

**MERKUR SLOTS, 40-41 QUEENS ROAD, HASTINGS, TN34 1RE**

**LICENSING SUB-COMMITTEE HEARING**

**14<sup>TH</sup> OCTOBER 2021**

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**HASTINGS BOROUGH COUNCIL**

**LICENSING SUB-COMMITTEE**

**14<sup>TH</sup> October 2021**

**APPLICATION FOR BINGO PREMISES LICENCE**

**MERKUR SLOTS UK LIMITED**

**40-41 QUEENS ROAD, HASTINGS TN34 1RE**

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**SKELETON ARGUMENT ON BEHALF OF APPLICANT**

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**INTRODUCTION**

1. This is an application for a new bingo premises licence.
2. There is no objection to this application by any responsible authority or local resident. There is one objection, from a trade objector, which trades half a mile away.
3. The purpose of this skeleton argument is to help the Sub-Committee navigate the material by setting out some of the background to the application, explaining the legal context under the Gambling Act 2005, and making brief submissions dealing with the representations.
4. In considering the application, the Committee may be particularly assisted by looking at the following documents:
  - Witness statements:
    - Amanda Kiernan (page 3 to 11)
    - Steve Ambrose (page 12 to 15)
    - Andy Tipple (page 16 to 17)
    - Jason Stiborski (page 18 to 20)

- Legal obligations to promote licensing objectives:
  - Gambling Commission’s Licence Conditions and Codes of Practice applicable to non-remote bingo licences (page 250 to 303)
  - Mandatory and default conditions attaching to bingo premises licences (page 323 to 325)
  - Proposed licence conditions for 40-41 Queens Road (page 1 to 2)
- Operational standards (page 51 to 53 of the Licensing Sub-Committee Agenda papers)

**BACKGROUND**

5. The applicant is part of the Gauselmann group, which is one of the most experienced providers of gaming premises on the high street across the UK, including adult gaming centres and bingo premises. Players in high street bingo premises access bingo games through the use of tablets, which are increasingly replacing paper bingo cards as provided in large, flat-floor bingo halls.
6. As one would expect, the applicant and its sister companies have detailed systems for compliance with the law and promotion of the licensing objectives, which they implement through staff training and management programmes and supervise through area and national management oversight and independent audit.
7. Bingo premises are subject to a high degree of regulation in order to support the licensing objectives, including the following:
  - Premises and their management and operation are subject to the Gambling Commission’s extensive Licence Conditions and Codes of Practice applicable to non-remote bingo operating licences.

- Premises licences are subject to mandatory and default conditions set by the Secretary of State with the approval of Parliament.
  - The number of gaming machines, the way they operate and their stake and prize limits, are strictly regulated through the Gambling Act 2005 (by Parliament), regulations (by the Secretary of State) and technical standards (by the Gambling Commission). Specifically, in bingo premises, while there is no limit on the number of gaming machines, at least 80% of the machines have the same stake and prize limits as pub fruit machines, with 20% governed by the same limits as other high street gambling establishment (adult gaming centres and betting offices).
8. In addition, the applicant has offered individual licence conditions as mentioned above.

*The nature of high street bingo premises*

9. Gambling on the high street in Great Britain is dominated by betting offices, both numerically and in terms of environmental impact. As to numbers, betting offices outnumber bingo premises 11:1 (6,735 v 601<sup>1</sup>). As to impact, betting offices can bring with them social issues, including street drinking and disorder and loitering outside. Hence, when an application is made for a bingo premises licence, it is sometimes thought, perfectly understandably, that it will bring with it the same kind of issues as arise at high street betting offices.
10. In fact, high street bingo premises in general and the applicant's in particular are completely different from betting offices in terms of local impact. It is therefore important to try to convey why the applicant's premises trade without regulatory concern.
11. *On arrival.* It is noticeable that groups do not loiter or gather outside high street bingo premises smoking, drinking, littering and importuning passers-by. The absence of such activity is not only observable empirically but is explained by several facts:

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<sup>1</sup> Gambling Commission industry statistics.

- The customer demographic is different from betting offices. It is older and 50% female with customers coming in alone or with partners rather than in groups.
  - There are no “events” in bingo premises such as football matches or horse races and therefore no reason to hang around, and nowhere to cluster or socialise.
  - There are no general seating areas for people to gather inside. The premises are not fitted out for groups.
  - Alcohol is not only not sold but strictly prohibited.
  - Those under the influence of drugs or alcohol are not admitted.
  - Unlike in betting offices, staff are not behind the counter taking or paying out bets. They are there to greet customers as they enter, which also means controlling who is permitted to enter and effectively supervising the premises.
  - Good quality CCTV systems are fitted to the exterior of the premises and are monitored. Those outside know they are under surveillance. If loitering occurs, it is dealt with.
12. The upshot is that those walking past high street bingo premises do not have to run the gauntlet of street drinkers or other groups, whether during the school run, the evening or otherwise.
13. *Exterior appearance.* The facades of high street bingo premises are smart, well-maintained and spotlessly clean. It is not possible to see gambling taking place inside, unlike (for example) betting offices or pubs which admit children. There is no advertising on the exterior which might be attractive to children: this is strictly controlled by the Advertising Standard Authority’s Codes of Practice which are translated into legally enforceable regulation by the Gambling Commission’s Licence Conditions and Codes of Practice. The exterior contains signage explaining that Think 25 is operated, that alcohol is not permitted and that CCTV is in operation, alongside responsible gambling messaging.
14. *Upon entry.* Those entering will be greeted face to face by a uniformed member of staff. This is an opportunity to ascertain whether the customer may appear to be under 25 (in which case Think 25 is operated), or whether there may be any other issue such as inebriation, in which case the customer will politely be asked to leave. The staff

member will ascertain whether the customer needs any other form of assistance. This interaction means that staff are aware of who is using their premises. Again, this is unlike betting offices where staff are behind a counter taking and paying out bets.

15. *Appearance.* The interior of premises is clean, well-lit, comfortable and carpeted. Toilet facilities are provided. Responsible gambling messaging is prominently displayed throughout the premises and on the machines. Customer information leaflets are also prominently displayed, explaining where and how to obtain help with problem gambling.
16. *Participation.* Customers have an opportunity to play bingo on tablets, which includes being linked to a national game, and to play machines, the limits for which are set by law. During their stay they will be offered tea/coffee and snacks, and will often chat with the friendly staff. When they are finished playing they wander off with zero impact on the locality.
17. *Protection of vulnerable people from being harmed or exploited by gambling.* So far as vulnerable persons are concerned:
  - Alcohol is not permitted in the applicant's bingo premises.
  - Those who are intoxicated through alcohol or drugs are not permitted on the premises.
  - As required by the Gambling Commission's Licence Conditions and Codes of Practice, the applicant's systems include processes for customer interaction and self-exclusion, operated by trained staff. Interventions are recorded electronically so that they can be overseen by independent compliance auditors.
  - Customers are encouraged to use a self-help, app-based tool named Play Right to assist them with managing their gambling behaviour.
  - "Stay in Control" posters and leaflets with the GamCare helpline number are located prominently in the premises, including the WC.

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

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

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

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

19. *Security.* As stated above, the applicant does not suffer significant issues with crime and disorder. This is a function of the customer demographic, the ban on alcohol and

the nature of the product, but is also because of the measures taken by the applicant to prevent it:

- Staffing levels are set following a security risk assessment. In this case, the applicant will have no pre-planned single staffing after 8 p.m.
- Customer numbers are low, with usually only a handful of customers in the premises. Double digit numbers occur very rarely. This means that miscreant behaviour is immediately identified, recorded and dealt with.
- The layout of the premises facilitates effective supervision. There is no space for groups to gather.
- Staff members are on the trading floor, not behind a counter.
- Good quality CCTV is used throughout and customers are aware they are monitored.
- The use of Staff Guard which enables staff to use a portable alarm to liaise with a central security hub and SIA-licensed staff with audio and visual feeds, and for hub staff to speak directly with customers who therefore know they are being overseen. Staff Guard personnel can liaise directly with local Police if necessary.
- Staff members do not carry floats.
- Safes are time-delayed.
- Anti-money laundering systems are used on the machines.
- The locational and social context is part of induction training for all staff.
- Staff are also trained in how to deal with difficult customers (there is a 6 week training course at the outset followed by regular refresher training).
- Any incidents are logged on the tablet and reviewed at national level.

- Premises are fitted with maglocks, enabling entry to be controlled when necessary. In this case, the applicant has proposed a condition that the maglock will always be available for use.
- The applicant maintains good liaison with local Police.
- It will also join any available Betwatch scheme.

### **THE REGULATORY RECORD OF THE APPLICANT**

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

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

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

22. This despite the great range of town and city centres in which the applicant operates. Its systems, staff training, compliance monitoring and audit have proved sufficient to ensure that the licensing objectives are promoted.

