

		<p>Merkur operate over 140 24-hour venues across the country and has extensive experience of operating later hours and protecting the local vulnerable population.</p>
B4	<p>Applications that intend to provide facilities for gambling from premises located outside a Gambling Vulnerability Zone for hours beyond those set out in Clause D will be considered on their own merits, subject to other relevant policies within this Statement, and with particular regard to the following: Sufficient transport links to customers leaving the premises to ensure that customers are not stranded or likely to be a victim of or cause crime or disorder upon leaving the premises</p>	<p>Merkur Slots is a 6-minute walk from Edgware Road tube station, which provides the Circle and Hammersmith line east and west and the District line west.</p> <p>Merkur Slots is a 12-minute walk from Marble Arch Tube Station which operates the central line east and west. This tube also runs 24 hours on Fridays and Saturdays.</p> <p>On Edgware Road there is a plethora of buses, with numbers 7, 23 36 and N7 running north from Burwood Place (Stop EK) and buses number 7, 98, N7 and N98 running south from Sussex Gardens (Stop EE).</p> <p>The majority of the current customers of Merkur Slots Edgware Road are local to the venue. When the premises is operating with door supervisors, the door supervisor will monitor the customer leaving to ensure they are not showing signs of vulnerability and are at risk of being a victim of crime and disorder.</p>
B5	<p>Applications that intend to provide facilities for gambling from premises located outside a Gambling Vulnerability Zone for hours beyond those set out in Clause D will be considered on their own merits, subject to other relevant policies within this Statement, and with particular regard to the following: The impact of any additional hours on children and the vulnerable</p>	<p>The premises is currently licensed and open to the public Sunday to Thursday 0700 – 0100 and Friday to Saturday 0700 – 0200. The application to extend the hours is to extend the hours from 0200 – 0600 Monday to Sunday.</p> <p>It is not expected that during the extended hours of 0200 – 0600 there will be any children in the vicinity of the premises. Merkur Slots venues do not regularly have issues with children entering the venue.</p>

		<p>With regards to potential vulnerable people, Merkur Slots venues have considerable safeguards in place to protect the vulnerable from entering the premises. Floor layout is designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed, and staff regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>Merkur operates training upon recruitment to all venue staff 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.</p> <p>All venues are headed up by an experienced venue manager and supported by assistant staff at the venue, all trained on the Gambling Act Licensing objectives.</p>
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<p>B6</p>	<p>Applications that intend to provide facilities for gambling from premises located outside a Gambling Vulnerability Zone for hours beyond those set out in Clause D will be considered on their own merits, subject to other relevant policies within this Statement, and with particular regard to the following: What genuine gambling activities are available for customers during the extended hours</p>	<p>Merkur Slots venues operate under a bingo premises licence granted under the Gambling Act 2005. The reason for this is to differentiate the premises from other high street venues and provide an alternative offering for the customer. Merkur operate this style of venue across the whole country in over 200 sites, and operate within the statutory requirements and limits at each site. The business model for licensed bingo venues is in full compliance with the governing regime and gaming machines prescribed by statute. Further, a specific condition has been offered requiring the provision of a dedicated bingo-only area.</p> <p>Merkur High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.</p> <p>Across Merkur Slots 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</p> <p>The proposed operation of this venue is not in question with this application, as the bingo premises licence has already been granted and approved by Westminster Licensing Sub-Committee in January 2020.</p> <p>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. This is also referenced in the Westminster Statement of Licensing Principles for Gambling 2023 at Policy G-2B.</p>
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		The gambling activities provided during the hours of 0200 – 0600 will be exactly the same as currently provided.
B7	Applications that intend to provide facilities for gambling from premises located outside a Gambling Vulnerability Zone for hours beyond those set out in Clause D will be considered on their own merits, subject to other relevant policies within this Statement, and with particular regard to the following: Minimum staffing levels so as not to leave staff feeling vulnerable or isolated and to allow staff safe passage to and from public transport where necessary.	<p>Existing condition 7 provides that there shall be no pre-planned single staffing at the premises from 12:00 until closing and no single staffing from 20:00 until closing.</p> <p>Existing condition 15 provides that the staffing levels at the premises will be assessed by way of risk assessment and cognisance will be taken of any Police advice.</p> <p>Further, proposed condition 26 provides that there shall be a minimum of 1 SIA licensed door supervisor at the premises from 18:00 to 06:00 daily.</p> <p>Proposed condition 31 provides that the total number of staff (not including door staff) between the hours of 18:00 and 06:00 will be a minimum of two.</p> <p>All Merkur venues operate a Staff Guard system and fixed and mobile panic buttons in case any additional help or assistance is needed at any point by staff.</p> <p>Merkur operate over 140 24-hour venues across the country and does not experience issues with staff feeling vulnerable or isolated.</p>
C1	Whist aiming to permit the Licensing Authority may, none the less refuse applications within a designated Gambling Vulnerability Zone that seek to provide gambling facilities for hours beyond the hours set out in Clause D below or any later hour which has already been	All matters in Clause B have been adequately addressed in the above responses.

	permitted by this Authority, and that: Does not address the matters set out in Clause B above, and,	
C2	Whist aiming to permit the Licensing Authority may, none the less refuse applications within a designated Gambling Vulnerability Zone that seek to provide gambling facilities for hours beyond the hours set out in Clause D below or any later hour which has already been permitted by this Authority, and that: Does not provide sufficient reasons and risk mitigation in accordance with the Gambling Vulnerability Policy F2 for those hours, and	All matters relevant to the Gambling Vulnerability Policy F2 have been dealt with specifically and independently in the section below.
C3	Whist aiming to permit the Licensing Authority may, none the less refuse applications within a designated Gambling Vulnerability Zone that seek to provide gambling facilities for hours beyond the hours set out in Clause D below or any later hour which has already been permitted by this Authority, and that: Does not meet the Gambling Commissions Codes of Practice or its Guidance to Licensing Authorities or is not reasonably consistent with one or more of the Licensing Objectives or any other policy within this statement.	<p>Merkur are a leading national operator of bingo premises with clear and proactive policies to promote the Gambling Licensing Objectives. Merkur has 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.</p> <p>A full and comprehensive response has been provided above with regards to the applications consistency with all the licensing objectives and all the policies within this statement.</p>
D2	For the purposes of Clauses, A to C above, the hours when gambling facilities can be provided for each premises licence use or gaming machine permit type, as defined within this statement are: Bingo Monday to Sunday 09:00 to 00:00	The hours proposed for the operation of the premises are outside of the hours defined within the Hours Policy E1(D), however the applicant has put forward numerous additional premises licence conditions, controls and safeugaurds to support the future operation of the premises, which have been designed to assure the Licensing Auhtority that effective provide the authority reason and mitigation measure will be applied evidencing that to show that the applicant can operate the premises safely and effectively. The applicant operates many 24 hour licences across the country in similarly challenging

		locations akin to Edgware Road, and always works with authorities to address local risks and will engage with organisations that provide support services to potentially vulnerable individuals. Many of the applicants safeguarding and control measures are standard for all Merkur Slots venues and apply at all hours, not just the early morning hours.
G	For the purposes of Clause D.2 (Bingo Premises) the hours stated do not apply to the access of gaming machines in bingo premises	The hours proposed for the use of gaming machines are within Bingo Hours Policy E1(G).
H	For the purposes of this policy any reference to “children” will include any person who meets the definition of a child and young person within section 45 of the Gambling Act 2005, therefore such references will apply to anyone under the age of 18.	All Merkur Slots venues are adult only and operate a challenge 25 policy. Merkur Slots premises are not attractive to young persons and sites rarely have issues with young person’s attempting to gain access.

