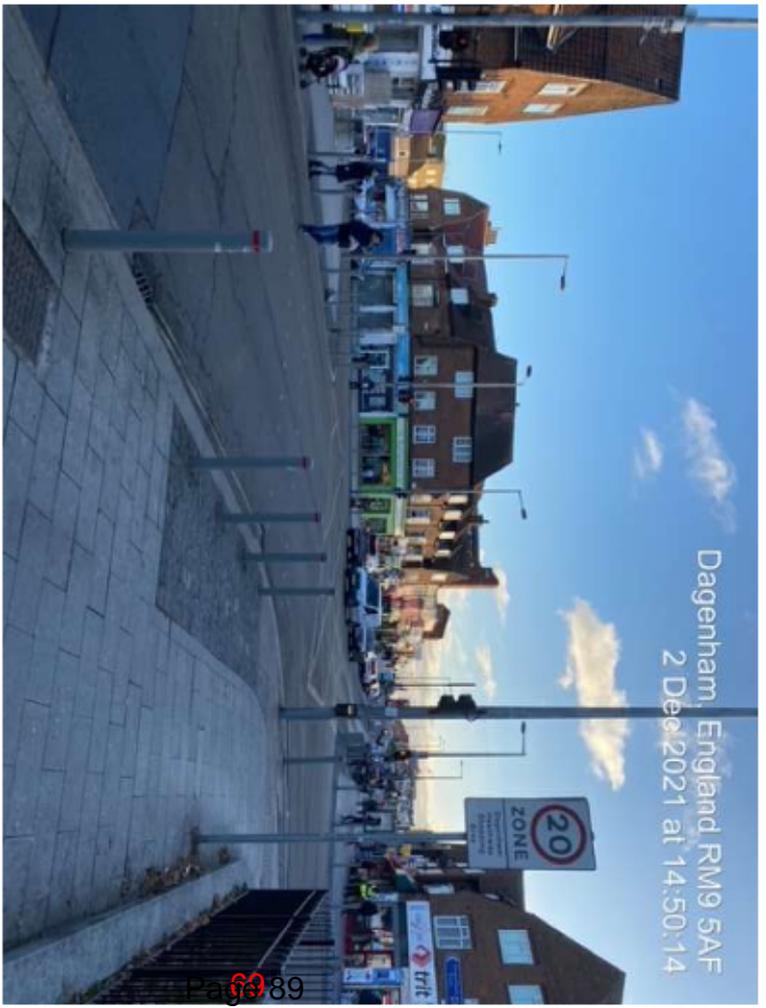


Image A10
14:50hrs - Looking south Reeds Road / Parsloes Avenue
junction with Heathway

Mercur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Image A11
14:51hrs - South towards Dagenham Heathway Station



Image A12
14:52hrs - Shop premises opposite Dagenham Heathway Station



Image A13
14:53hrs - North entrance Heathway Shopping Centre
opposite premises



Image A14
14:55hrs - William Hill Bookmakers 220 Heathway Dagenham

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Image A15
14:55hrs - Betfred Bookmakers Unit 25 Heathway Shopping Mall

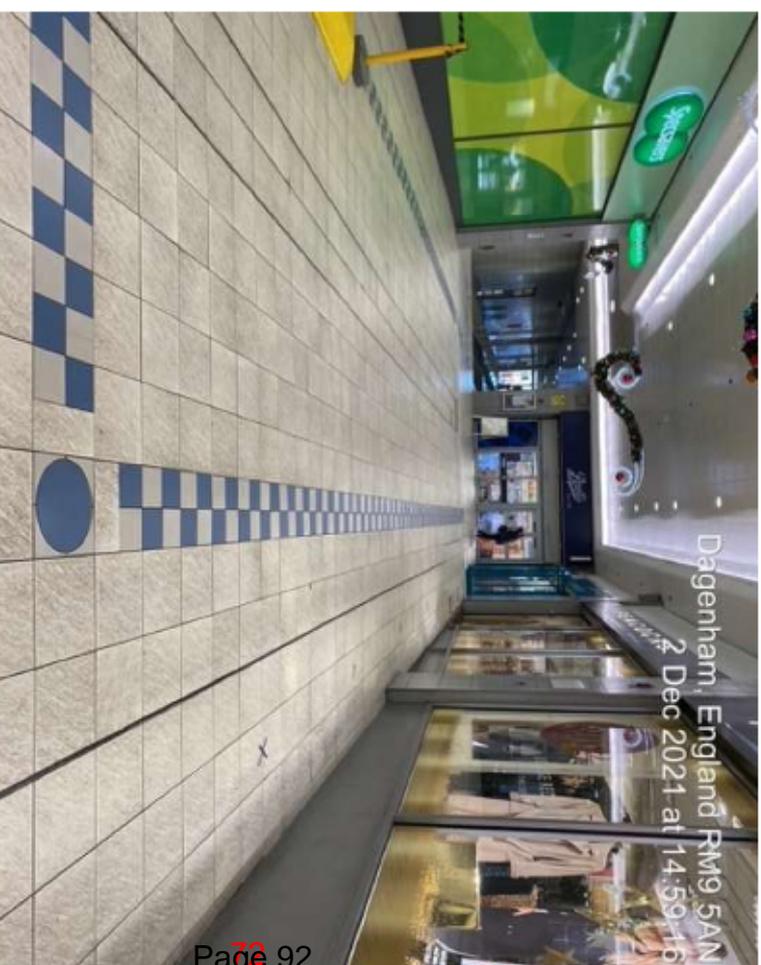
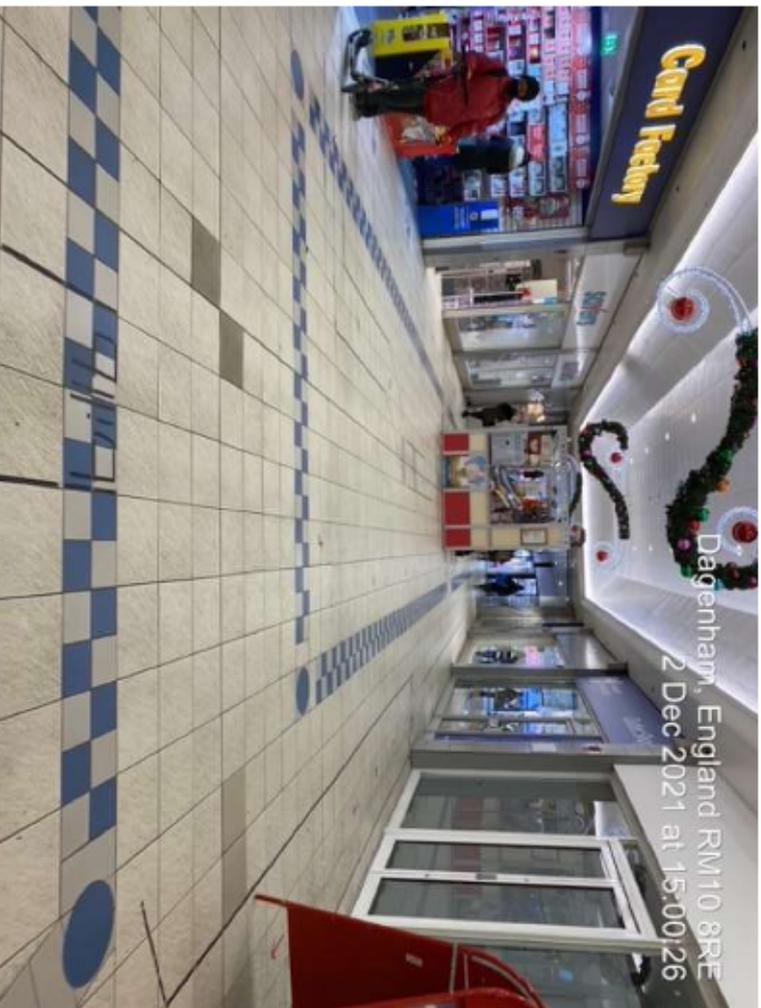


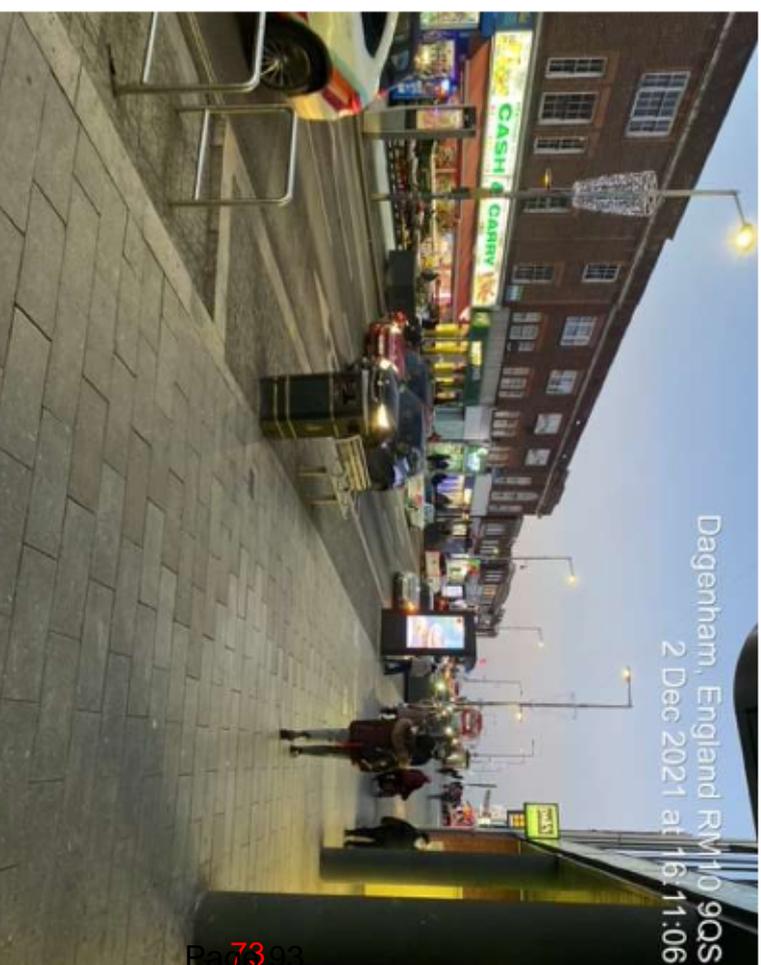
Image A16
14:59hrs - Inside Heathway Shopping Centre

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Dagenham, England RM110 8RE
2 Dec 2021 at 15:00:26

Image A17
15:00hrs - Inside Heathway Shopping Centre



Dagenham, England RM110 9QS
2 Dec 2021 at 16:11:06

Image A18
16:11hrs - Outside Dagenham Library looking north

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Image A19
16:13hrs - 'Gaming Fun' Gaming Centre opposite
Dagenham Heathway Station

