

Premises Address: 292-292A Green Lanes, Palmers Green, London, N13 5TW

Operating Hours: 24 Hours

Restaurant Address: Gossip Restaurant, 290 Green Lanes, London, N13 5TW

Restaurant Operating Hours: Mon-Wed 08:00-23:00 & Thurs – Sun 08:00-01:00

Restaurant Address: McDonald's, 286 Green Lane, London, N13 5TU
Restaurant Operating Hours: Mon-Sat 06:00-00:00 & Sun 07:00-00:00



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: 94-96 Uxbridge Road, Shepherds Bush, London, W12 8LR

Operating Hours: 24 Hours

Restaurant Address: KFC, 102 Uxbridge Road, Shepherds Bush, London, W12 8LR

Restaurant Operating Hours: Mon-Sun 11:00 – 23:00

Restaurant Address: McDonald's, 88-90 Uxbridge Road, Shepherds Bush, London, W12 8LR

Restaurant Operating Hours: Mon – Thurs 06:00 – 02:00, Fri 06:00 – 04:45, Sat 24Hrs, Sun 05:00 – 02:00



Premises Address: 9 North Street, Taunton, TA1 1LH

Operating Hours: 24 Hours

Restaurant Address: Greggs, Rontec Shop n Drive, Taunton, TA1 1LH

Restaurant Operating Hours: Mon-Fri 06:00 – 18:00 & Sat – Sun 07:00 – 18:00



Premises Address: 159/163 Trongate, Glasgow, G1 5HF

Operating Hours: 24 Hours

Restaurant Address: McDonald's, 165/167 Trongate, Glasgow, G1 4HF

Restaurant Operating Hours: Mon-Sun 05:00 – 04:00



Premises Address: 69 Tottenham Court Road, London, W1T 2HA

Operating Hours: 24 Hours

Restaurant Address: KFC, 71 Tottenham Court Road, London, W1T 2HD

Restaurant Operating Hours: Mon-Sun 10:00 – 01:00



Merkur Slots, 182-184 Edgware Road, W2 2DS

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	182-184 Edgware Road, W2 2DS
Local Authority:	City of Westminster
Premise Licence No:	20/08155/LIGN – Bingo Premise Licence
Operator Licence No:	000-003266-N-103444-030 (Merkur Slots UK Ltd)
Company Details:	Merkur Slots UK, Matrix House, North Fourth Street, Milton Keynes, MK9 1NJ
	Wichkur Slots Ok, Watth Mouse, North Fourth Street, Whiton Reynes, IVIKS 1145
Name and Title of Assessor:	Amanda Kiernan – Head of Compliance
Date of Assessment:	09/10/23
Review Date:	28/03/2024 and annually on Compliance Audit Visit

Local Area Profile Risk Factors

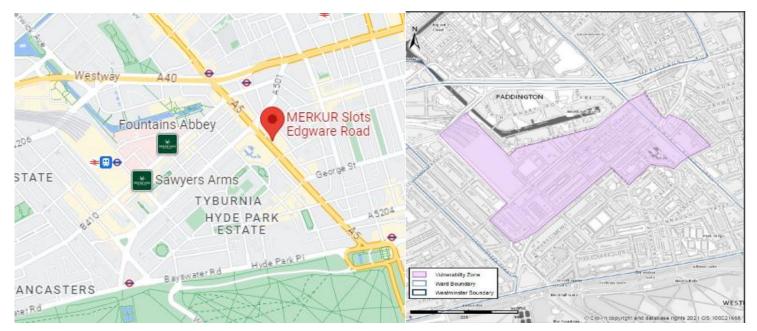
Local Risk Profile:

Merkur Slots Edgware Road is located on a busy high street within central London congestion charge area. The area sits within the Marylebone Ward of Westminster Council and Edgware Road is within the Council's Paddington Vulnerability Zone. The most common recorded business type in this area are shops and communication stations. The premises on the road include convenience stores, coffee shops, restaurants, takeaways, banks, fresh food suppliers, supermarkets, hair and beauty salons, betting shops, phone shops, pawnbrokers, pharmacies, travel and property agencies. There are a few pubs in close proximity. The premise is next door to a McDonalds restaurant which is known to attract groups of young people.

This premise is located within the Paddington (South) Gambling Vulnerability Zone:

This area, while smaller than others denoted in this section, is particularly vulnerable to gambling-related harm because it contains an elevated number of areas that rank high on the index. This area's vulnerability is linked to the very high numbers of residents receiving mental health care packages, a substantial presence of young people aged 10 to 24 and of people deemed to be financially "at risk", "struggling" or "in crisis", the presence of many temporary accommodations, and supported housing premises for people experiencing homelessness, including a women's only site. In this area, IMD scores range between 31 and 52, i.e., the two most deprived brackets.

Other factors contributing to the vulnerability index are two educational institutions and three youth clubs, as well as several pharmacies dispensing opiate substitutes or offering needle exchanges, and a job centre. We also find some smaller clusters or sporadic points of vulnerability towards the South of this area, particularly close to Paddington Station. These are exacerbated by temporary accommodations, pharmacies, supported housing and in one specific area by the close proximity of a pawn shop and payday loan shop. One medium risk yet larger cluster is formed due to the high numbers of 10- to 24-year-olds, while the whole area has substantial levels of residents receiving mental health support packages.



	City of Westminster Council local authority Statement of Licensing Principles for Gambling (November 2022)	
Establishments of note:	Two doors away from Merkur Slots Edgware Road there is Waitrose supermarket. The Little Vic Casino (Grosvenor Casino) is only 80 yards away with Argos collection store in the same building on the corner on the ground floor. There are a few bookmakers in the vicinity: William Hill, Ladbrokes, Coral, Paddy Power and Reel Time Adult Gaming Centre. The proximity of the McDonalds restaurant next door increases the risk of young people congregating in the area outside the Merkur Slots premise.	
Adjoining premises:	Merkur Slots Edgware Road is located between a McDonalds restaurant Westminster and a vacant unit. Above there is a solicitor's office and offices to let on the first floor. On the second and third floor are residential flats.	
Crime statistics:	182-184 Edgware Road is within the Marylebone policing neighbourhood, under the Metropolitan Police Force. The most commonly reported crime types in the past 12 months were other theft	
	(27.2%), theft from a person (13.4%), anti-social behaviour (13.3%), violence and sexual offences (11.1%), and vehicle crime (7.9%). There were 363 crimes recorded in Marylebone during January 2024 predominantly consisting of Other Theft (74), theft from a person (59), violence & sexual offences (54),anti–social behaviour (48), shoplifting (26) and burglary (25).	
	The neighbouring policing area, Hyde Park which aligns to Edgware Road has similar incident trends.	
	The most commonly reported crime types in the past 12 months were other theft (24.5%), violence and sexual offences (17.7%), theft from a person (15.3%) and anti-social behaviour (13.7%). There were 332 crimes recorded in Hyde Park during January 2024 predominantly consisting of Other Theft (70), theft from a person (66), violence & sexual offences (66), anti–social behaviour (46), robbery (17) and Burglary (16).	
Population:	Westminster has a population of 204,236 usual residents, 13.2% are children below the age of 15 years and a 13.9% between the vulnerable age group of 16-24 years, these are higher than the national population where 16-24 years account for only 8.3%. Across the UK as a whole, the gender split is roughly equal at 48.4% male, 51.6% female. Dominating age groups are 25 to 34 (21.6%), 35 to 49 (21.5%) and 50 - 64 (17.8%). The majority of local population is unmarried – 54.4% of all residents. 13.8% of usual residents are classed as disabled under The Equality Act and 4.7 have long term physical or mental health conditions.	
Culture:	The majority population of Westminster identify themselves as 55.2% white, 16.8% Asian with 55.6% born outside the UK and 66.6% with English as their main language. 37.3% of residents follow Christian religion and 20% are Muslim.	
Unemployment:	4.8% of residents are unemployed. 62.2% of residents are economically active with 57.3% in employment. 4.8% of the economically inactive 10.9% are retired, 11.1% are students, 6.3% look after home/family, 4.8% are long term sick or disabled and 4.8% other. The majority of those employed work in Professional, scientific and technical activities, Financial and insurance activities, Wholesale & Retail and Health & Social Work. 30.6% have Professional Occupations. 55.8% work from home and 12% travel to work on foot.	
Deprivation:	Overall deprivation in Edgware Road is better than 30% of areas in England, Income deprivation is better than 37% of areas in England, Employment Deprivation is better than 61% of areas in England, Health Deprivation is better than 61% of areas in England, Education Deprivation is better than 68% of areas in England, Barriers to Services Deprivation is better than 9% of areas in England, Living Environment Deprivation is better than 1% of areas in England, Crime Deprivation is better than 15% of areas in England. (UK local Area.com)	