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

### **THE LAW**

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

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

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

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

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

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

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

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

25. The following points should be noted:

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

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

As the Gambling Commission Guidance says:

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

- d. Conditions should only be added where it is necessary to do so, and even then such conditions need to be proportionate to the circumstances requiring a response, relevant, directly related, fair and reasonable.
- e. As the Guidance states: *“Any refusal should be for reasons which demonstrate that the licensing objectives will not or are unlikely to be met”* That means demonstrate by evidence.
- f. Conversely, the following considerations are legally irrelevant to the determination of an application for a premises licence:
  - i. A dislike of gambling.
  - ii. A general notion that it is undesirable to allow gambling premises in an area.
  - iii. Moral or ethical objections to gambling.
  - iv. The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.
  - v. Nuisance (see Guidance by Gambling Commission).
  - vi. Planning, which is a separate regime. However, if the applicant is unable to obtain planning consent, it cannot open.

### **THE TRADE OBJECTION**

- 26. The objector trades an adult gaming centre at 29-31 White Rock. Its alleged concerns are not echoed by any responsible authority. These alleged concerns are taken in turn.
- 27. First, it is said that bingo will not be the “primary gambling activity.” The concept of primary gambling activity was abolished by the Gambling Commission many years

ago. The relevant requirement in bingo premises is set out in the Commission's Social Responsibility Code 9.1.2:

*Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.*

*Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.*

*Licensees must ensure 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.*

28. The applicant is fully compliant with the Code. Its presentation here will be no different from its other 90+ high street bingo premises.
29. The objector suggests that it is a "tactic" to apply for a bingo premises licence. This is unfounded. The applicant wants to offer bingo at its premises. In order to do so, it must apply for a bingo premises licence.
30. Second, the objector says that the operating style is generic and the local area risk assessment has not been adjusted to reflect local conditions etc. The applicant has prepared a detailed local area risk assessment, running to 18 pages, which has caused no concern among responsible authorities, including the Police who were expressly consulted. The risk assessment has led to the proposal for licence conditions which are specifically referable to these premises. The risk assessment is supplemented by a bespoke security risk assessment prior to opening and both are subject to periodic review in the light of experience of operating the premises.
31. Third, the objector complains that there may be lone staffing at the premises. Strikingly, the objector has forgotten to mention that there is lone staffing in its own premises. In common with other high street retail and service providers, the applicant assesses staffing levels in the light of the customer service and security needs of the

individual premises. However, in this case, it has offered a condition that there will not be pre-planned single staffing after 8 p.m.

32. The objector also complains about 24 hour operation, again omitting to mention that its own premises are advertised as being open 24 hours. No responsible authority or neighbour has any issue with this.
33. Fourth, the objector complains that it cannot see whether the layout, lighting and fitting of the premises are designed not to attract children or vulnerable people. The applicant provides well laid out and lit interiors, which are covered by CCTV. A layout plan is included in the bundle. Those outside cannot see inside. It has never been subject to criticism from a licensing authority in this regard.
34. There is, with respect, no substance in any of the objector's points.

### **Conclusion**

35. In conclusion:

- The applicant is a highly competent organisation, regulated by the Gambling Commission, and one whose corporate systems, staff training, management and audit are directed towards promotion of the licensing objectives.
- It is part of a group which operates 190 licensed gambling premises in a wide variety of locations of higher and lower crime, deprivation and population density.
- Despite that, it has never experienced a regulatory complaint, review of a trading venue or prosecution.
- There is no evidence before the Sub-Committee that it has failed to promote the licensing objectives elsewhere.
- The type of premises, their layout, their customer demographic, the low numbers of customers simultaneously using premises and the quality of management mean that issues of crime and disorder are rare.

- The premises, if licensed, will be subject to strict regulatory requirements, deriving from: the Licence Conditions and Codes of Practice; machine stake, prize and numbers limits, and mandatory and default premises licence conditions.
  - Following a risk assessment, the applicant has offered a set of individual licence conditions which are designed to protect the licensing objectives at this site in this location.
  - The applicant has a strong track record of co-operation with local statutory bodies. In the unlikely event of an untoward consequence, it will work to resolve the issue promptly and efficiently.
36. For these reasons, it is submitted that the test in section 153 is fully met. Conversely, taking into account the competence and track record of the applicant (nationally and locally), its legal obligations under the Act, Regulations and codes, and the comprehensive suite of individual licence conditions to which it is proposing to submit, it has not been demonstrated that the licensing objectives are unlikely to be met.
37. Accordingly, the Sub-Committee is respectfully invited to grant the application as asked.

**PHILIP KOLVIN QC**  
**28th September 2021**

**11 KBW**  
**Temple EC4**

# **Proposed Licence Conditions**

### **Proposed Operational Condition**

All Merkur Slots premises maintain a high standard of operation and implement many of the following measures as standard.

Having considered Hastings Borough Council's Statement of Licensing Principles under the Gambling Act 2005, local demographics, crime statistics and local concerns raised by the Interested Party, Merkur Slots UK Limited would be willing to accept the following premises licence conditions:

- 1. The premises shall install and maintain a comprehensive CCTV system, which shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days. Viewing of recordings shall be made available upon the request of Police or an authorised officer of the Licensing Authority, subject to data protection legislative requirements.**
- 2. Notices shall be prominently displayed within the premises stating that CCTV is in operation.**
- 3. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:**
  - a. all crimes reported to the venue**
  - b. all ejections of patrons**
  - c. any complaints received concerning crime and disorder**
  - d. any incidents of disorder**
  - e. all seizures of drugs or offensive weapons**
  - f. any visit by a relevant authority or emergency service.**
  - g. any attempts by children and young persons to gain access to the premises to gamble**
  - h. any Challenge 25 Refusals.**
- 4. A think 25 proof of age scheme shall be operated at the premises where any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.**
- 5. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.**
- 6. A magnetic door locking system (maglock) shall be available for use at the premises.**
- 7. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.**
- 8. The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice. There shall be no pre-planned single staffing at the premises from 20:00 until closing and if trading past midnight there will always be two members of staff on duty.**

**Witness statement from  
Amanda Kiernan, Head of  
Compliance at Merkur Slots  
UK Limited**

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**LICENSING SUB - COMMITTEE HEARING – 14<sup>TH</sup> OCTOBER 2021**

**SUPPLEMENTAL STATEMENT – AMANDA KIERNAN**

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**Merkur Slots**

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

verification checks are collated on a central hub, which is regularly reviewed, and monthly reports are provided to Operations Teams.

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

### **Relationship with the Responsible Authorities and Interested Parties**

11. Merkur takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
12. For the purposes of the original bingo premises licence application, Hastings Policing Support Team was approached at the beginning of March 2021.
13. The Local Policing Support Team based at Hastings police station had no concerns with our proposed activities, nor were any concerns identified regarding an association between local licensed gambling premises and crime, disorder, nuisance or anti-social behaviour.
14. It is rare for our venues that operate throughout the night to attract customers leaving alcohol licensed venues as the entertainment offering is significantly different. Merkur Slots' 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.
15. All Merkur venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools are designed to ensure minimal conflict and successful implementation of our strict policies. In our experience, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate regardless of premises location.
16. None of the Responsible Authorities under the Gambling Act 2005, those of most relevance being the Licensing Authority, Police, Gambling Commission, Environmental Health and Child Protection teams, have raised any concerns regarding Merkur's bingo premises licence proposals and none have objected to the application.
17. 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.
18. It has been our consistent experience in the majority of circumstances, that we do not experience the kind of difficulties sometimes experienced by betting offices in terms of crime and disorder and nuisance, due to our different clientele, product, layout and management. A position which is supported by the police comments. Nevertheless, lines

of communication will be maintained with the local police and the Licensing Authority to ensure that local knowledge is continuously shared and that the premises adapt to any emerging risks or local concerns identified.

19. We have identified a local provider of vulnerability support services within the local area risk assessment and we will contact that organisation and invite feedback on any local concerns that can be incorporated into premises training and evaluation. The Company is also committed to working with all Responsible Authorities to ensure that any emerging risks are identified, incorporated into the premises risk assessment and effectively addressed.