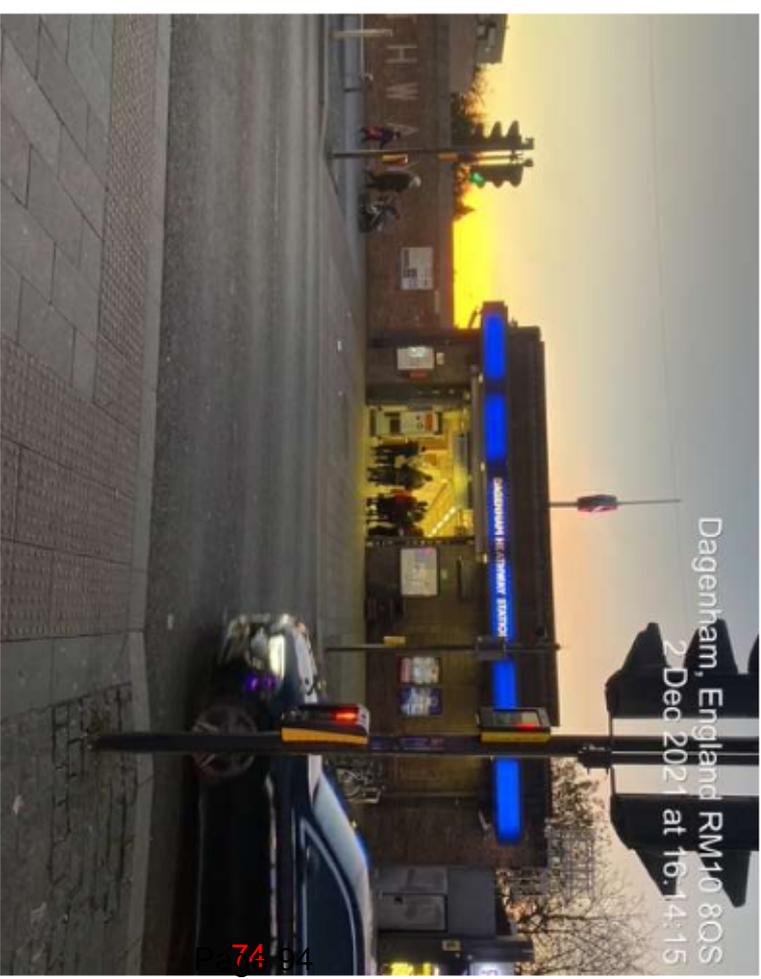


Image A20
16:14hrs - Dagenham Heathway Station

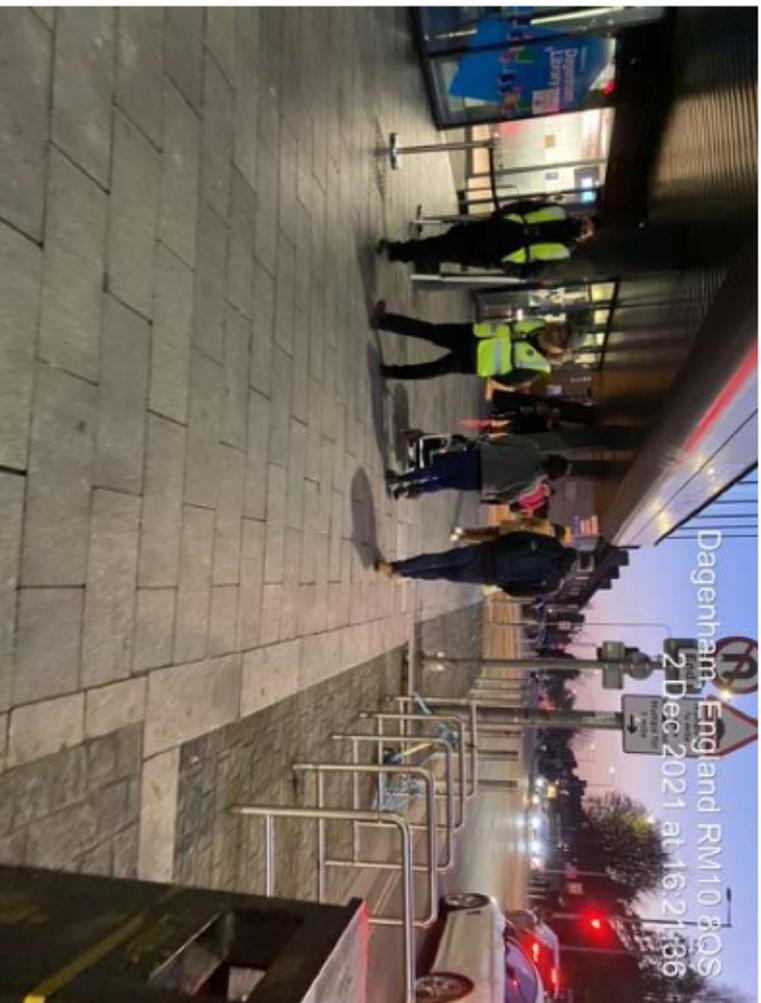


Image A21
16:21hrs - Local security patrol Heathway south of premises

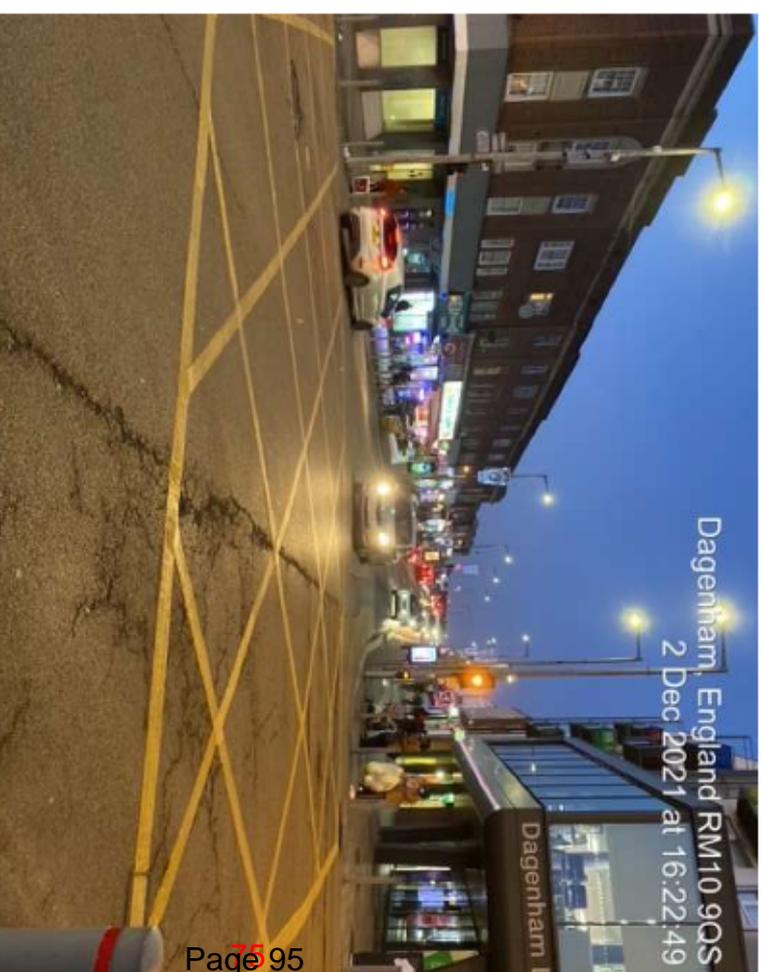


Image A22
16:22hrs - Hedgemans Road and Church Elm Lane junction Heathway



Image A23
17:35hrs - Outside Dagenham Library looking north

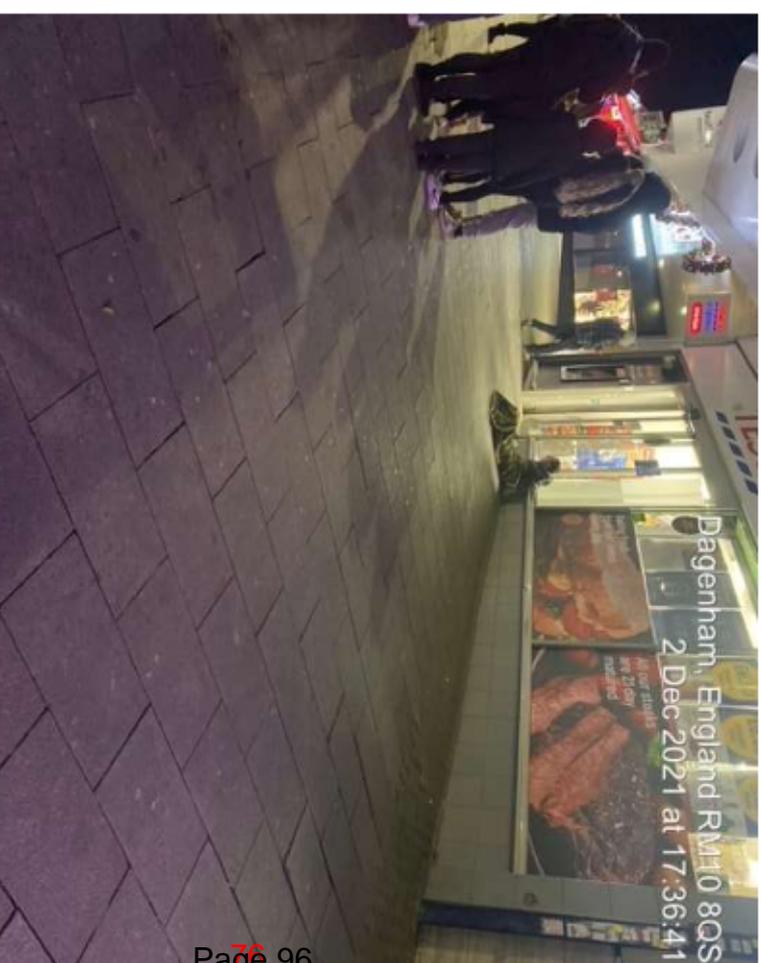


Image A24
17:36hrs - Homeless male begging outside Tesco
Express Heathway

Mercur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021

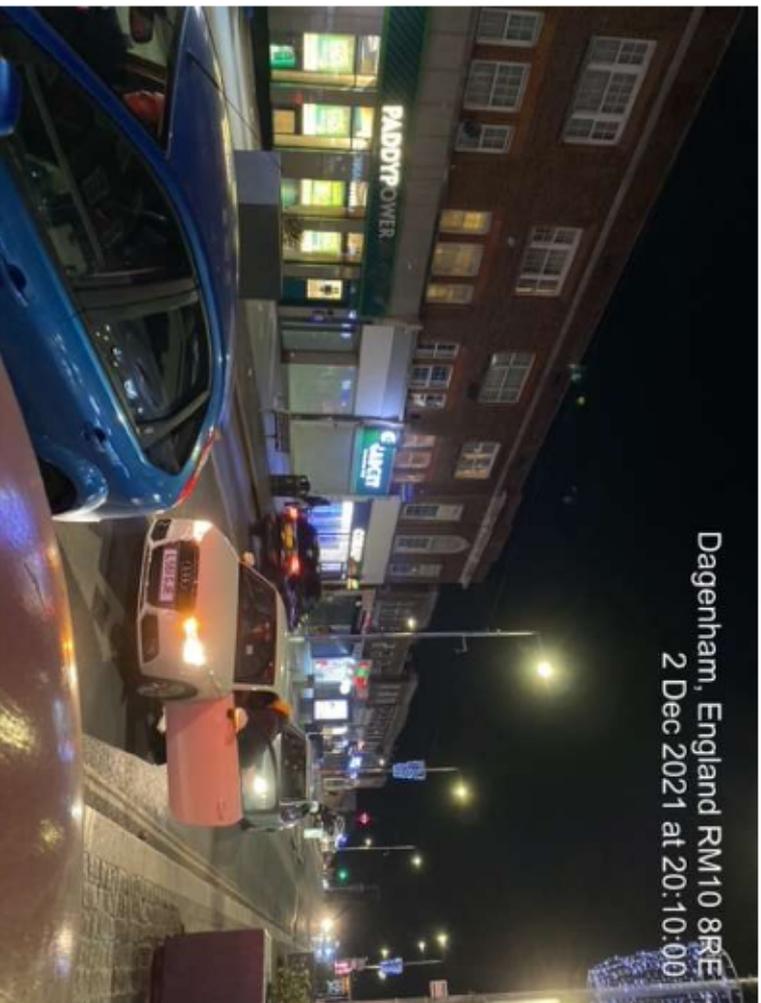


Image A25
20:10hrs - Front of 247 Heathway Dagenham

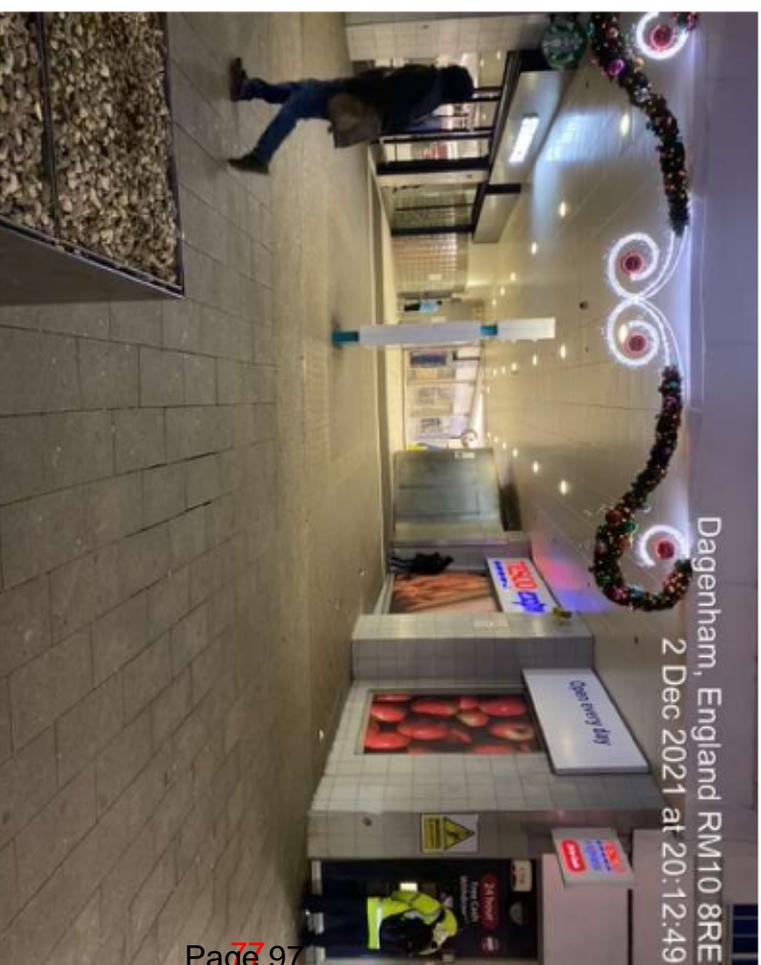


Image A26
20:12hrs - Homeless male standing in north entrance
Heathway Shopping Centre

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021

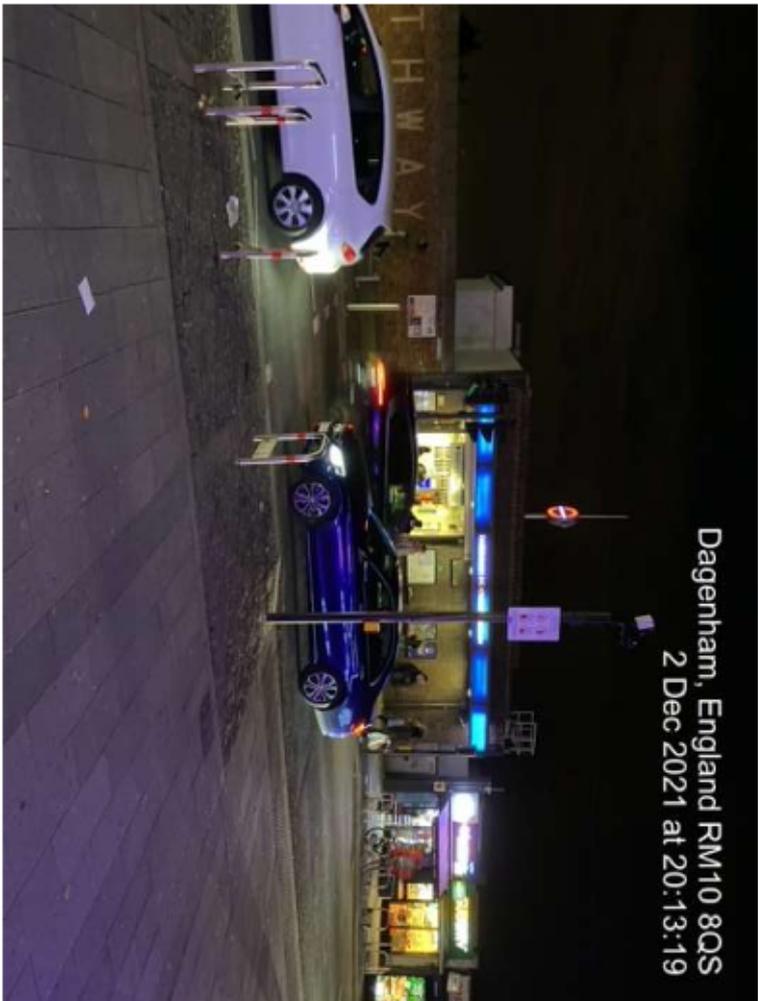


Image A27
20:13hrs - Dagenham Heathway Station



Image A28
20:13hrs - 'Gaming Fun' Gaming Centre opposite
Dagenham Heathway Station



Image A29
20:14hrs - Looking south from Dagenham Heathway Station

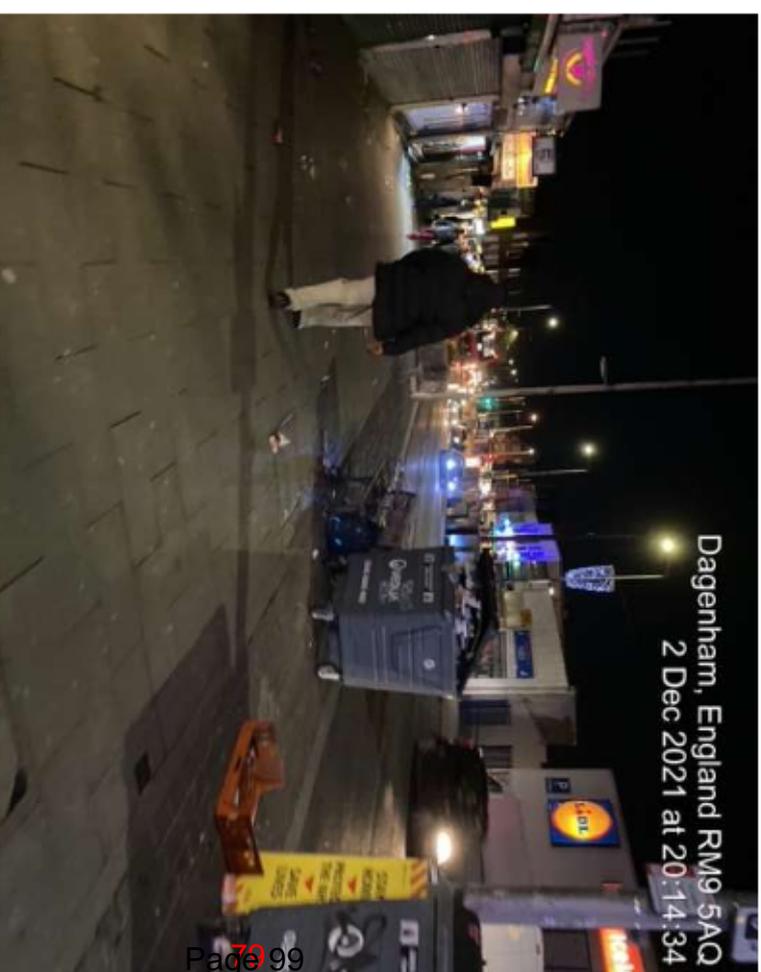


Image A30
20:14hrs - Looking north from Dagenham Heathway Station

Mercur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Image A31
20:15hrs - The Lord Denman PH north of Dagenham
Heathway Station



Image A32
20:16hrs - Looking south towards Dagenham
Heathway Station

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Image A33
21:16hrs - Looking south from Dagenham Heathway Station

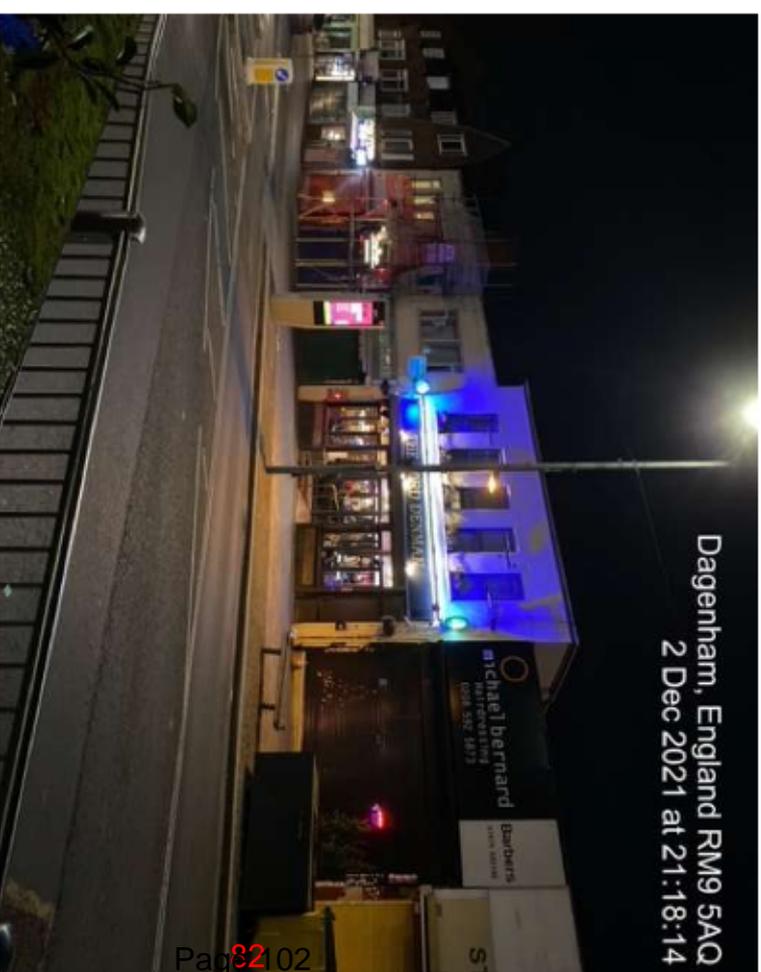


Image A34
21:16hrs - Dagenham Heathway Station



2 Dec 2021 at 21:16:49

Image A35
21:16hrs - 'Gaming Fun' Gaming Centre opposite
Dagenham Heathway Station



Dagenham, England RM9 5AQ
2 Dec 2021 at 21:18:14

Image A36
21:18hrs - The Lord Denman PH north of Dagenham
Heathway Station



Image A37
21:20hrs - Male and female street drinkers outside
Dagenham Heathway Station



Image A38
21:22hrs - Looking south from Dagenham Heathway
Station

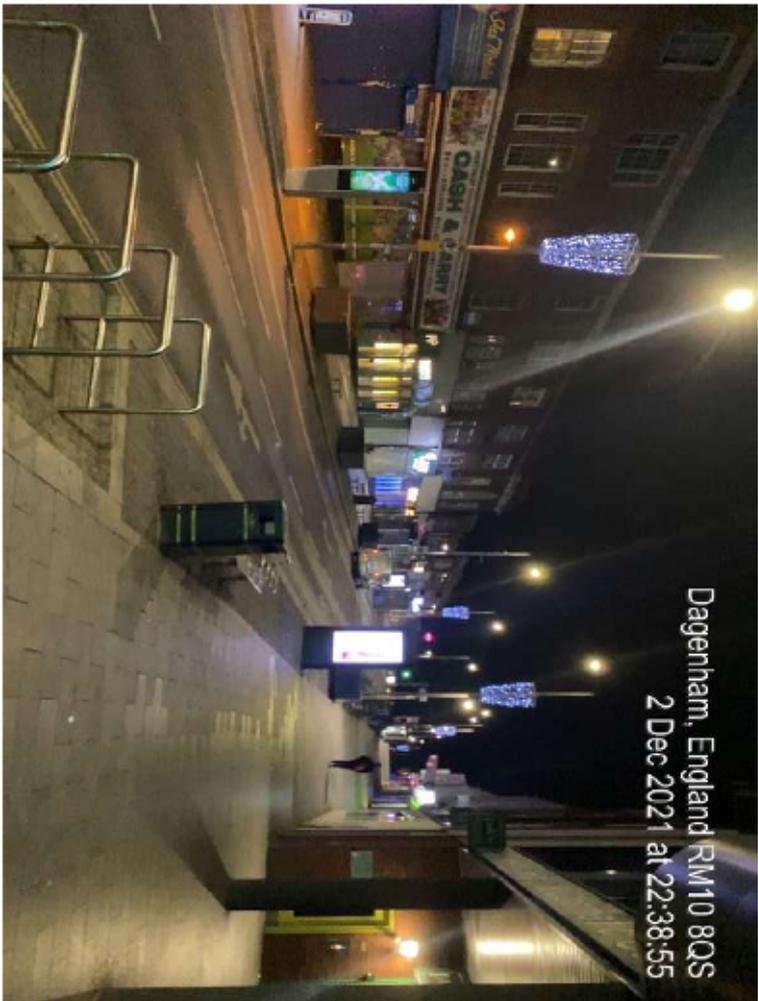


Image A39
22:38hrs - Outside Dagenham Library looking north



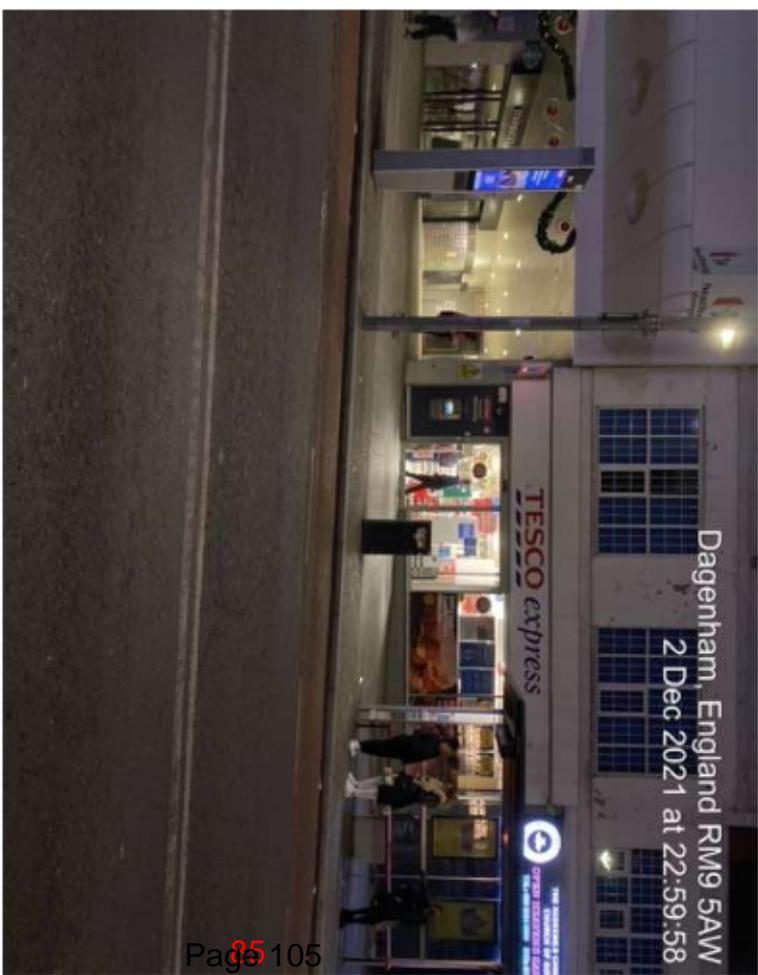
Image A40
22:39hrs - South entrance Heathway Shopping Centre

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Dagenham, England RM9 5AQ
2 Dec 2021 at 22:50:40

Image A41
22:50hrs - The Lord Denman PH north of Dagenham
Heathway Station



Dagenham, England RM9 5AW
2 Dec 2021 at 22:59:58

Image A42
22:59hrs - Tesco Express Heathway closing

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021

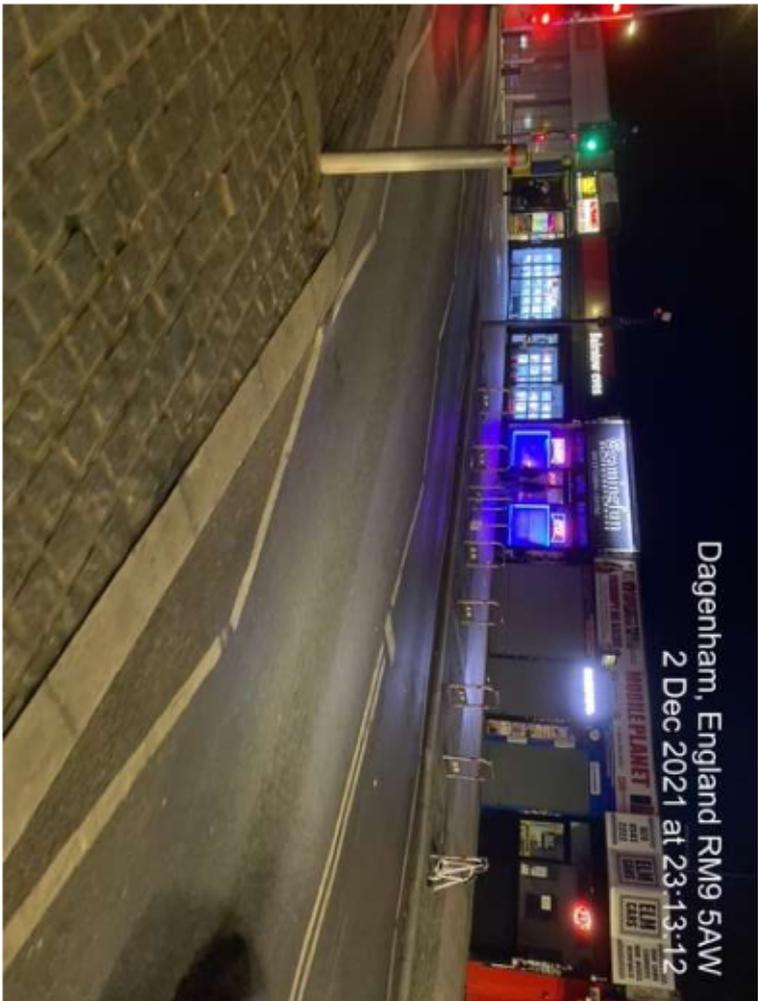


Image A43
23:13hrs - 'Gaming Fun' Gaming Centre opposite
Dagenham Heathway Station