Local Police:	Charing Cross Police Station, Agar St, London WC2N 4JP. Marylebone division of the London Metropolitan Police.
	The current police priorities (August 2023) in Marylebone, as highlighted on the https://www.police.uk/ website, are Robberies around Marylebone High Street; Scooter and illegal bike activity; and ASB in Manchester Place and Paddington Street Gardens. None of these priorities relate to Merkur slots or the location of the premises.
Incidents reported by venue:	Merkur Slots venues are encouraged to record all incidents, however minor or trivial. Since opening in January 2022, the venue has recorded 96 incidents: 57 relating to aggressive behaviour; 24 relating to barred persons; 11 relating to incidents outside/inside or near the premise, 2 in relating to alcohol and 2 in relating to drugs. Recorded incidents at this venue run at a rate of under 1 per week. 11 of the incidents were reported to the Police, 5 of these incidents occurred during the evening, with the latest at 9:15pm.
Security measures:	As part of a regular Risk Assessment MERKUR have identified the requirement for security as a preventative measure. SIA service appointed via CSS covering Sunday-Thursday 6pm to 1:10am and Friday-Saturday 6pm to 2:10am. SIA responsibilities include supporting with customer interactions relating to gambling behaviour, preventing crime being committed, ensuring customers comply with the operational rules and conducting age verification checks at point of entry. If extended hours are granted the SIA. licence condition 28 will be adhered to - 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.
Independent Security Reviews	MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area. Key comments from the reports include: 'Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.' 'MERKUR Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards'. 'The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to'. Leveche Associates Ltd conducted a further review including covert visits to the Merkur Slots, Edgware Road premises. Key comments from the report include: 'I carried out my observations of Merkur Slots premises at 182-184 Edgware Road and the surrounding area between 21:00 hours on Thursday 1st September 2022 and 06:15 hours on Friday 2nd September 2022, and again between 22:50 hours and 23:35 hours on Thursday 1st September 2022. 'People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises'. 'It is clear the presence of Merkur Slots in Edgware Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to' Complete Licensing Consultancy conducted a recent visit to support the licence variation application over night on the 19 th , 20 th and 21 st October 2023 and then a further visit on the weekend of 22nd and 23rd March. Key comments from the October 2023 report include: 'I co

'I observed the McDonalds restaurant and Merkur Slots next door, McDonalds was closing, and security were by the door letting customers out but not letting anyone in. Quite a few customers were leaving McDonalds, but I did not see any go to Merkur next door. As previously there was a clear difference between those leaving McDonalds, who were a younger (teens/ 20'S) crowd comprising of males and females mainly in small groups and those in Merkur who tended to be male and older, in their 30's and 40's and alone or with one other.'

'I did not observe anyone loitering in the vicinity of Merkur Slots or hanging about before or after using the premises. Those leaving did so quickly and made their way away from the premises without causing noise or nuisance in the area.'

'The only begging I observed took place outside the Grosvenor Casino in Harrowby Street and the only rough sleeping I observed was under the covered area close to the Barclays bank on the opposite side of the Edgware Road about 150 metres away. These are not associated with Merkur Slots and will be unaffected by an increase in hours to 06.00.'

The visit in March 2024 was instructed following a variation to the premises licence at McDonalds to operate until 0200 on weekends. Key comments from this report include:

'I did not see anyone go from McDonalds to Merkur Slots, or vice-versa, on either night that I conducted observations'

'In conclusion I can state that from my observations the later operating hours at McDonalds had no impact on the operation of Merkur Slots and Merkur Slots had no impact on the vicinity and would not do so if the application to extend the hours is permitted.'

Reference data: Police.UK; Street Check UK; UK Crime Stats; 2021 Census data, Marylebone Ward Profile 2022; Local Area Profile for Gambling Risk in Westminster (Jan 2022).

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

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration City of Westminster Council local authority Statement of Licensing Principles for Gambling (November 2022), Local Area Profile for Gambling Risk in Westminster (January 2022), City of Westminster Council Ward Profile for Marylebone 2023.

Environmental Factors

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

Licensing Objectives	Local Risks	Control Measures
Protecting children	Gambling Vulnerability Zones	Age Verification
and other vulnerable	This premise is located within the Paddington (South) Gambling	Ensuring Under 18's do not have access to licensed premises
people from being	Vulnerability Zone:	
harmed or exploited		All Merkur Slots venues are strictly adult only (over 18's only).
by gambling	This area, while smaller than others denoted in this section,	
	is particularly vulnerable to gambling-related harm because	Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.
	it contains an elevated number of areas that rank high on the	
	index. This area's vulnerability is linked to the very high numbers	Age verification is embedded in training platforms and responsible gambling policies.
		120

of residents receiving mental health care packages, a substantial presence of young people aged 10 to 24 and of people deemed to be financially "at risk", "struggling" or "in crisis", the presence of many temporary accommodations, and supported housing premises for people experiencing homelessness, including a women's only site. In this area, IMD scores range between 31 and 52, i.e., the two most deprived bracket.

Other factors contributing to the vulnerability index are two educational institutions and three youth clubs, as well as several pharmacies dispensing opiate substitutes or offering needle exchanges, and a job centre. We also find some smaller clusters or sporadic points of vulnerability towards the South of this area, particularly close to Paddington Station. These are exacerbated by temporary accommodations, pharmacies, supported housing and in one specific area by the close proximity of a pawn shop and payday loan shop. One medium risk yet larger cluster is formed due to the high numbers of 10- to 24-year-olds, while the whole area has substantial levels of residents receiving mental health support packages.

City of Westminster Council local authority Statement of Licensing Principles for Gambling (November 2022)

Unemployment:

4.8% of residents are unemployed. 62.2% of residents are economically active with 57.3% in employment. 4.8% of the economically inactive 10.9% are retired, 11.1% are students, 6.3% look after home/family, 4.8% are long term sick or disabled and 4.8% other. The majority of those employed work in Professional, scientific and technical activities, Financial and insurance activities, Wholesale & Retail and Health & Social Work. 30.6% have Professional Occupations. 55.8% work from home and 12% travel to work on foot.

Deprivation:

Overall deprivation in Edgware Road better than 30% of areas in England, Income deprivation is better than 37% of areas in England, Employment Deprivation is better than 61% of areas in England, Health Deprivation is better than 61% of areas in England, Education Deprivation is better than 68% of areas in England, Barriers to Services Deprivation is better than 9% of areas in England, Living Environment Deprivation is better than 1% of areas in England, Crime Deprivation is better than 15% of areas in England. (UK local Area.com)

Over 18's notices are displayed on the entrance.

Think 25 advertising is prominently displayed throughout the premise.

Merkur Slots Edgware Road Premise frontage is of a style which obscures the interior with no advertising depicting images that may appeal to children.

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

Merkur Casino operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID are be told to leave, if they have managed to play machines, their staked money would be returned to them.

Age verification test purchasing, and mystery shopper visits are frequently carried out by third party companies - ServeLegal and Store Checker. Age verification tests for 2023 current pass rate of 89% is higher than the industry average, all venues receive 2 or 3 random test visits per year.

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

Third-party test results can be provided to the Licensing Authority upon request.

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

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

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

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

Schools and Education:

Reach 2 Academy Trust Within Minerva Academy, 157 Edgware Rd, W2 2HR

Edgware Academy language school, 205 Edgware Rd, W2 1ES International Community School, 21 Star St, W2 1QB Paint Pots Montessori School Hyde Park, St Johns Church,

Hyde Park Cres, W2 2QD

Connaught House School, 47 Connaught Square, W2 2HL Marylebone Boys' School, N Wharf Rd, W2 1QZ

School, 13 Nutford Pl, Marylebone, W1H 5HA

St. James & St. John Cofe Primary School, 4 Craven Terrace, Bayswater, W2 3QD

Hope Montessori Nursery School, 11 Wharf Road, Paddington, W2 1JB

Russian Education Centre Dar, St John's, Hyde Park Cres, W2 2QD Hampden Gurney C Of E Primary School, 13 Nutford Pl, Marylebone, W1H 5HA

ASD Music Lessons London Music Box at Jacques Samuel Pianos, Edgware Rd, W2 2DZ

Micky Star Nursery & Pre-School, 58 - 61 St Michael's St, W2 1QR Naveen, Call Centre, 69 Praed St, W2 1NS

Bright Horizons Hyde Park Day Nursery and Preschool, St. James Church, 6 Gloucester Terrace, W2 3UD

Merchant Square Day Nursery Paddington, 13 Harbet Rd, W2 1AJ Great Beginnings Montessori Nursery School, 39 Brendon Street, W1H 5JE

Miss Daisy's Nursery School, Hyde Park, The Long Garden, Albion St, St George's Fields, W2 2AX

Committee Room, Medical School Building, 8 Norfolk Pl, W2 1QL L'Ecole Bilingue Elementary, St David's, Welsh Church, St Mary's Terrace, W2 1SJ

Phileas Fox Nursery School, St Mary's Square, W2 1SE Hyde Park Village Nursery, 35 Craven Terrace, Bayswater, W2 3EL St Mary's Bryanston Square Primary School, Enford St, W1H 1DL Wetherby Preparatory School, Bryanston Square, W1H 2EA Museo delle cere Londra, Craven Rd, Paddington, W2 3QB Ark King Solomon Academy - Younger Years Site, 10 Crompton St, W2 1ND

Wetherby School, 133 George St, Marylebone, W1H 7HB Halcyon London International School, 33 Seymour Pl, W1H 5AU Sudanese Supplementary School, 37 Chapel St, NW1 5DP Les Trois Oursons Bilingual Nursery, 170 Gloucester Terrace, W2 6HS licensed to offer Category Ds which are as a result tightly-regulated.