Policy F1 & F2– Spatial Policy

Policy section	Policy wording	Merkur response
B1	Applicants will be expected to have: Considered the Council’s Local Area Profile when assessing the local area risks.	The local area risk assessment provides a complete and thorough review of all the local risks associated with the area and relevant control measures provided to mitigate these risks, and full consideration has been taken of the Council’s Local Area Profile. Each licensing objective is dealt with independently and control measures are provided to effectively deal with any possible concern. Within the updated local area risk assessment provided, the local risk profile of the area is provided including reference to the location of the premises within the Paddington (South) Vulnerability Zone. This includes reference to the specific neighbouring premises and a review of local crime stats for two neighbourhoods as Merkur Slots Edgware Road falls on the boundary of two separate crime policing neighbourhoods.

B2	Applicants will be expected to have: Considered any other information that may relate to the local area risks to the licensing objectives, which may include information supplied within representations from interested parties and/or responsible authorities following the application being made.	<p>All information provided by the responsible authorities and interested parties has been fully reviewed and informed the updated local area risk assessment.</p> <p>Multiple meetings have been held with all objecting parties, including invitations sent to parties who have not objected, and significant conditions offered to mitigate the concerns.</p> <p>A full and comprehensive response has been provided to the objection submitted by the Licensing Authority and provided via email on 2nd April, which was acknowledged on 4th April.</p>
B3	Applicants will be expected to have: Set out the relevant local risks within their gambling risk assessment and put forward suitable and sufficient measures to mitigate or eliminate those risks, in accordance with Policy C1 of this statement.	A detailed and updated local area risk assessment has been supplied in the supporting documentation, designed in consideration of the councils Gambling Statement of Licensing principles, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder. The updated local area risk assessment has been prepared and updated with specific consideration to the sites location within the Paddington (South) Vulnerability Zone.
C1	Applicant must demonstrate that: They have specifically assessed the relevant risks associated with that Gambling Vulnerability Hot Spot and/ or designated Gambling Vulnerability Zone within their gambling risk assessment	Within the updated local area risk assessment provided, the local risk profile of the area is provided including reference to the location of the premises within the Paddington (South) Vulnerability Zone. This includes reference to the specific neighbouring premises and a review of local crime stats for two neighbourhoods, as Merkur Slots Edgware Road falls on the boundary of two separate crime policing neighbourhoods. The specific risks of the area have been identified within the area and assessed.
C2	Applicant must demonstrate that: Put forward sufficient control measures to mitigate or eliminate those risks being associated with the operation of the gambling premises.	Merkur Slots Edgware Road opened in January 2022. Since opening, the premises has been fully compliant with all the conditions on the premises licence and continually promoted the

		<p>licensing objectives. The premises licence was granted to permit the premises to provide bingo and gaming machines Sunday to Thursday 0700 – 0100 and Friday and Saturday 0700 – 0200.</p> <p>The current premises licence which was granted in 2020 has 27 conditions, in addition to the legislative mandatory conditions. This premises licence has more extensive conditions than the majority of our clients bingo estate, which were attached to address operational concerns raised at the time of the application. Following discussions with the Police and Licensing Authority, a further 20 conditions have been offered to be added to the premises licence (and two of the existing conditions relating to hours have been requested to be removed). These 45 conditions, the applicant contends, are more than suitable control measures to mitigate the risks identified within the Councils Gambling Vulnerability Zone.</p>
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LICENSING SUB - COMMITTEE HEARING – 18 APRIL 2024

SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

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 merger 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 230 licensed bingo, adult gaming centre and family entertainment centre premises. Over 140 of Merkur's premises operate with a 24-hour premises licence.
3. Merkur is a leading national operator of bingo premises with clear 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 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 and security procedures, and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Gambling Commission's Licence Conditions and Codes of Practice ("LCCP").
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.¹
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 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 compliance audit in each venue annually. 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

¹ Two non-trading premises licences were subject to review applications in Enfield in 2021, 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.

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 LCCP 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 this application for a variation to the bingo premises licence, the local Licensing Authority were initially contacted on 18th May 2023.
13. On 13th June 2023, a meeting was held with myself, David Inzani of Poppleston Allen, Kevin Jackaman and Karyn Abbott of Westminster Licensing Authority and Bogdan Onica, Area Manger covering Merkur Slots Edgware Road. At this meeting, the proposed application was discussed with the officers to understand any concerns.
14. On 13th July 2023, the variation application was submitted to the Licensing Authority. On the same day, notice was provided to Kevin Jackaman, Karyn Abbott and the Metropolitan Police Service Licensing Team.
15. No contact or response was received from the Licensing Authority or Police Licensing Team until receipt of the formal representations submitted to the licence application.
16. Further, on 28th June 2023 and then the 13th July 2023, Councillor Karen Scarborough, Guy Austin of the Marylebone Association and Amanda Feeny of the Harrowby and District Residents Association were contacted to advise them of the submission of the application.
17. Three local services were also provided notice of the application via letter dated 13th July 2023 (Addiction Services Ltd, Crawford St, W1H 2HL, Recovery Circle, 104 York St, W1H 4QL and WLM (West London Mission), 134-136 Seymour Pl, W1H 1NT). These local services were also invited to a meeting at site in February 2024 but no response was received, nor attendance.
18. On 28th July 2023, a meeting was held on site with myself, Bogdan Onica Area Manager, David Inzani of Poppleston Allen and Steven Thomas and Zoe Dundas from Harrowby and District Residents' Association. The meeting was very positive and allowed both Mr Thomas and Ms Dundas to discuss their concerns about the local area. The majority of the concerns centered around the application for McDonalds next door to extend to 24 hours. Both Mr Thomas and Ms Dundas expressed their gratitude for the opportunity to meet with us.