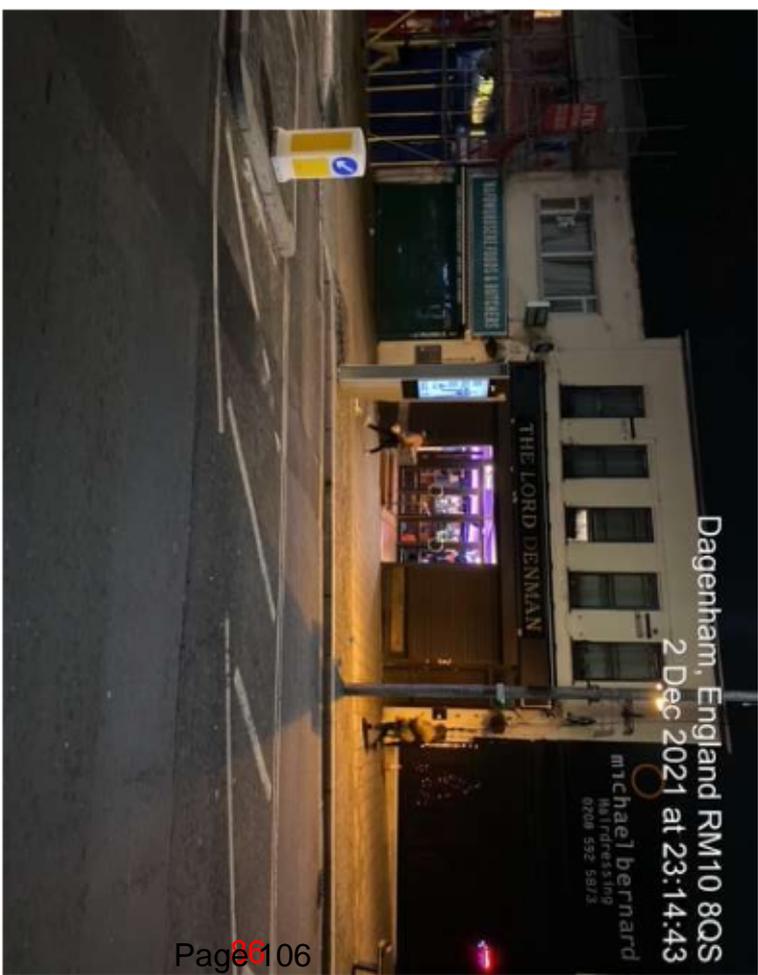


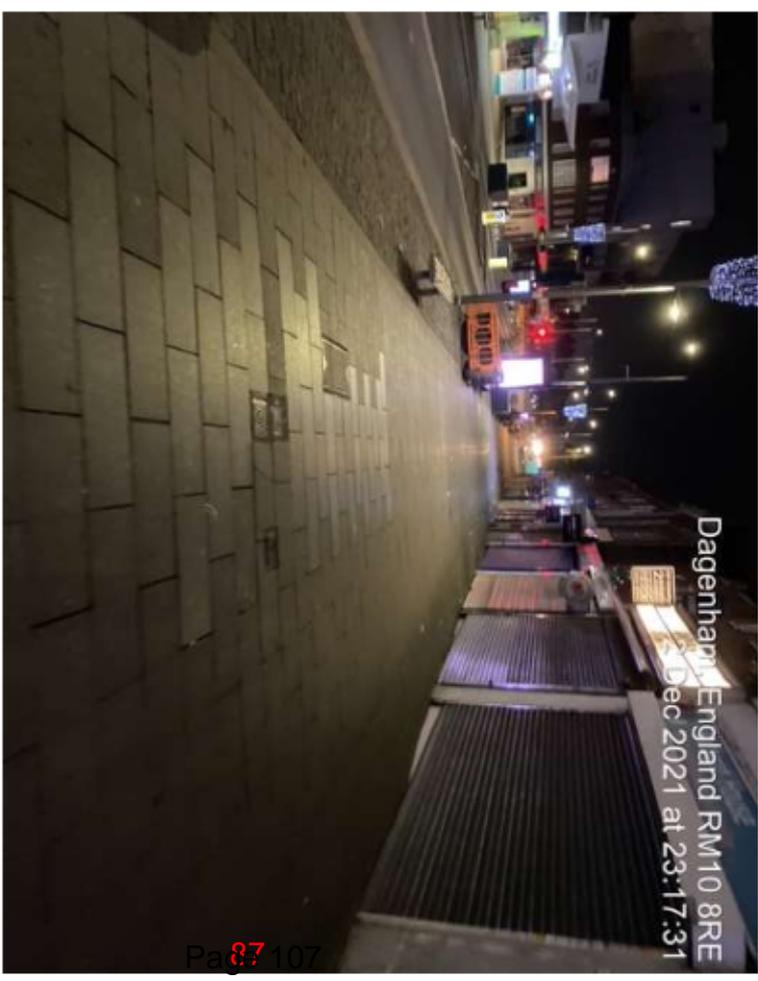
Image A44
23:14hrs - The Lord Denman PH north of Dagenham
Heathway Station

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021



Dagenham, England RM10 8QS
2 Dec 2021 at 23:16:37

Image A45
23:16hrs - Looking south towards 'Gaming Fun' Gaming
Centre



Dagenham, England RM10 8RE
2 Dec 2021 at 23:17:31

Image A46
23:17hrs - Looking south from Heathway
Station

Mercur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021

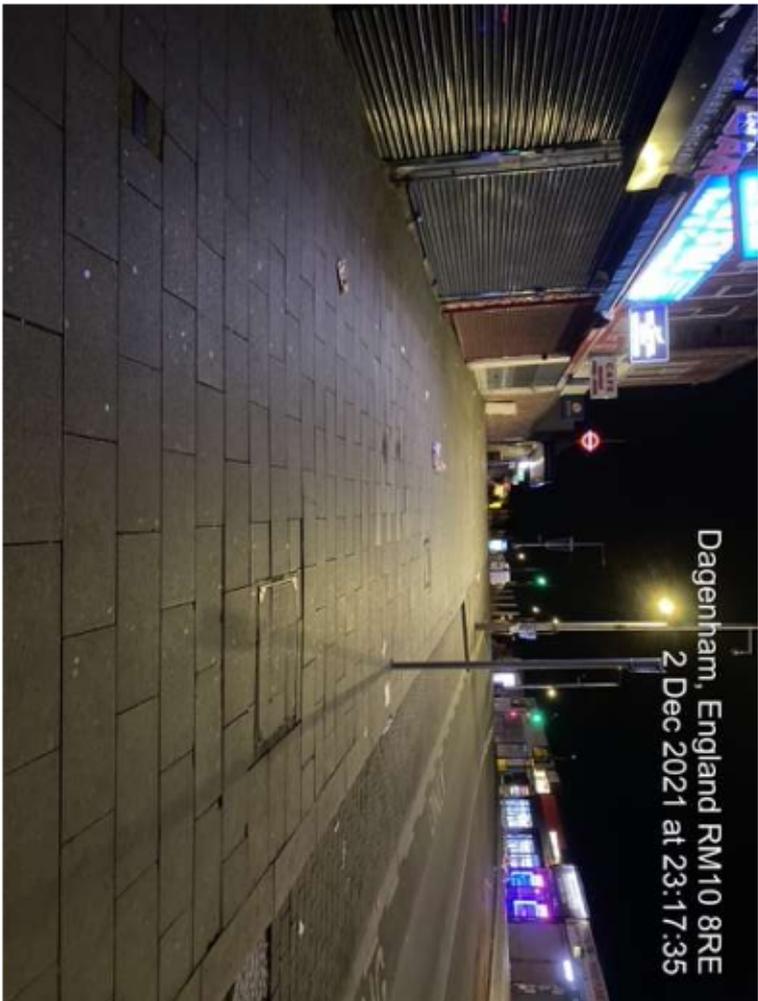


Image A47
23:17hrs - Looking north towards Dagenham Heathway Station

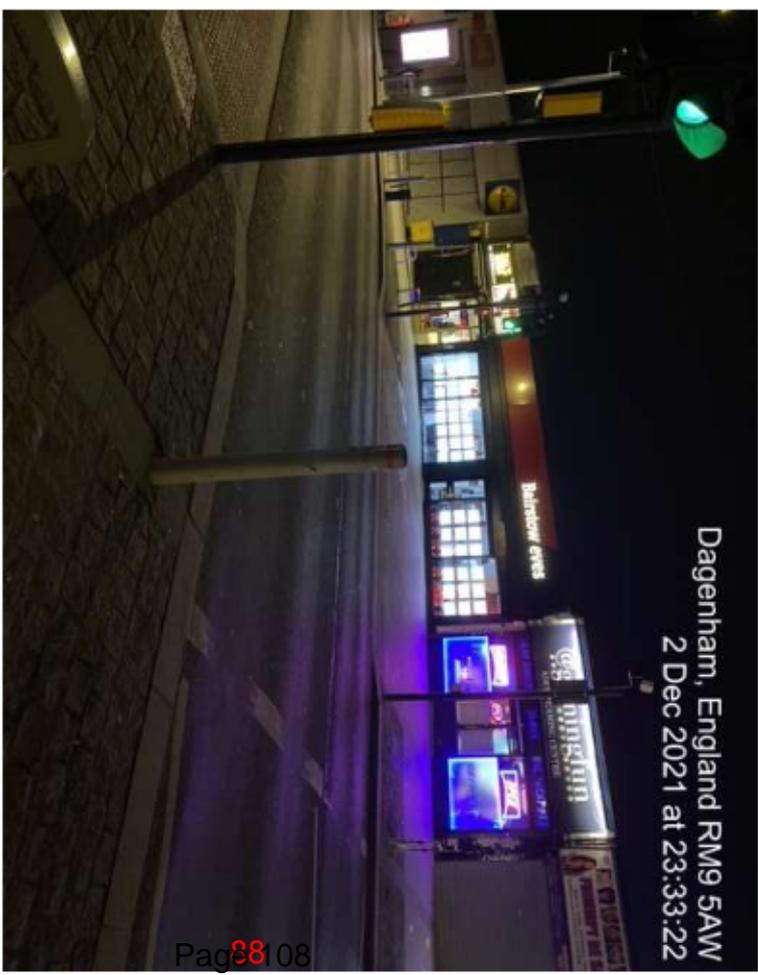


Image A48
23:33hrs - 'Gaming Fun' Gaming Centre opposite Dagenham Heathway Station

Merkur Slots - 247 Heathway Dagenham RM9 5BG
2nd December 2021

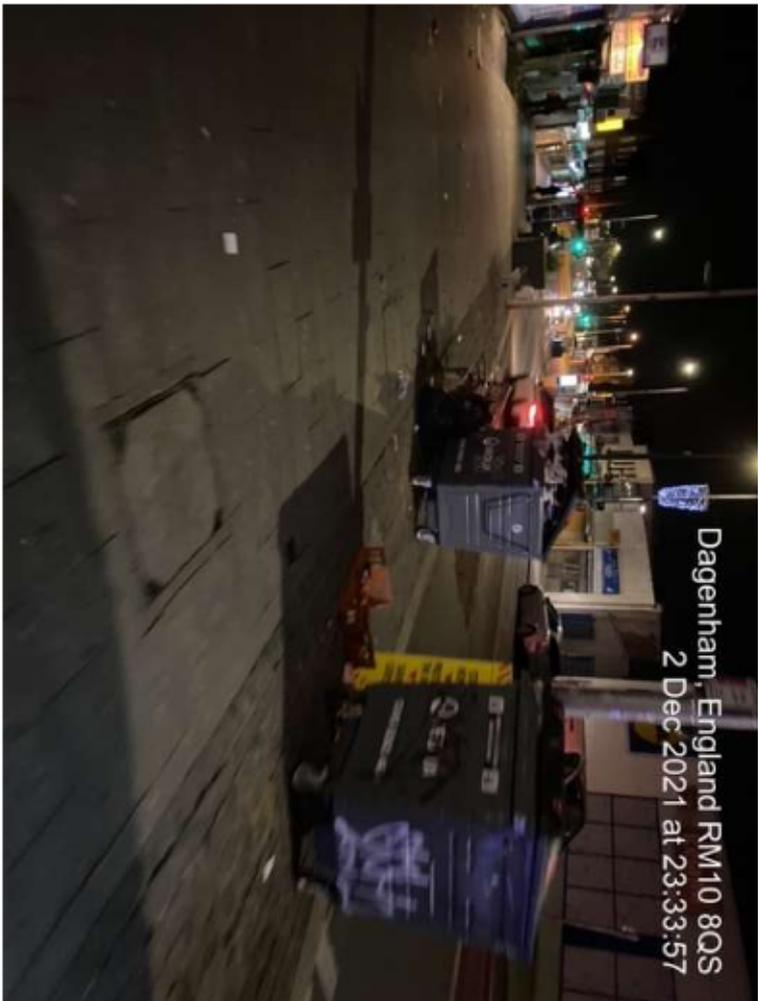


Image A49
23:33hrs - Looking north from Dagenham Heathway
Station

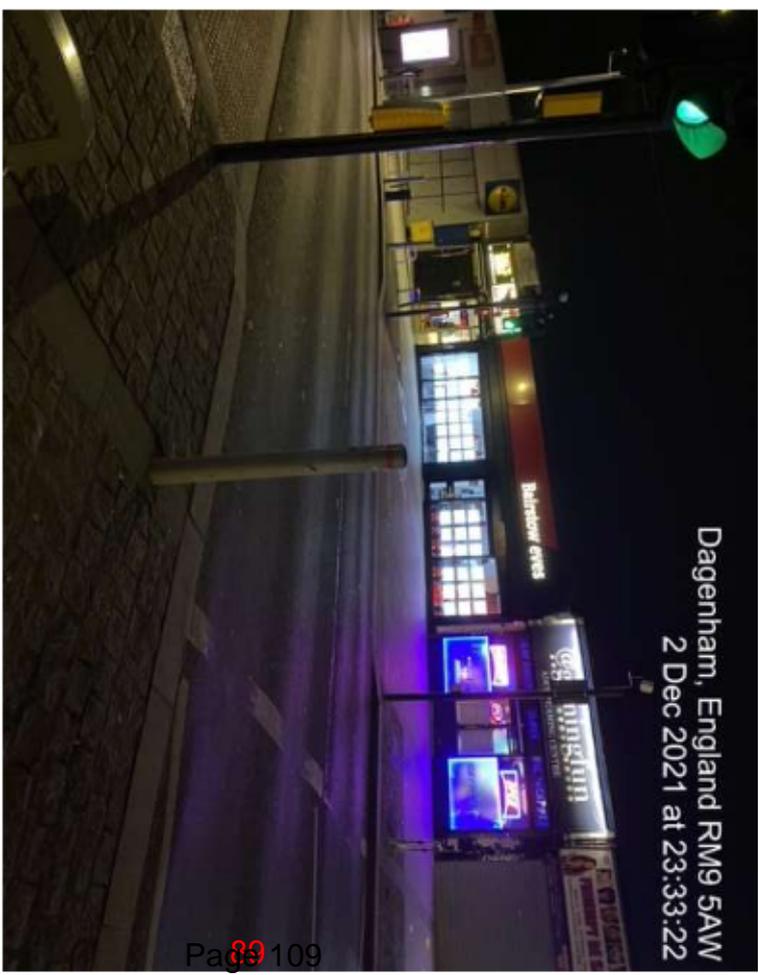


Image A50
23:33hrs - 'Gaming Fun' Gaming Centre opposite
Dagenham Heathway Station



Image A51
23:56hrs - Looking south from Dagenham Heathway
Station

END OF OBSERVATION





Independent Covert Licensing Visit Report

Mr Nicholas Mason – Consultant

Leveche Associates Limited

Merkur Slots

91, High Road, Wood Green, N22 6BB

Introduction

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots premises at 91, High Road, Wood Green, N22 6BB.
2. The premises are currently trading with a Bingo Premises License issued under the Gambling Act 2005 by Haringey Borough Council.

Personal Summary – Nicholas Mason

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment

and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Observations

10. On Tuesday 1st June 2021 between approximately 19:50hrs and 20:15hrs I covertly visited Merkur Cashino, 91 High Road, Wood Green, London N22 6BB. The premises sits amongst a number of other betting and gaming premises on a busy high street.
11. The front display of the premises was smart and well-lit. It was clean, well maintained and looked professional.
12. The premises are advertised as being open for 24 hours per day.
13. The glass on the front door of the premises was displaying some information including a warning that CCTV was in operation, no smoking and over 18's only.
14. I entered the premises and immediately in front of me and to the right was a large branded Merkur display sign that provided Covid-19 information regarding then use of hand sanitisers, social distancing, face coverings and what to do if you were feeling unwell.
15. Also in this area was a hand sanitiser station that I was able to use and next to this a QR Code and information re social distancing and the wearing of face masks in respect of Covid-19 regulations.
16. There was no other additional information in this area.
17. As I moved into the premises I saw that there a series of gaming machines on both sides. To the right-hand side each gaming machine area was defined by a solid hoarding that prevented customers seated next to each other making

contact. To the left-hand side these hoardings were not in place but there were signs that stated due to Covid-19 restrictions the machine was not in operation on every other machine. This allowed for social distancing between customers playing the machines without the need for the dividing hoarding.

18. On the left-hand side and further into the premises was the staff reception desk area. There was a Perspex screen at the desk which staff could stand behind. This area was also used for the preparation of refreshments with a facility to make hot drinks. The area was clean and tidy and additional hand sanitisers were adjacent to this location.
19. As I walked towards the reception area I was greeted by a female member of staff who asked that I check in on the Covid-19 app and use the hand sanitiser that was available around the premises. I explained that I was unable to use the app and she took my name and telephone number which was properly recorded on a log she obtained from behind the reception counter.
20. This member of staff was wearing the dark blue branded Merkur uniform waistcoat and trousers and was of smart appearance, wearing a face mask. Pinned to her waistcoat was a Challenge 25 badge and a name badge identifying her as Melisa. I did not see any other member of staff.
21. I walked through the premises which was relatively quiet with only a small number of customers using machines. At the rear of the premises and to the left was the fire exit. As I approached this area I saw an elderly female customer standing in the door area, not wearing a face mask and smoking a cigarette. I did not see this woman after she had finished her cigarette. This particular incident has been reported to those that instruct Leveche Associates Ltd. As I walked through the premises there did not appear to be any pressure on the customers to use the machines and spend money and they were not vulnerable or drunk.
22. I used a number of the gaming machines and while doing so I was offered a free drink by the staff member Melissa which I declined.
23. During my visit I asked to use the toilet facilities that were situated on the left hand side of the premises just past the reception area. The member of staff Melissa showed me the toilet and explained that it was a unisex facility. I entered the toilet which I found to be clean and in good condition. On the rear of the door was a toilet cleaning check sheet showing that the toilets had last been checked at 20:00hrs. Additionally, a Gamcare poster was situated above the toilet and this was supported by leaflets that were available for customers to take away. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.
24. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend money and I found the premises clean and tidy.
25. Having played on a number of machines I left the premises at approximately 20:15hrs.

Summary

26. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
27. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
28. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
29. At the time of my visit on Tuesday 1st June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
30. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
31. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Nicholas Mason
Consultant
Leveche Associates Limited
06/06/2021



Independent Covert Licensing Visit Report

**Nicholas Mason – Consultant
Leveche Associates Limited**

Merkur Slots

403- 405, Green Street, Upton Park, Plaistow E13 9AU

Introduction

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots premises at 403-405, Green Street, Upton Park, Plaistow E13 9AU.
2. The premises are currently trading with a Bingo Premises License issued under the Gambling Act 2005 by Newham Borough Council.

Personal Summary – Nicholas Mason

1. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
2. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

3. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
4. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
5. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
6. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
7. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Research

8. As part of my research into Merkur Slots Limited gaming venues and their operation I have previously visited these premises.
9. On Friday 8th January 2021 at 18:10hrs and Thursday 11th February 2021 between 16:00hrs to 16:25hrs I attended the Merkur Slots premises at 403-405 Green Street, Plaistow E13 9AU.
10. At the time of these visits the premises were closed due to UK Government Covid-19 restrictions. However, the front of the premises were clean, of smart appearance and had what appeared to be new signage displayed across the front fascia.
11. The premises are situated on a busy road with residential accommodation close by and other retail premises.
12. The area is served by a number of bus routes and additionally Upton Park London Underground Station is approximately 100 metres east of the premises. During these visits the area was relatively quiet with few pedestrians and minimal vehicular traffic.
13. I saw no evidence of street drinking, begging, anti-social behaviour or any other criminality and I did not see any groups of youths in the area at that time.

Observations

14. On Tuesday 1st June 2021 between approximately 15:35hrs and 16:15hrs I covertly visited the Merkur Slots premises at 403-405, Green Street, Upton

Park, Plaistow E13 9AU. The front display of the premises was smart and well-lit. It was clean, well maintained and looked professional.

15. The premises are advertised as being open for 24 hours per day.
16. I entered through the front door and immediately in front of me was an information board displaying the Merkur Slots logo. The information displayed on this board included:
 - i. The premises license.
 - ii. The premises certificate of insurance.
 - iii. The company code of practice which as its first heading had the information that persons under 18 were prohibited from entering the premises.
 - iv. The licensing objectives under The Gambling Act 2005.
 - v. A Gamcare information poster advertising help for those who may be experiencing issues with Gambling.
 - vi. That CCTV is in operation.
 - vii. The premises are a no smoking venue.
 - viii. Think 25, where customers may be challenged for ID if they appear under 25.
 - ix. QR Code and information re social distancing and the wearing of face masks in respect of Covid-19 regulations.
17. As I entered the premises I was greeted by a male member of staff who asked that I check in on the Covid-19 app and use the hand sanitiser that was available around the premises. I explained that I was unable to use the app and he took my name and telephone number which was properly recorded on a log he obtained from behind the reception counter. This member of staff was wearing black trousers, a black fleece jacket which displayed a Challenge 25 badge and a name badge, though I was unable to make out his name. He was a black male and had medium length dreadlock style hair and was wearing a black face mask. I asked about the machines in the premises and he explained how they operate. His attitude was friendly, helpful and informative.
18. As I moved into the premises I saw that there a series of gaming machines on both sides. Each gaming machine area was defined by a solid hoarding that prevented customers seated next to each other making contact. Where these hoardings were not in place there were signs that stated due to Covid 19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines without the need for dividing hoarding that was situated in other parts of the venue.

19. Further into the premises and on the right-hand side was a staff reception area with a Perspex screen. Standing behind this was another member of staff, a white male aged about 35, smartly dressed in a black waistcoat, black trousers and a white shirt. This area also provided a facility to prepare drinks and was clean and tidy.
20. I walked through the premises and found it was quiet. There was a white male customer who was casually dressed with a black baseball cap, black trousers and was seated at one machine. There was a second customer, an Asian male dressed all in black. He was talking loudly on a mobile-phone whilst using a gaming machine. There was clearly no pressure on the customers to use the machines and spend money and they were not vulnerable or drunk.
21. I used a number of the gaming machines whilst in the premises. I was offered free drinks, tea, coffee or a soft drink by the male member of staff that had greeted me on entry. I explained to him that this was my first time at a Merkur Slots premises and he subsequently provided me with a gift bag that consisted of a pen, facemask, battery pack, USB cable and two chocolates. Additionally, he offered me a membership form and a rewards card that I accepted.
22. During my visit I asked to use the toilet facilities. The member of staff who greeted me upon arrival took me to the toilet that was at the rear of the premises. Access was by use of a key that he obtained from a drawer in the reception area. I entered the toilet at about 16:00hrs which I found to be clean and in good condition. On the wall was a toilet cleaning check sheet showing that the toilets had last been checked at 14:00hrs. Additionally there was the same Gamcare poster I had seen on entry to the premises and this was supported by leaflets that were available for customers to take away. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.
23. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend money and I found the premises clean and tidy. The staff member I spoke to was helpful and friendly.
24. Having played on a number of machines I left the premises at 16:16hrs.