Vulnerability

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

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

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

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

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

Customer Interaction

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

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

Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling with particular focus on customers playing the higher risk B3 machines.

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

Dance Art, 1 Chilworth Mews, Paddington, W2 3RG
St Marylebone School, 64 Marylebone High St, W1U 5BA
Bright Horzions, St James's Church, Sussex Gardens, W2 3UD
Abercorn School, 248 Marylebone Rd, Marylebone, NW1 6JF
The Shaftesbury Academy, 3 Queen's Gardens, Bayswater, W2 3BA
Portman Nursery School, Broadley St, Marylebone, NW8 8DN
Christ Church Bentinck C of E Primary School, 39 Cosway Street, NW1
5NS

ICS Summer School, 7B Wyndham Pl, W1H 1PN
London Qur'an School, 64 Marylebone High St, W1U 5BA
St Edward's Catholic School, Lisson Grove, NW1 6UH
King Solomon Academy, Penfold St, NW1 6RX
Sylvia Young Theatre School, 1 Nutford Pl, W1H 5YZ
London Ballroom Studio, 1 Chilworth Mews, W2 3RG
Malylebone Kindergarten, 34 Crawford St, W1H 1LT
New Horizons London, 2 Eastbourne Terrace, W2 6LG
Saint Marylebone Church of England School, 19 Marylebone Rd, NW1 5LT
Gateway Academy, Gateway Academy, 4 Capland St, NW8 8LN

Community Centres and Youth Centres:

Almogran Centre, Gilbert Sheldon House, Edgware Rd,
St John's Wood, W2 1BX
Greenside Community Centre, 24 Lilestone Street, Marylebone, NW8 8SR
Church Street Neighborhood Centre, Church St, NW8 8HN
Penfold Community Hub, 60 Penfold St, NW8 8PJ
The Fourth Feathers Youth & Community Centre,
12 Rossmore Rd, NW1 6NX
Marble Arch, 21 Portsea Pl, St George's Fields, W2 2BL
The Fourth Feathers Youth & Community Centre,
12 Rossmore Rd, NW1 6NX

Parks, play grounds and sports/leisure facilities:

Hyde Park, Rangers Lodge, W2 2UH
Kensington Gardens, London W2 2UH
Oxford Square, 12 Oxford Square, W2 2PB
Connaught Square, Tyburnia, London W2
Rembrandt Gardens Little Venice, 6 Warwick Ave, Little Venice,
W2 1XB
Hyde Park Square, 2 Hyde Park Square, W2 2JT
Westbourne Green Open Space, 157 Bourne Terrace, W2 6PB

Westbourne Green Open Space, 157 Bourne Terrace, W2 6PB Floating Pocket Park, Paddington, W2 1JX Talbot Square Gardens, Talbot Square, W2 1TR Sussex Gardens Open Space, 227 Sussex Gardens, W2 2RL

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

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

Player Protection

To identify signs associated with problem gambling and people who may be at risk of gambling related harm

Failure to provide information to customers on responsible gambling
Failure to maintain and administer the self-exclusion process, including breaches and
reinstatement reviews

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

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

Merkur Slots actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.

Socially Responsible messaging is implemented on all digital B3 and Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details.

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

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

Deprivation

Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and its

Buckhill Playground, Hyde Park Gardens, W2 2LY Hyde Park Playground, W2 2AR Seymour Leisure Centre, Seymour Pl, W1H 5TJ

Vulnerable and addiction support services:

Addiction Services Ltd, Crawford St, W1H 2HL Recovery Circle, 104 York St, W1H 4QL

Homeless shelters and food banks:

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

Pawnbrokers and Loan Shops:

H&T Pawnbrokers, 63 Praed Street, W2 1NS Suttons & Robertson Pawnbrokers London, 199 Edgware Road, W2 1ES

Pawnbrokers London, 28-30 New Cavendish St, W1G 8TZ New Bond Street Pawnbrokers, 5 Blenheim St, W1S 1LD

Medical Centres, Care Homes and Mental Health facilities:

Lancaster Gate Medical Centre, 20-21 Leinster Terrace, W2 3ET Paddington Green Health Centre, 4 Princess Louise Cl, W2 1LQ H R Chinese Medicine Centre, 155 Edgware Rd, W2 2HR Marble Arch MED Centre, 217 Edgware Rd, W2 1ES Little Venice Medical Centre, 2 Crompton St, W2 1ND Private Medical Services, 73 Edgware Rd, St George's Fields, W2 2HZ

Belgaum Medical Centre, 6 Bendall Mews, Marylebone, NW1 6SN Crompton Medical Centre, 1 Crompton St, W2 1ND

MR Therapy Centre, Clarence Wing Basement, St Mary's Hospital, Praed Street, W2 1NY

The Medical & Surgical Centre, 19 Edgware Rd, W2 2JE
The London Bariatric Centre, The Lindo Wing, St Mary's Hospital,
Praed St, W2 1NY

London Medical, 49 Marylebone High St, W1U 5HJ London Breast Pain Clinic, 516 S Wharf Rd, W2 1JB Dr A Dodi - Bayswater Medical Centre, 46 Craven Rd, W2 3QA Roodlane Medical part of HCA Healthcare UK - Baker St Clinic, 53-55 Baker St, W1U 8EW

London Obesity Clinic, 242 Marylebone Rd, NW1 6JQ Cavendish Health Centre, 53 New Cavendish St, W1G 9TQ Nightingale Hospital, 11-19 Lisson Grove, NW1 6SH North Westminster Centre for Psychological Wellbeing, 11 Praed St, W2 1NJ procedures, as identified in this document are designed to identify individuals whilst recognising the potential density of deprivation within the surrounding area.

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

Homelessness

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

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

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

A line of contact will be created with local high-risk premises, local homeless/rough sleeping hostels/shelters, foodbanks, drug, alcohol and gambling treatment/support services to provide social responsibility information.

Merkur will contact local homeless hostels/shelters, offering to provide information on problem gambling support services and how their residents and members can self-exclude from their premises.

Merkur will at least once a year organise a meeting and invite a representative of residents' associations, and local associations to discuss any issues arising from the operation of the premises on the local community. Such meetings shall then take place unless those invited believe it to not be necessary. The license holder shall directly notify residents' associations and local associations of the meeting date and venue at least two weeks before the meeting. The meeting will be held during normal trading hours (not before 0900hrs and not after 1700hrs), during which time no facilities for gambling shall be available for use.

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

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

Gambling premises:

Silvertime, 424 Edgware Road, London, W2 1EG

William Hill, 95 Edgware Rd, W2 2HX

Ladbrokes, 113, 115 Edgware Rd, St George's Fields, W2 2HX

Paddy Power, 242 Edgware Rd, W2 1DS

Coral, 395 Edgware Rd, St John's Wood, W2 1BT

Ladbrokes, 382 Edgware Rd, Greater, W2 1EB

Coral, 9 Praed St, W2 1NJ

Ladbrokes, 13 London St, W2 1HL

William Hill, 95, 97 Baker St, W1U 6RN

Ladbrokes, 14-16 Great Central St, NW1 6JH

Betfred, 28 Baker St, W1U 3DP

William Hill, St James S Court, 75 Gloucester Terrace, W2 3DH

Ladbrokes, 14, 16 Great Central St, NW1 6JH

Ladbrokes, 11A Thayer St, W1U 5LE

Ladbrokes, 128 Gloucester Pl, NW1 5AD

Mainstage Bingo, 233-237 Old Marylebone Rd, NW1 5QT

Grosvenor Casino, The Little Vic, 156 Edgware Rd, W2 2DS

Admiral, 212 Edgware Rd, W2 1DH

Sportsman Casino, 16 Old Quebec St, W1H 7AF

Grosvenor Casino, The Barracuda, 1 Baker St, W1U 8ED

Public Houses and Alcohol Licensed Premise:

Sawyers Arms, 8 London St, W2 1HL

The Royal Exchange, 26 Sale Pl, W2 1PU

Fountains Abbey, 109 Praed St, W2 1RL

Urban Pubs and Bars, 40-42 Brendon St, W1H 5HE

Mitre Lancaster Gate, 24 Craven Terrace, W2 3QH

The Monkey Puzzle, 30 Southwick St, W2 1JQ

The Victoria, 10A Strathearn Pl, W2 2NH

Prince of Wales, 2 Cleveland Terrace, W2 6LH

The Mad Bishop & Bear, 1st Floor, The Kiosk, W2 1HB

The Heron Bar and Restaurant, Norfolk Cres, W2 2DN

The Sussex Arms, 21 London St, W2 1HL

The Swan, 66 Bayswater Rd, W2 3PH

The Dickens Tavern, 25 London St, W2 1HH

The Globe Marylebone, 47 Lisson Grove, NW1 6UB

Residential Areas:

The area containing Edgware Road, Westminster, London consists predominantly of flats, mainly rented from private landlords (67%). 27% of properties are owned with or without a mortgage. Households are equally divided between single and multiple person's occupancy. There

are a number of temporary and supported accommodations in the area surrounding Edgware Road.