19. No other responsible authorities, including the Child Protection team and the Gambling Commission raised any concerns regarding Merkur's bingo premises licence proposals and did not object to the application.
20. 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.
21. 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. Merkur understand and acknowledge that the venue is located within Westminster's 'Paddington (South) Gambling Vulnerability Zone'.
22. We understand that the local area suffers with general crime and disorder and nuisance, albeit not always specifically associated with gambling premises. We do not generally experience the kind of difficulties sometimes experienced by betting offices in terms of crime and disorder and nuisance, due to our different clientele, customer numbers, product, layout and management. We carry out security risk assessments which are periodically reviewed and will adjust staffing levels, including the provision of security, to maintain an orderly presence in the places where we trade. Lines of communication are, and will continue to 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.
23. We have identified local providers of vulnerability support services within the local area risk assessment and we will endeavor to contact any relevant organisations and invite feedback on any local concerns that can be incorporated into premises training and evaluation. A condition has been offered within the application to invite these organisations to a meeting at the venue annually. 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

24. 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 a comprehensive review of the business, completed at Board level, involving consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and assess crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.
25. 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'*.
26. In February 2022, Merkur were subject to the G4 follow up audit where it retained its accreditation status. The auditor commended the senior management training regarding gambling harm and social responsibility, noted that Merkurs Safer Gambling ethics shine through as priority and customer care is a strong focus of the business. The auditor further noted that staff loyalty, enthusiasm and knowledge were all of a high standard.

27. Merkur has been praised by one of the country's leading safer gambling and gaming experts for 'championing innovation' in social responsibility. Lee Willows, who founded ESG Gaming following his tenure launching and establishing Ygam, highlighted the work of Merkur. He said: *"Merkur is specifically supporting ESG Gaming with a two-year RET [research, education, treatment] funding commitment which has been transformational and enabled us to not only establish robust foundations but also contribute to crucial safer-gambling research."* The year one donation was used to support academic research into safer gambling and gaming and focused on what would be appropriate customer protection considerations in an immersive environment. The academic research was carried out by Bournemouth University.
28. 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, LCCP, 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.
29. Merkur have a National Training Centre where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are trained to take appropriate action, such as offering support such as managing time spent playing (time outs) and 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.
30. 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.
31. Following a customer interaction, customers may be offered a variety of self-help measures to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst ensuring that the Company's policies and procedures are effectively implemented.
32. Merkur has also undergone Gambling Commission inspection. It ensures that its training and compliance policies and procedures comply with the LCCP attached to the Company's Operating Licence.
33. Examples of some of Merkur's responsible gambling information have been provided in the supporting documents.
34. 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.

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. Merkur has extended its industry acclaimed 360 Safer Gambling program to support research which seeks to understand the dominant trends in the relationship between gaming and gambling.

35. In addition, a series of focus groups has been held over the past 2 years, with both high street gaming and pub customers, with the participants being selected on the basis of being regular users of Merkur Slots or pub machines. The aim of the project was to provide Merkur with a snapshot of the business through the eyes of the customer. Focused on the key areas of customer engagement, product and service and understanding customer spending and gaming habits.
36. 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.
37. 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

38. A detailed and updated local area risk assessment has been supplied in the supporting documentation, designed to take account of the 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. The updated local area risk assessment has been prepared and updated with specific consideration to the site's location within the Paddington (South) Vulnerability Zone.
39. 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.
40. 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.
41. As a result of the Company's commitment to responsible operation and the resources directed to responsible play, none of Merkur's operational premises licences have been subject to review proceedings or revocation.

Underage Gambling

42. 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.
43. 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.
44. 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.
45. Merkur Slots customer demographics are up to 50% female with an average age over 30.
46. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
47. 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.

In our experience, our venues are not attractive to underage individuals due to the ambience of our venues, the nature of our gaming services and customer demographics. This is consistently seen across our licensed estate. Our products are not designed for children, and do not appeal to them.

48. 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

49. It is rare for our premises to be associated with serious 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.
50. Merkur is an experienced operator with a proven history of operating premises in some challenging areas and serious incidents relating to crime and disorder are rare.
51. In the case of Edgware Road, the licence is already subject to extensive conditions. We do, however, wish to provide greater assurance to the Sub-Committee and so have decided to offer a further 20 conditions. These include the provision of licensed door staff from 6p.m., in addition to a minimum of two venue staff together with formal community liaison.
52. Two other premises offering gaming machines operate within a few metres of our premises – Admiral at 212 Edgware Road and Little Vic at 156 Edgware Road. Neither of these have any conditions on their licence at all.
53. My understanding is that the conditions we are offering will make this one of the most conditioned licences in Westminster, and I hope would set a standard for the operation of

bingo and AGC premises

54. In addition, all staff training is developed to consider local area characteristics and Merkur Slots operates on the basis that its controls and best practice are adopted at all times.
55. Local premises management will always work with local authorities under the Act, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.
56. I note that some concern has been expressed in the representations that the premises trading next door to McDonalds is liable to produce crime and disorder. As a high street operator Merkur trades in close proximity, or even next to, McDonalds and similar fast food venues in circa 35 different locations across the UK and does not experience cross-over from such juxtaposition, let alone crime and disorder, due to a different demographic of clientele. We have included in the papers a number of examples of close-by trading with fast food outlets.
57. I also note that some residents are concerned about an impact on their amenity if the premises are allowed to open later. I set aside that amenity considerations are not material under the Gambling Act (but are material under the planning system). We have had no residential complaints in Edgware Road. Further, I am not aware of any complaints from neighbours that our later hours operation is causing night time disturbance. This is because the kind of people who come to our premises (including their age and general behaviour) is not such as to threaten the peace of the neighbourhood.
58. Furthermore, unlike pubs and clubs, one does not find groups of people loitering outside our premises smoking or creating a disturbance. Our customers arrive, play the machines and leave. That is one reason why none of our premises have faced a review hearing.
59. Unlike betting offices, there is no ongoing entertainment such as a sporting event and no communal places for crowds to gather. Similarly, unlike betting offices, our premises do not experience significant peaks and troughs of customers. Our customer numbers are almost always in single figures. This is a further reason why we do not experience conflicts with our residential neighbours.
60. In general, it is rare for our venues that operate late at night to attract customers leaving alcohol licensed venues or fast food 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.
61. The Police in their representation refer to a quote by Leveche Associates from the local area risk assessment. This quote was incorrectly stated and has been updated in the updated local area risk assessment provided to the committee. The Police have not provided any evidence to back up their representation, nor any evidence that "anyone looking to gamble between 0200 and 0600 in this area is more likely to be vulnerable than not". The incident statistics recorded at the premises show that the operation of the premises in the early hours has less footfall, less machine play and causes fewer incidents. There is no direct correlation to the early hours and vulnerability.
62. Merkur operate a business-wide Anti-Money Laundering (AML) policy, which is reviewed annually, and ensures that the risks of money laundering in these premises are low. The premise layout is designed to allow customer supervision at all times. All machines within the premises are linked to a central machine data capture system, which identifies and sends alerts of suspicious activity and allows the venues to individually analyse live transactional activity for money laundering. All AML incidents, rare as they are, are reported

by the venue staff via a tablet which also provides an automated email alert to myself, as the dedicated AML manager.

63. 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.
64. 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. All records are regularly evaluated to ensure that premises operate safely and responsibly.