Summary

25. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
26. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in

support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside, unlike some other gaming and betting premises.

27. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
28. At the time of my visit on Tuesday 1st June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
29. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
30. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Nicholas Mason
Consultant
Leveche Associates Limited
04/06/2021



Independent Covert Licensing Visit Report

**Nicholas Mason – Consultant
Leveche Associates Limited**

Merkur Slots

456, Holloway Road, London N7 6QA

Introduction

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots premises at 456, Holloway Road, London N7 6QA.
2. The premises has an Adult Gaming Centre Premises Licence issued under the Gambling Act 2005 by Islington Borough Council.

Personal Summary – Nicholas Mason

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means

including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Observations

10. On Tuesday 1st June 2021 between approximately 20:50hrs and 21:25hrs I covertly visited the Merkur Slots premises at 456, Holloway Road, London N7 6QA.
11. Situated on the corner of Holloway Road at the junction with Camden Road, this is a larger Merkur premises than I have previously visited. The front display of the premises is smart and well-lit with a clean, well maintained and professional appearance.
12. The premises are advertised as being open for 24 hours per day.
13. The front door of the premises was controlled by a door supervisor monitoring entry and exit. He was a white male, smartly dressed in a dark suit, wearing a face mask and displaying an SIA licence on his right arm. There was also a side door in Camden Road though this was closed for access to the premises.
14. The glass on the front door of the premises displayed information including a warning that CCTV was in operation, no smoking and over 18's only.
15. I entered the premises being greeted by the door supervisor as I did so. In the entrance area was information regarding Covid-19 and the use of hand sanitisers, social distancing and face coverings. I was able to use the hand sanitiser situated at this location.
16. Adjacent to this was an information board displaying the premises licences and rules and there was further clear signage in relation to CCTV in operation.

17. As I moved into the premises I observed numerous gaming machines situated along the walls of the premises and in the central floor area. The premises itself is generally an L-shape lounge with a staff reception area to the left and then another area extending to a smoking area and the toilets. Each gaming machine area was defined by a solid hoarding that prevented customers seated next to each other making contact. Where these hoardings were not in place there were signs that stated due to Covid 19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines.
18. The staff reception area had a Perspex screen at the counter, this also provided a facility to prepare drinks and was very clean and tidy. There were two female members of staff on duty, one with a dark complexion and dark hair wearing a name badge identifying her as Dina and a white woman with brown hair wearing a name badge identifying her as Rosalind. Both were smartly dressed wearing the Merkur branded dark suits and white shirts. Both were displaying the Challenge 25 badge. I provided my details to staff for track and trace at the reception desk.
19. I walked through the premises and found it was relatively quiet. There were four male customers inside the premises who were all casually dressed. There was also an elderly woman who had a push chair and was periodically walking through the premises looking at different machines. Customers appeared to be making the effort to wear face masks though these were not always properly in place. When I arrived there was a black male customer dressed in blue cargo style work clothing who spent about 10 minutes speaking to the two female staff members that were standing behind the reception area. The customers were clearly not being pressurised or encouraged to spend money and they were not vulnerable or drunk.
20. I used a number of the gaming machines whilst in the premises. Whilst sat playing a high value machine the staff member Rosalind approached me and explained details of an ongoing Merkur offer, 'Matchplay Membership' handing me a card to be retained for later use. She then took me to another high value machine which, with her assistance I played.
21. Whilst playing another high value machine I was approached by the other female member of staff known as Dina. She offered me a slice of pizza that she was holding on a cardboard plate but I declined the offer.
22. During my visit I observed the door supervisor periodically patrol the inside of the premises before returning to the front door.
23. During my visit I asked to use the toilet facilities. The member of staff Rosalind directed me to the rear of the premises where there was a door marked smoking area. Through this door and on the right was a Unisex Disabled Toilet. The door had a keycode lock but was unlocked and the code was not required. I entered the toilet which was clean and had the

appearance of being recently refurbished. There was a toilet cleaning check sheet showing that the toilets had last been checked at 20:00hrs. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.

24. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend extra money and I found the premises clean and tidy. The staff I spoke to were helpful and friendly.
25. Having played on a number of machines I left the premises at approximately 21:25hrs.

Summary

26. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
27. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
28. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
29. At the time of my visit on Tuesday 1st June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
30. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
31. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Nicholas Mason
Consultant

Leveche Associates Limited
06/06/2021



Independent Covert Licensing Visit Report

**Nicholas Mason – Consultant
Leveche Associates Limited**

Merkur Slots

157, High Street North, East Ham E6 1JB

Introduction

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots, 157, High Street North, East Ham E6 1JB.
2. The premises has an Adult Gaming Centre Premises Licence issued by Newham Borough Council.

Personal Summary – Nicholas Mason

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Observations

10. On Tuesday 1st June 2021 between approximately 17:00hrs and 17:30hrs I covertly visited Merkur Slots, 157, High Street North, East Ham E6 1JB.
11. The front display of the premises was smart and well-lit though older than some of the other Merkur premises I have visited. It appeared well maintained though the area itself was let down by a local authority bin situated on the pavement outside that had a number of sealed bin bags that were spilling onto the pavement.
12. The premises are advertised as being open for 24 hours per day.
13. There appeared to be two doors allowing access to the premises but the door to the left displayed a sign directing customers to use the other door. I entered via the front door on the right where two fire extinguishers and various signage was displayed. The information displayed included:
 - i. The premises license.
 - ii. The premises certificate of insurance.
 - iii. That CCTV is in operation.
 - iv. The premises are a no smoking venue.
14. Adjacent to the signage was a hand sanitiser station that I was able to use and next to this a QR Code and information re social distancing and the wearing of face masks in respect of Covid-19 regulations.
15. I entered the premises and immediately started to play a low value gaming machine. From here I was able to observe that there were gaming machines throughout the length of the floor. Each gaming machine area was defined by

a solid hoarding that prevented customers seated next to each other making contact. Where these hoardings were not in place there were signs that stated due to Covid 19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines without the need for dividing hoarding that was situated in other parts of the venue.

16. I was approached by a female member of staff who I would describe as black, aged about 35 years with dark hair wearing a face mask. She was dressed smartly in a dark blue branded Merkur Slots waistcoat and trousers. Pinned to the waistcoat was a name badge showing her name to be Gloria and a 'Challenge 25' badge. She asked if I needed anything and I told her I was fine.
17. Having played the low value machine I walked further into the premises and saw the reception area was situated to the left-hand side. There was a Perspex screen at the desk. This area was also used for the preparation of refreshments with a facility to make hot drinks. The area was clean and tidy and additional hand sanitisers were adjacent to this location.
18. I observed a number of customers, 6 male customers playing machines to the right and a male and female to the left-hand side at the rear of the premises. There was clearly no pressure on the customers to use the machines and spend money and they were not vulnerable or drunk.
19. I used a number of the gaming machines whilst in the premises. Whilst sat playing a machine at the rear of the premises I was approached by the member of staff Gloria who asked if I would like a free drink which I declined.
20. I asked to use the toilet facilities and was taken to the toilet that was close to the Reception area. The toilet door was closed and secured with a digital lock. The member of staff, Gloria used the keypad to unlock the door and I entered. The toilet area was dated but clean, there was a mop and bucket situated to the right-hand side of the toilet. On the rear of the toilet door was a cleaning check sheet showing that the toilets had last been checked at 15:00hrs. Additionally there was the Gamcare leaflets offering assistance to people dealing with Gambling issues and available for customers to take away. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.
21. I returned to play a machine at the rear of the premises and was approached by a different member of staff, a black male who was smartly dressed wearing a Merkur waistcoat, a Challenge 25 badge and a name badge giving a name of Soloman. He asked if I had provided details for Check and trace as part of the Covid-19 regulations. I said I had not and he took my name and telephone number which he recorded on a log sheet.
22. Whilst I remained at this Gaming machine, the staff member Gloria returned and explained details of an ongoing Merkur offer handing me a card to be retained for later use.

23. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend excessive amounts of money and I found the premises clean and tidy.
24. Having played on a number of machines I left the premises at approximately 17:30hrs.

Summary

25. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
26. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
27. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
28. At the time of my visit on Tuesday 1st June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
29. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
30. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Nicholas Mason
Consultant
Leveche Associates Limited
04/06/2021



Independent Covert Licensing Visit Report

Nicholas Mason – Consultant

Leveche Associates Limited

Merkur Slots

62, East Street, Barking IG11 8EQ

Introduction

1. Leveche Associates Limited have been instructed to conduct a covert visit to Merkur Slots premises at 62, East Street, Barking IG11 8EQ.
2. The premises are currently trading with a Bingo Premises Licence issued under the Gambling Act 2005 by Barking and Dagenham Borough Council.

Personal Summary – Nicholas Mason

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Research

10. As part of my research into Merkur Slots Limited gaming venues and their operation I have previously visited these premises.
11. On Thursday 11th February 2021 at 16:42hrs, I attended the Merkur Cashino (Slots) premises at 62
12. East Street, Barking IG11 8EQ. The premises were closed and not trading at this time due to UK Government Covid-19 restrictions.
13. The location of these premises differs somewhat to other Merkur premises I have visited previously in that it is in a 'pedestrian only' controlled zone with no vehicular traffic and a market place with a number of stalls outside the front.
14. During my visit in February, though some of the Market Stalls were trading, this area was relatively quiet, something I attributed to the UK Government Covid-19 restrictions.
15. This Merkur premises had clearly been subject to recent renovation and the front of the premises were clean, of smart appearance. and had what appeared to be new signage displayed across the front fascia.
16. It is situated in what would normally be a busy retail hub with a concentrated residential area close by.

17. At the time of my February observations I saw no evidence of street drinking, begging, anti-social behaviour or any other criminality. There were no groups of youths in the area.

Observations

18. On Tuesday 1st June 2021 between approximately 18:10hrs and 18:30hrs I covertly visited Merkur Slots, 62 East Street, Barking IG11 8EQ.

19. On the day of my visit the premises were advertised as being open from 09:00hrs until midnight.

20. The front display of the premises was smart and well-lit. It was clean, well maintained and looked professional. There was a push button keypad for the lock situated to the right of the front door and above this a doorbell. There was litter in front of the premises but this was clearly from the adjacent Market Stalls.

21. The glass on the front door of the premises displayed information including a warning that CCTV was in operation, no smoking and over 18's only. As I entered the premises I saw the opening times displayed and then immediately to the left was an information board displaying the Merkur Slots logo. The information displayed on this board included:

- i. The premises license.
- ii. The premises certificate of insurance.
- iii. The company code of practice which as its first heading had the information that persons under 18 were prohibited from entering the premises.
- iv. The licensing objectives under The Gambling Act 2005.
- v. A Gamcare information poster advertising help for those who may be experiencing issues with gambling.
- vi. That CCTV is in operation.
- vii. The premises are a no smoking venue.
- viii. Think 25, where customers may be challenged for ID if they appear under 25.
- ix. No alcohol notice.
- x. Strictly over 18's only notice.
- xi. Notice of Bingo rules.

22. As I entered the premises, a customer, a white male dressed in a grey track-suit was leaving and he was followed by a female with long dark hair. She

was clearly staff from the premises and was wearing a mask. She asked me to use the hand sanitiser as I entered which I agreed to, she then left the premises.

23. I was greeted by a female member of staff who I would describe as a white lady, approximately 45 years old with ginger hair that was in a pony tail. She was smartly dressed wearing a white shirt, dark waistcoat and dark trousers. On the waistcoat was pinned a Challenge 25 badge. She asked that I check in on the Covid-19 app and use the hand sanitiser that was available around the premises. I explained that I was unable to use the app and after I had used the hand sanitiser she invited me further into the premises to the reception area where she recorded my details on a Tablet.
24. The reception area was located along the right-hand wall of the premises, about halfway along with a Perspex screen at the counter. This area also provided a facility to prepare drinks and was clean and tidy. Standing behind the counter was another female member of staff with long brown hair and wearing similar clothing to the first member of staff I had spoken to. I was offered a drink which I declined.
25. As I moved into the premises I saw that there was a series of gaming machines on both sides. Each gaming machine area was defined by a solid hoarding that prevented customers seated next to each other making contact. Where these hoardings were not in place there were signs that stated due to Covid-19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines without the need for dividing hoarding that was situated in other parts of the venue.
26. I used a number of the gaming machines whilst in the premises. While playing a high value machine on the right-hand side I was able to observe a female customer who was seated in the area closest to the reception. She was wearing a mask and talking to staff whilst she played a machine.
27. I subsequently walked through the premises and found it to be quiet with no other persons present. The one customer that was present was clearly under no pressure to use the machines and she did not appear vulnerable or drunk.
28. During my visit I asked to use the toilet facilities. The female member of staff who greeted me upon arrival took me to the toilet and explained that the gentlemen's toilet was out of order. I was directed to the ladies toilet that was near the rear of the premises and a rear exit door. The toilet door was unlocked and I entered. The toilet area was clean and in good condition and had clearly been subject to recent refurbishment. On the wall was a toilet cleaning check sheet for week ending 06/06/21 showing that the toilets had last been checked at 18:00hrs. In a plastic rack next to this were the Gamcare leaflets that were available for customers to take away, providing information to people dealing with gambling issues. There was soap available to wash hands and a hot air blower to dry, though no hand sanitiser.

29. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend money and I found the premises clean and tidy. The staff member I spoke to was helpful and friendly.
30. Having played on a number of machines I left the premises at approximately 18:30hrs.

Summary

31. I have visited numerous gaming premises including those operated by Merkur Slots or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
32. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure they operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
33. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
34. At the time of my visit on Tuesday 1st June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
35. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
36. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Nicholas Mason
Consultant
Leveche Associates Limited
05/06/2021



Independent Covert Licensing Visit Report

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

**Merkur Slots
847 High Road, North Finchley, N12 8PT**

Introduction

1. I have been instructed to conduct an independent covert visit on the venue at Merkur Slots, 847 High Road, North Finchley, N12 8PT.
2. The premises has a Bingo Premises Licence issued under the Gambling Act 2005 issued by Barnet Council.
3. The premises are situated on a large busy high road. The area is densely populated with a large number of retail premises which include large supermarkets, mini supermarkets, betting shops, late licensed bars, hairdressers and fast-food restaurants.
4. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

Personal – Stuart Jenkins

5. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.

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

Covert Observations

1. On Wednesday 2nd June 2021 I conducted a covert licensing visit to Merkur Slots, 847 High Road, North Finchley, N12 8PT. My visit took place between 23:00 hours and 23:30 hours.
2. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
3. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open from 08:00 hours to Midnight.
4. I went to the front door of the premises and entered. Once inside the entrance I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
 - i. The premises licence.
 - ii. The company codes of practice.
 - iii. It was a no smoking venue.
 - iv. Think 25 poster.
 - v. GamCare poster.

- vi. QR Code – NHS test & trace poster, information on social distancing and a face mask poster stating that they must be worn in the premises. All were in support of the current COVID19 regulations.
5. On entering the premises, I was greeted by a black female member of staff in smart corporate fleece top, dark trousers and white shirt with a Challenge 25 badge displayed. She asked me to check in on the premises QR Code NHS app and use the hand sanitiser before I could fully enter the premises. I used the hand sanitiser but I was unable to use the app so she recorded my name and telephone number on a registration sheet.
6. Once inside I saw there were a series of gaming machines stretching from the front to the back of the premises. On the right-hand side there were gaming machines and a reception desk with a Perspex screen about half way down. On the left-hand side there were more gaming machines leading to the back of the venue into an alcove. There was a customer toilet too.
7. The female staff member asked me what machines I wanted to use, and I stated I wanted to play a traditional style fruit machine. She offered me free soft drinks, water, tea and coffee. I asked for a black coffee which she went to prepare. I walked around the venue deciding on which machine to play. I saw that the venue enforced social distancing and saw the hardboard panels used on every other machine to make sure customers did not sit directly next to each other whilst using the machines.
8. I chose to play a gaming machine towards the back of the premises on the right. As I walked around the premises, I saw there were only two other customers in the venue. Both were white males aged around 40 years of age and were not wearing masks. They were both casually dressed and quietly playing the machines. They were clearly not being pressurised or encouraged to spend money and they were not vulnerable or drunk.
9. I accepted a black coffee which I consumed on the premises. There were no alcoholic drinks available. The hot drinks were prepared behind the reception desk which was clean and tidy.
10. Whilst playing the machine I saw the black female member of staff and the black male of staff who appeared towards the end of my visit were not wearing masks at any time during my visit. I was unable to establish if the people not wearing masks had an exemption and I have informed those that instruct Leveche Associates Limited.
11. I visited the toilet which was clean and tidy with ample handwashing facilities and hand sanitiser and was clearly cleaned regularly. On the wall I saw a toilet cleaning date & time sheet showing that the toilets had been checked and cleaned recently. Also, on the wall was a GamCare poster and holder with leaflets in it that customers could take away with them.
12. No one was pressurised or encouraged to spend money and I did not see anyone who was vulnerable, drunk or underage.

13. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
14. I left the premises at 23:35 hours.

Summary

15. I found the premises to have a smart, well-lit and professional looking frontage. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing, begging or groups of youths hanging around.
16. From my visits to this and other Merkur Slots and Cashino Premises, I have found professional and attentive staff managing them. The premises were well run and there are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside.
17. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
18. In conclusion, from my visit it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
19. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
06/06/2021



Independent Covert Licensing Visit Report

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

**Merkur Cashino (Slots)
478 High Road, Wembley HA9 7BH**

Introduction

1. I have been instructed to conduct an independent covert visit on the venue at Merkur Cashino (Slots), 478 High Road, Wembley HA9 7BH.
2. The premises has an Adult Gaming Centre Premises Licence issued under the Gambling Act 2005 by Brent Council.
3. The premises are situated on a large busy high road. The area is densely populated with a large number of retail premises which include mini supermarkets, betting shops, late licensed bars, hairdressers and fast-food restaurants.
4. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

Personal – Stuart Jenkins

5. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.

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

Covert Observations

10. On Wednesday 2nd June 2021 I conducted a covert licensing visit to Merkur Cashino (Slots), 478 High Road, Wembley HA9 7BH. My visit took place between 21:00 hours and 21:40 hours.
11. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
12. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open for 24 hours per day.
13. I went to the front door of the premises and entered. Once inside the entrance I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
 - i. The premises licence.
 - ii. The company codes of practice.
 - iii. It was a no smoking venue.
 - iv. Think 25 poster.
 - v. GamCare poster.

- vi. QR Code – NHS test & trace poster, information on social distancing and a face mask poster stating that they must be worn in the premises. All were in support of the current COVID19 regulations.
14. On entering the premises, I was greeted by a female member of staff of South Asian appearance in smart corporate dark trousers and white shirt. She asked me to check in on the premises QR Code NHS app and use the hand sanitiser before I could fully enter the premises. I used the hand sanitiser but I was unable to use the app so she recorded my name and telephone number on a registration sheet.
 15. Once inside I saw there were a series of gaming machines stretching from the front to the back of the premises. On the right-hand side there were gaming machines and a change machine. On the left-hand side there was a reception desk with a Perspex screen and at the back there was a toilet for customers use and an office.
 16. The female staff member asked me what machines I wanted to use, and I stated I wanted to play a traditional style fruit machine. The female showed me a couple of the machines and then I walked around the venue deciding on which machine to play. I saw that the venue enforced social distancing and saw the hardboard panels used on every other machine to make sure customers did not sit directly next to each other whilst using the machines.
 17. I chose to play a gaming machine towards the front of the premises. When I had I walked around the premises, I saw a white male about 30 years of age playing the machines directly in front of the cashier desk. This male was not wearing a face mask. He was casually dressed and quietly playing the machines. He was clearly not being pressurised or encouraged to spend money and he was not vulnerable or drunk.
 18. Whilst in the premises I was offered free soft drinks, water, tea and coffee. I accepted a black coffee which I consumed on the premises. There were no alcoholic drinks available.
 19. Whilst playing the machine I was approached by the other member of staff, a white female with a name badge that said 'Lydia' on it. She was smartly dressed in dark corporate attire with a white shirt. She asked me if I would like to choose a scratch card from a selection she had in her hand. I chose one and won a £10 voucher for use in a machine of my choice. I noticed that Lydia was not wearing a face mask and nor was her colleague. I was unable to establish if the people not wearing masks had an exemption and I have informed those that instruct Leveche Associates Limited.
 20. I visited the toilet which was clean and tidy with ample handwashing facilities and hand sanitiser and was clearly cleaned regularly. There was a toilet cleaning date & time sheet showing that the toilets had been checked and

cleaned recently. Also, there was a GamCare poster and holder with leaflets in it that customers could take away with them.

21. During my visit another mature male of South Asian appearance, aged about 35 years, came into the premises and played the gaming machines. He wore a mask whilst in the venue.
22. No one was pressurised or encouraged to spend money and I did not see anyone who was vulnerable, drunk or underage.
23. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
24. I left the premises at 20:40 hours.

Summary

25. I found the premises to have smart well-lit and professional looking frontage. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing, begging or groups of youths hanging around.
26. From my visits to this and other Merkur Slots and Cashino Premises I have found professional and attentive staff managing them. The premises were well run and there are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside.
27. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
28. In conclusion, from my visit it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
29. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited

06/06/2021



Independent Covert Licensing Visit Report

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

**Merkur Cashino (Slots)
304 Neasden Lane, Neasden, London NW10 0AD**

Introduction

1. I have been instructed to conduct an independent covert visit on the venue at Merkur Cashino (Slots), 304 Neasden Lane, London NW10 0AD.
2. The premises has an Adult Gaming Centre Premises Licence issued under the Gambling Act 2005 by Brent Council.
3. The area is populated with a number of retail premises which include mini supermarkets, betting shops, licensed bars, hairdressers and fast-food restaurants.
4. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

Personal – Stuart Jenkins

5. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.