Bus stops and other Transport links:

Bus stop, Burwood Place, W2 2DB Edgware Road Station, London W2 1DX

Locally Identified Premises:

Alexander Fleming Museum, 135a Praed St, W2 1QY
Madame Tussauds London, Marylebone Rd, NW1 5LR
The Park Gallery, 26 Connaught St, St George's Fields, W2 2AF
König London, 259 Old Marylebone Rd, NW1 5RA
Hai Gallery, 46A Harrowby St, W1H 5HT
Selma Feriani Gallery, 19 Connaught Square, St George's Fields, W2 2HJ
Serpentine Sackler Gallery, W Carriage Dr, W2 2AR
Lisson Gallery, 27 Bell St, NW1 5BY
Dellasposa Gallery, 2a Bathurst St, W2 2SD
The Peep Gallery, 46 Crawford St, W1H 1JT

Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime

Crime statistics:

182-184 Edgware Road is within the Marylebone policing neighbourhood, under the Metropolitan Police Force.

The most commonly reported crime types in the past 12 months were other theft (27.2%), theft from a person (13.4%), anti-social behaviour (13.3%), violence and sexual offences (11.1%), and vehicle crime (7.9%). There were 363 crimes recorded in Marylebone during January 2024 predominantly consisting of Other Theft (74), theft from a person (59), violence & sexual offences (54),anti–social behaviour (48), shoplifting (26) and burglary (25).

The neighbouring policing area, Hyde Park which aligns to Edgware Road has similar incident trends.

The most commonly reported crime types in the past 12 months were other theft (24.5%), violence and sexual offences (17.7%), theft from a person (15.3%) and anti-social behaviour (13.7%).

There were 332 crimes recorded in Hyde Park during January 2024

There were 332 crimes recorded in Hyde Park during January 2024 predominantly consisting of Other Theft (70), theft from a person (66), violence & sexual offences (66), anti–social behaviour (46), robbery (17) and Burglary (16).

Local Police:

Premise Security and violence in the workplace

Poor security control measures which may increase vulnerability to crime Failure to protect employee and customers from harm during the hours of late-night opening

Merkur Slots Edgware Road is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.

Merkur Slots Edgware Road is fitted with a HD CCTV system as per the minimum requirements of Westminster Police Licensing Team. Coverage of all public areas including all entry and exits points and an external camera with sufficient coverage of the premise frontage. CCTV is clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.

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.

Currently SIA service is appointed via CSS covering Sunday-Thursday 6pm to 1:10am and Friday-Saturday 6pm to 2:10am. SIA responsibilities include supporting with

Charing Cross Police Station, Agar St, London WC2N 4JP. Marylebone division of the London Metropolitan Police.

The current police priorities (August 2023) in Marylebone, as highlighted on the https://www.police.uk/ website, are Robberies around Marylebone High Street; Scooter and illegal bike activity; and ASB in Manchester Place and Paddington Street Gardens. None of these priorities relate to Merkur slots or the location of the premises.

Public Houses and Alcohol Licensed Premise:

Sawyers Arms, 8 London St, W2 1HL
The Royal Exchange, 26 Sale PI, W2 1PU
Fountains Abbey, 109 Praed St, W2 1RL
Urban Pubs and Bars, 40-42 Brendon St, W1H 5HE
Mitre Lancaster Gate, 24 Craven Terrace, W2 3QH
The Monkey Puzzle, 30 Southwick St, W2 1JQ
The Victoria, 10A Strathearn PI, W2 2NH
Prince of Wales, 2 Cleveland Terrace, W2 6LH
The Mad Bishop & Bear, 1st Floor, The Kiosk, W2 1HB
The Heron Bar and Restaurant, Norfolk Cres, W2 2DN
The Sussex Arms, 21 London St, W2 1HL
The Swan, 66 Bayswater Rd, W2 3PH
The Dickens Tavern, 25 London St, W2 1HH
The Globe Marylebone, 47 Lisson Grove, NW1 6UB

Pawnbrokers and Loan Shops:

H&T Pawnbrokers, 63 Praed St, W2 1NS Suttons & Robertson Pawnbrokers, 199 Edgware Rd, W2 1ES Pawnbrokers London, 28-30 New Cavendish St, W1G 8TZ New Bond Street Pawnbrokers, 5 Blenheim St, W1S 1LD

Gambling premises:

Silvertime, 424 Edgware Road, London, W2 1EG
William Hill, 95 Edgware Rd, W2 2HX
Ladbrokes, 113, 115 Edgware Rd, St George's Fields, W2 2HX
Paddy Power, 242 Edgware Rd, W2 1DS
Coral, 395 Edgware Rd, St John's Wood, W2 1BT
Ladbrokes, 382 Edgware Rd, Greater, W2 1EB
Coral, 9 Praed St, W2 1NJ
Ladbrokes, 13 London St, W2 1HL
William Hill, 95, 97 Baker St, W1U 6RN
Ladbrokes, 14-16 Great Central St, NW1 6JH

customer interactions relating to gambling behaviour, preventing crime being committed, ensuring customers comply with the operational rules and conducting age verification checks at point of entry.

Subject to grant of variation licence condition 28 will be adhered to - 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.

General Crime and Disorder

To identify aggressive customers to prevent crime and disorder Awareness of local crime issues in the local area

We have reviewed the Police.UK hot-spot mapping for the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We make every effort to liaise with local Police over reducing our involvement in any incident.

Staff are trained to identify suspicious activity and have the ability to interrogate realtime machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.

All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable. All incidents reported via the IHL tablet are regularly reviewed to identify specific or emerging risks.

Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.

The company operate an internal security alert system and are registered with trade associations for crime bulletins (BACTA and The Bingo Association).

Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.

Merkur Slots Edgware Road actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and engage in the sharing of information with other businesses to support the local community.

Betfred, 28 Baker St, W1U 3DP
William Hill, St James S Court, 75 Gloucester Terrace, W2 3DH
Ladbrokes, 14, 16 Great Central St, NW1 6JH
Ladbrokes, 11A Thayer St, W1U 5LE
Ladbrokes, 128 Gloucester Pl, NW1 5AD
Mainstage Bingo, 233-237 Old Marylebone Rd, NW1 5QT
Grosvenor Casino, The Little Vic, 156 Edgware Rd, W2 2DS
Admiral, 212 Edgware Rd, W2 1DH
Sportsman Casino, 16 Old Quebec St, W1H 7AF
Grosvenor Casino, The Barracuda, 1 Baker St, W1U 8ED

Anti-social behaviour outside the premise

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

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

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

Merkur implement a policy of banning any persons who engage in crime, disorder or anti-social behaviour within or outside the premise.

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

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance.

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

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

Money Laundering

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

Merkur Casino has a designated Anti Money Laundering Officer (AMLO), and AML polices with clear escalation and reporting processes.

Where there are pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity

or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

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

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

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity, which is monitored, and any incidents investigated.

Adequate staff is always maintained and subject to regular review and risk assessment. Appropriate staffing levels are assessed by way of risk assessment and cognisance taken of any police advice.

There is no pre-planned single staffing at the premise from 12:00 until closing and no single staffing from 20:00 until closing.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy. In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.

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

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

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

MERKUR operate a 'refresh period' in all 24hr venues that allows for any cash empties and refills to take place when the venues are closed to the public.

The premise and staff are protected by a Staffguard security system, fixed panic alarms, Maglock and intruder alarms are also installed. Staffguard provides instant access to live monitoring station via audio and CCTV to reduce the potential for false activations.

Maglock systems are made available for staff to deploy at any point in time to protect against crime or disorder and are always deployed during times of public houses closing. If trading past midnight the Maglock is always in use.