Local Concerns

65. The representations received from the local residents identify the potential for increased anti-social behavior and the increased risk to vulnerable people and children in the area should the Licensing Sub-Committee be minded to grant the current premises licence application. I have already touched on some of the concerns expressed.
66. All comments made within the representations were reviewed. We are confident that our existing and proposed conditions are more than sufficient to alleviate these concerns.
67. Merkur has provided a detailed local area risk assessment, reviewed local area statistics and demographics and reviewed the Council's detailed policies in order to effectively identify any potential risks to the proposed operation.
68. 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 event that any incidents of crime or disorder occur.
69. Merkur Slots premises, from experience, are not attractive to young persons and sites rarely have issues with young person's attempting to gain access. All our premises are over 18s and operate a Challenge 25 policy.
70. Merkur Slots premises usually only have low numbers of customers within the premise at any one time, with members of staff continually walking around. This means that in the rare event that a young person attempts to enter the premises, they would be intercepted and challenged for their ID at the earliest opportunity.
71. 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.
72. Should the Committee members be minded to grant the variation applied for, we believe all potential operational risks will be effectively mitigated.

73. Merkur understands that local risk assessment and staff training is a live matter, which is regularly assessed and adapts to any emerging or changing risks in the locations in which it operates. This premises will be no exception.
74. 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.
75. 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.
76. The Police in their representation have produced no evidence regarding the performance of the venue, but do refer to the potential for crime and disorder, by reference to our local area risk assessment submitted with the application. That has now been updated and some minor corrections applied. Since opening in January 2022, a period of 27 months, we have called out the police on 11 occasions, that is to say once every 2.5 months. The latest such call-out was 9.10 p.m.
77. Our staff are under instructions to record every incident, however minor. Our staff are trained in conflict management, and in the overwhelming majority of cases handle matters themselves. They are equipped not only with panic alarms, but also with a "Staff Guard" fob, which enables them to call up assistance from a central hub staffed with SIA-personnel who can view the CCTV, speak and be heard in the premises. When Staff Guard staff become involved, it usually resolves the incident rapidly. In a small number of cases, the Police are summoned, and the action of summoning them usually brings the incident to a halt.
78. As I have stated above, we are not experiencing incidents later at night, and that may well be because at such times the staff are also supported by an SIA security officer, which provides a strong deterrent against misconduct.
79. The Local Area Risk Assessment also refers to incidents "outside/inside or near the premises". This is simply a function of how incidents are coded. We have no record of street disorder, but if someone is refused entry, for example because of their behaviour or appearance, that is how the incident is recorded.
80. I have no reason to believe, based on our record here or elsewhere, that later hours will cause a significant uptick in crime and disorder at the venue or place a significant additional burden on the Police.
81. There is also a suggestion from the Police that later hours at these premises may harm vulnerable people. I respectfully take issue with this speculative suggestion, which is not supported by any evidence. The incident statistics recorded at the premises show that the operation of the premises in the early hours has less footfall than during the day, less machine play and is associated with fewer incidents. As a company, we have no evidence of a direct correlation to the early hours and vulnerability. We find that our premises at night are attractive to shift workers, including hospitality workers and public services. In Edgware Road, there is a strong component of Arab residents and tourists using the area, as was observed by Adrian Studd. We have no evidence at all that our premises are being visited by vulnerable people at night, and if they were our systems, which have not been commented on, let alone criticized, are designed to identify and assist such individuals. I would finally point out that there are two machines premises within close proximity to ours, which, unlike ours, have no extra conditions on their licence and a less consistently high level of staff and security provision. We are not

aware of any evidence that their late night trade is proving harmful to vulnerable people, and nor do we have reason to believe that ours would be either.

Premises Operation

82. The premises is currently, and will continue to be so, 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 of our Policies and Procedures has been provided as part of our hearing bundle.
83. 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.
84. 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.
85. 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.
86. 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.
87. Staff numbers and premises operation are regularly risk assessed, incorporating monitoring of premises operation, internal compliance audit completed by our field-based compliance team, evaluation of customer numbers and feedback from Responsible Authorities and Interested Parties. These effective measures ensure that premises are able to quickly adapt to any emerging risk or local concern. Staff numbers and rotas are continuously reviewed to adapt to customer numbers and cognisance is taken of police advice.
88. Merkur Slots premises do not play any music above background level, and in addition due to the low footfall of customers at any one time, are rarely a cause of neighborhood nuisance. No complaints have been made directly to the premises from local residents, nor has the premises been notified of any nuisance complaints by the Environmental Health noise team.

Conclusion

89. 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.

90. 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.
91. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
92. Although nuisance is not a licensing objective under the Gambling Act, our premises do not cause nuisance to neighbours.
93. 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: 04/04/2024

LICENSING SUB - COMMITTEE HEARING – 18 APRIL 2024

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, Bingo Halls and Casino.
2. I am a Director of the Bingo Trade Association "The Bingo Association" and a member of the Gaming Council of the Amusement Trade Association "BACTA" covering High Street 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 in double figures at any one time would be considered a 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. In addition, conditions have been offered that the total number of staff (not including door staff) at the premises from 18:00 – 06:00 shall be a minimum of 2 (proposed condition 31) and that at least 1 SIA door supervisor will be at the front entrance of the premise from 18:00 – 06:00 daily (proposed condition 26).
13. Customer monitoring, interaction and any incidents including implementation of our Think 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Merkur Slots UK Limited's independent audit team can regularly monitor all records.
14. The Company's audit department collates and evaluates monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.
15. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours.
16. Machine emptying is only carried out when customer numbers are low and security systems implemented, which include activating the premises maglock and ensuring sufficient staff remain on duty.
17. Merkur Slots UK Limited's venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor.
18. Venues are equipped with our staff guard system. The system allows direct communication with a central monitoring station through audio and CCTV. The central monitoring station would then contact the relevant emergency services in case of incident.
19. The entrances to all venues are fitted with a magnetic door locking system. This allows staff members working to manage the entrants to the venue when in use. The use of maglock must be constant if the premises operates past midnight.
20. The use of door supervision at any premises is decided on a risk assessment basis based on a multitude of factors per premises, with cognisance always taken of local Police and Licensing knowledge and advice. In addition, as mentioned above, the use of door supervisors has been offered as a condition with the application.
21. We have considered the local concerns raised by the Licensing Authority, Police and Interested Parties and believe that should the Committee members be minded to grant the new premises licence as all perceived operational risks and fears should have been effectively addressed.

22. The existing premises licence has 27 conditions (although the application in question has applied to remove two of these regarding opening hours), and a further 20 conditions have been proposed with the application. These include extensive safeguards surrounding staff numbers, staff training and experience, panic buttons and a responsibility to have regular dialogue with the Licensing Authority, Police, residents associations and local vulnerable associations.
23. In our local area risk assessment, we have identified local 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. This is evident through the proposed conditions to hold meetings annually with all relevant parties, a list to be agreed with Westminster Licensing Authority.
24. On 1st February 2024, an invitation was sent to all interested parties who submitted a representation via Westminster Licensing Authority, and to the three relevant services mentioned above via postal letter, to a meeting on site to discuss the premises and ongoing operation.
25. On 28th February 2024, myself, our legal representative Felix Faulkner from Poppleston Allen and Bogdan Onica, Area Manager, attended a meeting at the site with Cllr Karen Scarborough, Susie Burbridge and Zoe Dundas of the Harrowby and District Residents' Association. The meeting was beneficial for all parties involved and allowed all individuals to discuss their concerns surrounding the local area with myself and Bogdan. Ms Dundas, Ms Burbridge and Cllr Scarborough expressed their thanks for the opportunity to meet and form professional relationships with us.