### **Merkur Compliance – Protection of Children and Vulnerable**

20. Merkur was selected by the Gambling Commission as one of the first top 40 licensees to prepare an annual assurance statement due to its size and scale of operation. Annual Assurance Statements enable an annual comprehensive review of the business, completed at Board level, in consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.
21. 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'.
22. Merkur operates training upon recruitment and then 6-monthly refresher training programmes for all employees. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, Licence Conditions and Codes of Practice, the Licensing Objectives under the Gambling Act 2005 and 'Safeguarding Children & Vulnerable People', which focus on assisting staff to recognise and respond to indicative behaviours of potential problem gambling and vulnerability and how to conduct effective customer interaction. Initial six-week, classroom based, induction training is completed for all new venue teams and includes customer interaction role play and exposure to operation and customers in live venues. Following site opening, new teams are provided regular follow up and support. The Company also incorporates accredited Social Responsibility and Interaction training for its premises management teams. Excerpts from the Company's training platform are provided in the supporting documents.
23. Merkur has two National Training Centres where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are rigorously trained to take appropriate action, such as where to offer gambling control support including managing time spent playing (time outs), controlling stake limits, providing information on gambling support agencies such as GambleAware, offering participation in the Bingo Association's national self-exclusion scheme and refusing service where deemed necessary.
24. 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.

25. Following a customer interaction, customers may be offered a variety of self-help measures, where appropriate, such as the Playright App to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst ensuring that the Company's policies and procedures are effectively implemented.
26. Merkur has undergone Gambling Commission inspection and Company training and compliance policies and procedures comply with the Licence Conditions and Codes of Practice attached to the Company's Operating Licence.
27. Examples of some of Merkur's responsible gambling information have been provided in the supporting documents.
28. 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.
29. 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.
30. Merkur promotes the use of the customer self-help tool called Playright. All venues have the capability for customers to sign up to the App and staff are fully trained and able to advise on its use. This responsible gambling tool enables customers to set time limits on their machine play. Subject to the customers' set permissions, the system has the ability to send an alert to the venue should the customer enter at a time they have chosen not to gamble. This alert would then trigger a customer interaction.
31. 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.
32. 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**

33. A detailed local area risk assessment has been submitted designed in consideration of Hastings Borough Council's Statement of Licensing Principles under the Gambling Act 2005, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
34. 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.

35. Merkur is an experienced operator with premises in many large cities and towns across the country. 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.

### **Underage Gambling**

36. 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.
37. 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.
38. 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.
39. Merkur Slots customer demographics are up to 50% female with an average age over 30.
40. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
41. 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.
42. In our experience venues are not more susceptible to access by underage individuals, regardless of location, due to the nature of our gaming services and customer demographics.
43. 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**

44. It is rare for our premises to be associated with anti-social behaviour or crime and disorder but our staff training procedures and security measures, including external CCTV, are designed to monitor customer behaviour and external areas for anti-social behaviour. Company policy ensures that appropriate steps are taken to minimise any risks and we record and report any incidents or concerns to Company management, for internal review and assessment, and local authorities.
45. Merkur is an experienced operator with a proven history of operating premises in some challenging areas and incidents relating to crime and disorder are rare.
46. 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.

47. Whilst none of the Responsible Authorities have identified any concerns with the existing licensed gambling premises in Hastings, 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.
48. It is rare for our venues that operate late at night to attract customers leaving alcohol licensed venues as the entertainment offering is significantly different. Merkur's late night operation appeals to shift workers and employees of the late night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
49. Merkur operate a business-wide Anti-Money Laundering (AML) policy, which is reviewed annually, and ensures that the risks of money laundering in these premises are low. The premise layout is designed to allow customer supervision at all times. All machines within the premises are linked to a central machine data capture system, which allows the venues to individually analyse live transactional activity for money laundering. All AML incidents, rare as they are, are reported by the venue staff via a tablet which also provides an automated email alert to myself, as the dedicated AML manager.
50. 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.

### **Local Concerns**

51. The single representation received from the local competitor operator suggests that the location may not be suitable for a premises of this type, despite the Interest Party's premises operation without any identified difficulties or additional control measures or licence conditions applied to its own premises licence. The representation suggests, without evidence, that there will be increased risk of crime and disorder and anti-social behavior and a risk to local individuals that may be at risk of gambling harm should the Licensing Sub-Committee be minded to grant the current premises licence application. None of Council's own expert Responsible Authorities, including the local police licensing team, or any other organisation with responsibility for the protection of the vulnerable have raised any concerns with our proposals, nor have they raised any concerns regarding the existing operation of licensed gambling premises within the Council's jurisdiction. The representation provides no consideration for the extensive and effective control measures and procedures implemented by Merkur Slots UK Limited.
52. Merkur has completed a detailed local area risk assessment, reviewed local area statistics and demographics, consulted with the local police licensing team and reviewed the Council's detailed policies in order to effectively identify any potential risks to the proposed operation.
53. Merkur will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to individuals who may be under the influence of alcohol or drugs and work in partnership with the local police in the unlikely event that any incidents of crime or disorder occur.
54. 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.

55. Merkur does not permit alcohol within its high street bingo venues, nor does it permit customers on the premises who are deemed to be under the influence of alcohol or drugs.
56. Having considered the concerns raised, we believe that the proposed licence conditions contained within our hearing documentation will mitigate any perceived risks to the Licensing Objectives.
57. We note our that the premises licence for East Kent Leasing Limited does not contain any limitations on its operational hours, nor does it contain any additional licence conditions beyond the mandatory conditions applied by the Gambling Act itself. East Kent Leasing Limited advertises its hours of operation as being 24 hours a day and Merkur seeks parity with local operators and would like to retain flexibility of operation. We note that no concerns are raised regarding the existing venues and additional conditions have not been considered relevant or appropriate to East Kent Leasing Limited's operation. Despite this, Merkur is proud of its operational standards and is willing to implement the conditions proposed.
58. Merkur understands that local risk assessment and staff training is a live matter, which is regularly assessed and adapts to any emerging or changing risks in the locations in which it operates. Merkur, Hastings, will be no exception.
59. 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.

### **Premises Operation**

60. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the Licensing Objectives and a copy of our Policies and Procedures has been provided as part of our hearing bundle.
61. 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.
62. 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.
63. 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.
64. 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.
65. It is very rare for our premises to employ dedicated SIA registered door staff as, in our experience, this is almost never necessary. However, staff numbers and rotas are continuously reviewed and risk assessed to adapt to customer numbers and cognisance is taken of police advice.
  66. Having consider the local concerns raised, we have committed to minimum staffing numbers at set times, which are apparently in excess of the staffing measures implemented by the Interested Party at its premises.
  67. We have considered the concerns of the Interested Party and have proposed a number of premises licence conditions, which I hope will allay any fears.

### **Conclusion**

68. 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.
69. 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.
70. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
71. I can state that it is rare for our premises to be the cause of, or otherwise associated with, crime, disorder or nuisance to nearby premises due to the nature of our gaming premises and our customer base.
72. 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 4<sup>th</sup> October 2021

**Witness statement from Steve  
Ambrose, Operations Director  
at Merkur Slots UK Limited**

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**LICENSING SUB - COMMITTEE HEARING – 14<sup>TH</sup> OCTOBER 2021**

**SUPPLEMENTAL STATEMENT – STEVE AMBROSE**

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1. I am the Operations Director for Merkur having held this position since December 2016 responsible for all day to day operations across our estate of Adult Gaming Centres, High Street Bingo premises and Bingo Halls.
2. I am a Director of the Bingo Trade Association "The Bingo Association" and the Division 3 Chairman of the Amusement Trade Association "BACTA" covering Adult Gaming Centres across Great Britain.
3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position of Operations Director, this experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, in rural and city centre locations.
4. Through my years of working in the gambling industry I can state categorically that it is rare for Merkur Slots UK Limited's venues, and specifically its high street bingo premises, to be associated with crime and disorder, anti-social behaviour or local nuisance.
5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this reflects the type of gaming operated by Merkur and its customer demographic, which is approximately 50% female with an average age of over 30.
6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues, there is no 'event' taking place.
7. Across the high street bingo estate, average customer numbers at any one time remain relatively low, in single figures, and customer numbers between 5 and 10 at any one time, would be considered an exceptionally busy period.
8. Customer numbers do not vary significantly throughout the hours of premises operation and due to the relatively low numbers, later hours of operation are often sought, with the majority of Merkur premises operating into the early hours. Merkur currently operates 113 high street premises for 24 hours a day and the majority of our 192 venues operate 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 children.
10. Merkur's Think 25 policy and its implementation are effective tools ensuring that our venues operate responsibly. By strictly controlling our marketing and advertising and limiting line of site into venues, individuals that pass by our venues are not exposed to ambient gambling, which may be visible in other operator's venues, such as some betting premises and public houses that provide gaming machines.
11. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.