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

Covert Observations

10. On Wednesday 2nd June 2021 I conducted a covert licensing visit to Merkur Cashino (Slots), 304 Neasden Lane, London NW10 0AD. My visit took place between 19:45 hours and 20:30 hours.
11. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
12. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open for 24 hours per day.
13. I went to the front door of the premises and entered. Once inside I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
 - i. The premises licence.
 - ii. The company codes of practice.
 - iii. It was a no smoking venue.
 - iv. Think 25 poster.
 - v. GamCare poster.

- vi. QR Code – NHS test & trace poster, information on social distancing and a face mask poster stating that they must be worn in the premises. All were in support of the current COVID19 regulations.
14. I was greeted by a male member of staff in smart corporate dark trousers, white shirt and dark waist coat with a Challenge 25 badge. He asked me to check in on the premises QR Code NHS app and use the hand sanitiser before I could fully enter the premises. I used the hand sanitiser but I was unable to use the app so he recorded my name and telephone number on a registration sheet.
 15. Once inside I saw there were a series of gaming machines stretching from the front to the back of the premises. On the right-hand side there were gaming machines, a change machine and beyond that a staff counter with a Perspex screen. On the left-hand side were further machines and at the back a toilet for customers use. At the rear of the premises there was a door leading to a smoking area and outside seating.
 16. The male staff member asked me what machines I wanted to use, and I stated I wanted to play a traditional style fruit machine. The male showed me around the venue explaining to me which machines might be of interest to me and how they worked. He also explained to me that the venue enforced social distancing and pointed to the hardboard panels on every other machine to make sure customers did not sit directly next to each other when using the machines.
 17. I chose to play one of the machines to the rear of the premises. As I walked into the premises there were two males playing on the machines. One was about 40 years old of Mediterranean appearance and the other was about 30 years old of East Asian appearance. They were both casually dressed and quietly playing the machines. They were clearly not being pressurised or encouraged to spend money and they were not vulnerable or drunk.
 18. Whilst in the premises I was offered free soft drinks, bottled water, coffee and snacks – crisps and pop corn type foods. I accepted a bottle water and a black coffee which I consumed on the premises. There were no alcoholic drinks available.
 19. I visited the toilet which was clean and tidy with ample handwashing facilities and hand sanitiser and was clearly cleaned regularly. On the wall I saw a toilet cleaning date & time sheet showing that the toilets had been checked and cleaned recently. There was a GamCare poster and holder with leaflets in it that customers could take away with them.
 20. During my visit other mature males came into the premises and played the gaming machines. Their ages ranged between 27 to 50 years of age. Everyone I saw in the venue was wearing a face mask. At one stage I was offered a fresh new face mask by the staff member who also offered them to

all customers. He stated they were available for anyone who wanted to enter the venue but may have lost their mask.

21. No one was pressurised or encouraged to spend money and I did not see anyone who was vulnerable, drunk or underage.
22. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
23. I left the premises at 20:30 hours.

Summary

24. I found the premises to have smart well-lit and professional looking frontage. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing, begging or groups of youths hanging around.
25. From my visits to this and other Merkur Slots and Cashino Premises I have found professional and attentive staff managing them. The premises were well run and there are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside.
26. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
27. In conclusion, from my visit it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
28. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
06/06/2021



Independent Covert Licensing Visit Report

Stuart Jenkins – Licensing Consultant
Leveche Associates Limited

Merkur Cashino (Slots)
19 The Concourse, Edmonton Shopping Centre,
Edmonton Green, London N9 0TQ

Introduction

1. I have been instructed to conduct an independent covert visit on the venue at Merkur Cashino (Slots), 19 The Concourse, Edmonton Shopping Centre, London N9 0TQ.
2. The premises has a Bingo Premises Licence issued under the Gambling Act 2005 by Enfield Council.
3. The premises are situated within a 26 acre retail park next to a large bus garage. The area is densely populated with a large number of retail premises which include large supermarkets, mini supermarkets, coffee shops, late licensed bars, hairdressers and fast-food restaurants.
4. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

Personal – Stuart Jenkins

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

Covert Observations

10. On Thursday 3rd June 2021 I conducted a covert licensing visit to Merkur Cashino (Slots), 19 The Concourse, Edmonton Shopping Centre, London N9 0TQ. My visit took place between 00:10 hours and 00:45 hours.
11. From the outside of the premises, I saw that it had a smart corporate and professional looking frontage. It was well lit, well maintained and clean.
12. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open for 24 hours per day.
13. I went to the double doors and tried to enter but found the doors were locked. I knocked on the doors and after a short time the doors were opened by a tall well built white male in a dark suit wearing a face mask. I saw that he was wearing an SIA licence.

14. The male invited me in and directed me to the QR NHS app on the wall which I scanned. He then asked me to sanitise my hands which I did with the sanitiser provided.
15. Once inside the entrance I saw there was an information board. On this board were Merkur Slots information documents, premises rules, policies and licences. The documents displayed included:
 - i. The premises licence.
 - ii. The company codes of practice.
 - iii. It was a no smoking venue.
 - iv. Think 25 poster.
 - v. GamCare poster.
 - vi. QR Code – NHS test & trace poster, information on social distancing and a face mask poster stating that they must be worn in the premises. All were in support of the current COVID19 regulations.
16. I was then led by the door supervisor towards the back of the premises to the cashier desk which had a Perspex screen. There I was greeted by a white female member of staff who had a corporate uniform of dark trousers, white shirt and a dark waist coat. She asked me if I wanted anything to drink and I asked for a black coffee.
17. Other free refreshments were also available such as soft drinks, water and tea. There were no alcoholic drinks available.
18. I saw there were a series of gaming machines stretching from the front to the back of the premises. On the right-hand side there were gaming machines leading to the cashier desk. On the left-hand side there were more machines. There was also a customer toilet available for use.
19. I then walked around the venue deciding on which machine to play. I saw that the venue enforced social distancing and saw the hardboard panels used on every other machine to make sure customers did not sit directly next to each other when using the machines.
20. I chose to play a gaming machine near the reception desk on the right. After a short time, the female member of staff came over to me with my coffee wearing her face mask and handed me my coffee.
21. There were five mature males in the premises quietly playing the gaming machine at the time of my visit. Their age range was between 30 to 50 years

and they were all casually dressed. All were socially distanced and wearing masks.

22. I visited the toilet which was locked and had to be opened by the female member of staff. The toilet was clean and tidy with ample handwashing facilities and hand sanitiser and was clearly cleaned regularly. There was a toilet cleaning date & time sheet showing that the toilets had been checked and cleaned recently. Also, there was a GamCare poster and holder with leaflets in it that customers could take away with them.
23. Towards the end of my visit, I did notice a male who I believed to be another member of staff working at the back of the cashier desk out of my line of sight.
24. No one was pressurised or encouraged to spend money and I did not see anyone who was vulnerable, drunk or underage.
25. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
26. I left the premises at 00:45 hours.

Summary

27. I found the premises to have smart well-lit and professional looking frontage. At the time of my visit, I saw no evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing, begging or groups of youths hanging around.
28. From my visits to this and other Merkur Slots and Cashino Premises I have found professional and attentive staff managing them. The premises were well run and there are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside.
29. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
30. In conclusion, from my visit it is my opinion these types of gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.

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

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
06/06/2021



Independent Covert Licensing Visit Report

**Nicholas Mason – Consultant
Leveche Associates Limited**

Merkur Cashino (Slots)

Unit 2 - 8, Eleanor Cross Road, Waltham Cross EN8 7LA

Introduction

1. Leveche Associates Limited have been instructed to conduct an independent covert visit to Merkur Cashino (Slots), Unit 2 - 8, Eleanor Cross Road, Waltham Cross EN8 7LA.
2. The premises has a Bingo Premises License issued under the Gambling Act 2005 by Broxbourne District Council.

Personal Summary – Nicholas Mason

3. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
4. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for leading teams in high profile pan-London investigations. As a

Senior Investigating Officer, I led and had responsibility for the risk assessment and management of intelligence led operations by covert means including the disruption of organised crime groups infiltrating the licensing industry.

5. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
6. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into the MPS through other UK crime authorities / Police forces.
7. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
8. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
9. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Observations

10. On Tuesday 8th June 2021 between approximately 18:25hrs and 18:45hrs I covertly visited Merkur Cashino (Slots) at Unit 2 - 8, Eleanor Cross Road, Waltham Cross EN8 7LA.
11. The premises is situated in a paved pedestrian area with numerous retail outlets surrounding it. At the time of my visit the area was quiet with very little pedestrian traffic.
12. The premises were advertised as being open from 09:00hrs until 22:00hrs.
13. As I approached the front display of the premises, I could see that it had been recently refurbished. It was smart, well-lit, clean and looked professional.
14. The design of the frontage meant I was unable to see into the premises from the street with frosted effect glass on the doors and posters in the windows. Displayed on the entry door glass was information including a warning that CCTV was in operation, no smoking, over 18's only and the need to wear a face mask to comply with Covid-19 regulations.
15. As I entered the premises, I saw immediately to the right was an information board displaying the Merkur Slots logo. The information displayed on this board included:
 - i. The premises license.

- ii. The premises certificate of insurance.
- iii. The company code of practice which as its first heading had the information that persons under 18 were prohibited from entering the premises.
- iv. The licensing objectives under The Gambling Act 2005.
- v. A GamCare information poster advertising help for those who may be experiencing issues with gambling.
- vi. That CCTV is in operation.
- vii. The premises are a no smoking venue.
- viii. Think 25, where customers may be challenged for ID if they appear under 25.
- ix. No alcohol notice.
- x. Strictly over 18's only notice.
- xi. Notice of Bingo rules.

16. To the left of me was a hand sanitiser machine that I used and a large branded Merkur display sign that provided Covid-19 information regarding the use of hand sanitizers, social distancing, face coverings and what to do if you were feeling unwell.
17. On my left I saw a female customer who was seated playing a gaming machine. She was wearing a face mask, a black gillet jacket, blue/white jogging pants and had dark brown hair. I later heard the staff refer to her as Margaret.
18. As I walked through the premises, I saw that there were a series of gaming machines on both sides. Each gaming machine area was defined either by a solid hoarding that prevented customers making contact, and where that was not present there were signs that stated due to Covid 19 restrictions the machine was not in operation. This allowed for social distancing between customers playing the machines without the need for dividing hoarding that was situated in other parts of the venue.
19. I walked towards the rear of the premises where a reception area was located. This had a Perspex Screen on the counter and an area used for the preparation of refreshments with a facility to make hot drinks. It was clean and tidy and additional hand sanitizers were adjacent to this location.
20. Standing behind this counter was a female member of staff. She was wearing a full perspex face shield and the Merkur Slots branded waistcoat and trouser suit. Pinned to her waistcoat was a Challenge 25 badge and a name badge

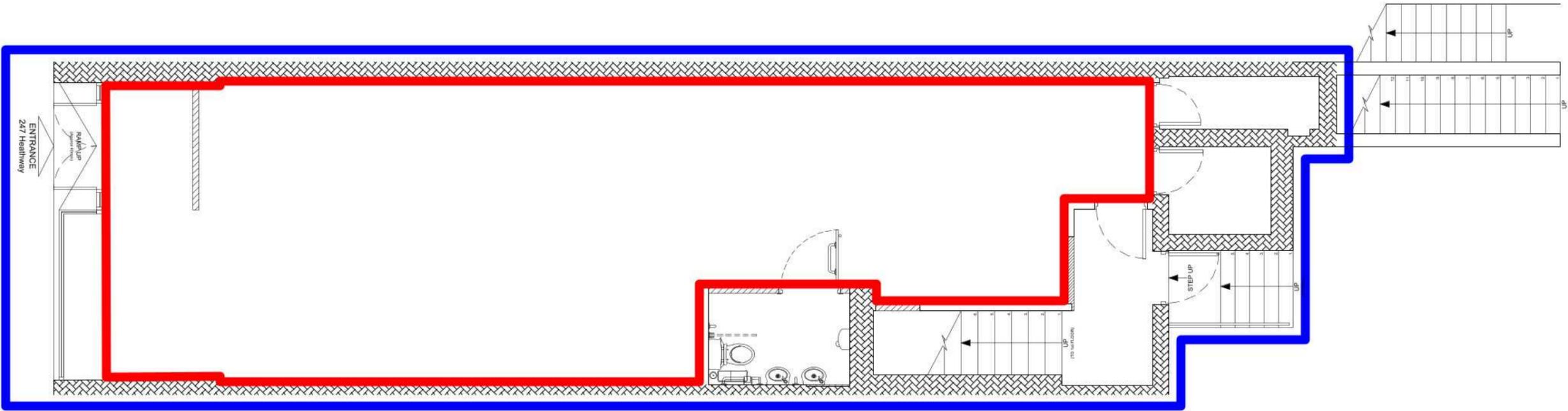
identifying her as Sally. She said hello and I then continued to look at gaming machines on the right-hand side of the premises.

21. The staff member Sally came from behind the counter and asked if she could help. I asked her if she could change two £5 notes into a £10 note which she did at a cash machine next to me. I then sat down and played a high value gaming machine.
22. While I was seated a door to my left and at the rear of the premises opened and I saw another female staff member appear pushing a mop and bucket. She to was wearing the branded Merkur clothing, displaying the Challenge 25 badge and a name badge that identified her as Michelle.
23. Whilst I sat playing the machine the staff member Sally approached me and offered me a drink and snacks, both of which I declined. She also explained details of an ongoing Merkur offer, 'Rainbow Riches Party £5 Matchplay' and enquired if I was interested in membership which I also declined.
24. I finished playing the machine then asked the staff member Sally if I could use the toilet facilities. She obtained a key from the reception area and then led me through a door at the rear of the premises to the toilet. The toilet door was unlocked and I entered. The toilet area was clean, in good condition and had clearly been subject to recent refurbishment. On the wall was a toilet cleaning check sheet for week ending 13/06/21 showing that the toilets had last been checked at 17:00hrs. In a plastic rack on the wall were the GamCare leaflets that were available for customers to take away, providing information to people dealing with gambling issues. There was soap available to wash hands and a hot air blower to dry.
25. On returning from the toilet, I asked Sally to show me the promotion game which I then played. I saw that there was another female customer in the premises playing a machine close to me and to my right. She was wearing dark clothing and a full-face mask. I heard the staff refer to her as Maria.
26. Whilst playing the promotional game the staff member Sally approached me and asked if I had the Covid-19 app. I said I did not so she recorded my name and telephone number on a tablet.
27. Aside from the two females I have described there were no other customers in the premises. Those who were there were clearly under no pressure to use the machines and did not appear vulnerable or drunk.
28. Whilst inside the premises I felt safe, I was not pressurised to use the machines or to spend money and I found the premises very clean and tidy. The staff member I spoke to was helpful and friendly.
29. Having played on a number of machines I left the premises at approximately 18:45hrs.

Summary

30. I have visited numerous gaming premises including those operated by Merkur Slots, or Merkur Cashino as they were formerly known. I have found the Merkur premises operating at a high standard with well-maintained and professional looking frontages. The interiors are clean and well-kept offering a lounge style with carpeted floors and clean seating areas.
31. I have found professional and attentive staff managing the premises. There are clearly defined systems in place to ensure the premises operate in support of the licensing objectives and don't attract or take advantage of juveniles or other vulnerable persons. None of the gaming activity on the premises can be seen by the public from the outside unlike some other gaming and betting premises.
32. The demographic for this type of venue is generally older and doesn't attract young people or children, clearly the Challenge 25 policy assists in this.
33. At the time of my visit on Tuesday 8th June 2021 I saw no evidence of crime and disorder, anti-social behavior, street drinking, drug dealing, begging or groups of youths hanging around the premises.
34. In conclusion, from my observations and visits and in my opinion, these gaming premises are well run and significantly reduce the risk of crime and disorder and the vulnerable being taken advantage of as may have been the case in some traditional betting establishments.
35. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Nicholas Mason
Consultant
Leveche Associates Limited
08/06/2021



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

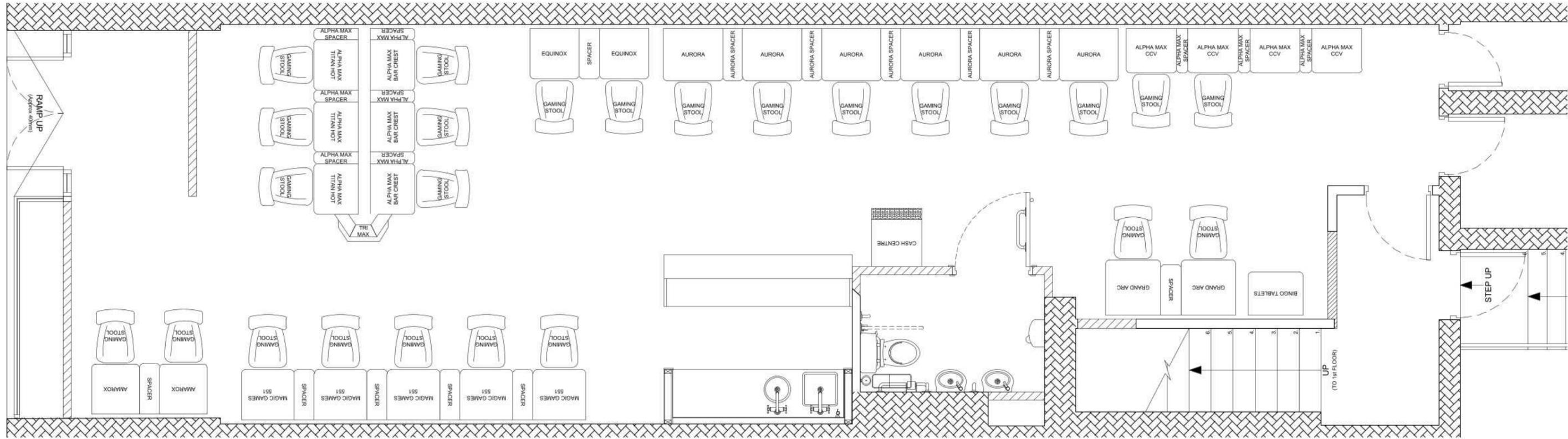
REVISIONS

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

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	247 The Heathway, Dagenham, RM9 5BG
Local Authority:	Barking and Dagenham Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-027 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
Name and Title of Assessor:	Amanda Kiernan – Head of Compliance
Date of Assessment:	25/07/21, 12/08/21 and 10/12/21
Review Date:	On opening in conjunction with local staff

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Local Area Profile Risk Factors

Local Risk Profile:	<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 & 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>
Establishments of note:	<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>
Adjoining premises:	<p>Paddy Power, 243-245 Heathway, RM9 5AN and Gadcet, 249 Heathway, RM9 5AN</p>
Crime statistics:	<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 & 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 & Dagenham, down in the Metropolitan Police force area compared with the corresponding quarter in 2019. (<i>police.uk</i>)</p>
Population:	<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, & lowest grade workers. (<i>streetcheck.uk</i>)</p>
Culture:	<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. (<i>streetcheck.uk</i>)</p>
Unemployment:	<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>
Deprivation:	<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>
Local Police:	<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>Unemployment: 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>Deprivation: 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>Schools and Education 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 Cl, RM9 6XN Saint Joseph's Catholic, 48 Connor Rd, RM9 5UL</p>	<p>Age Verification <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>

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<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>Community Centres and Youth Centres 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, Barnmead 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 & Dagenham Youth Zone, 201, 225 Porters Ave, RM9 5YX Darul Ummah Goresbrook, 36 Maplestead Rd, RM9 4XR</p> <p>Parks, play grounds and sports/leisure facilities 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>Vulnerable and addiction support services 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 Subwize, The Vibe, 195-211 Becontree Ave, RM8 2UT <i>Subwize 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' https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</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>Homeless shelters and food banks Look Ahead Housing & 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>Pawnbrokers and Loan Shops CeX, Unit 6, The Mall, Heathway, RM10 8RE Gadget, 249 Heathway, RM9 5AN Cash Convertors, 287a The, Heathway, RM9 5AQ H&T Pawnbrokers, 299 Heathway, RM9 5AQ D T & T Money Transfer, 222A Heathway, RM10 8QS Access Financial Services, 296 Heathway, RM10 8LU Simply Gold, 307 Heathway, RM9 5AQ</p> <p>Medical Centres, Care Homes and Mental Health facilities 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>Gambling premises William Hill, 220 Heathway, RM10 8QS Betfred, 125 Broad St, RM10 9HP Betfred, Unit 25, The Mall, Heathway, RM10 8RE @GamingFun, 250 Heathway, RM10 8QS Coral, 251, 253 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>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</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>Player Protection <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>Paddy Power, 243-245 Heathway, RM9 5AN Coral, 24 Goresbrook Rd, RM9 6UR Hollywood Bowl, Cook Rd, RM9 6UQ Mecca, Dagenham Leisure Park, Cook Road, RM9 6UQ</p> <p>Residential Areas 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>Bus stops and other Transport links Dagenham Heathway, Underground Station, RM10 8QS Bus Stops along The Heathway</p> <p>Locally Identified Premises Citizens Advice, 339 Heathway, RM9 5AF Dagenham Library, 1 Church Elm Lane, RM10 9QS, Citizens Advice, 339 Heathway, RM9 5AF</p> <p>Public Houses and Alcohol Licensed Prem 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>'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. 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>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</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>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</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>
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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>Crime statistics: 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 & 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 & Dagenham, down in the Metropolitan Police force area compared with the corresponding quarter in 2019. (police.uk)</p> <p>Local Police: 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>Public Houses and Alcohol Licensed Premise 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>Pawnbrokers and Loan Shops CeX, Unit 6, The Mall, Heathway, RM10 8RE Gadcet, 249 Heathway, RM9 5AN Cash Convertors, 287a The, Heathway, RM9 5AQ H&T Pawnbrokers, 299 Heathway, RM9 5AQ D T & T Money Transfer, 222A Heathway, RM10 8QS Access Financial Services, 296 Heathway, RM10 8LU Simply Gold, 307 Heathway, RM9 5AQ</p> <p>Gambling premises William Hill, 220 Heathway, RM10 8QS Betfred, 125 Broad St, RM10 9HP Betfred, Unit 25, The Mall, Heathway, RM10 8RE Gaming Fun, 250 Heathway, RM10 8QS Coral, 251, 253 Heathway, RM9 5AN Paddy Power, 243-245 Heathway, RM9 5AN</p>	<p>Premise Security and violence in the workplace <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>General Crime and Disorder <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 Dagenham 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 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>Coral, 24 Goresbrook Rd, RM9 6UR Hollywood Bowl, Cook Rd, RM9 6UQ Mecca, Dagenham Leisure Park, Cook Road, RM9 6UQ</p> <p>Residential Areas (impacted by Anti-Social Behaviour) 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>Anti-social behaviour outside the premise Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</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>Money Laundering <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.