After the meeting, a follow-up email was sent to Ms Dundas and Cllr Scarborough¹ to thank them for their time and to provide the opportunity to ask any further questions. No further questions were received. However, we are committed to engagement with the Residents' Association and councillors both in general and in particular in the unlikely event that there are any issues associated with the premises.
26. In conclusion, our experience is 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 authorities with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises begin to operate as permitted.
27. The current premises has been operating successfully for 27 months without significant impacts on our neighbours. We have no reason to believe that this would change if the variation we have requested is granted.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 04/04/2024

¹ A follow up email was not sent to Ms Burbridge as no email address was available, so it was requested that Cllr Scarborough forward the email onto Ms Burbridge. Cllr Scarborough did so, cc'ing Ms Burbridge into the email reply.

LICENSING SUB-COMMITTEE HEARING – 18 APRIL 2024

SUPPLEMENTAL STATEMENT - ANDY TIPPLE

1. I am Currently Managing Director of Blueprint Operations, part of the Merkur UK Group. Until August 2023, I was 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 230 high street bingo premises, bingo clubs, Family Entertainment Centres and Adult Gaming Centres throughout Great Britain.
3. The development of high street bingo has occurred because customers are becoming less interested in attending large, sub-regional bingo halls and increasingly wish to play bingo with a portable electronic terminal rather than marking numbers off a card. Accordingly, the 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. At this venue, we have provided a dedicated bingo area within the premises, where customers are provided a space to sit and play on the bingo tablets.
5. As for gaming machines, the governing legislation provides strict limits on the types of machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.
6. High street bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
7. Across Merkur Slots UK Limited's venues the average stake placed is between 30p and 40p. Only 20% of the gaming machines provided may be category B3s. The remainder, being the category C gaming machines, have the same stake and prize levels as those offered in pubs
9. All Merkur Slots UK Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling. Full written details of the training and the Company's operating procedures have been provided in the hearing bundle.
10. As stated above, electronic bingo is a natural evolution of 'traditional bingo' and has been operated nationally for many years since the inception of the Gambling Act 2005 and is approved and understood by the Gambling Commission. This is also referenced in the Westminster Statement of Licensing Principles for Gambling 2023 at Policy G-2B.
11. I understand that the licensing officer has raised a question about the provision of bingo in the premises. It may help if I explain that the machines entitlement in adult gaming centres and bingo premises is exactly the same. Indeed, were these premises to be licensed as an adult gaming centre, our gaming machine provision would be identical. The only reason why, in some premises, we apply for a bingo premises licence is that in addition to the gaming machines, we also wish to provide bingo by way of tablets.

12. We notify the public of this on the façade of the premises, which states prominently “bingo played here” and also inside the premises.
13. The rules governing this are in the Gambling Commission’s Licence Conditions and Codes of Practice.
14. These require that there are substantive facilities for non-remote bingo, provided in reliance on the licence, available in the premises, which there are. They also require that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities, which again they are. The rules do not require that bingo is played to a specific level in the premises. Under the rules which these rules replaced, bingo had to be the “primary gambling activity”. However, because those rules served no real purpose and were not clearly understood by regulators or the industry, they were replaced with the current rules.
15. Our bingo offer is the same as it is in all of our high street bingo premises across the country. It is simply an extra offer to our customers, and we are advised that it is lawful. We have no evidence that it is harmful to any of the licensing objectives.
16. In order to assuage any concern regarding our bingo offer, however, we have offered a condition that there will be a dedicated bingo-only area, so that our compliance with the Commission’s rules is absolutely clear.

Mr Andy Tipple

Date: 04/04/2024

2 April 2024

Ref: 017449/00019

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Karyn Abbott
Senior Licensing Officer
Licensing Team
Westminster City Council
15th Floor
64 Victoria Street
London SW1E 6QP

Dear Sirs

Merkur Slots, 182-184 Edgware Road, London

Variation to Bingo Premises Licence - Merkur Slots, 182-184 Edgware Road, London

We are instructed by Merkur Slots UK Limited to write in response to the representation received to the above variation application via email dated 9th August 2023.

Background

Merkur Slots operate a Bingo Premises Licence which was granted by Westminster City Council Licensing Sub-Committee on 10th December 2020.

At the hearing, the Licensing Sub-Committee carefully considered the application and all supporting evidence provided. In their decision, the Licensing Sub-Committee stated:

“The Sub Committee concluded that the conditions it has imposed on the Premises Licence would mitigate the concerns of all those that had objected and would therefore help to aim and permit the licensing objectives as indicated above.”

Merkur Slots Edgware Road opened in January 2022. Since opening, the premises has been fully compliant with all the conditions on the premises licence and continually promoted the licensing objectives. The premises licence was granted to permit the premises to provide bingo and gaming machines Sunday to Thursday 0700 – 0100 and Friday and Saturday 0700 – 0200.

The Application

In November 2022, we were contacted by David Sycamore with regard to a visit carried out to the venue. Correspondence was had between Nick Arron, Poppleston Allen, and Mr Sycamore and proactive discussions were held surrounding the operation of the premises.

Within this correspondence, Mr Sycamore questioned *“what percentage of gaming use at this premises is bingo as opposed to the other category B and C non-bingo machines usage? I would be keen to know how much use the bingo tablets receive over the course of month to give me an idea of the latest trends.”*

In response, Nick Arron on the 7th February 2023 replied *“On how much bingo takes place at the premises and how often tablets are used. You will appreciate facilities for bingo are available at the premises, but not used as much by customers as Merkur would like. The business preference will be to have more customers to play the bingo products provided. The bingo products do not have any value to the business, if customers do not engage and play. However, there are no regulatory benefits to providing the bingo, other than the bingo itself. The gaming machine allocation of a Bingo Premises is the same as that of an Adult Gaming Centre premises. By providing bingo, we cannot have more machines. We could provide alcohol but we do not do this in our venues. The reason we provide bingo is to provide a wider range of products to customers, to give our venues a point of difference over other High Street Gaming Venues.”*

Following this correspondence, in early 2023 we contacted Westminster Licensing Authority to advise of our client’s intention to submit a variation application to their bingo premises licence.

A meeting was held at the venue on 13th June 2023 with David Inzani of Poppleston Allen, Kevin Jackaman and Karyn Abbott of Westminster Licensing Authority and Bogdan Onica, Area Manger covering Merkur Slots Edgware Road. At this meeting, the proposed application was discussed with the officers to understand any concerns.

Mr Jackaman and Ms Abbott reiterated the question asked by Mr Sycamore regarding the percentage split between bingo tablets and machines within the venue.

It was further agreed that when submitting the application, local residents’ associations and local organisations concerned with vulnerable persons would be contacted.