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

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

Alcohol and Drugs

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

'No Alcohol Allowed' signage on the door.

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

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

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

Toilet checks are conducted hourly for evidence of drug taking. These checks are logged and retained for inspection.

Maglock systems are deployed during times of public houses closing.

Money Lending

Money lending is not tolerated within our premises.

	Suspicions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams. Late Night Operation Maglock systems are made available for staff to deploy at any point in time to protect against crime or disorder and are always deployed during times of public houses closing. Dedicated Regional Night Managers are employed to support venues with security incidents. Area Manager's operate a late night rota system to ensure the 'late night contact number' is monitored so venues always have an Operational Manager to call upon for support with any issues during late night operation. The premise and staff are protected by a Staffguard security system, Maglock and intruder alarms are installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.
Ensuring that gambling is conducted in a fair and open way	Gaming Machine and Supervision The premise operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p). Bingo is available by means of Bingo tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes. Customer Complaints Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises. Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.

The Company Code of Practice and Complaints and Disputes Policy is be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS. Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue. Marketing Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP, and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). External windows have digital marketing screens which display safer gambling messages, No Under 18's allowed, Think 25, opening times and promotional activity. All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children. Places of worship and Religious Buildings Ethnicity and Local Area Demographic Other Merkur Slots does not discriminate on the ground of ethnic or social demographic. Central London Seventh-day Adventist Church, Crawford Place, W1H 5JE Adventist Church Seven Days, 39 Brendon St, W1H 5JE Local area profiles which detail deprivation, social, ethnic or population may be used St Mary's Church, 255 Old Marylebone Rd, NW1 5QT as part of the risk assessment in relation to gambling related harm in conjunction St Mary's Church, Little Venice, St Mary's Square, W2 1NB with the company standard controls. South England Conference of Adventist, 37-39 Brendon St, W1H 5JE Merkur Slots takes a holistic approach to customers and is aware that the Equality St James's Church, Sussex Gardens, Sussex Gardens, W2 3UD Act precludes the exclusion of any group for generalised reasons. Igreja Adventista do Sétimo Dia, 39 Brendon St, W1H 5HD Father's Michael Church, 209 Old Marylebone Rd, NW1 5QT Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation CELP - Conselho Europeu de Língua Portuguesa, 39 Brendon St, W1H 5HD St Mary's Churchyard, Paddington Green, W2 1NB (crime/employment/health) and engage in the sharing of information. St John's Church, 18 Hyde Park Cres, W2 2QD Christ Church of England, 35 Cosway St, NW1 5BT Training & Social Responsibility Merkur Slots take responsible gambling and social responsibility seriously, ensuring St Mary's Church London, Wyndham Pl, York St, W1H 1PQ Eleventh Church of Christian Scientists, 91 Seymour Pl, W1H 5TG all staff are fully trained to carry out their roles in a responsible manner. Saint David's Welsh Church, 2 St Mary's Terrace, W2 1SF Merkur Casino have attained Responsible Gambling Accreditation from the G4 Global Church of the Annunciation of the Virgin Mary, 5 Craven Hill, Gambling Guidance Group. W2 3EN Abrar Foundation, 45 Crawford Pl, W1H 4LP Merkur Casino work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all The Swedish Church in London, 6 Harcourt St, W1H 4AG Annunciation Marble Arch, Bryanston St, Marble Arch, W1H 7AH levels of management.

Central Pentecostal Church, 141 Harrow Rd, W2 1JP
Repossession Saviour, 94-96 Seymour Pl, W1H 1NB
St Mary's, Bryanston Square, 38 Crawford St, W1H 1HA
St Paul's Church, 5 Rossmore Rd, NW1 6NJ
St Marylebone Parish Church, 17 Marylebone Rd, NW1 5LT
St James' Roman Catholic Church, 22 Spanish Pl, George St, W1U 3QY
Tyburn Convent and Church, 8-9 Hyde Park Pl, W2 2LJ
Greek Orthodox Archdiocese of Thyateira and Great Britain, Thyateira
House, 5 Craven Hill, W2 3EN
Masjid Salahuddin, 1 Norfolk Pl, W2 1QN
Prayer Room Mosque, 432 Edgware Rd, W2 1EG
Malaysia Hall Prayer Room, 30-34 Queensborough Terrace, W2 3ST

There are two National Training Centres and a dedicated Learning and Development Team.

Gamcare Accredited training completed by members of management.

All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.

Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.

Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors annually.

Merkur Slots Edgware Road Premise Layout

Premise level:	Merkur Slots Edgware Road is a ground floor premises.
Premise frontage:	Merkur Slots Edgware Road is a property is of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions comply with LCCP, and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
Counter Position:	Merkur Slots Edgware Road floor layout is of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons. The central service area serves as the main support area for staff to manage the venue without having to leave the floor: - TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots Edgware Road floor layout is designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed, and staff regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets are located in prominent locations within the premise.
Machine Positions:	Merkur Slots Edgware Road operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p). Bingo is available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.
Hidden Areas:	Merkur Slots Edgware Road is fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV is clearly advertised to customers with screens visible by employees when working in the service area.

Additional Comments

Merkur Slots has attained the prestigious Global Gaming Guidance Group (G4) accreditation for Responsible Gambling. This is only awarded after a rigorous audit of the company's safer gambling measures. Furthermore, ongoing accreditation requires reassessment every 18 months.

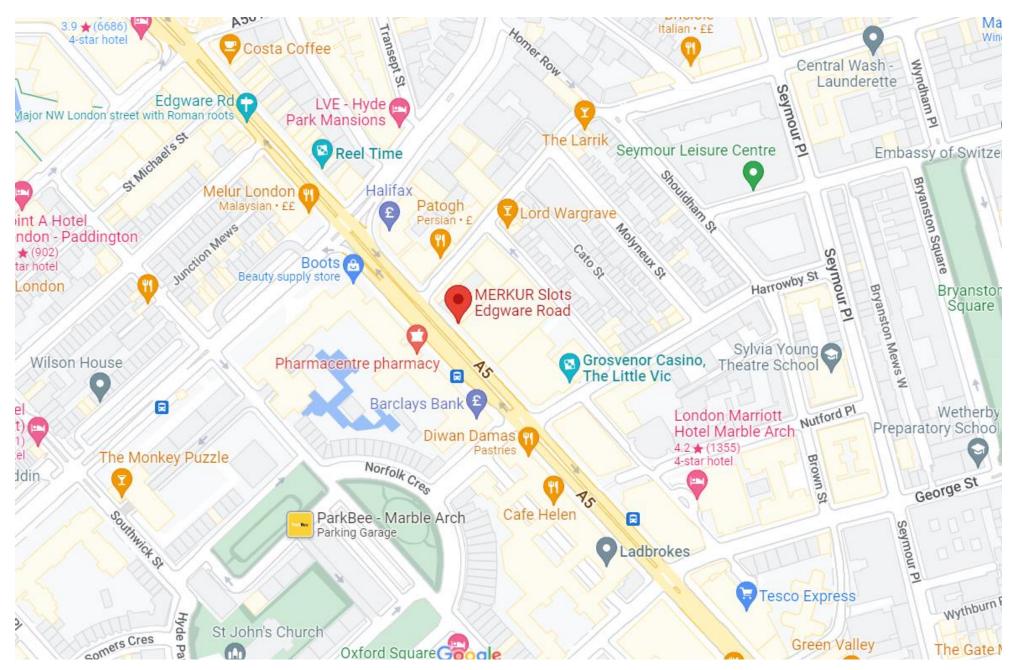
The venue manager is Sharon Claire Santos who is experienced in the Gambling Industry and familiar with Gambling Compliance and supporting with people who may be vulnerable, possibly at risk of having a problem with their gambling and may need interaction. Sharon Claire is aware of the need to support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