		<p>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.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p>Alcohol and Drugs Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise. 'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
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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>Places of worship and Religious Buildings</p> <p>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>Ethnicity and Local Area Demographic</p> <p>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>Training & Social Responsibility</p> <p>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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		<p>COVID 19 All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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Merkur Slots Dagenham Premise Layout

Premise level:	Merkur Slots is a ground floor premise located on The Heathway area of the Dagenham Town Centre.
Premise frontage:	Merkur Slots Dagenham will be a property will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
Counter Position:	<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"> - 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. - Beverage and snacks are provided from the service area - IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots 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.
Machine Positions:	<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>
Hidden Areas:	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.

Additional Comments

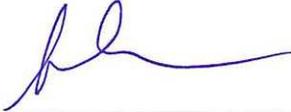
Merkur Slots is accredited by the G4 Global Gambling Guidance Group for Responsible Gambling.

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).

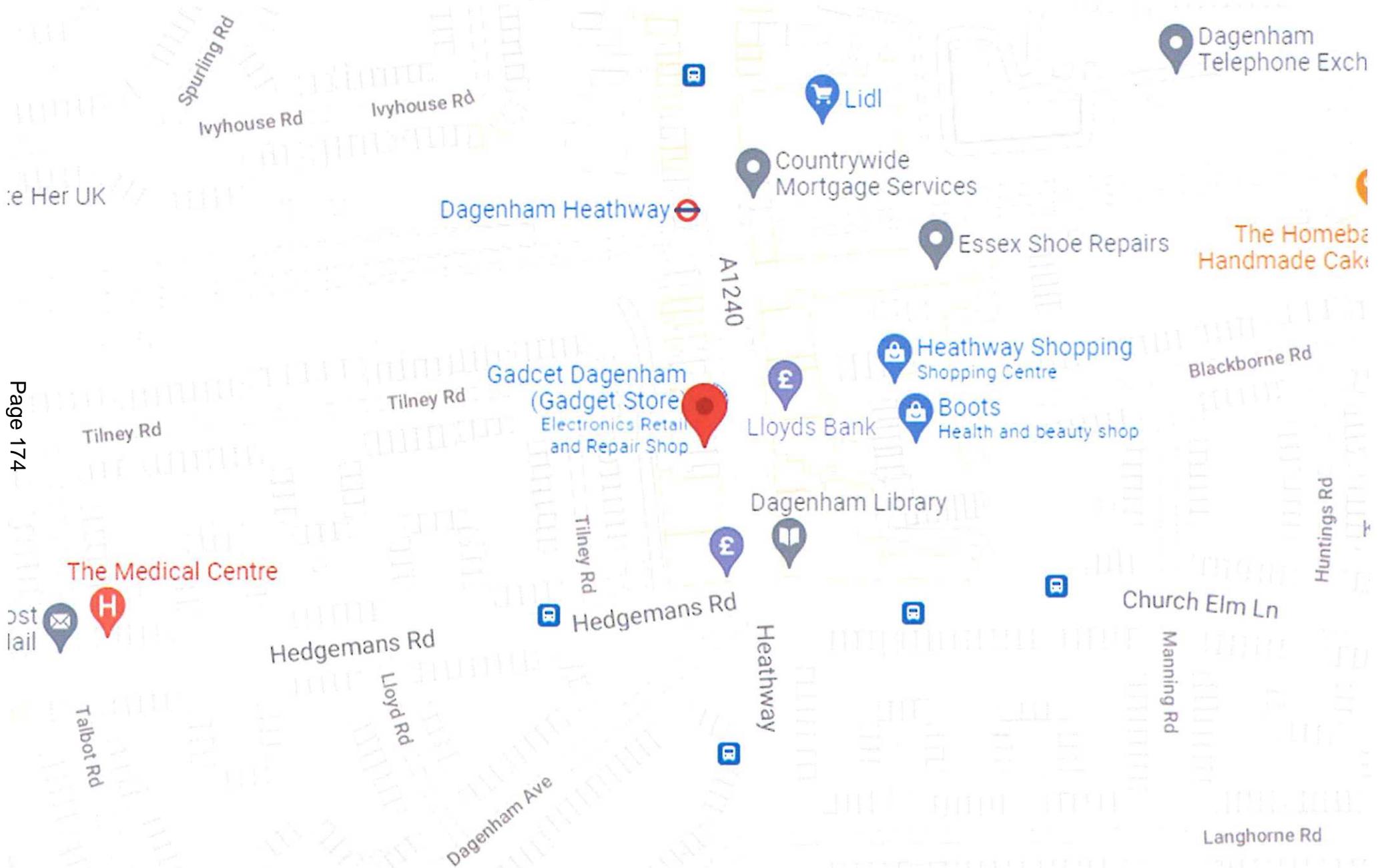
Merkur Slots UK have operated a Bingo licensed premise within the Barking and Dagenham Local Authority, Merkur Slots, 62 East Street, Barking, IG11 8EQ since 2012. This premise has never been subject to a local authority or Gambling Commission review.

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.

Assessors Name:	Amanda Kiernan
Signature:	
Date:	10/12/21

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



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



Page 17/5

LBBD Reference: 21/01649/FULL

Planning Potential
Magdalen House, 148 Tooley Street
London
SE1 2TU

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015 (AS
AMENDED)**

Dear Sir / Madam,

Application Number: 21/01649/FULL
Address: 247 Heathway, Dagenham, Barking And Dagenham, RM9 5AN
Development Description: Change of use of the ground and first floors from a bank (Class E) to an Adult Gaming Centre (Sui Generis)

Thank you for your recent application at the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council.

Yours sincerely,

Marilyn Smith

Marilyn Smith
Head of Planning and Assurance
London Borough of Barking and Dagenham

PLANNING DECISION NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015 (AS AMENDED)

Agent: Planning Potential
Magdalen House, 148 Tooley Street
London SE1 2TU

Applicant:
SE1 2TU

PART 1 - PARTICULARS OF THE APPLICATION

Application Number: 21/01649/FULL
Application Type: Full Planning Permission
Development Description: Change of use of the ground and first floors from a bank (Class E) to an Adult Gaming Centre (Sui Generis)
Site Address: 247 Heathway, Dagenham, Barking And Dagenham, RM9 5AN
Date Received: 06 September 2021
Date Validated: 06 September 2021

PART 2 - PARTICULARS OF THE DECISION

The London Borough of Barking and Dagenham, as Local Planning Authority, in pursuance of its powers under the above mentioned Act, Rules, Orders and Regulations made thereunder, hereby gives notice that PLANNING PERMISSION has been **GRANTED** for the carrying out of the development referred to in PART 1 hereof and as described and shown on the plan(s) and document(s) submitted with the application, subject to the conditions and reasons listed below.

Conditions:

1. The development hereby permitted shall be commenced before the expiration of three years from the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

2. The development hereby approved shall only be carried out in accordance with the following approved plans and documents: -

- DRAWING 999-PR-01 DATED 30/07/2021
- DRAWING 999-PR-02 DATED 30/07/2021
- PLANNING BROCHURE
- PR2001_55_FINAL DATED 06/08/2021
- PLANNING STATEMENT DATED 06/09/2021
- SECURE BY DESIGN MEASURES

No other drawings or documents apply.

Reason: To ensure that the development is undertaken in accordance with the approved drawing(s) and document(s), to ensure that the finished appearance of the development will enhance the character and visual amenities of the area and to satisfactorily protect the residential amenities of nearby occupiers.

3. The development shall be constructed in accordance with the external materials shown on the proposed drawings and to the satisfaction of the Local Planning Authority.

Reason: In order to protect or enhance the character and amenity of the area and to ensure an exemplar finish to the building.

4. The development hereby approved must not operate outside of the hours of 7am-11pm Monday to Sunday.

Reason: In order to protect nearby residential amenity.

Summary of Policies and Reasons:

In deciding to grant planning permission in this instance, Be First, working in partnership the London Borough of Barking and Dagenham, found the proposal to be acceptable following careful consideration of the relevant provisions of the National Planning Policy Framework, the Development Plan and all other relevant material considerations. Upon review, the London Borough of Barking and Dagenham is satisfied that any potential material harm resulting from the proposal's impact on the surrounding area would be reasonably mitigated through compliance with the conditions listed above.

The following policies are of particular relevance to this decision and for the imposition of the abovementioned conditions:

National Planning Policy Framework (NPPF) (MHCLG, February 2019)

London Plan (March 2021)

Policy D1: Londons form, character and capacity for growth
Policy D4: Delivering Good Design
Policy D13: Agent of change
Policy D14: Noise
Policy E9: Retail, markets and hot food takeaways
Policy GG3: Creating a healthy city
Policy SD6: Town centres and high streets
Policy SD7: Town centres: development principles and Development Plan Documents
Policy SD8: Town centre network
Policy HC1: Heritage Conservation and Growth

Local Development Framework (LDF) Core Strategy (July 2010)

Policy CM1: General Principles for Development
Policy CM5: Town Centre Hierarchy
Policy CE1: Vibrant and Prosperous Town Centres
Policy CP3: High Quality Built Environment

Local Development Framework (LDF) Borough Wide Development Plan Document (DPD) (March 2011)

Policy BE1: Protection of Retail Uses
Policy BE2: Managing the Evening Economy
Policy BC8: Mixed Use Development
Policy BP8: Protecting Residential Amenity
Policy BP11: Urban Design

The London Borough of Barking and Dagenham's Draft Local Plan: (Regulation 19 Consultation Version, September 2020)

The London Borough of Barking and Dagenham's Draft Local Plan: (Regulation 19 Consultation Version, September 2020) is at an "advanced" stage of preparation. Having regard to NPPF paragraph 216 the emerging document is now a material consideration and significant weight will be given to the emerging document in decision-making, unless other material considerations indicate that it would not be reasonable to do so.

Policy SP5: Promoting inclusive economic growth
Policy DME3: Encouraging vibrant, resilient, and characterful town centres
Policy DME5: Evening Economy
Policy DMD1: Securing High Quality Design
Policy DMD3: Development in town centres
Policy SP2: Delivering a well-designed, high-quality and resilient built environment

Supplementary Planning Documents

N/A

The above policies can be viewed on the Council's website: www.lbbd.gov.uk/planning.

Working with the applicant:

In dealing with this application, Be First, working in partnership with the London Borough of Barking and Dagenham, has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) to work with the Applicant in a positive and proactive manner. As with all applicants, Be First has made available detailed advice in the form of statutory policies and all other relevant guidance, as well as offering a full pre-application advice service, so as to ensure the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

This development is potentially liable for payment of both the Mayor of London and London Borough of Barking and Dagenham's Community Infrastructure Levies (CIL). Further information about CIL, including the process that must be followed and forms that will be required, can be found on the Council's website: <https://www.lbbd.gov.uk/developer-contributions-cil-and-s106> . CIL forms can be submitted to: S106CIL@befirst.london

DATE OF DECISION: 10.11.2021

Yours sincerely,

Marilyn Smith

Marilyn Smith

Head of Planning and Assurance
London Borough of Barking and Dagenham

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
Applicant's Rights following the Grant or Refusal of permission

1. Appeals to the Secretary of State

Should you (an applicant/agent) feel aggrieved by the decision of the council to either refuse permission or to grant permission subject to conditions, you can appeal to the Secretary of State for the Department of Communities and Local Government – Section 78 of the Town and Country Planning Act 1990 / Sections 20 and 21 of the Planning (Listed Building and Conservation Areas) Act 1990. Any such appeal must be made within the relevant timescale for the application types noted below, beginning from the date of the decision notice (unless an extended period has been agreed in writing with the council):

- **Six (6) months:** Full application (excluding Householder and Minor Commercial applications), listed building, conservation area consent, Section 73 'variation/removal', Section 73 'minor-material amendment', extension of time and prior approval applications.
- **Twelve (12) weeks:** Householder planning, Householder prior approval and Minor Commercial applications.
- **Eight (8) weeks:** Advertisement consent applications.
- **No timescale:** Certificate of lawful development (existing/proposed) applications.

Where an enforcement notice has been issued the appeal period may be significantly reduced, subject to the following criteria:

- The development proposed by your application is the same or substantially the same as development that is currently the subject of an enforcement notice: **28 days of the date of the application decision.**
- An enforcement notice is served **after the decision on your application** relating to the same or substantially the same land and development as in your application and if you want to appeal against the council's decision you are advised to appeal against the Enforcement Notice and to do so before the Effective Date stated on the Enforcement Notice.

Appeals must be made using the prescribed form(s) of The Planning Inspectorate (PINS) obtained from www.planning-inspectorate.gov.uk or by contacting 03034445000. A copy of any appeal should be sent both to PINS and the council (attn: Planning Appeals Officer).

The Secretary of State can allow a longer period for giving notice of an appeal but will not normally be prepared to use this power unless there are exceptional/special circumstances.

The Secretary of State can refuse to consider an appeal if the council could not have granted planning permission for the proposed development or could not have granted it without the conditions it imposed, having regard to the statutory requirements and provisions of the Development Order and to any direction given under the Order. In practice, it is uncommon for the Secretary of State to refuse to consider appeals solely because the council based its decision on a 'direction given by the Secretary of State'.

2. Subsequent Application Fees

No planning fee would be payable should a revised planning application be submitted within 12 months of the decision. This 'fee waiver' is permitted only where the new application meets the following criteria:

- the applicant is the same as the applicant of the original application
- site boundary is the same as the site boundary of the original application
- the nature of development remains the same.

3. Purchase Notices

Should either the council or the Secretary of State refuse permission or to grant permission subject to conditions, the owner may claim that the land cannot be put to a reasonably beneficial use in its existing state nor through carrying out of any development which has been or could be permitted. In such a case, the owner may serve a purchase notice on the council.

This notice will require the council to purchase the owner's interest in the land in accordance with the provisions of Part IV of the Town and Country Planning Act 1990 and Section 32 of the Planning (Listed Buildings Conservation Areas) Act 1990.

4. Compensation

In certain circumstances compensation may be claimed from the council if permission is refused or granted subject to condition(s) by the Secretary of State on appeal or on reference to the Secretary of State. These circumstances are set out in Section 114 and related provisions of the Town and Country Planning Act 1990 and Section 27 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Working in partnership



**Barking &
Dagenham**

Be First Regeneration Ltd

9th Floor Maritime House
1 Linton Road, Barking
London
IG11 8HG

THE BUILDING REGULATIONS 2010 (AS AMENDED)

Building Control

Most construction requires Building Control.

Our Building Control team are here to make that process as streamlined as possible while protecting you, the property owner.

The simplest way to get started is to register and apply on our portal:

<https://online-befirst.lbbd.gov.uk/>

As Building Control, we will check the work carried out to ensure that it complies with current regulations.

Unlike private approved inspectors, we are not a business that will close due to financial or regulatory issues, nor will we cancel an application once it has been accepted and paid for.

If you would like further information before applying or need to discuss a large commercial or residential project, please email buildingcontrol@befirst.london with any queries or to request a call.



REPORT

Merkur Slots 247 Heathway Dagenham Noise Assessment

Client: MERKUR Slots UK Limited

Reference: PR2001_55_FINAL

Date: 16/08/2021

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1 Introduction

1.1 Background

Archo Consulting Ltd have been appointed to undertake an assessment of sound insulation performance for a new Merkur Slots site at 247 Heathway, Dagenham. Planning permission is being sought for operation until 2am and as such the assessment has been undertaken in accordance with night-time internal noise criteria thresholds in accordance with BS8233:2014.

An onsite inspection has been undertaken of the existing condition of the separating ceiling and walls to identify areas where the sound insulation performance can be improved. Recommendations for improvement have been made in order to prevent noise impacts to adjacent noise sensitive receptors. The resulting sound insulation performance has been calculated using INSUL Sound Insulation Prediction Software to prove compliance.

Recommendations to mitigate potential noise flanking paths during construction have been made as well as suggestions for internal finishes to absorb operational sound.

1.2 Site Context

The site is located at ground floor level facing out onto Heathway with neighbouring commercial units on each side. Merkur Slots will be taking the ground floor level for trading and the first-floor level for ancillary / administrative uses. The second floor is residential usage which is the closest noise sensitive receptor.

Predictions of the sound insulation performance after implementation of recommendations and defect rectification are provided to ensure noise impacts do not occur. Measurements of operational noise levels from an existing Merkur Casino site have been used to assess noise breakout.

2 Guidance and Acoustic Requirements

2.1 Legislation

Noise impacts to adjacent residential premises have been calculated and assessed in accordance with the following standards:

- *British Standard (BS) 8233:2014 – Guidance on Sound Insulation and Noise Reduction for Buildings* (herein after referred to as BS 8233:2014).

Full details of all legislation, guidance and standards referenced for noise assessments are presented in **Appendix A**.

3 Onsite Inspection and Assessment

3.1 Background

In order to assess the current site conditions, an inspection and assessment was undertaken on the 26th July 2021. The assessment focused predominantly on the ceiling area, walls and shop front which will separate the premises from the adjacent spaces. Detailed site notes and accompanying photographs were taken to inform the assessment and are presented in **Section 3.2** below.

3.2 Onsite Observations

It was noted onsite that a suspended grid ceiling was present which incorporated mineral fibre ceiling tiles. Additionally, a perforated metal grid ceiling was also present in some areas. The separating floor consisted of cast concrete which had been plastered over. The thickness of the cast concrete could not be determined, however, concrete slabs are required to be a minimum thickness of 100mm for structural purposes and therefore this assumption was used for the assessment.

The separating walls were noted to be composed of brick. The entrance consisted of a single-leaf glass door mounted in glazed frontal façade.

Table 1 below presents the key findings of the onsite investigation in relation to the sound insulation performance including photos for reference:

Table 1: Site Assessment Findings and Recommendations

Site Photo	Comment
	<p>Location: <i>Entrance Door</i></p> <p>It is recommended that acoustic perimeter seals are installed around the frame of the door and at the bottom to prevent unnecessary sound transmission to the outside. It is recommended that the door also incorporate an automatic closer system.</p>
	<p>Location: <i>Separating Floor</i></p> <p>It is recommended all holes and gaps in the ceiling as a result of M&E or structural elements are fully patched over and sealed.</p>

Table 1: Site Assessment Findings and Recommendations

Site Photo	Comment
	<p>Location: <i>Walls / Separating Floor</i></p> <p>All M&E penetrations must be fully sealed up and insulated.</p>
	<p>Location: <i>Walls</i></p> <p>It is recommended all gaps in the walls are fully sealed to create a homogenous ceiling layer.</p>

4 Predicted Sound Insulation Performance and Assessment

4.1 Operational Noise Levels in Existing Merkur Cashino

Previous measurements of internal noise levels within an operational Merkur Cashino in Hull located at 106 Newland Avenue and are presented in **Table 2** below. These measurements were made in 2 locations inside the Cashino on 17th March 2020 during a particularly busy period when the machines were in operation and noise levels were at the highest. Measurements were made for 5 minutes in each location which were at opposite ends of the Cashino to gain representative operational levels. A description of acoustic terminology is provided in **Appendix B**.

Table 2: Source Level Noise Measurements within Operational Merkur Cashino

Measurement	L _{Aeq}	L _{Amax}	Octave Band Levels (dB)							
			63	125	250	500	1kHz	2kHz	4kHz	8kHz
MP1	65.7	73.6	57.6	65.8	66.1	62.8	61.5	56.1	52.0	49.3
MP2	63.1	75.0	60.3	59.9	63.6	61.1	58.3	53.9	46.5	41.0

Table 3 below presents the details of the equipment used at the time of the measurements (17/03/2020):

Table 3: Instrumentation

Instrument	Serial No.	Calibration Due Date at Time of Survey
Norsonic 140 Class 1 Sound Level Meter	1406433	August 2021
Norsonic 1209 Preamplifier	21318	August 2021
Norsonic 1225 Microphone	226973	August 2021
Nor 1252 Acoustic Calibrator	31717	April 2020

4.2 Site Context in Relation to Noise

During the site visit in which source noise levels were measured, the following contextual factors were noted with relation to noise:

- No sound was audible outside of the premises to the front or rear during peak operation;
- Internal noise levels were not high with normal conversations clearly audible and perceptible at normal speech level;
- Max levels were infrequent and short in duration;

- Patrons observed entering and leaving the premises during peak operation were always alone or in a pair with no loud conversation or rowdy behaviour observed; and,
- Patrons enter and leave quickly without loitering.