On the 28th June 2023, the following individuals were contacted via email to advise of the submission of the application:

- Councillor Karen Scarborough
- Guy Austin, Marylebone Association
- Amanda Feeny, Harrowby and District Residents Association

On the 13th July 2023, an application to vary the premises licence was submitted to Westminster Licensing Authority. The application was to remove conditions restricting the operating hours of the

premises and add a condition that states:

The hours of the premises are open to the public and are permitted to be used for the provision of facilities for the playing of Bingo and other gaming machine use, as permitted under the Act: Monday to Sunday 07:00 to 06:00.

On the same day, the following services were contacted via letter to advise of the submission of the application and invited to meet with the applicant to discuss any queries they may have:

- Addiction Services Ltd, Crawford St, W1H 2HL
- Recovery Circle, 104 York St, W1H 4QL
- WLM (West London Mission), 134-136 Seymour Pl, W1H 1NT

No response or representation was received from any of these services.

Cllr Karen Scarborough, Guy Austin, Amanda Feeny, Kevin Jackaman, Karyn Abbott and the Metropolitan Police Service Licensing Team were also all advised of the submission of the application via email.

On Friday 28th July 2023, a meeting was held with David Inzani, Amanda Kiernan of Merkur Slots UK Limited and Steven Thomas and Zoe Dundas from Harrowby and District Residents' Association. The meeting was very positive and allowed both Mr Thomas and Ms Dundas to discuss their concerns about the local area. The majority of the concerns centred around the application for McDonalds next door to extend 24 hours. Both Mr Thomas and Ms Dundas expressed their gratitude for the opportunity to meet with us.

Following the close of the consultation period, 14 representations were received, 12 from interested parties, one from the Police and one from Westminster's Licensing Authority.

On the 25th October 2023, a teams meeting was held with myself, Karyn Abbott, Kevin Jackaman, Bogdan Onica and Tom Stewart of the Police Licensing Team. Within the meeting, additional conditions that were offered by Merkur were discussed to see if they alleviated the concerns of either objector. Both Mr Jackaman and Ms Abbott reiterated the query raised by Mr Sycamore back in 2022 surrounding the percentage split between the usage of bingo tablets and machines. The applicant's business model for its licensed bingo premises is in full compliance with the governing regime and gaming machine entitlements prescribed by statute. Our client incorporates bingo within its estate, as it is licensed to do, in order to provide a variety of gaming content to differentiate its venues from other operators. Our client's venues are clear that bingo is made readily available to customers.

On the 30th January 2024 the full list of existing and proposed conditions in support of the application was sent to Westminster Licensing Authority to be shared with all the interested parties.

On the 1st February 2024, an invitation was sent to all interested who submitted a representation parties via Westminster Licensing Authority, and to the three relevant services mentioned above via postal letter, to a meeting on site with myself, Bogdan Onica and Steve Ambrose, Operations Director at Merkur Slots UK Limited. On the 28th February, the open meeting was held and the premises was closed to the public for two hours from 9am to 11am.

A response to the invitation was received from Zoe Dundas and Cllr Karen Scarborough, who both attended the meeting at 10am to discuss the operation of the premises. The meeting was beneficial for all parties involved and allowed both individuals to discuss their concerns surrounding the local area with the relevant members of the applicant. Both Ms Dundas and Cllr Scarborough expressed their thanks for the opportunity to meet and form professional relationships with the applicant.

After the meeting, a follow-up email was sent to both Ms Dundas and Cllr Scarborough to thank them for their time and to provide the opportunity to ask any further questions. No further questions were received.

Westminsters Statement of Licensing Principles for Gambling

Within the representation submitted by Westminster Licensing Authority, Westminster make reference to many policies and sections within Westminster's Statement of Licensing Principles for Gambling. I will deal with each of these directly and individually.

1. Paddington (South) Vulnerability Zone section F2

In line with Section F2, the applicant has a full and comprehensive local area risk assessment which takes into account the local risks identified and provides the licensee's controls and safeguards to address those risks. Prior to submission of the application, no operational concerns or risks had been identified to date that were not addressed and effectively mitigated. The local area risk assessment submitted by the applicant spans a multitude of areas and risk factors associated with the specific locality of the venue, and takes into account Policy C1 of Westminster's Statement of Licensing Principles. The local area risk assessment is regularly reviewed and updated, and cognisance is always taken of any police or local authority advice. This is also in line with policy D1.5.

In support of Policy F2(3), the current premises licence which was granted in 2020 has 27 conditions, in addition to the legislative mandatory conditions. This premises licence has more extensive conditions than the majority of our clients' bingo estate, which were attached to address operational concerns raised at the time of the application. Following discussions with the Police and Licensing Authority, a further 20 conditions have been offered to be added to the premises licence (and two of the existing conditions relating to hours have been requested to be removed). These 45 conditions, the applicant contends, are more than suitable control measures to mitigate the risks identified within the Council's Gambling Vulnerability Zone.

The full list of existing and proposed conditions are annexed to this letter. For ease of reference, the specific condition number referred to within this letter relates to the number on the annexed list of conditions.

The proposed application, supported by the thorough local area risk assessment and extensive premises licence conditions provides sufficient reasons and mitigation to satisfy Section F2 of the Westminster Statement of Licensing Principles.

2. Bingo Premises Policy G (B)

The proposed application and operation meets the requirements of the Gambling Commission Licence Conditions and Codes of Practice and Guidance to Licensing Authorities. The applicant is a leading experienced operator with over 200 venues similar to the one in question, with clear and proactive safeguards and policies in place to uphold and promote the licensing objectives.

The hours proposed for the operation of the premises are outside of the hours defined within the Hours Policy E1(D), however the applicant has put forward numerous additional premises licence conditions, controls and safeguards to support the future operation of the premises, which have been designed to assure the Licensing Authority that effective provide the authority reason and mitigation measure will be applied evidencing that to show that the applicant can operate the premises safely and effectively, as they do at many other venues across the country.

It is noted that within Westminster Hours Policy E1(G) it states "For the purposes of Clause D.2 (Bingo Premises) the hours stated do not apply to the access of gaming machines in bingo premises". This mirrors the default hours permitted under the Gambling Act. The hours proposed for the use of gaming machines are within Bingo Hours Policy E1(G).

The applicant operates over 140 24-hour licences across the country, with many in similarly challenging locations akin to Edgware Road. The applicant always works with authorities to address local risks and will engage with organisations that provide support services to potentially vulnerable individuals. Many of the applicants safeguarding and control measures are standard for all Merkur Slots venues and apply at all hours, not just the early morning hours.

3. The operation of the premises

The premises operates under a bingo premises licence, granted under the Gambling Act 2005. The applicant operates under a bingo premises licence as they provide bingo facilities at the premises for their customers to use.

Westminster Licensing Authority queried the operation of the premises in late 2022 - early 2023, and a written response was provided. The operation of the premises has not changed since opening. Facilities for bingo are made available at the premises, however the customer use of these is not as

much as Merkur would like. The Bingo products do not have any value if customers do not play. There is no additional machine benefit with holding a bingo premises over an Adult Gaming Centre, and both of these are set by statute. Merkur provides bingo to differentiate themselves from other high street operators and provide an additional offering to their customers.