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

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

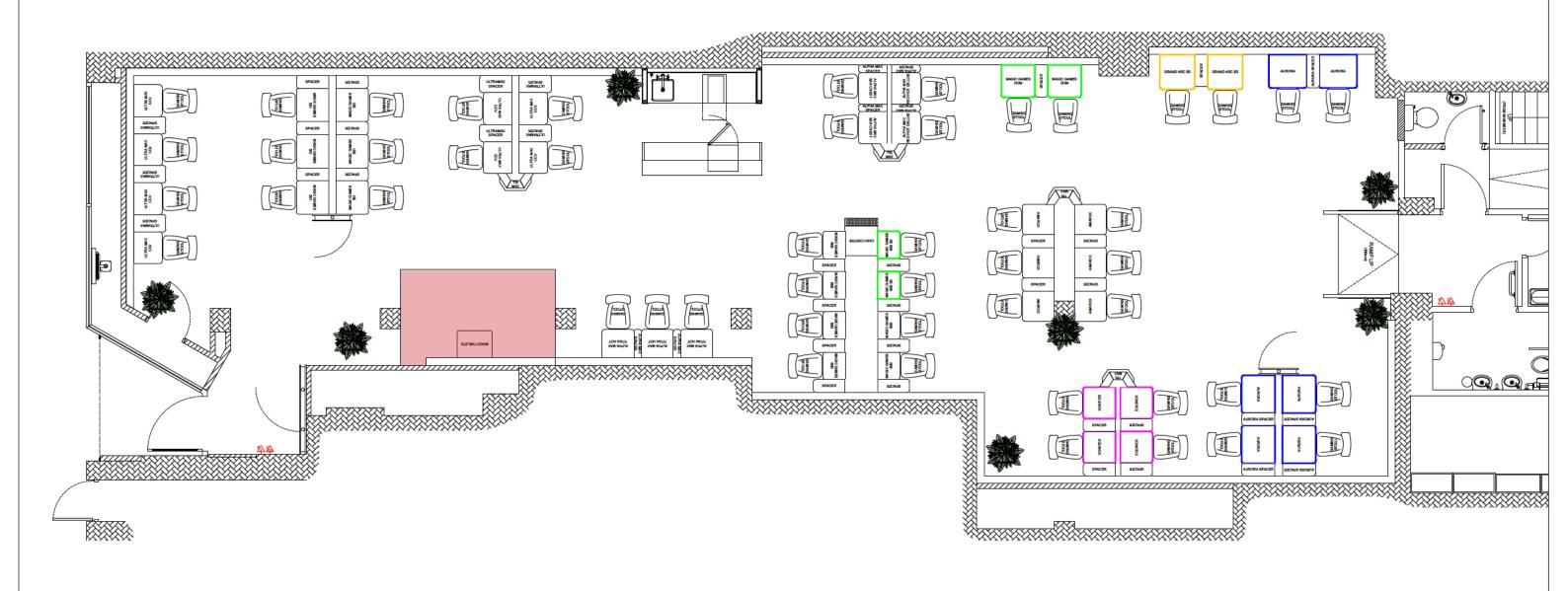
Assessors Name:	Amanda Kiernan
Signature:	fl-
Date:	28/03/2024

Merkur Slots, 182-184 Edgware Road, W2 2DS, map:



Merkur Slots, 182-184 Edgware Road, W2 2DS





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

REVISIONS
REV 05: Fully updated to SLOTS
specification and scope of works reviewed
on site (21/10/21).

REV 06: Machine plan updated (26/10/21).

REV 07: Wall between kitchen and store room adjusted to retain ductwork (03/11/231).

 FIT OUT TYPE	REFERENCE DRAWINGS	Τ
PROJECT MERKUR SLOTS 182-184 EDGWARE ROAD LONDON W2 2DS	SCALE 1:75 DRAWN BY S.R.B.	
DESCRIPTION PROPOSED MACHINE PLAN	DATE 21/10/21 DRAWING No. REVISION 07	COF NOT FRO THIS SITE



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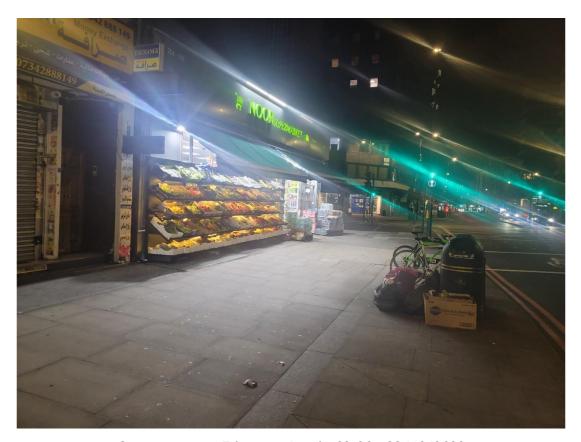
MERKURSLOTS

Consultants Report

Poppleston Allen 27.10.23

1. INTRODUCTION

- 1. I have been instructed by Poppleston Allen Solicitors to conduct observations at, and in the vicinity of, Merkur Slots, 182-184 Edgware Road, London, W2, in connection with the application to remove the Conditions that limit the hours of use for Bingo and Gaming machines and the operational hours; and to permit the premises to be used for the provision of facilities for the playing of Bingo and other gaming machine use from to Monday to Sunday 07.00 hours to 06.00 hours.
- 2. The premises are located in Edgware Road, W2 just a few minutes' walk from two Night Tube stations. These are Edgware Road Station to the North that is on the Circle, District and Hammersmith & City lines and Marble Arch station to the South on the Central Line. There are also good night bus services running directly past the premises with stops in the immediate vicinity.
- 3. Close to the premises are a small number of other casino and gaming premises that include:
 - The Grosvenor Casino (open 24/7) with the main entrance in nearby Harrowby Street.
 - The Little Vic Casino at 156 Edgware Road (open 24/7), and
 - Reel Time/ Admiral slots (open 24/7*)at 212 Edgware Road.
 - *Admiral slots closed around 02.00 hours during my observations, but I understand they have a 24/7 licence.
- 4. Next to Merkur Slots at 178 Edgware Road is McDonalds which is open 05.00 to 23.45 hours Monday to Sunday. On the other side of Merkur the building is currently unoccupied.
- 5. This part of the Edgware Road has a diverse population with an Arabic/Middle Eastern influence. This is reflected in the shops, restaurants and Shisha bars offering food and recreation popular in this diverse community and the tourists that visit. Many of these premises reflect the late, and often all-night, culture popular in such communities and with visitors to them, by staying open very late or through the night.
- 6. The restaurants and other late and all-night premises such as Shisha bars, restaurants, specialist grocery shops and The Grosvenor Casino were all busy through the early hours and night during my observations.
- 7. While traffic in the vicinity reduced a little from about 02.00 hours on the Edgware Road, traffic continued through the night and the area and transport links remained busy.



Greengrocers, Edgware Road, 02.38, 22/10/2023.



Locals and visitors enjoy the night-time 'café culture'. 02.09 hours, 21/10/2023

2. SUMMARY OF EXPERTISE

- 1. I retired from the police service on 2nd November 2012 having completed 31 years exemplary service with the Metropolitan Police in London. Between January 2012 and my retirement I was employed as the Chief Inspector in charge of licensing for the London Olympic Games 2012. I headed up a team of officers with responsibility for supervision of licensing compliance at all the Olympic venues, including the Olympic Park, and that associated events were appropriately licensed. I worked with both the Olympic Park management and many other venues to ensure that the Games were delivered safely and securely. I was awarded an Assistant Commissioners Commendation for this work.
- 2. Prior to this role I was employed first as an Inspector and then as a Chief Inspector running the MPS specialist central licensing unit with a London wide remit to support all the Boroughs with licensing activity. Providing both Overt and Covert support for policing problem licensed premises across London my team worked for compliance with premises and, when this failed, supported Boroughs with evidence for licensing hearings when required. I devised and implemented the MPS strategy 'Safe and Sound' which sought to improve the safety of customers at licensed premises by reducing violent and other crime. I also developed the Promoters Forum and risk assessment process, and together these initiatives contributed to an overall reduction in violence in London of 5% and of the most serious violence and gun crime at licensed premises by 20% whilst I was there.
- 3. From 2004 until 2008, my role included representing the MPS and national police licensing lead on licensing strategy in London and nationally. I was involved with Best Bar None for several years and successfully helped several boroughs to implement the initiative. I was a trained Purple Flag and Best Bar None assessor and, until my retirement, I sat on the Board for Best Bar None in the Royal Borough of Kensington and Chelsea. For the last five years of my service I was in charge of licensing for the Notting Hill Carnival, the largest street carnival in Europe. During this time, I contributed to a reduction in violence overall at the Carnival and delivered increased seizures of illegal alcohol, reduction of unlicensed alcohol sales and a reduction in alcohol related violence. Following my retirement in 2012 I set up a licensing consultancy to improve standards and provide independent advice for premises requiring a local authority licence.