10. Our venue teams seek to form genuine relationships with local police, town centre groups, support services and Betwatch or Pubwatch schemes should they be available. Our staff are proud of the areas in which they live and work and do not wish to see any level of anti-social behaviour.
11. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers and offering tea and snacks.
12. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained not only to enable effective premises management but also to ensure that customers can be continually monitored and assisted where necessary. As part of our commitment to working with local authorities, we will always liaise with local police licensing teams to ensure that where local police concerns are identified, sufficient staff members are on site during premises' hours of operation.
13. As part of our analysis of potential new venues we often investigate local gambling premises' operation to assist with our evaluation of any local risks identified by other operators. As part of this process, we instructed one of our local Night Managers to complete a number of local visits to other nearby licensed gambling venues and an inspection log has been provided in our supporting documentation. Whilst I acknowledge that our covert visits only provide a brief assessment of local premises operation, it is apparent that local venues manage their venues and staffing levels according to their own policy and risk assessment throughout their hours of operation. The Licensing Authority has confirmed to us that both venues visited are not subject to any premises licence conditions beyond those applied by the Gambling Act 2005 and associated Regulations.
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 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. We have proposed a number of licence conditions for this premises, far in excess of the other local gambling premises, which we hope will address any perceived risk and allay any fears.
20. In our local area risk assessment we have identified an organisation, which provides 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.

21. All of these features mean that our premises provide safe and congenial environments and do not impact on their localities. In my experience, while concerns are sometimes expressed with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises actually open.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 4<sup>th</sup> October 2021

**Witness statement from Andy  
Tipple, Head of Product at Merkur  
Slots UK Limited**

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LICENSING SUB-COMMITTEE HEARING – 14<sup>TH</sup> OCTOBER 2021

SUPPLEMENTAL STATEMENT - ANDY TIPPLE

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**Merkur Slots UK Limited, formerly Cashino Gaming Limited**

1. I am Currently Head of Product for Merkur Slots UK Limited and have over 35 years' experience in the Gaming Industry and have held a multitude of positions ranging from Arcade Manager, Service Manager to Gaming Manager. This experience has enabled me to gain an understanding of the intricacies of operating across all our gaming platforms.
2. Merkur Slots UK Limited operates over 90 'High Street Bingo' premises, 5 bingo clubs, 5 Family Entertainment Centres and 87 Adult Gaming Centres throughout Great Britain.
3. The development of High Street Bingo has occurred because customers are becoming less interested in attending large, sub-regional bingo halls and increasingly wish to play bingo with a portable electronic terminal rather than marking numbers off a card. Accordingly the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals, as well as on paper, with gaming machines in accordance with the permission provided by a bingo premises licence. The Gambling Commission is fully aware of the presentation of bingo in our high street premises.
4. In our premises, customers can move around with the terminal, choosing to play while standing or in seating provided around the premises.
5. As for gaming machines, the governing legislation provides strict limits on the types of machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.
6. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
7. Across Merkur Slots UK Limited's venues the average stake placed is between 30p and 40p. Only 20% of the machines may be category B3s. The remainder, being the category C gaming machines, have the same stake and prize levels as those offered in pubs.
8. 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.
9. As stated above, electronic bingo is a natural evolution of 'traditional bingo' and has been operated nationally for many years since the inception of the Gambling Act 2005 and is approved and understood by the Gambling Commission.

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

Date: 4<sup>th</sup> October 2021

**Local Observation Log - Mr Jason  
Stiborski, Night Manager, Merkur  
Slots UK Limited**

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**LICENSING SUB - COMMITTEE HEARING – 14<sup>TH</sup> OCTOBER 2021**

**STATEMENT & OBSERVATION LOG – JASON STIBORSKI**

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1. I am a Night Manager for Merkur Slots UK Limited and assist with premises management and operational compliance with Company policy and procedure.
2. As part of Merkur's local risk assessment process for new venues, I was asked to investigate the operation of local gambling establishments in Hastings to assist with the assessment and identification of potential local concerns and operational risks.
3. On the 22<sup>nd</sup>, 23<sup>rd</sup> and 24<sup>th</sup> of August 2021 I completed a number of covert site visits and the brief details are provided below.

<b>Name of Premises</b>	<b>Admiral - Adult Gaming Centre</b>
<b>Address of premises</b>	<b>11 Wellington Place, Hastings</b>
<b>Date and time of 1<sup>st</sup> visit</b>	<b>22<sup>nd</sup> August 2021 at 20:00</b>
<b>Staff Numbers</b>	<b>2</b>
<b>Date and time of 2<sup>nd</sup> visit</b>	<b>23<sup>rd</sup> August 2021 at 23:45</b>
<b>Staff Numbers</b>	<b>2</b>
<b>Date and time of 3<sup>rd</sup> visit</b>	<b>24<sup>th</sup> August 2021 at 22:00</b>
<b>Staff Numbers</b>	<b>2</b>
<b>Comments</b>	<b>Refreshments available</b> <b>Open Door Policy during all visits</b>

<b>Name of Premises</b>	<b>Palace Amusements – Adult Gaming Centre</b>
<b>Address of premises</b>	<b>29-31 White Rock, Hastings</b>
<b>Date and time of 1<sup>st</sup> visit</b>	<b>22<sup>nd</sup> August 2021 at 20:30</b>
<b>Staff Numbers</b>	<b>1</b>
<b>Date and time of 2<sup>nd</sup> visit</b>	<b>23<sup>rd</sup> August 2021 at 01:30</b>
<b>Staff Numbers</b>	<b>1</b>
<b>Date and time of 3<sup>rd</sup> visit</b>	<b>24<sup>th</sup> August 2021 at 23:00</b>
<b>Staff Numbers</b>	<b>1</b>

<b>Comments</b>	<b>Refreshments available</b> <b>Open Door Policy during all visits</b>
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Mr Jason Stiborski, Night Manager, Merkur Slots UK Limited

Date: 24<sup>th</sup> August 2021

**Letter from Ms Katie Turvey,  
Associate Director, Planning  
Potential**

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

29 September 2021

Our Ref: 21/5696

Dear Richard

**Proposed Merkur Slots Venue, 40-41 Queens Road, Hastings, TN34 1RE,**

I can confirm that because the bingo to be played at the above site alongside gaming machines will be electronic and for independent play, the proposed use is regarded as an adult gaming centre in planning terms. A bingo use within the planning system relates to the traditional bingo halls where groups of people come together to play bingo.

I trust you find the above of assistance.