To allay the concerns of Westminster, a dedicated bingo only area will be hatched on the proposed premises licence plan and provided in the premises. This will provide a specific area for customers to play the bingo tablets. This has been offered through proposed condition 44.

Further, it is noted in Policy G2.29 of Westminster's Statement of Licensing Principles "Electronic bingo is considered to present a lower risk than other forms of gambling due to the lower stakes required to participate."

Policy G2.30 states that the Licensing Authority expects operators to demonstrate that sufficient staff will be in place to enable them to ensure that the licensing objectives are not at risk. Proposed condition 31 states that "*The total number of staff (not including door staff) at the premises from 18:00 – 06:00 shall be a minimum of two when the premises is open to the public.*". Furthermore, proposed condition number 26 states "*When the premises is open to the public, there shall be a minimum of 1 SIA licensed door supervisor employed at the front entrance to the premises from 18:00 to 06:00 hours daily. The need for an SIA door supervisor at all other times shall be risk assessed. Door supervisors shall display their licence at all times in a yellow high visibility arm band.*" The SIA staff are in addition to the two staff required to be in the venue from 18:00 – 06:00.

Policy G2.31 provides that operators should have adequate policies and procedures in place to mitigate the risks of gambling related harm. The applicant has extensive and industry-leading policies and procedures in place to mitigate these risks and allow the premises to understand their customer base. Praesepe Limited, Merkur's parent company, and the Merkur brand premises obtained G4 Global Gambling Guidance Group accreditation in 2020. 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'. In 2022 Merkur were subject to the G4 follow up audit where it retained its accreditation status. The auditor commended the senior management training in regards to gambling harm and social responsibility, noted that Merkur's Safer Gambling ethics shine through as priority and customer care is a strong focus of the business. The auditor further noted that staff loyalty, enthusiasm and knowledge were all of a high standard.

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. Merkur 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.

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.

Key members of the Merkur compliance team are committee members for many trade bodies such as BACTA and the Bingo Association, to allow the company to be at the forefront of responsible industry standards and to drive responsible gambling at the highest level.

Policy G2.32 relates to Children in bingo premises. All Merkur's bingo premises are strictly adult only and operate a strict Think 25 policy (existing condition 5). 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). Merkur prides itself on its high standard of venue compliance and its test purchase success rates nationally (existing condition 16).

The applicant does not intend to apply for a premises licence under the Licensing Act 2003, for completeness.

Existing Control Measures

A think 25 proof of age scheme is in place to ensure the companies age verification policy is upheld and the risk of underage gambling is mitigated (existing condition 5).

A MagLock is installed at the premise and is available for use at all times (existing condition 8) and is **always** in use when trading past midnight (existing condition 9).

No logos or promotional material is used on the outside of the premises designed for the use by children (existing condition 18) and the applicant will undertake regular checks to ensure that customers children are not left outside the premises unsupervised (existing condition 19).

The applicant maintains a policy of banning any customers engaging in crime, disorder or anti social behaviour within or outside the premises (existing condition 22) and will take cognisance of Police and the Licensing Authorities advice in banning customers which they believe should be banned (existing condition 21).

A staff guard system is installed at the premises, allowing direct communication with a central monitoring station who have access to the CCTV visuals of the venue and can make audio statements within the venue (existing condition 23).

The applicant ensures that the customer toilets are checked every hour for evidence of drug taking. These toilet checks are documented stating the time and member of staff who made the checks. Toilets remain locked at all times with access being provided by staff (existing condition 24).

Additional Proposed Control Measures

Contact shall be made quarterly with the local police and licensing authority to discuss any possible concerns with the premises operation or local area (proposed condition 27).

Staff will receive a notification when the front doors open so customers can be adequately welcomed and their age assessed (proposed condition 30)

The premise will operate with a minimum of 1 SIA door supervisor from 18:00 – 06:00 daily (Proposed condition 26) and the total number of staff at the premises between 18:00 – 06:00 will be a minimum of two (excluding door supervisors) (proposed condition 31).

At any one time, one member of staff on site will have been fully inducted and trained for a minimum of 12 weeks (proposed condition 32).

Fixed and portable panic buttons will be provided within the premises and will allow direct communication to the Company's staff guard (proposed condition 34).

All employees will be provided induction training and refresher training at least every six months (proposed condition 37), with training focused on the specific risks in the local area, drug and alcohol awareness and conflict management. Training shall be recorded formally on each member's training record (proposed condition 38).

An annual meeting will be organised and offered to local representatives of resident associations, local community groups and local homeless/drug/alcohol services, with the services to be agreed with Westminster's licensing authority (proposed conditions 41, 42 and 43). This is in line with Policy D3. Upon application submission, three local centres were contacted to advise of the submission of the application. Merkur will continue to facilitate active engagement with these services throughout their operation and welcome open working relationships with any local group or service.

The applicant agrees to participate in a local BetWatch, if available. (existing condition 11).

Summary

Merkur Slots UK Limited is an experienced and well-established bingo operator both nationally and locally in Westminster and has a real and strong understanding of the local area which it operates in. Merkur Slots has been operating successfully and without major concern on Edgware Road since January 2022 with extensive controls, safeguards and conditions placed upon them. Merkur endeavours to continue to apply the highest standard of operation with responsible gambling at the forefront of its operation delivered from Head Office down to premises level. The initial premises licence application was granted in 2020 by Westminster's Licensing sub-committee after heavy scrutiny from members with an extensive list of conditions. With this application, a further 20 licence conditions have been offered to further safeguard the premises operation and show Merkur's commitment to promote the licensing objectives. For these reasons, Merkur does not believe that the additional hours being sought will have a negative impact or effect on the licensing objectives and they will continue to be upheld to the highest standard possible.

Yours faithfully



Felix Faulkner
Poppleston Allen
02038597751
f.faulkner@popall.co.uk

13 July 2023

Ref: 017449/00019

Doc Ref: 181124

Recovery Circle
104 York Street
London
W1H 4QL

Dear Sir or Madam,

Variation to Bingo Premises Licence - Merkur Slots, 182-184 Edgware Road, London

I am writing on behalf of Merkur Slots UK Limited, who operate the Merkur Slots premises at 182-184 Edgware Road.

We have today applied to extend the operating hours on our client's bingo premises licence, to allow the premises to operate from 07:00am to 06:00am the following day, seven days a week. Our client has operated this premises since January 2022 and currently trades from 07:00am until 02:00am on Fridays and Saturdays and until 01:00am on Sundays to Thursdays.

This application to extend the hours is only being made after careful consideration has been given to the licensing objectives and the management controls in place at the premises. Merkur Slots UK Limited are a compliant and responsible operator and, based on their experience at this premises and across their entire nationwide estate, we are confident that the proposed extension of operating hours will not have a negative impact on the licensing objectives.

We would welcome the opportunity to meet with you to share details of the safeguards that our client has in place to protect the vulnerable in the area, to discuss the variation application and offer the opportunity for you to get to know the team at the premises.