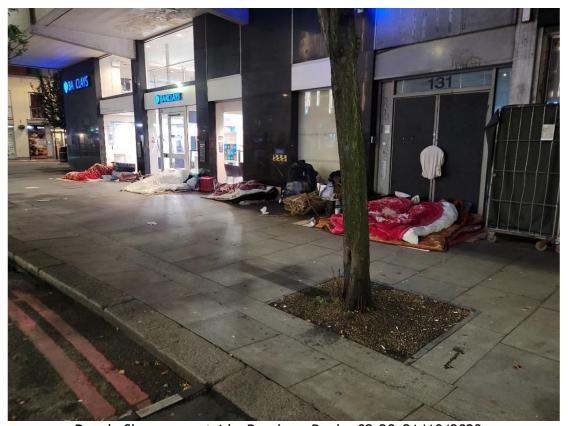
3. EXECUTIVE SUMMARY

- I conducted observations over three nights, when the area was busy, on Thursday 19th October,
 Friday 20th October and Saturday 21st October 2023 covering the hours between 22.00 to 06.00 over
 the three nights. During these observations many of the people I observed using the restaurants,
 cafés, shops, shisha and gaming premises were of Arab/ Middle Eastern appearance.
- 2. Some appeared to be locals, on nights out with family and friends and arrived on foot or local transport; some appeared to be coming to the area from other parts of London attracted by the diverse, late-night environment and others were tourists, for example those staying at international hotels nearby such as The London Marriott, Marble Arch. As the night wore on it also became apparent that some were local workers who, having finished working late in the restaurants and shops were relaxing and enjoying the facilities on offer.
- 3. Traffic on the Edgware road reduced after about 02.00 but the late-night premises remained busy, particularly those serving shisha and tea & coffee with customers sitting outside under heated canopies and chatting with each other, and with passers-by, in a familiar manner.
- 4. I visited the Bingo/gaming premises in the vicinity and found them all well run and managed professionally. On entry staff were visible around the premises and engaging with those playing. In particular I found that Merkur Slots had a high ratio of staff to customers and always had an SIA door supervisor present and visible, which is best practice. Each time on each arrival at Merkur Slots I was personally greeted by staff and welcomed in, a process that also clearly involved discrete vetting for age and behaviour. I observed that all customers arriving at Merkur were greeted and vetted in a similar manner on arrival and any who appeared to be under 25 were required to produce ID.
- 5. The Merkur staff were friendly, helpful and polite to customers and the atmosphere inside the Merkur premises was relaxed and welcoming with soft furnishings and background music. Customers were mature, most in their 30's and 40's and the premises did not attract young or noisy customers. The staff were very vigilant around the premises and with the SIA door supervisor present it was clear that such behaviour would not be tolerated.
- 6. While in the area at various times over the three nights I did not observe any noise or nuisance, crime or disorder being generated by the premises or in the vicinity. Customers arriving entered the premises quickly and after being welcomed went and found a seat to play the games. Some arrived with friends and sat together chatting while they played. On leaving they made their way away quickly and I did not see customers loiter or cause any nuisance in the area.

- 7. I did not see any police, local authority wardens or other authority figures on the street in the vicinity of Merkur slots or any of the similar premises. I did not see any crime or disorder or any incident or occasions when I considered that they would be required. I have not seen any evidence from the police or other authorities that the premises causes, or contributes to, crime and disorder in the vicinity.
- 8. From what I observed during my observations at Merkur Slots the premises fully supports the Gambling Licensing Objectives by preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime and ensured that gambling is conducted in a fair and open way. I saw nothing suggesting vulnerability, such as intoxication or other behavioral markers, and I did not see street dwellers trying to enter.

4. OBSERVATIONS

- 1. On Thursday 19th October 2023 I arrived in the vicinity of Merkur Slots at about 23.30 hours. The McDonalds restaurant next door was preparing to close with customers leaving but no new admissions. Those leaving McDonalds made their way away mainly on foot apparently heading home with a small number going towards the nearby underground stations and the night bus stops. I did not see any go from McDonalds to Merkur Slots.
- 2. The weather was wet and windy and pavements in Edgware Road were quiet with the exception of the pavement opposite the premises where street sleepers set up under the overhead canopy close to Barclays Bank. I did not see any beggars or drug users/sellers in Edgware Road, and I was not approached by anyone in the street. I did not see any cross-over between the rough sleepers and those using Merkur Slots or any of the other similar premises.



Rough Sleepers outside Barclays Bank, 02.28 21/10/2023.

- 3. The Grosvenor Casino and the other slot/bingo premises in the vicinity were open and I observed a small number of customers coming and going to and from them. Admiral had the doors closed and apparently locked and customers were admitted by staff who personally greeted them and appeared to vet them at the door. The Little Vic had the doors open and customers were able to walk in unchecked although I could see staff inside the premises and interacting with customers.
- 4. I went to Merkur Slots at about 00.10 and found the door locked. I pushed the bell, and the door was opened by an SIA door supervisor who was correctly displaying his badge and scrutinised me prior to permitting me entry. Inside the premises I was greeted by a female member of staff who welcomed me and offered me a tea or coffee.
- 5. Walking around the premises it was quiet and orderly with a relaxed atmosphere. There were about Ten (10) people playing on the machines, mainly males but a couple of females. Most appeared in their 30's and 40's and appeared a diverse mix of Arab/Middle East, North African and Eastern European people. All were playing games on the machines, and none appeared drunk or under the influence of drugs.
- 6. There was clear messaging around the premises and on all the machine screens highlighting the need to 'Stay in Control' and giving information on where help can be obtained by phone or on the internet. There was also highly visible 'GambleAware' messaging on posters and leaflets around the premises and details of where help could be obtained.
- 7. A short while later I was sitting at one of the machines and I was approached by a member of staff who was cleaning in the premises and asked if I needed any help. I explained that I wanted to play on the machine but was not sure how to go about it without cash. The staff member explained how to get a ticket from another machine using a debit card and then how to use this to gain credits. He explained when I had finished I could 'cash out' by getting another ticket from the machine I played that could be cashed in at the change machine.
- 8. The staff member was polite and friendly, and I did not feel under any pressure to play. In total there appeared to be 3 or 4 staff members on duty and the premises were clean and tidy, very orderly and well run.
- 9. I left Merkur Slots at about 00.30 hours, Edgware Road was still busy, and the 'GoPuff' delivery service opposite was busy. I made my way to the 'Little Vic' just along the road which is open 24 hours. The premises were quite busy with 25 plus customers and the environment was similar to that I experienced at Merkur, relaxed with no pressure to play. I was again offered tea and coffee and welcomed in. Walking around some of the customers were playing games, others chatting and at least one was on a phone call that appeared to be to family abroad.

- 10. At about 00.45 I left the Little Vic; I noticed that a nearby Supermarket was busy as I made my way along Edgware Road. The many cafés, restaurants and Shisha bars were very busy. I went to the Shishawi restaurant a short distance along the Edgware Road which was also busy and had tea and a light meal. Listening to the conversations around me many of the customers were from the local area.
- 11. At about 01.45 I made my way back along Edgware Road, that was still very busy, and went to Admiral Slots. As I went to enter a member of staff informed me that they were closing. Making my way back along Edgware Road, Merkur Slots was also closed. The Little Vic was open with the doors open, and I could see some people inside playing on machines, the premises were orderly and appeared well run.
- 12. Walking around to Harrowby Street there were a couple of female beggars, I would estimate their age to be 30's or 40's, outside the entrance to the Grosvenor Casino who asked for money, but they were the only beggars I saw all night. I remained in the area until about 05.00, the Edgware road was quieter than it had been earlier, but traffic was constant. Admiral and Merkur slots were closed but the Little Vic and Grosvenor Casino remained open, as did some of the other shops and restaurants. The area was orderly, and I did not observe any noise or nuisance, crime or disorder. I did not see any police or other enforcement agencies during the night or any incidents that required them.
- 13. On Friday 20th October 2023 the weather was fine and dry, and I arrived at Edgware Road at about 22.00 hours. The area was busier than the previous night and the McDonalds was busy. I went to the door of Merkur Slots that was closed but not locked and went into the premises. There were about 6 8 male players inside, mainly of Arab/Middle Eastern appearance and in the 30–40-year- old age range. As before the atmosphere was orderly and relaxed and I was greeted on arrival.
- 14. At about 22.15 I left Merkur and went next door into McDonalds that was busy with 24 plus customers and a steady flow of customers going into and from the premises and a number of delivery riders waiting with bikes outside or sitting at tables by the windows. It was noticeable that the customer demographic in McDonalds was very different to that in Merkur Slots. In McDonalds the customers tended to be younger with many in their late teens and 20's. I sat in McDonalds for some time observing and did not see any customers leave McDonalds and go into Merkur Slots.
- 15. At about 22.35 I left McDonalds and went to Admiral Slots, there were 6-8 customers there including 2 females and the customer demographic appeared similar to those in Merkur with the age range apparently in their 30's and 40's, noticeably older than most of the McDonalds customers. Leaving Admiral around 22.45 I made my way to the Little Vic, which is similar to, though larger than, the Merkur and Admiral premises and open 24 hours. There were about 30 customers present, again

similar demographic to Merkur and Admiral. As a larger premises, and with the doors left open, the Little Vic customers were not all welcomed and vetted on arrival and had a lower ratio of staff to customers than Merkur.