Yours sincerely,

*K Turvey*

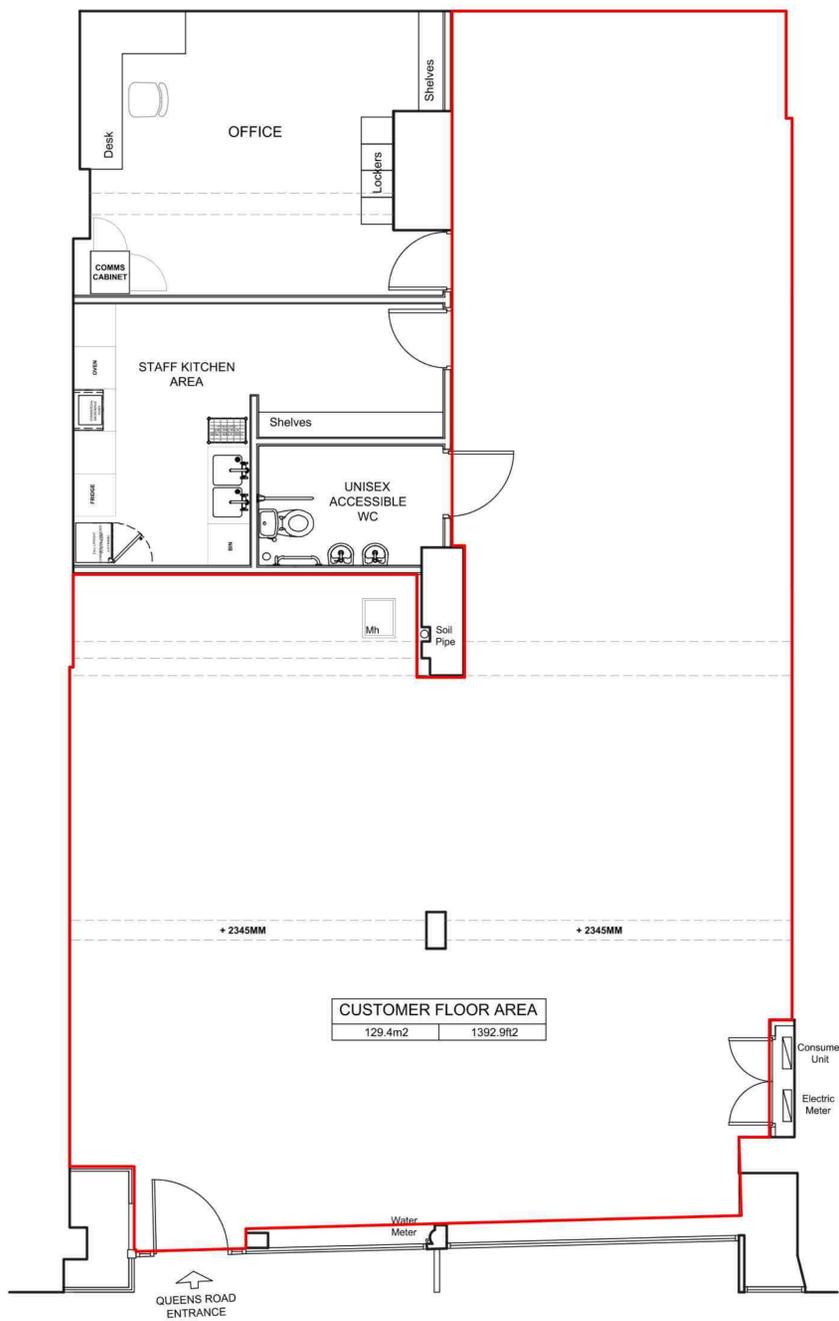
Katie Turvey

Associate Director

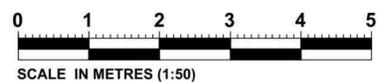
**Planning Potential**

London

# **Copy of Licensing plan of the premises**



**Proposed Ground Floor Plan 1:50**



**Location Plan 1:1250**

**GAMBLING ACT 2005 LICENSING PLAN**

Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licence and Provisional Statements) Regulation 2007 is for information purposed only and **does not** form part of the premises licence.

— Area in which facilities will be provided for gaming.

Rev	Date	Description

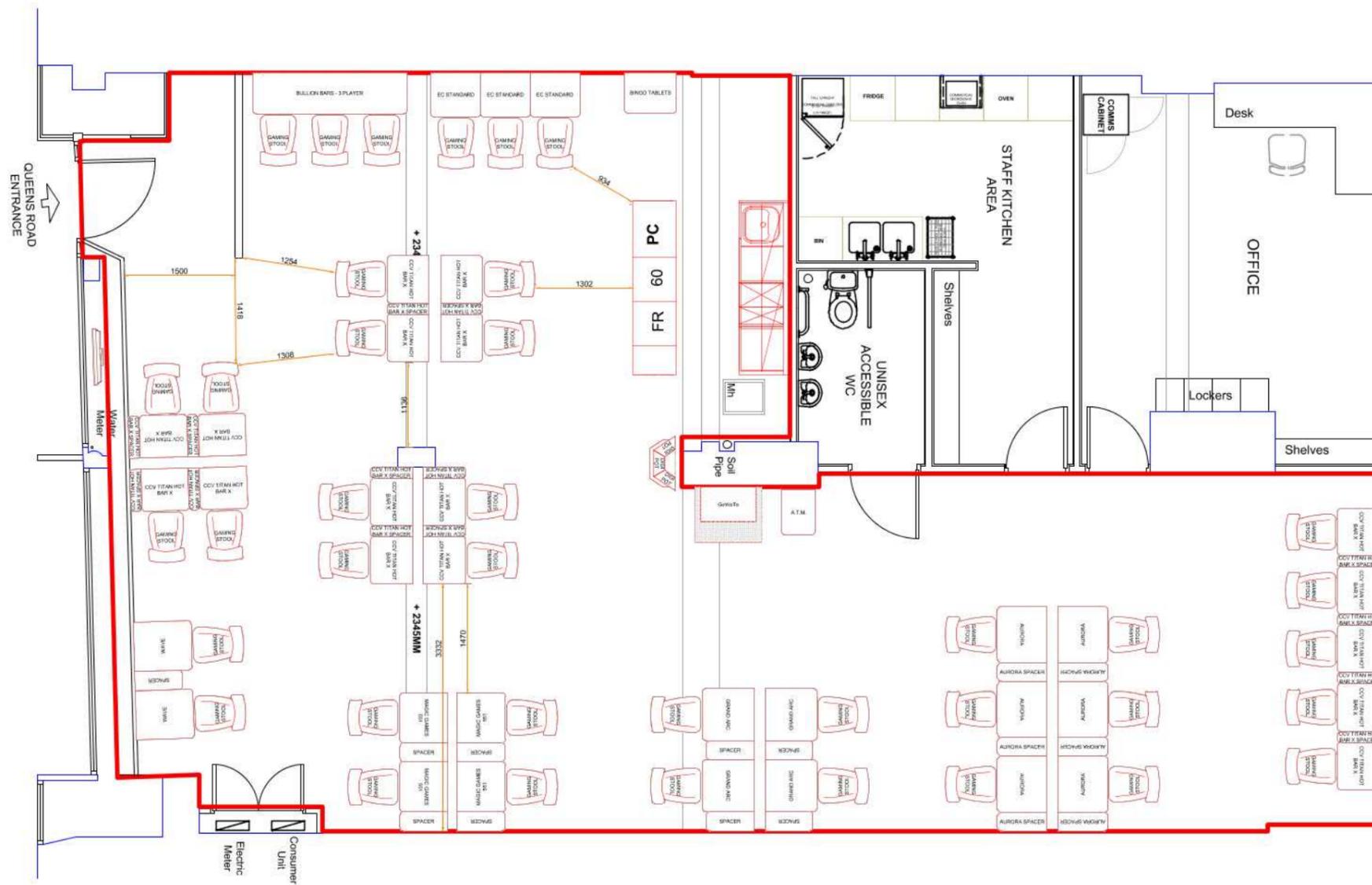


Address  
40 - 41 QUEENS ROAD  
HASTINGS  
TN34 1RE

Title  
LICENCE PLAN

Drawn	Date	Scale
JAM	20/04/2021	1:50 @ A1
Customer Area	129.4m2	
Drawing Number	QRD/HAS/02	Revision
McKeowns Plans for Construction 301 Alvechurch Road, Birmingham, B31 4UB Tel: 0121 433 4745		
Licence Plan		

# **Copy of Illustrative plan of the premises**



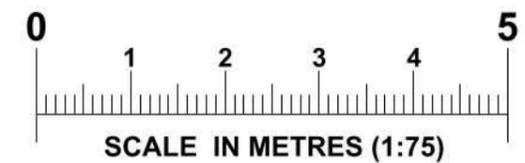
**Proposed Ground Floor Plan 1:75**

CUSTOMER FLOOR AREA	
129.4m <sup>2</sup>	1392.9ft <sup>2</sup>

**GAMBLING ACT 2005 LICENSING PLAN**

Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only and **does not** form part of the premises licence.

**—** Area in which facilities for gaming will be made available



REVISIONS	FIT OUT TYPE Merkur Slots	REFERENCE DRAWINGS	
	PROJECT Merkur Slots	SCALE 1:75	
	40 - 41 QUEENS ROAD HASTINGS TN34 1RE	DRAWN BY	
	DESCRIPTION PROPOSED MACHINE PLAN	DATE 26/04/2021	
		DRAWING No.	REVISION



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THIS DRAWING SHOULD NOT BE SCALED. THE CONTRACTOR SHOULD CHECK ALL DIMENSIONS ON SITE. ANY ERROR OR OMISSION SHOULD BE REPORTED TO PRAESEPE PLC.

# **Copy of the Local Area Risk Assessment**

# Merkur Slots, 40-41 Queens Road, Hastings, TN34 1RE

## Local Area Risk Assessment

<b>Trading Name:</b>	Merkur Slots
<b>Premise</b>	40-41 Queens Road, Hastings, TN34 1RE
<b>Local Authority:</b>	Hastings Borough Council
<b>Premise Licence No:</b>	New application
<b>Operator Licence No:</b>	000-003266-N-103444-025 (Merkur Slots UK Limited)
<b>Company Details:</b>	Merkur Slots UK Ltd, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
<b>Name and Title of Assessor:</b>	Jolanta Mackowska - Internal Auditor, Gill Clulow – Senior Compliance Auditor
<b>Date of Assessment:</b>	20/04/2021
<b>Review Date:</b>	On opening in conjunction with local staff

## Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots, a former Cash Generator Store is located on a busy Queens Road (A2101) which connects with two major roads in Hastings: the A21 trunk road to London; and the A259 coastal road. The metal barriers separating pavement from the traffic road secure pedestrian area. There are flats above the venue with entrance at the back of the property. Hastings main shopping center: Priory Meadow Shopping Centre is just across the street. There are plans to expand the retail area in Hastings, which includes expanding Priory Meadow and creating more retail space as part of the Priory Quarter development. Hastings has four rail links: two to London, one to Brighton and one to Ashford. The Queens Road has mix of retail and non-retail outlets that are mostly occupied. Morrisons Store and Petrol Station is few minutes' walk away. The area has multiple car parks and side roads have bays designated to pay and display or residential parking. Number of beauty salons and barbers can be noticed along the Queens Road. Number of pubs and bars present in the area. There is five betting shops one Adult gaming center and three pawnbrokers.
Establishments of note:	Hastings is a fishing port with the UK's largest beach-based fishing fleet. Well known Norman ruins of Hastings Castle, once home to William the Conqueror, overlook the English Channel. East along the shingle seafront of Stade beach, Hastings Fishermen's Museum and Shipwreck Museum. Odeon Cinema is located further south along the Queens Road.
Adjoining premises:	The premise is situated between Powermend –The mobile repair specialist and Boo Buster – gift, bookshop. Other nearby retailer include Oriental Supermarket, Hastings Fresh Fruit and Veg, Pure clothing shop and Polska Chata – polish food store.
Crime statistics:	Merkur Slot Hastings is situated within Castle Hastings policing neighborhood. 2101 incidents of crime reported between March 2020 and Feb 2021, anti-social behaviour accounted for 35.2% and Violence and sexual offences 25.1% of reported incidents. During February 2021, 145 crimes were recorded. Mostly committed crimes, Anti-social behaviour - 49 (33.8%), Violence and sexual offences – 40 (27.6%), Robbery - 2 (1.4%), Drugs – 3 (2.1%) and Public order – 12 (8.3%), Shoplifting – 9 (6.2%), Vehicle crime – 4 (2.8%), Theft from the person – 1 (0.7%), Other theft – 5 (3.4%) and Other Crime – 2 (1.4%). In the year ending September 2020, the crime rate in Hastings was about the same as the average crime rate across similar areas and higher than average for the Sussex force area. ( <i>Police.uk</i> )
Population:	In the 2011 census the population of Hastings was 90,254 and is made up of approximately 51% females and 49% males. The average age of people in Hastings is 40, while the median age is higher at 41. 89.1% of people living in Hastings were born in England. Other countries of birth were 1.2% Scotland, 0.7% Wales, 0.6% Ireland, 0.4% India, 0.3% South Africa, 0.3% Northern Ireland, 0.3% Philippines, 0.3% Zimbabwe, 0.2% United States. 95.8% of people living in Hastings speak English. The other top languages spoken are 0.6% Polish, 0.2% Russian, 0.2% Bengali, 0.2% Tagalog/Filipino, 0.2% French, 0.2% Kurdish, 0.2% Latvian, 0.2% All other Chinese, 0.1% Nepalese. Last known population is 91 100 (year 2014). This was 0.142% of total United Kingdom population. If the population growth rate remains the same as in period 2011-2014 (+0.34%/year), Hastings population in 2021 would be: 93 276. In Hastings 38.6% of people are married, 13.8% cohabit with a member of the opposite sex, 1.0% live with a partner of the same sex, 26.4% are single and have never married or been in a registered same sex partnership, 12.8% are separated or divorced. There are 6,957 widowed people living in Hastings. ( <i>Census 2011, Wikipedia, Local stats.co.uk</i> )
Culture:	The religious make up of Hastings is 51.9% Christian, 35.8% No religion, 1.3% Muslim, 0.5% Buddhist, 0.5% Hindu, 0.2% Jewish, 0.1% Agnostic, 0.1% Atheist. 7,451 people did not state a religion. 522 people identified as a Jedi Knight and 17 people said they believe in Heavy Metal. ( <i>Local stats.co.uk</i> )
Unemployment:	The unemployment rate in Hastings is 4.4% which is slightly lower than UK average 4.8%. The top occupations listed by people in Hastings are Professional 14.0%, Skilled trades 13.3%, Caring, leisure and other service 13.2%, Administrative and secretarial 12.0%, Associate professional and technical 11.1%, Elementary 10.7%, Caring personal service 10.6%, Managers, directors and senior officials 9.7%, Administrative 9.3%, Sales and customer service 9.1%. ( <i>plumplot.co.uk, local stats.co.uk</i> )
Deprivation:	Nationally, Hastings is ranked as the 13th most deprived, out of 317 local authorities. Hastings remains as the most deprived neighbourhood in the county, but ranks as 147 in the 2019 index compared to 89 in 2015. Regarding The Index of Multiple Deprivation TN34 1RE has a score of 3452 out of 32844 (10.5%) ( <i>sussexlive.co.uk, maps.cdrc.ac.uk</i> )

Local Police:

Hastings Police Station, Bohemia Rd, Hastings TN34 1JJ , (Castle Hastings) East Sussex Constabulary. When contacted Catherine Daniel (Police licensing support team) responded - Having read your extensive documents, Sussex Police would have no objections to a bingo hall at the above address.

**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 Hastings Borough Council local authority Statement of Gambling Principles, reference 8.6 for Bingo Centres and Hastings Council Borough Profile 2011.

**Environmental Factors**

In preparing this assessment Merkur Slots UK Ltd 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
<p>Protecting children and other vulnerable people from being harmed or exploited by gambling</p>	<p><b>Unemployment:</b> The unemployment rate in Hastings is 4.4% which is slightly lower than UK average 4.8%. The top occupations listed by people in Hastings are Professional 14.0%, Skilled trades 13.3%, Caring, leisure and other service 13.2%, Administrative and secretarial 12.0%, Associate professional and technical 11.1%, Elementary 10.7%, Caring personal service 10.6%, Managers, directors and senior officials 9.7%, Administrative 9.3%, Sales and customer service 9.1%. (<i>plumplot.co.uk, local stats.co.uk</i>)</p> <p><b>Deprivation:</b> Nationally, Hastings is ranked as the 13th most deprived, out of 317 local authorities. Hastings remains as the most deprived neighbourhood in the county, but ranks as 147 in the 2019 index compared to 89 in 2015. Regarding The Index of Multiple Deprivation TN34 1RE has a score of 3452 out of 32844 (10.5%) (<i>sussexlive.co.uk, maps.cdrc.ac.uk</i>)</p> <p><b>Schools and Education</b> Ark Castledown Primary Academy, Priory Road, TN34 3QT Torfield School, Croft Road, TN34 3JT The Baird Primary Academy, Parker Road, TN34 3TH Sacred Heart Catholic Primary School, Old London Road, TN35 5NA St Mary Star of the Sea Catholic Primary School, Magdalen Road, TN37 6EU Ark Blacklands Primary Academy, Osborne Close, TN34 2HU Dudley Infant Academy, Harold Road, TN35 5NJ</p>	<p><b>Age Verification</b> <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots UK Ltd operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Hastings Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

<p>St Paul's Church of England Academy, Horntye Road, TN37 6RT  The Hastings Stage Studio School Of Performing Arts, York Gardens, TN34 1QW  The Flagship School, 40 Collier Rd, TN34 3JR  Hastings Actors Studio, Unit 13, The Britannia Enterprise Centre, Waterworks Rd, TN34 1RT  Greenway Nursery, Waterworks Rd, TN34 1RT  Whitehall Nursery School (Term Time Only), 15 Elphinstone Rd, TN34 2EE  The Meadows Nursery School, 18 St. Helens Crescent, TN34 2EW  Sussex Coast College Hastings Station Approach, TN34 1BA  Cambridge Gardens College, 5-7 Cambridge Gardens, TN34 1EH  Sussex Trinity College, 45 Robertson St, TN34 1HL  Buckwood St George's College, 7, 9 Holmesdale Gardens, TN34 1LY</p> <p><b>Community Centres and Youth Centres</b>  Central Hall Community Centre, 6B Station Rd, TN34 1NG  Hva Jackson Hall, Portland Pl, TN34 1QQ  Xtrax Young Peoples centre, 23 Priory St, TN34 1EA  Counselling Plus Community, 48 Cambridge Gardens, TN34 1EN  E S R A, 5 Harold Pl, TN34 1JA  Youth Employability Service, Cambridge Rd, TN34 1DJ</p> <p><b>Parks, play grounds and sports/leisure facilities</b>  Linton Gardens, Unnamed Road, TN34 1UN  Cornwallis Gardens, TN34 1LX  The Oval – Hastings Skatepark, Bohemia Rd, TN34 1EU  Warrior Square, 1 Eversfield Pl, TN37 6BY  Falaise Fitness Centre, Cambridge Rd, TN34 1EU  West Hill, Priory Rd, TN34 3NL  East Hill, East Hill, TN35 5PB  Alexandra Park, St Helen's Rd, TN34 2LQ  Better Braybrooke Pocket Park, 6 Hughenden Rd, TN34 3TG  Heart of Hastings - Ore Valley DIY Regen, Old Power Station Site, TN34 3TR  Bohemia Walled Garden, Bohemia Rd, Hastings TN34 1EX  Old Town Maritime Gardens-Memorial park, 44 High St, TN34 3EN  Horntye Park Sports Complex, Bohemia Rd, TN34 1EX  Source BMX, White Rock, TN34 1JA  Summerfields Leisure Centre, Bohemia Rd, TN34 1ET</p> <p><b>Homeless shelters and food banks</b>  Salvation Army, 26 St Andrew's Square, TN34 1SR  The Hastings and Rother Samaritans, 26 St Andrew's Square, TN34 1SR</p>	<p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified'  <a href="https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019">https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</a></p> <p><b>Vulnerability</b>  Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p>
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**Vulnerable and addiction support services**