If you would like to discuss this further, then please do contact me, of which my details are below

Felix Faulkner
Email: f.faulkner@popall.co.uk
Telephone: 0203 859 7751 / 07595 497199

Kind Regards,



Felix Faulkner
Solicitor, Poppleston Allen

List of partners and associates available on request

Address: 37 Stoney Street, The Lace Market, Nottingham NG1 1LS | T: 0115 953 8500 | F: 0115 953 8501 | W: popall.co.uk

Authorised and Regulated by the Solicitors Regulation Authority (SRA no. 78244)

13 July 2023

Ref: 017449/00019

Doc Ref: 181103

Addiction Services Ltd
Crawford St
London
W1H 2HL

Dear Sir or Madam,

Variation to Bingo Premises Licence - Merkur Slots, 182-184 Edgware Road, London

I am writing on behalf of Merkur Slots UK Limited, who operate the Merkur Slots premises at 182-184 Edgware Road.

We have today applied to extend the operating hours on our client's bingo premises licence, to allow the premises to operate from 07:00am to 06:00am the following day, seven days a week. Our client has operated this premises since January 2022 and currently trades from 07:00am until 02:00am on Fridays and Saturdays and until 01:00am on Sundays to Thursdays.

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Kind Regards,



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Address: 37 Stoney Street, The Lace Market, Nottingham NG1 1LS | T: 0115 953 8500 | F: 0115 953 8501 | W: popall.co.uk

Authorised and Regulated by the Solicitors Regulation Authority (SRA no. 78244)

13 July 2023

Ref: 017449/00019

Doc Ref: 181125

WLM (West London Mission)
134-136 Seymour Place
London
W1H 1NT

Dear Sir or Madam,

Variation to Bingo Premises Licence - Merkur Slots, 182-184 Edgware Road, London

I am writing on behalf of Merkur Slots UK Limited, who operate the Merkur Slots premises at 182-184 Edgware Road.

We have today applied to extend the operating hours on our client's bingo premises licence, to allow the premises to operate from 07:00am to 06:00am the following day, seven days a week. Our client has operated this premises since January 2022 and currently trades from 07:00am until 02:00am on Fridays and Saturdays and until 01:00am on Sundays to Thursdays.

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Felix Faulkner
Email: f.faulkner@popall.co.uk
Telephone: 0203 859 7751 / 07595 497199

Kind Regards,



Felix Faulkner
Solicitor, Poppleston Allen

List of partners and associates available on request

Address: 37 Stoney Street, The Lace Market, Nottingham NG1 1LS | T: 0115 953 8500 | F: 0115 953 8501 | W: popall.co.uk

Authorised and Regulated by the Solicitors Regulation Authority (SRA no. 78244)

13 July 2023

Ref: 017449/00019
Doc Ref: 181125

WLM (West London Mission)
134-136 Seymour Place
London
W1H 1NT

Dear Sir or Madam,

Variation to Bingo Premises Licence - Merkur Slots, 182-184 Edgware Road, London

I am writing on behalf of Merkur Slots UK Limited, who operate the Merkur Slots premises at 182-184 Edgware Road.

We have today applied to extend the operating hours on our client's bingo premises licence, to allow the premises to operate from 07:00am to 06:00am the following day, seven days a week. Our client has operated this premises since January 2022 and currently trades from 07:00am until 02:00am on Fridays and Saturdays and until 01:00am on Sundays to Thursdays.

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Felix Faulkner
Email: f.faulkner@popall.co.uk
Telephone: 0203 859 7751 / 07595 497199

Kind Regards,



Felix Faulkner
Solicitor, Poppleston Allen

List of partners and associates available on request

Address: 37 Stoney Street, The Lace Market, Nottingham NG1 1LS | T: 0115 953 8500 | F: 0115 953 8501 | W: popall.co.uk

Authorised and Regulated by the Solicitors Regulation Authority (SRA no. 78244)

Poppleston Allen
37 Stoney Street
The Lace Market
Nottingham
NG1 1LS

Delivered by



13-07-23
£0.90 PB5577023



1
Letter



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RETURN TO SENDER
NOT AT THIS ADDRESS

.....

1st February 2024

To whom it may concern,

My name is Bogdan Onica, I am the Area Manager at Merkur Slots UK Limited, the licence holder of Merkur Slots, 182-184 Edgware Road.

I am writing to you to provide my contact details should you have any concerns with the operation of the premises.

Please therefore see below my contact details if you wish to get in contact:

Email: bonica@merkur-casino.com

Mobile: 07918337251

If these contact details change at any point, I will of course inform you.

Further to the above, we are proposing to hold a meeting at the premises at 9am on 28 February 2024.

The reason behind this is to allow yourself and local residents to understand the business, meet staff, and discuss any concerns.

The meeting will you be held at the venue, 182-184 Edgware Rd, London W2 2DS.

Should you need any more information or have any questions please do not hesitate to contact me through the email address or telephone number as detailed above.

I look forward to meeting you.

Yours Sincerely

Bogdan Onica

Merkur Slots UK Limited



Merkur Premises Address: 157-159 High Street, Acton, London, W3 6LP

Merkur Operating Hours: 24 Hours

Restaurant Address: McDonald's, 147-151 High Street, Acton, London, W3 6LP

Restaurant Operating Hours: Sun-Thurs 05:00 – 00:00 & Fri – Sat 05:00 – 01:00



Premises Address: 16-17 South Walk, Basildon, Essex, SS14 1BZ

Operating Hours: 08:00-06:00 (Permitted opening 24 hours under the Adult Gaming Centre Premises Licence)

Restaurant Address: Munchy Chicken, 18 South Walk, Basildon, Essex, SS14 1BZ

Restaurant Operating Hours: Mon – Sat 10:00 – 23:00 & Sun 11:00 – 23:00



Premises Address: 13A Station Street, Burton upon Trent, Staffordshire, DE14 1AN

Operating Hours: 24 Hours

Restaurant Address: McDonald's, 11-12 Station Street, Burton upon Trent, Staffordshire, DE14 1AN

Restaurant Operating Hours: Sun – Wed 06:00 – 23:00 & Thurs - Sat 06:00 – 02:45



Premises Address: 35 Cornmarket, Derby, DE1 2DG

Operating Hours: 24 Hours

Restaurant Address: Subway, 37 Cornmarket, Derby, DE1 2DG

Restaurant Operating Hours: Mon-Thurs 09:00 – 20:00, Friday - Sat 09:00 – 04:00 & Sun 10:00 – 16:00



Premises Address: 297 Kentish Town Road, London, NW5 2TJ

Operating Hours: 24 Hours

Restaurant Address: McDonald's, 295 Kentish Town Road, London, NW5 2TJ

Restaurant Operating Hours: Mon-Sun 05:00 – 01:00



Premises Address: 297 Kentish Town Road, London, NW5 2TJ

Operating Hours: 24 Hours

Restaurant Address: McDonald's, 295 Kentish Town Road, London, NW5 2TJ

Restaurant Operating Hours: Mon-Sun 05:00 – 01:00