4.3 Assessment of a 24-Hour Merkur Site (Cashino)

In order to determine what potential noise impacts could arise from patrons during the early hours of the morning, a series of surveys have been undertaken at existing operational Merkur Sites which have a 24-hour consent.

The surveys aimed to determine the typical behaviour of patrons during the most noise sensitive period of the night (after midnight) and identify if noise impacts could occur. Night-time assessments have been undertaken at 3 different venues spread-out over the UK which were granted 24-hour consent and the outcome of the assessments is detailed below:

4.3.1 302-304 Hessle Road, Hull – 11th September 2020

The following points were noted in regard to patron behaviour:

Time window - 01:45 to 02:45:

- A total of 10 patrons entered the site during this time and 4 left. Examination of records kept by the Cashino management indicated an average of 9 patrons an hour entered at any point of the day, indicating the measurement period represented an averagely busy time;
- Patrons were generally alone or in a pair and did not generate any significant noise;
- Any noise generated by patrons was usually masked by cars passing by on Hessle road;
- Patrons were well behaved with no tendency towards shouting or other anti-social behaviour which might be associated with pubs or food takeaway's; and,
- Car pass by events were equally frequent to records of patrons generating any sound.

Analysis of Observations

It was observed that the behaviour of Cashino patrons on Hessle Road was directly comparable to that observed at Newland Avenue. Patrons were typically alone or in a couple or small group and normal-level conversation was the only sound recorded which occurred infrequently. People occasionally stood outside to smoke and had brief conversations at normal speech level with no shouting or otherwise anti-social behaviour. It was noted that cars passing on Hessle Road generated greater L_{Amax} levels than patrons and these events occurred more frequently.

4.3.2 48-50 Camberwell Church Street, Camberwell, London – 15th July 2021

The following points were noted in regard to patron behaviour:

Time window - 01:00 to 02:00:

- Internal operational noise level measurements were made in the venue between 01:00 and 01:10 which ranged from L_{Aeq} 62.3 dB to 66.8 dB. Max levels were recorded to peak at L_{Amax} 77.2 dB;
- The ambient soundscape on Camberwell Church Street during this time was dominated by road traffic noise and was measured to be on average L_{Aeq} 66.0 dB which is considered high for night-time. No sound was audible from the venue;
- A total of 2 patrons entered the site and 4 patrons left during this time window;
- A group of 3 people left the site at 01:18 talking at normal conversation level which was barely audible against the noise from cars on the road;
- On 3 occasions people came outside for a cigarette, in the first instance the patron was alone and did not make any sound. In the second instance 2 people came out together and occasionally talked but at very low level. Again, this was masked by the road traffic noise;
- No antisocial behaviour was observed, sound from other people passing on the street who were not associated with the venue was occasionally audible.

Analysis of Observations

It was observed that the behaviour of Merkur Slots patrons on Camberwell Church Street was very normal with no significant sounds generated. The majority of people did not speak and no antisocial behaviour was observed whatsoever. No sound was audible from the venue and the ambient noise level on the street was considered to be high due to frequent car passes.

It can be concluded that no noise impacts were generated as a result of the venue's operation and no evidence was observed to suggest that any noise impacts would occur.

4.3.3 45 West Street, Boston – 29th July 2021

The following points were noted in regard to patron behaviour:

Time window - 00:00 to 01:00:

- Internal operational noise level measurements were made in the venue between 00:20 and 00:25 which ranged from L_{Aeq} 48.7 dB to 50.9 dB. Max levels were recorded to peak at L_{Amax} 66.3 dB. It should be noted that background music was not being played at the time due to a poor wifi connection the staff confirmed;
- The ambient soundscape on West Street during this time consisted of sound from occasional passing cars, people talking outside a nearby taxi rank and a continuous hum from a condenser unit associated with a nearby shop. The ambient levels outside were measured to be on average L_{Aeq} 49.3 dB;
- A total of 2 patrons entered the site and 0 patrons left during this time window;
- 00:43 1 person comes outside for a cigarette and does not make any sound;
- No sound was audible from the venue and only audible noise came from nearby taxi rank, occasional passing cars and people passing on the street;
- No antisocial behaviour was observed and patron behaviour was the same as in other venues i.e. quiet, kept to themselves.

Analysis of Observations

It was observed that the behaviour of Merkur Slots patrons on West Street, Boston was very normal with no significant sounds generated, correlating with observations at other venues. No antisocial behaviour was observed whatsoever. No sound was audible from the venue and the ambient noise level on the street was considered to be low in comparison to other locations.

It can be concluded that no noise impacts were generated as a result of the venue's operation and no evidence was observed to suggest that any noise impacts would occur.

4.4 Noise Rating (NR) Curves

Noise rating curves provide a method of measuring, specifying and controlling noise levels within buildings. They consist of single figure values corresponding to individual mid-frequency octave bands. The overall single figure NR value is determined by examining which curve the highest of the individual NR values for the frequency bands falls onto. **Table 4** reproduced from 'The Little Red Book of Acoustics: A Practical Guide (Second Edition)', (published by Blue Tree Acoustics) below provides examples of typical noise levels within different buildings and spaces.

Table 4: Typical Noise Levels for Different Spaces

Location	NR Value at Octave Band Centre Frequencies							dB(A)
	63	125	250	500	1k	2k	4k	
Quiet Restaurant	60	60	60	65	65	55	50	67
Busy Restaurant	60	70	75	75	75	75	70	80
Busy Pub/Bar	80	85	85	85	85	80	70	88
Music Bar/Nightclub	110	110	100	100	95	90	85	101
Classroom	55	55	55	60	60	60	55	65

Table 5 below presents typical NR curves for different spaces:

Table 5: NR Curves for Different Spaces

Noise Rating (NR) Curve	Application
NR 25	Concert halls, broadcasting and recording studios, churches
NR 30	Private dwellings, hospitals, theatres, cinemas, conference rooms
NR 35	Libraries, museums, court rooms, schools, hospitals operating theatres and wards, flats, hotels, executive offices
NR 40	Halls, corridors, cloakrooms, restaurants, night clubs, offices, shops
NR 45	Department stores, supermarkets, canteens, general offices
NR 50	Typing pools, offices with business machines
NR 60	Light engineering works
NR 70	Foundries, heavy engineering works

The closest noise sensitive receptors to the site are the residential flats situated on the second floor which will typically experience very low internal noise levels, mostly from conversations and entertainment. In determining what NR criteria should be the limit to sufficiently protect the occupants, it was deemed prudent that a threshold of NR20 should be applied as this criterion will

be sufficiently low to protect the amenity of residents. This criterion has been used for previous assessments of the same nature and provided adequate protection.

4.5 British Standard 8233:2014

BS8233:2014 criteria for recommended internal noise levels (night-time) has also been referenced in order to provide a prudent assessment.

Guidance on suitable internal noise levels is provided in BS 8233:2014 (Section 7.7.2, Table 4) derived from the guidance provided by the WHO. These details recommended internal noise levels to ensure that adequate noise reduction occurs to reduce direct and flanking transmission across facade elements. Recommended internal noise levels are reproduced in **Table 6** below:

Table 6: Recommended Internal Noise Levels – BS 8233:2014

Activity	Location	07:00 to 23:00	23:00 to 07:00
Resting	Living rooms	35 dB $L_{Aeq,16hour}$	-
Dining	Dining room/area	40 dB $L_{Aeq,16hour}$	-
Sleeping (daytime resting)	Bedrooms	35 dB $L_{Aeq,16hour}$	30 dB $L_{Aeq,8hour}$

BS8233:2014 specifies that, in order for the above thresholds to apply, the noise source in question must have “no specific character” i.e. no tones, strong low frequency component etc. Based on the measurements made within an active Cashino/Merkur Slots site detailed within **Section 4.1, Table 2**, it was determined that noise levels were low and without specific character (predominantly people talking and low-level sounds from machines). The site will be operational until 2am and it can be observed from **Table 6** above that the night-time (23:00 to 07:00) internal noise criteria is more stringent. Therefore, **the threshold of 30 dB $L_{Aeq,8hour}$** presented in **Table 6** above representing the BS8233:2014 night-time criteria has also been referenced for this assessment.

4.6 Sound Insulation Prediction

Since the closest noise sensitive receptor to the site is the second-floor residential flats directly above the first-floor ancillary space, sound transmission through the ceiling area is the main focus of the sound insulation assessment. The first-floor administration / ancillary spaces will not generate any noise and therefore, in order to assess a worst-case scenario, the assessment has been undertaken of the potential sound transmission from the Merkur site to the first-floor to cover the scenario of the first-floor potentially changing to residential use in the future. The same

recommendations presented in **Table 1** should also be applied to the separating floor between the ancillary space and residential uses.

With reference to the site observations detailed in **Section 3** and the proposed construction of the site, INSUL Sound Insulation Prediction Software was used to calculate the sound reduction to be achieved by the ceiling once all defects detailed in **Table 1** have been rectified. The following details were used to calculate the predicted performance which represent a conservative approach:

Shopfront:

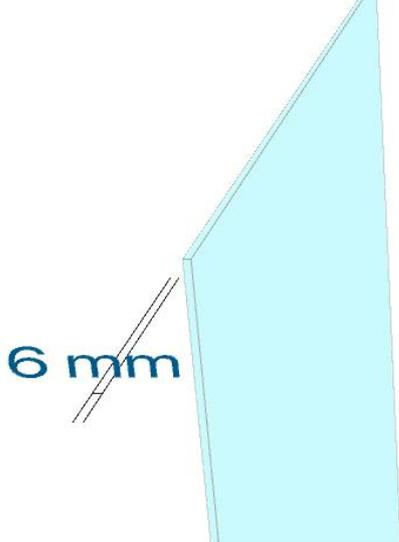
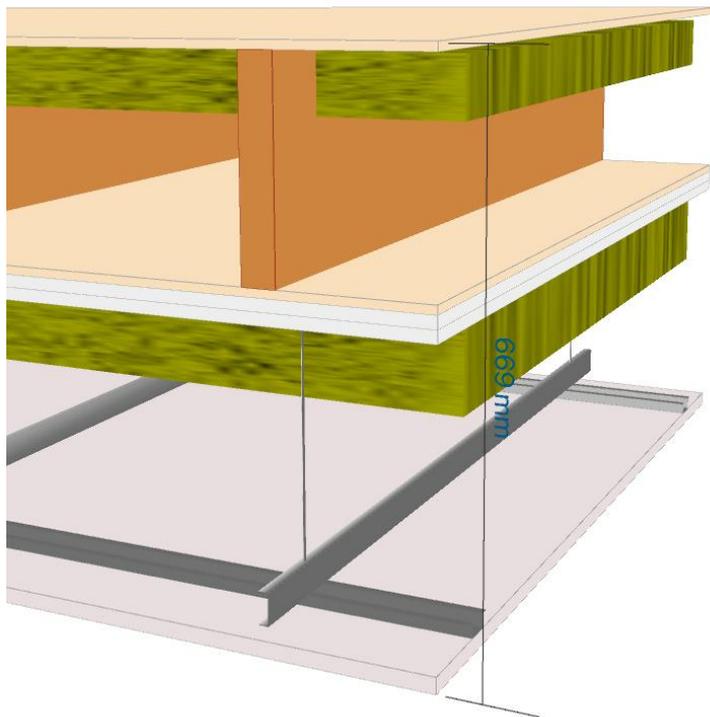
- Single layer of 6mm glazing.

Ceiling:

- 250mm deep timber joists with 10mm plywood substrate board on each side;
- Double layer of 15mm thick gypsum board on the underside;
- 100mm thick rockwool insulation (or equivalent); and,
- Suspended grid mineral fibre ceiling (19mm thick).

Using these configurations described above, INSUL Sound Insulation Prediction Software was used to calculate the performance once all defects have been rectified and is presented in **Table 7** below:

Table 7: Predicted Sound Insulation Performance

Element	Illustration														
Shopfront	 <table border="1" data-bbox="614 1041 917 1097"> <thead> <tr> <th>63</th> <th>125</th> <th>250</th> <th>500</th> <th>1k</th> <th>2k</th> <th>4k</th> </tr> </thead> <tbody> <tr> <td>18</td> <td>21</td> <td>25</td> <td>29</td> <td>33</td> <td>31</td> <td>35</td> </tr> </tbody> </table> <p>Rw 31 dB C-1 Ctr -2 Rw+Ctr 29 dB 100-3150 Hz</p>	63	125	250	500	1k	2k	4k	18	21	25	29	33	31	35
63	125	250	500	1k	2k	4k									
18	21	25	29	33	31	35									
Ceiling	 <table border="1" data-bbox="614 1937 917 1993"> <thead> <tr> <th>63</th> <th>125</th> <th>250</th> <th>500</th> <th>1k</th> <th>2k</th> <th>4k</th> </tr> </thead> <tbody> <tr> <td>16</td> <td>45</td> <td>51</td> <td>56</td> <td>61</td> <td>54</td> <td>61</td> </tr> </tbody> </table> <p>Rw 58 dB C-2 Ctr -3 Rw+Ctr 55 dB 100-3150 Hz</p>	63	125	250	500	1k	2k	4k	16	45	51	56	61	54	61
63	125	250	500	1k	2k	4k									
16	45	51	56	61	54	61									

4.7 Assessment of Noise Breakout – Noise Rating

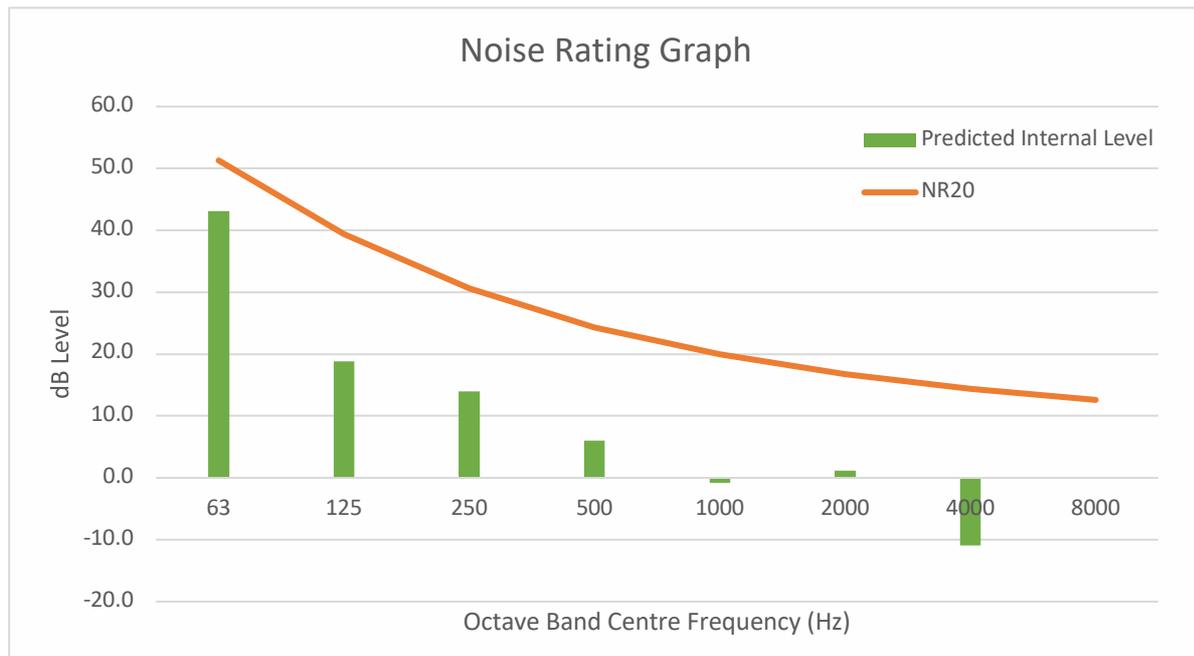
With reference to **Section 4.4** it was deemed appropriate that the limit of **NR20** can be applied for the residential flats. **Table 8** below presents the values associated with the NR20 curve:

Table 8: NR20 Octave-band Values

Noise Rating	Octave Band Mid-Frequency Levels (dB)							
	63	125	250	500	1000	2000	4000	8000
NR20	51.3	39.4	30.6	24.3	20	16.8	14.4	12.6

Using the predicted sound reduction achieved by the separating floor presented in **Table 7** and using the measured noise data from an active Cashino/Merkur Slots site presented in **Table 2** the NR curve inside the first-floor apartments was predicted. This was undertaken by logarithmically averaging the measured noise data from **Table 2**. **Figure 1** below presents the predicted NR curve plotted against the NR20 curve:

Figure 1: Predicted NR curve against NR20



It can be observed from **Figure 1** above that the predicted NR curve within the second-floor residential flats will be below the **NR20** curve values. Therefore, provided that all defects detailed in **Table 1** have been adequately satisfied, the limit of NR20 is predicted to be achieved.

4.8 Assessment of Noise Breakout – BS8233:2014

With reference to **Table 2**, the measured operational noise levels within a Merkur Cashino during peak times ranged between L_{Aeq} 63.1 dB to 65.7 dB with L_{Amax} levels peaking at 75.0 dB. **Table 9** below details the predicted noise levels at the closest noise sensitive receptor (measured to be approximately 3 metres from entrance).

Table 9: Predicted Noise Levels

Source Noise Level	Element	Calculated Sound Reduction from Element	Resulting Noise Level in First Floor Apartment / Adjacent Unit	BS8233:2014 Criteria	Comment
L_{Aeq} 65.7 dB	Ceiling	58.0 dB	+7.7 dB	30.0 dB	Compliant with BS8233:2014
L_{Amax} 75.0 dB			+17.0 dB		Compliant with BS8233:2014
L_{Aeq} 65.7 dB	Shopfront	31.0 dB	+10.2 dB*	30.0 dB	Compliant with BS8233:2014
L_{Amax} 75.0 dB			+19.5 dB*		Compliant with BS8233:2014

* Note: calculated over a 3-metre distance and applying -15dB to account for a partially open window in accordance with BS8233:2014.

It can be observed from **Table 9** above that, once all rectification work has been completed, the predicted noise levels at the closest noise sensitive receptors are significantly below BS8233:2014 for internal habitable rooms during the night-time. It should be noted that this assessment represents a worst-case scenario and in practise noise levels will likely be lower.

It is recommended that consideration be given to inclusion of soft internal finishing such as fabric panelling to further reduce internal noise levels.

5 Conclusion

A site inspection and assessment of sound insulation performance has been undertaken for the new Merkur Slots site located at 247 Heathway, Dagenham. The site will be operational until 2am.

The inspection has identified the current configuration and areas in which the sound insulation performance can be improved. All defects, site photos and recommendations for rectification are presented in **Table 1** of this report.

Based on the configuration of the separating elements and the identified areas of improvement, the sound insulation performance was calculated using INSUL Sound Insulation Prediction Software and presented in **Table 7**.

An assessment of noise breakout was undertaken using source noise measurements previously obtained from a Merkur site in Hull during peak operation and is presented in **Table 9**. The assessment showed that the separating elements will attenuate noise levels sufficiently to comply with the criteria of NR20 and also the criteria stipulated within BS8233:2014 for internal habitable rooms in the closest residential unit. This is conditional upon rectification of all defects identified in **Table 1**. Once all defects identified in **Table 1** have been rectified the night-time criteria stipulated within BS8233:2014 will be satisfied and the site will be suitable for operation until 2am and even 24-hour operation. This is also true based on the site assessments of patron behaviour at different Merkur site with 24-hour consent during the most noise sensitive period of the night detailed in **Section 4.3**.

Appendix A – Legislation

Legislative Framework and Planning Policy

National Legislation Environmental Protection Act 1990

Section 79 of the Act defines statutory nuisance with regard to noise and determines that local planning authorities have a duty to detect such nuisances in their area.

The Act also defines the concept of “Best Practicable Means” (BPM):

“ ‘practicable’ means reasonably practicable having regard among other things to local conditions and circumstances, to the current state of technical knowledge and to the financial implications;

the means to be employed include the design, installation, maintenance and manner and periods of operation of plant and machinery, and the design, construction and maintenance of buildings and structures;

the test is to apply only so far as compatible with any duty imposed by law; and the test is to apply only so far as compatible with safety and safe working conditions, and with the exigencies of any emergency or unforeseeable circumstances.”

Section 80 of the Act provides local planning authorities with powers to serve an abatement notice requiring the abatement of a nuisance or requiring works to be executed to prevent their occurrence.

The Control of Pollution Act 1974

Section 60 of the Act provides powers to Local Authority Officers to serve an abatement notice in respect of noise nuisance from construction works.

Section 61 provides a method by which a contractor can apply for ‘prior consent’ for construction activities before commencement of works. The ‘prior consent’ is agreed between the Local Authority and the contractor and may contain a range of agreed working conditions, noise limits and control measures designed to minimise or prevent the occurrence of noise nuisance from construction activities. Application for a ‘prior consent’ is a commonly used control measure in respect of potential noise impacts from major construction works.

National Policy Guidance

National Planning Policy Framework 2019

The National Planning Policy Framework (NPPF) was introduced in March 2012 replacing the former Planning Policy Guidance 24: Planning and Noise. It was revised in July 2018 and in February 2019 and this document now forms the basis of the Government's planning policies for England and how these should be applied.

Paragraph 170 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should contribute to and enhance the natural and local environment by:

".....preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution...."

Furthermore, Paragraph 180 of the NPPF states:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health,

living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

1. *a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life:*
2. *b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and,*
3. *c) Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."*

The NPPF also refers to the Noise Policy Statement for England (NPSE) (Defra, 2010).

Noise Policy Statement for England

The Noise Policy Statement for England (NPSE) document was published by Defra in 2010 and paragraph 1.7 states three policy aims:

"Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

*avoid significant adverse impacts on health and quality of life;
mitigate and minimise adverse impacts on health and quality of life; and, where possible, contribute to the improvement of health and quality of life.”*

The first two points require that significant adverse impact should not occur and that, where a noise level falls between a level which represents the lowest observable adverse effect and a level which represents a significant observed adverse effect:

“...all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life whilst also taking into consideration the guiding principles of sustainable development. This does not mean that such effects cannot occur.”
(Paragraph 2.24, NPSE, March 2010).