- 16. I did not see any beggars in the Edgware Road but making my way round into Harrowby Street there were again two female beggars outside the Grosvenor Casino.
- 17. At about 23.45 hours, walking along Edgware Road, McDonalds next door was closing, but I did not observe any customers going from there into Merkur Slots which was now quieter with three staff members and three customers. Admiral was also open but appeared quiet. The road was still busy with traffic and pedestrians and the cafés, restaurants and shisha bars were busy. Going into Merkur slots I was greeted by staff and welcomed in.
- 18. At 01.00 Merkur Slots was open, but I could not see any customers inside. The staff informed me that they were closing at 01.45 hours. Admiral was open but quiet and the Old Vic was busier. All were orderly with no noise or nuisance being caused at the premises or in the vicinity. With the doors at Merkur and Admiral closed it was not possible to tell if the premises were open or closed from the street.
- 19. Walking around to Harrowby Road there were now 5 or 6 beggars outside the Grosvenor Casino who were calling out to people walking past. I did not see any police, local authority wardens, or other authority figures at any time during my observations either in Harrowby Road or in the Edgware Road which was busy with shops, cafes, restaurants and bars open. The beggars in Harrowby Road did not appear to be challenged either by the premises or by any authority figures.
- 20. By 02.00 Merkur and Admiral were closed, Little Vic was open but quiet. Keeping casual observations in the area the traffic in Edgware Road had reduced but the area generally was still quite busy with many premises still open and deliveries, for example to the Waitrose store, taking place. With the exception of the rough sleepers outside Barclays opposite and the beggars outside The Grosvenor Casino I did not see any begging or homeless in the vicinity of Admiral/Merkur/Little Vic.
- 21. On Saturday 21st October 2023 I arrived in the area at about 23.00 hours. The weather was cold and dry. Little Vic was open and had about 15 customers inside and I saw two members of staff.

 McDonalds was busy with 25 + customers. There were staff cooking behind the counter, but I did not see any staff in the customer area or any security managing the doors or seating area. There were a large number of delivery riders, some chatting loudly and joshing with each other, waiting either just inside the restaurant or on the pavement outside and on their bikes and scooters parked on the road.

- 22. At about 23.20 I went to Merkur Slots, the door was closed but not locked. Entering the premises there was an SIA registered door supervisor and two other members of staff. As previously I was greeted and welcomed with the offer of tea or coffee. There were about half a dozen males inside playing games who appeared to be in their 30s and 40s and of Arab/Middle eastern appearance.
- 23. At about 23.40 I went to Admiral and the doors there were closed but not locked. I observed two staff and about 3 or 4 customers, similar to those in Merkur. The Edgware Road itself was busy with traffic and pedestrians and the shops, restaurants and Shisha bars were busy.
- 24. I observed the McDonalds restaurant and Merkur Slots next door, McDonalds was closing, and security were by the door letting customers out but not letting anyone in. Quite a few customers were leaving McDonalds, but I did not see any go to Merkur next door. As previously there was a clear difference between those leaving McDonalds, who were a younger (teens/ 20's) crowd comprising of males and females mainly in small groups and those in Merkur who tended to be male and older, in their 30's and 40's and alone or with one other.
- 25. At about 00.40 hours I saw three beggars outside The Grosvenor Casino, this was still the only place I had seen them, with none in Edgware Road itself in the vicinity of Merkur or the other Bingo/slot machine premises.
- 26. At about 00.45 I went into Little Vic, as previously the doors were open and it was quite busy with three members of staff present, although I did not see any displaying an SIA door supervisor badge. I was welcomed and offered tea or coffee and I was asked to remove the baseball cap that I was wearing.
- 27. Leaving at about 00.50 Edgware Road was quieter, though still with traffic using it. Merkur Slots had the doors locked but I was admitted on ringing the bell. Inside there were only 3 other customers and staff were cleaning and clearing up. I asked what time they closed and was informed it was at 01.40.
- 28. At about 01.00 I made my way to Admiral; the doors were closed but not locked. There were three staff inside and a small number of customers, all late 20's/30's. At 02.00 I went to Merkur Slots, and the doors were locked, and the premises were closed. Admiral was open but had only a couple of customers inside and was quiet. Little Vic was open with the doors also open and just a small number of customers inside. The Grosvenor Casino was busy and walking along Edgware Road it was busy with pedestrians using the shisha bars, restaurants, shops and cafes.
- 29. I kept casual observation in the area for the remainder of the night, the night bus stops were used by a few of those leaving the various premises that remained open and the area generally remained open with cafes and shisha, shops and restaurants and The Grosvenor Casino and Little Vic slots.

30. As previously there were rough sleepers outside Barclays Bank and beggars outside The Grosvenor Casino, but I did not see any other signs or begging or nuisance. I did not observe any noise or nuisance being generated in what is clearly a busy night-time economic and entertainment environment.

5. CONCLUSIONS FROM OBSERVATIONS

- 1. Over the three nights of observations the majority of people out on the streets and using the many restaurants, cafés, shops, shisha bars and gaming premises were of Arabic/ Middle Eastern appearance and were not youngsters in their teens or early 20's, but were older in their 30's, 40's and older. The atmosphere in the area was generally relaxed and good-natured with groups of friends, couples and tourists enjoying the late-night environment.
- 2. As it got later some of the individuals appeared to have come after work locally, such as waiters from the restaurants, and many appeared familiar with the area and with others there, greeting each other and staff at the various shops and premises.
- 3. The area has a diverse population with Middle East, North African and Arab influences and it was people from these communities who made up the majority of customers I observed in the gaming premises, including at Merkur Slots, and in the other extensive and various late-night premises nearby.
- 4. The area has a genuine 24/7 culture. Traffic on the road reduced after about 02.00 but the late-night premises remained busy. Many of the various premises remained open until the early hours or even all night and were popular with outside seating, despite the weather, which was occasionally both cold and wet. Most had canopies and heaters to encourage customers to remain. A quick search on 'you tube' or similar highlights the late-night attraction of the area with organised night walks for tourists to enjoy the atmosphere and environment.
- 5. From my observations all the Slot/gaming premises in that vicinity were well run. In particular I found that Merkur Slots had a high ratio of staff to customers and always had an SIA door supervisor present and visible, which is best practice. While the other premises were well run the presence of an SIA door supervisor was not always so obvious. In my view premises such as Merkur, which are warm, welcoming and inviting add to the attraction and security of the area.
- 6. The Merkur staff were friendly, helpful and polite to customers; it was clearly a controlled environment with security visible and active inside the premises. The atmosphere inside the Merkur premises was relaxed and welcoming, soft drinks, tea and coffee were freely available, and I did not observe any noise, nuisance, crime or disorder being generated by the premises or in the vicinity.
- 7. Some of the customers gamed only a small amount but used the premises as a warm, comfortable environment to meet and socialise in small groups of two or three people. The staff were active at the door, and I did not see anyone who appeared to be under 25 attempt to gain entry.

8.	I did not observe anyone loitering in the vicinity of Merkur Slots or hanging about before or after
	using the premises. Those leaving did so quickly and made their way away from the premises without
	causing noise or nuisance in the area.

6. CRIME AND DISORDER

- 1. In the police representation PC Tom Stewart states that an extension to operating hours will lead to an increase in crime and anti-social behaviour, however he gives no evidence of crime and disorder that is currently associated with the premises or any recorded crimes at the premises.
- The current police priorities (August 2023) in Marylebone, as highlighted on the
 https://www.police.uk/ website, are robberies around Marylebone High Street; scooter and illegal
 bike activity; and ASB in Manchester Place and Paddington Street Gardens. None of these priorities
 relate to Merkur slots or the location of the premises.
- 3. PC Stewart states that this area of Edgware Road already has higher-than-average levels of crime, ASB including begging and rough sleeping and that it is likely that if the premises were to be open until 6am it would make an (a?) desirable location for local venerable (vulnerable?) adults to attend.
- 4. The only begging I observed took place outside the Grosvenor Casino in Harrowby Street and the only rough sleeping I observed was under the covered area close to the Barclays bank on the opposite side of the Edgware road about 150 metres away. These are not associated with Merkur Slots and will be unaffected by an increase in hours to 06.00.
- 5. I have conducted research on the https://www.police.uk/pu/your-area/metropolitan-police-service/marylebone/?yourlocalpolicingteam=about-us&tab=crimemap website and it does not show any crimes recorded in the vicinity of Merkur Slots to date this year (Jan to Aug 2023). While exact locations are anonymised any crimes that took place at the location would be shown in the vicinity.
- 6. As an example, looking at the latest crime hotspot information available (August 2023) in Marylebone there are hotspots such as Porter Street with 19 crimes and the Marylebone Road near Baker Street with 15 crimes. If there were a hotspot of crime near Merkur slots it would be highlighted in a similar fashion, however, there is no such hotspot.
- 7. The data relied on by police, taken from the LARA, demonstrates the high standard of recording by Merkur Slots as it shows every low level incident and a very small number of police call-outs. There is no night-time bias to these calls as would be the case in pubs and clubs and I see no reason why this would change if the application is granted.