East Sussex drug and alcohol recovery service (STAR), 13 Wellington Pl, TN34 1NY

St Michaels Hospice Trading Ltd, 66-67 Queens Rd, TN34 1RE

Hastings Voluntary Action, Jackson Hall, Portland Place, TN34 1QN

Barnardo's shop, 23 Queens Rd, TN34 1QY

British Heart Foundation Furniture & Electrical, 41 White Rock, TN34 1JL

Marie Curie – Charity Shop, 17 Queens Rd, TN34 1QY

Hastings Charity Shop, 186 Queens Rd, TN34 1RG

**Pawnbrokers and Loan Shops**

H&T Pawnbrokers, 18 Queens Rd, TN34 1QY

G A Pawnbrokers – Hastings, 3 Queens Rd, TN34 1QP

CeX, Unit Su34, Priory Meadow Shopping Centre, TN34 1PH

**Medical Centres, Care Homes and Mental Health facilities**

Hastings Old Town Surgery, The Ice House Rock-a-Nore, TN34 3DW

Hastings Medical Practice & Walk-in Centre, Station Approach, TN34 1BA

South Coast Sports Clinic, 183 Queens Rd, TN34 1RG

Priory Road Surgery, 83 Priory Rd, TN34 3JJ

Old Town Osteopathy –Clinic, 62A High St, TN34 3EW

Armadillo Medical Group, Medical Centre, 61 All Saints' St, TN34 3BH

Nurseplus Hastings - Homecare & Live-in Service, 6th Floor, Cavendish House, Breeds Pl, TN34 3AA

First Class Home Care Ltd, 33 Cambridge Gardens, TN34 1EN

Onpoint Homecare Ltd, 182 Queens Rd, TN34 1RG

Care Home, 19 Milward Rd, TN34 3RP

Evergreen, 15 Collier Rd, TN34 3JR

Sussex Housing & Care, Bourne Court, The Bourne, TN34 3UZ

**Gambling premises**

MegaBet, 86 Queens Rd, Hastings TN34 1RL

Ladbrokes, 19 Queens Rd, TN34 1QY

Betfred, 15/16 Queens Rd, Tonbridge, TN34 1QY

Coral, 5 Queens Rd, TN34 1QP

BET21, 19 Queens Rd, TN34 1QY

Admiral Casino, 11 Wellington Pl, TN34 1NY

**Bus stops and other Transport links**

Hastings -Train Station, off Station Approach, Havelock Rd, TN34 1BA

Ore –Train Station, Hughenden Rd, TN34 3ND

Bus Stops:

Morrisons, TN34 1RN

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.

**Customer Interaction**

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

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.

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.

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

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.

**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*

Milward Crescent, TN34 3RP  
 Sussex Trinity College, 185 Queens Rd, TN34 1RG  
 Priory Meadow (Stop H,K), TN34 1QY  
 Havelock Road (Stop G), TN34 1HY  
 Harold Place (Stop P), TN34 1JA  
 Albert Road (Stop X), TN34 3DU  
 Pelham Place (Stop U), TN34 3UY  
 Pelham Place (Stop Z), TN34 3AE  
 The Stade, TN34 3AR  
 Robertson Street (Stop L), TN34 1JG  
 Robertson Street (Stop T), TN34 1JR  
 Cambridge Road (Stop R), TN34 1HG  
 Cambridge Gardens (Stop S), TN34 1DU

**Locally Identified Premises**

Hastings Castle, Castle Hill Rd, TN34 3JL  
 Flower Makers Museum, 58A High St, TN34 3EN  
 Butler's Gap - Modern art museum, George St, TN34  
 Flamingo Family Amusements, E Beach St, TN34 3AR  
 RBE Trampolines Hastings, Marine Parade, TN34 3AJ  
 ODEON Hastings, Queens Rd, TN34 1QP

**Public Houses and Alcohol Licensed Premise**

The Fountain, Fountain Hotel, 93 Queens Rd, TN34 1RL  
 Bar Rum, 91-92 Queens Rd, TN34 1RL  
 Twelve Hundred Postcards, 80 Queens Rd, TN34 1RL  
 The Prince Albert, Prince Albert, The, 28 Cornwallis St, TN34 1SS  
 The Clown, 9 Russell St, TN34 1QU  
 The Clarence, 57 Middle St, TN34 1NA  
 The John Logie Baird - JD Wetherspoon, 29-31 Havelock Rd, TN34 1BE  
 The General Havelock, 27 Havelock Rd, TN34 1BP  
 Yates Hastings, 53-57 Robertson St, TN34 1HY  
 Albion Hastings, 33 George St, TN34 3EA  
 The Cutter, 11-13, 11-13 E Parade, TN34 3AL  
 Anchor Inn, 13 George St, TN34 3EG  
 Ye Olde Pumphouse, 64 George St, TN34 3EE  
 Hastings Arms, 2 George St, TN34 3EG  
 The Jolly Fisherman, 3 E Beach St, TN34 3AR  
 Royal Standard, E Beach St, TN34 3DW  
 The Dolphin Inn, 11-12 Rock-a-Nore Rd, TN34 3DW  
 The Crown, 64-66 All Saints' St, TN34 3BN  
 Club X S, 19-21 Prospect Pl, TN34 1LN  
 French's – Bar, 24 Robertson St, Hastings TN34 1HL

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.

'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.

Playright App available for customers to self-manage their play and spend and can send alerts to Merkur Slots Hastings if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer.  
 Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling

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

**Deprivation**

Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm

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.

	<p>Brass Monkey –Live Music Venue, 18 Havelock Rd, TN34 1BP  The Owl &amp; Pussycat Lounge –Restaurant, 14 Robertson St, TN34 1HL  Grand Elektra, Grand Elektra, 53-57 Robertson St, TN34 1HY  The Carlisle, 24 Pelham St, TN34 1PE</p>	<p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p>
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p><b>Crime statistics:</b>  Merkur Slot Hastings is situated within Castle Hastings policing neighborhood. 2101 incidents of crime reported between March 2020 and Feb -anti-social behaviour accounted for 35.2% and Violence and sexual offences 25.1%. of reported incidents. During February 2021, 145 crimes were recorded. Mostly committed crimes, Anti-social behaviour - 49 (33.8%), Violence and sexual offences – 40 (27.6%), Robbery - 2 (1.4%), Drugs – 3 (2.1%) and Public order – 12 (8.3%), Shoplifting – 9 (6.2%), Vehicle crime – 4 (2.8%), Theft from the person – 1 (0.7%), Other theft – 5 (3.4%) and Other Crime – 2 (1.4%). In the year ending September 2020, the crime rate in Hastings was about the same as the average crime rate across similar areas and higher than average for the Sussex force area. (Police.uk)</p> <p><b>Local Police:</b>  Hastings Police Station, Bohemia Rd, Hastings TN34 1JJ , (Castle Hastings) East Sussex Constabulary. When contacted Catherine Daniel (Police licensing support team) responded - Having read your extensive documents, Sussex Police would have no objections to a bingo hall at the above address.</p> <p><b>Public Houses and Alcohol Licensed Premise</b>  The Fountain, Fountain Hotel, 93 Queens Rd, TN34 1RL  Bar Rum, 91-92 Queens Rd, TN34 1RL  Twelve Hundred Postcards, 80 Queens Rd, TN34 1RL  The Prince Albert, Prince Albert, The, 28 Cornwallis St, TN34 1SS  The Clown, 9 Russell St, TN34 1QU  The Clarence, 57 Middle St, TN34 1NA  The John Logie Baird - JD Wetherspoon, 29-31 Havelock Rd, TN34 1BE  The General Havelock, 27 Havelock Rd, TN34 1BP  Yates Hastings, 53-57 Robertson St, TN34 1HY  Albion Hastings, 33 George St, TN34 3EA  The Cutter, 11-13, 11-13 E Parade, TN34 3AL  Anchor Inn, 13 George St, TN34 3EG  Ye Olde Pumphouse, 64 George St, TN34 3EE  Hastings Arms, 2 George St, TN34 3EG  The Jolly Fisherman, 3 E Beach St, TN34 3AR  Royal Standard, E Beach St, TN34 3DW</p>	<p><b>Premise Security and violence in the workplace</b>  <i>Poor security control measures which may increase vulnerability to crime</i>  <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Hastings is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Hastings will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p><b>General Crime and Disorder</b>  <i>To identify aggressive customers to prevent crime and disorder</i>  <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for Swale - Castle Hasting policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with Kent Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p>