Section 2.20 of the NPSE introduces key phrases including “Significant adverse” and “adverse” and two established concepts from toxicology that are being applied to noise impacts:

*“NOEL – No Observed Effect Level
This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise.
LOAEL – Lowest Observed Adverse Effect Level
This is the level above which adverse effects on health and quality of life can be detected”.*

Paragraph 2.21 of the NPSE extends the concepts described above and leads to a significant observed adverse effect level – SOAEL, which is defined as the level above which significant effects on health and quality of life occur.

The NPSE states:

“it is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations”. (Paragraph 2.22, NPSE, March 2010).

Furthermore paragraph 2.22 of the NPSE acknowledges that:

“further research is required to increase understanding of what may constitute a significant adverse effect on health and quality of life from noise”.

National Planning Practice Guidance for Noise

The National Planning Practice Guidance for Noise (NPPG Noise, December 2014), issued under the NPPF, states that noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing

acoustic environment. When preparing local or neighbourhood plans, or taking decisions about new development, there may also be opportunities to consider improvements to the acoustic environment.

Guidance

The following guidance has been used for the purpose of the noise and vibration assessment:

British Standard (BS) 7445: Parts 1 and 2 - Description and measurement of environmental noise

This Standard provides details of the instrumentation and measurement techniques to be used when assessing environmental noise, and defines the basic noise quantity as the continuous A-weighted sound pressure level (LAeq). Part 2 of BS 7445 replicates ISO standard 1996-2.

BS8233:2014 – Guidance on Sound Insulation and Noise Reduction for Buildings

Provides a methodology to calculate the noise levels entering a building through facades and façade elements and provides details of appropriate measures for sound insulation between dwellings. It includes recommended internal noise levels which are provided for a variety of situations.

World Health Organisation (WHO) (1999) Guidelines for community noise

These guidelines present health-based noise limits intended to protect the population from exposure to excess noise. They present guideline limit values at which the likelihood of particular effects, such as sleep disturbance or annoyance, may increase. The guideline values are 50 or 55dB LAeq during the day, related to annoyance, and 45 dB LAeq or 60dB L_{Amax} at night, related to sleep disturbance.

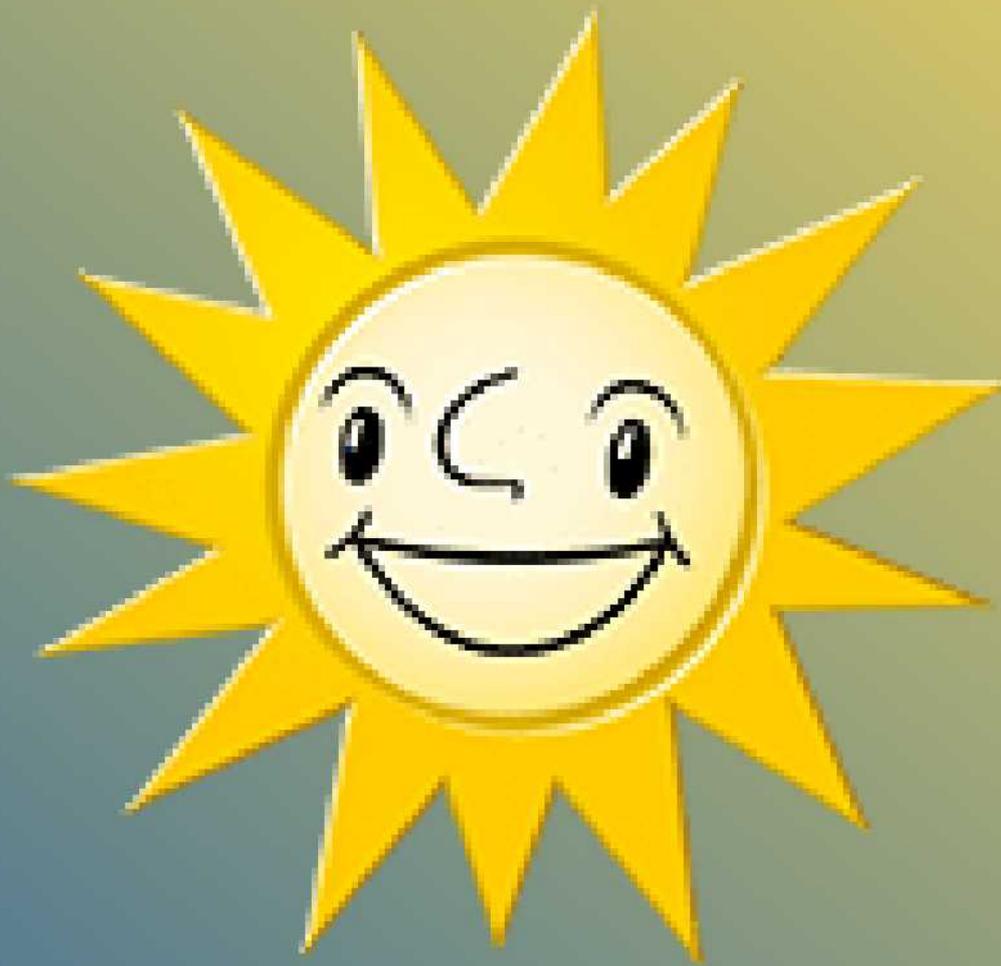
British Standard (BS) 4142:2014 – Method for rating and assessing industrial and commercial sound

BS 4142 describes methods for rating and assessing sound of an industrial and/or commercial nature. The methods use outdoor sound levels to assess the likely effects of sound on people who might be inside or outside a dwelling or premises used for residential purposes upon which sound is incident.

Appendix B – Description of Acoustic Terms

Term	Description
Noise sensitive receptors	People, property or designated sites for nature conservation that may be at risk from exposure to noise and vibration that could potentially arise as a result of the proposed development/project
Noise and Vibration study area	The area assessed for noise and vibration impacts during this assessment
Baseline scenario	Scenarios with the proposed development/project not in operation
Decibel (dB)	A unit of noise level derived from the logarithm of the ratio between the value of a quantity and a reference value. It is used to describe the level of many different quantities. For sound pressure level the reference quantity is 20 μ Pa, the threshold of normal hearing is 0dB, and 140dB is the threshold of pain. A change of 1dB is only perceptible under controlled conditions. Under normal conditions a change in noise level of 3dB(A) is the smallest perceptible change.
dB(A)	Decibels measured on a sound level meter incorporating a frequency weighting (A weighting) which differentiates between sounds of different frequency (pitch) in a similar way to the human ear. Measurements in dB(A) broadly agree with people's assessment of loudness. A change of 3 dB(A) is the minimum perceptible under normal conditions, and a change of 10 dB(A) corresponds roughly to halving or doubling the loudness of a sound. The background noise level in a living room may be about 30 dB(A); normal conversation about 60 dB(A) at 1 metre; heavy road traffic about 80 dB(A) at 10 metres; the level near a pneumatic drill about 100 dB(A).
LAeq,T	The equivalent continuous sound level – the sound level of a notionally steady sound having the same energy as a fluctuating sound over a specified measurement period (T). LAeq,T is used to describe many types of noise and can be measured directly with an integrating sound level meter.
LA10,T	The A weighted noise level exceeded for 10% of the specified measurement period (T). LA10 is the index generally adopted to assess traffic noise
LA90, T	The A weighted noise level exceeded for 90% of the specified measurement period (T). In BS 4142: 2014 it is used to define the 'background' noise level.
LAm _{ax}	The maximum A-weighted sound pressure level recorded during a measurement.

Rw	Single-number quantity which characterizes the airborne sound insulating properties of a material or building element over a range of frequencies.
Sound Reduction Index (SRI)	Laboratory measure of the sound insulating properties of a material or building element in a stated frequency band.



MERKUR

SLOTS

EXTERNAL DOORS

Merkur Slots Established Development Standards

Existing rear Steel Security door / frame utilised or installed where necessary. Push bar fire escape lock and manual overnight locks

SBD STANDARD: BS6510: 2010 (Steel)

BS7412: 2007 (PVCu).

BS644: 2012 (Timber)

BS8529: 2010 (Composite)

BS8473: 2009 (Aluminium)



GLASS - SHOP FRONTS

Merkur Slots Established Development Standards

Existing Timber / Metal frames and glass utilized where appropriate. 8mm laminated glass replaced like for like at some venues

SBD STANDARD: Glass manufactured separately from door frame - PAS24:2016 or STS 204. LPS 1175:Issue 7 and STS 202:Issue 3



GLASS - EXTERNAL WINDOWS

Merkur Slots Established Development Standards

Existing Timber / Metal frames and glass utilized where appropriate. 8mm laminated glass replaced like for like at some venues

SBD STANDARD: Laminated glass to a minimum thickness of 6.4mm tested to BS EN 356:2000 rating P3A unless protected by roller shutter or grille.



LIGHTING - EXTERNAL

Merkur Slots Established Development Standards

Standard emergency lighting and rear external floodlighting on PIR. Canopy light over front recessed door areas. Front of premises illuminated by High Street lighting.

SBD STANDARD: SBD does not require a particular registered standard but recommends an effective design to reduce crime levels and protect staff.



EXTERNAL CCTV

Merkur Slots Established Development Standards

Pro Series IP by HIK Vision. BS EN 50132-7:2012. Completed by Macdonald Martin, Amthal or Link Integrated

SBD STANDARD: BS EN 50132-7: 2012 + A1: 2013



ALARM SYSTEMS

Merkur Slots Established Development Standards

Premier Elite Grade 3 by Texecom. PD662 & BS8243-BS5979. Completed by Macdonald Martin, Amthal or Link Integrated

SBD STANDARD: LPS 1602 & 1603 Issue 1.0:2005. (Requirements for LPCB approval/listing Intruder alarm movement detectors & alarm control indicating equipment)



AUDIBLE PREMISES ALARM

Merkur Slots Established Development Standards

Intruder Alarm system & Staffguard unit. PD662 & BS8243-BS5979. Completed by Macdonald Martin. Amthal or Link Integrated

SBD STANDARD: **AWAITS**



Local Authority Indices of deprivation 2019 (extracted from <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>)

Merkur Premises:

Licences currently held

Currently Trading

Local Authority District name (2019)	IMD - Average rank	IMD - Rank of average rank*	IMD - Average score	IMD - Rank of average score	IMD - Proportion of LSOAs in most deprived 10% nationally	IMD - Rank of proportion of LSOAs in most deprived 10% nationally	IMD 2019 - Extent	IMD 2019 - Rank of extent
Blackpool	26765.29	1	45.039	1	0.4149	6	0.5766	5
Manchester	26417.75	2	40.005	6	0.4326	5	0.5999	2
Knowsley	26199.75	3	43.006	2	0.4694	3	0.5992	3
Liverpool	25833.57	4	42.412	3	0.4866	2	0.6213	1
Barking and Dagenham	25551.85	5	32.768	21	0.0364	139	0.4724	20
Birmingham	25319.55	6	38.067	7	0.4131	7	0.5792	4
Hackney	25312.57	7	32.526	22	0.1111	78	0.4319	25
Sandwell	25276.49	8	34.884	12	0.1989	44	0.5349	10
Kingston upon Hull, City of	25222.75	9	40.564	4	0.4518	4	0.5505	8
Nottingham	24458.51	10	34.891	11	0.3077	15	0.5235	11
Burnley	24400.26	11	37.793	8	0.3833	8	0.5357	9
Newham	24138.70	12	29.577	43	0.0244	154	0.2884	67
Hastings	23845.37	13	34.281	17	0.3019	17	0.4376	24
Blackburn with Darwen	23819.60	14	36.013	9	0.3626	9	0.5519	7
Stoke-on-Trent	23797.05	15	34.504	14	0.3208	12	0.5073	12
Middlesbrough	23729.10	16	40.460	5	0.4884	1	0.5710	6
Rochdale	23414.21	17	34.415	15	0.2985	20	0.4758	19
Hyndburn	23297.52	18	34.333	16	0.2692	21	0.4796	17
Wolverhampton	23274.95	19	32.102	24	0.2089	38	0.4828	16
Salford	23233.56	20	34.210	18	0.3000	19	0.4720	21
Bradford	23086.82	21	34.666	13	0.3355	11	0.4981	13
Leicester	22857.96	22	30.877	32	0.2031	42	0.3713	37

Tameside	22774.30	23	31.374	28	0.2057	40	0.4155	28
Great Yarmouth	22767.13	24	33.097	20	0.2459	25	0.3926	33
Hartlepool	22581.98	25	35.037	10	0.3621	10	0.4973	14
South Tyneside	22573.29	26	31.509	27	0.2451	26	0.4508	23
Tower Hamlets	22507.05	27	27.913	50	0.0139	175	0.3057	57
Islington	22490.24	28	27.535	53	0.0488	126	0.2705	74
Oldham	22460.10	29	33.155	19	0.3050	16	0.4790	18
East Lindsey	22178.95	30	29.892	39	0.1605	55	0.3396	49
Walsall	22152.64	31	31.555	25	0.2635	22	0.4844	15
Tendring	22083.12	32	30.484	36	0.1798	48	0.3139	53
Sunderland	21993.93	33	30.586	35	0.2270	34	0.3960	32
Thanet	21985.10	34	31.314	30	0.2143	37	0.3642	42
Lewisham	21959.25	35	26.661	63	0.0296	148	0.2464	84

*1 being the most deprived and 35 the least deprived.

Indices of Deprivation 2019, by post code (<https://imd-by-postcode.opendatacommunities.org/imd/2019>)

Merkur operational premises inspected by Leveche Associates Limited

Postcode	Merk Slots Venue	LSOA code	LSOA Name	Index of Multiple Deprivation Rank	Index of Multiple Deprivation Decile*
N22 6BB	Wood Green	E01002026	Haringey 016A E01002026	2796	1
E13 9AU	Upton Park	E01003489	Newham 019B E01003489	6119	2
N7 6QA	Holloway	E01002731	Islington 007B E01002731	11066	4
E6 1JB	East Ham	E01003520	Newham 018A E01003520	9784	3
IG11 8EQ	Barking	E01000010	Barking and Dagenham 015C E01000010	6900	3
N12 8PT	Live	E01000321	Barnet 012E E01000321	19535	6
HA9 7BH	Wembley	E01000635	Brent 020D E01000635	8174	3
NW10 0AD	Neasden	E01000510	Brent 014C E01000510	7979	3
N9 0TQ	Edmonton Green	E01001429	Enfield 030D E01001429	2781	1
N12 8PT	Finchley	E01000321	Barnet 012E E01000321	19535	6
EN8 7LA	Waltham Cross	E01023337	Broxbourne 013B E01023337	11162	4

* Decile -1 = most deprived

Dr Richard Bradley
POPPLESTON ALLEN, PRICE HOUSE
37, STONEY STREET
NOTTINGHAM
NG1 1LS
United Kingdom

Information Rights Unit
PO Box 313
Sidcup
DA15 0HH

Email: foi@met.police.uk

www.met.police.uk

Our ref: 01/FOI/21/021009

22/09/2021

Dear Dr Bradley

Freedom of Information Request Reference No: 01/FOI/21/021009

I write in connection with your request for information which was received by the Metropolitan Police Service (MPS) on 06/09/2021.

I note you seek access to the following information:

Please provide the total number of incident calls (CAD) and alleged crimes reported (CRIS) for the period from the 1st September 2018 to the 1st September 2021 associated with each of the following 7 premises:

1. *William Hill Bookmakers, 220 Heathway, Dagenham, RM10 8QS*
2. *Betfred, 125 Broad Street, Dagenham, RM10 9HP*
3. *Gaming Fun, 250 Heathway, Dagenham, RM10 8QS*
4. *Coral Bookmakers, 251-253 Heathway, Dagenham, RM9 5AN*
5. *Paddy Power, 245 Heathway, Dagenham, RM9 5AN*
6. *Coral, 24 Goresbrook Road, Dagenham, RM9 6UR*
7. *Mecca Bingo Club, Unit 2 London East Leisure Park, Cook Road, Dagenham, RM9 6UQ*

For the avoidance of doubt, we do not require the substantive details of any of the reports identified

SEARCHES

Following the receipt of your request searches were conducted with the Performance and Assurance Unit. These searches successfully located the information relevant to your request.

DECISION

I have attached an excel spreadsheet with the answers to your questions. Please note there are three separate tabs within the spreadsheet, titled **cover sheet, notes**

and **table**. The notes page should be read in conjunction with the data to ensure the report is interpreted correctly.

COMPLAINT RIGHTS

This notice concludes your request for information. I would like to take this opportunity to thank you for your interest in the MPS.

Should you have any further enquiries concerning this matter, please contact me using the email or postal addresses at the top of this document, quoting the reference above.

Yours sincerely

Ruth Binfor

In complying with their statutory duty under sections 1 and 11 of the Freedom of Information Act 2000 to release the enclosed information, the Metropolitan Police Service will not breach the Copyright, Designs and Patents Act 1988. However, the rights of the copyright owner of the enclosed information will continue to be protected by law. Applications for the copyright owner's written permission to reproduce any part of the attached information should be addressed to MPS Directorate of Legal Services, 10 Lambs Conduit Street, London, WC1N 3NR.

COMPLAINT RIGHTS

Are you unhappy with how your request has been handled or do you think the decision is incorrect?

You have the right to require the Metropolitan Police Service (MPS) to review their decision.

Prior to lodging a formal complaint you are welcome to discuss the response with the case officer who dealt with your request.

Complaint

If you are dissatisfied with the handling procedures or the decision of the MPS made under the Freedom of Information Act 2000 (the Act) regarding access to information you can lodge a complaint with the MPS to have the decision reviewed.

Complaints should be made in writing, within forty (40) working days from the date of the refusal notice, and addressed to:

FOI Complaint
Information Rights Unit
PO Box 313
Sidcup
DA15 0HH
foi@met.police.uk

In all possible circumstances the MPS will aim to respond to your complaint within 20 working days.

The Information Commissioner

After lodging a complaint with the MPS if you are still dissatisfied with the decision you may make application to the Information Commissioner for a decision on whether the request for information has been dealt with in accordance with the requirements of the Act.

For information on how to make application to the Information Commissioner please visit their website at www.ico.org.uk. Alternatively, write to or phone:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Phone: 0303 123 1113

1	Calls and Recorded Offences To Various Addresses in Dagenham	
2		
3	01/09/2018 to 01/09/2021	
4		
5	Protective Marking	OFFICIAL
6	Suitable for Publication Scheme	Yes
7	FOIA/MOPAC Ref Number	01/FOI/21/021009
8	Summary	Calls and Recorded Offences To Various Addresses in Dagenham for the period 01/09/2018 to 01/09/2021
9	Creating Branch / Directorate	MetHQ - Information and Insight
10	Date Created	44452
11	Review Date	44817
12		
13		
14	This report uses LIVE DATA extracted from: SAP BI & DARIS	
15	Date Live data was extracted: 10/09/2021 & 13/09/2021	
16		
17	The data in this report reflects live data which may be subject to small changes over time	
18		

3	Notes
4	
5	Source System: The live data for this report was extracted from SAP BI on 10/09/2021 and DARIS on 13/09/2021.
6	
7	<u>Date Range: The date range for this report was set between 01/09/2018 and 01/09/2021.</u>
8	
9	Definition: This report presents the following;
10	The Number of Offences Recorded in Specified Addresses in Dagenham.
11	The Number of Calls to Specified Addresses in Dagenham.
12	
13	Caveats
14	
15	Both the SAP BI and DARIS Runs for this report were set to include the following post codes requested by the applicant;
16	RM10 9HP
17	RM9 5AN
18	RM9 6UR
19	RM10 8QS
20	RM9 6UQ
21	
22	The data was filtered once in Excel to include the following addresses only as requested by the applicant;
23	Betfred, 125 Broad Street, RM10 9HP
24	Coral Bookmakers, RM9 5AN
25	Coral, 24 Goresbrook Road, RM9 6UR
26	Gaming Fun, RM10 8QS
27	Mecca Bingo Club, RM9 6UQ
28	Paddy Power, RM9 5AN
29	William Hill Bookmakers, RM10 8QS
30	
31	Please note DARIS returned no results to the address of Mecca Bingo Club, RM9 6UQ between the specified dates.
32	

1					
2	IMPORTANT: Please ensure that the Notes Page is read in conjunction with the data in this				
3	report to ensure that it is interpreted correctly.				
4	Number of Offences Recorded in Specified Addresses in Dagenham.				
5	Recorded between 01/09/2018 and 01/09/2021.				
6					
7	Address	Number of Offences			
8	Betfred, 125 Broad Street, RM10 9HP	5			
9	Coral Bookmakers, RM9 5AN	<u>7</u>			
10	Coral, 24 Goresbrook Road, RM9 6UR	<u>4</u>			
11	Gaming Fun, RM10 8QS	2			
12	Mecca Bingo Club, RM9 6UQ	15			
13	Paddy Power, RM9 5AN	6			
14	William Hill Bookmakers, RM10 8QS	6			
15	Grand Total	45			
16					
17					
18	Number of Calls to Specified Addresses in Dagenham.				
19	Recorded between 01/09/2018 and 01/09/2021.				
20					
21	Address	Count of Calls			
22	Betfred, 125 Broad Street, RM10 9HP	10			
23	Gaming Fun, RM10 8QS	<u>2</u>			
24	William Hill Bookmakers, RM10 8QS	<u>3</u>			
25	Coral, 24 Goresbrook Road, RM9 6UR	2			
26	Paddy Power, RM9 5AN	4			
27	Coral Bookmakers, RM9 5AN	3			
28	Grand Total	24			
29					
30	*Please note no calls were recorded to Mecca Bingo Club, RM9 6UQ in this time period.				
31					
32					
33					
34					
35					