	<p>The Dolphin Inn, 11-12 Rock-a-Nore Rd, TN34 3DW  The Crown, 64-66 All Saints' St, TN34 3BN  Club X S, 19-21 Prospect Pl, TN34 1LN  French's – Bar, 24 Robertson St, Hastings TN34 1HL  Brass Monkey –Live Music Venue, 18 Havelock Rd, TN34 1BP  The Owl &amp; Pussycat Lounge –Restaurant, 14 Robertson St, TN34 1HL  Grand Elektra, Grand Elektra, 53-57 Robertson St, TN34 1HY  The Carlisle, 24 Pelham St, TN34 1PE</p> <p><b>Pawnbrokers and Loan Shops</b>  H&amp;T Pawnbrokers, 18 Queens Rd, TN34 1QY  G A Pawnbrokers – Hastings, 3 Queens Rd, TN34 1QP  CeX, Unit Su34, Priory Meadow Shopping Centre, TN34 1PH</p> <p><b>Gambling premises</b>  MegaBet, 86 Queens Rd, Hastings TN34 1RL  Ladbrokes, 19 Queens Rd, TN34 1QY  Betfred, 15/16 Queens Rd, Tonbridge, TN34 1QY  Coral, 5 Queens Rd, TN34 1QP  BET21, 19 Queens Rd, TN34 1QY  Admiral Casino, 11 Wellington Pl, TN34 1NY</p> <p><b>Residential Areas (impacted by Anti Social Behaviour)</b>  2101 incidents of crime reported between March 2020 and Feb 2021-  anti-social behaviour accounted for 35.2% of reported incidents.</p>	<p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Hastings will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p><b>Anti-social behaviour outside the premise</b>  Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p><b>Money Laundering</b>  <i>Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.</i></p>
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Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.

There are 2 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.

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

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

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

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

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

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

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

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

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

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

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

**Alcohol and Drugs**  
 Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.  
 'No Alcohol Allowed' signage on the door.

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

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

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

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

**Money Lending**  
 Money lending is not tolerated within our premises.

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

Ensuring that gambling is conducted in a fair and open way

#### **Bingo/Gaming Machine and Supervision**

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

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

#### **Customer Complaints**

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

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

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

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

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

<p>Other</p>	<p><b>Places of worship and Religious Buildings</b>  Hastings Unitarian Church, 7A South Terrace, TN34 1SA  Agape Church, 197 Queens Rd, TN34 1RG  Wellington Square Baptist Church, 47 Wellington Square, TN34 1PN  His Place Community Church, Robertson St, TN34 1HT  Holy Trinity Hastings, Robertson St, TN34 1HT  Hastings Christian Spiritualist Church, 4 Claremont, TN34 1HA  Church of St Thomas of Canterbury and English Martyrs, 32 Magdalen Rd, TN37 6ET  East Sussex Islamic Association, The Mosque, 12 Mercatoria, TN38 0EB</p>	<p><b>Ethnicity and Local Area Demographic</b>  Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p><b>Training &amp; Social Responsibility</b>  Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots UK Ltd have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots UK Ltd work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p>
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		<p><b>COVID 19</b></p> <p>All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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## Merkur Slots Hastings Premise Layout

<b>Premise level:</b>	Merkur Slots is ground floor premise located on the Queens Road.
<b>Premise frontage:</b>	Merkur Slots Hastings will be a property will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
<b>Counter Position:</b>	<p>Merkur Slots Hastings floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> <li>- TITo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</li> <li>- Beverage and snacks are provided from the service area</li> <li>- IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists</li> <li>- The CCTV monitor on the central desk allows staff to view the exterior at all times.</li> </ul>
<b>Floor layout:</b>	Merkur Slots Hastings floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
<b>Machine Positions:</b>	<p>Merkur Slots Hastings will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
<b>Hidden Areas:</b>	Merkur Slots Hastings will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

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

I have worked in the Gaming Industry for 12 years, in operations as a venue manager for 2 years and in collection/ income protection department for 8 years before moving to the Audit and Compliance department in 2018, prior to which I was managing busy pub in central London. During my time in the industry, I have support and trained venues in many locations across the United Kingdom. (Jolanta Mackowska– Internal Auditor).

I have worked in the Gaming Industry for 25 years, in operations as a venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management. During my time in the industry, I have managed venues and areas in many locations from market towns such as Loughborough to large cities like Glasgow and Luton. (Gill Clulow – Senior compliance Auditor)

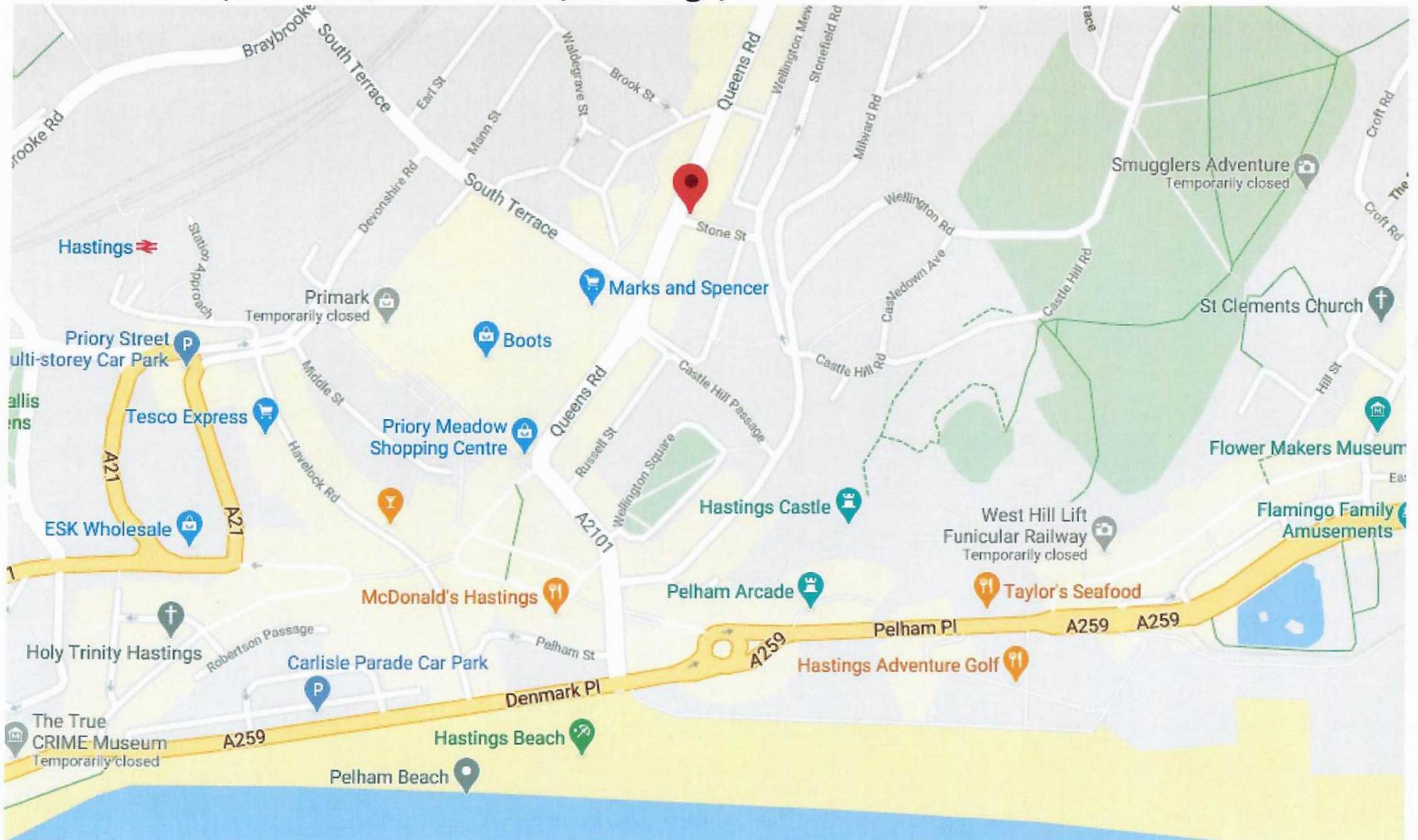
N.B. The standard procedure for completing a Local Area Risk Assessment would be to remotely research the area and complete an initial assessment this would be followed by a physical visit to the location and surrounding area, accompanied by a member of the operations team. However due to current lockdown restrictions a physical visit to the location has not been carried out and this assessment has been completed remotely. Once lockdown restrictions are eased, the retail and hospitality sector reopens and towns return to normal levels of trading a physical visit will be made and any appropriate adjustments made to the Risk Assessment. A review will additionally be carried out once the venue is open and local knowledge of the staff can be amalgamated.

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

Where relevant, Merkur Slots UK Ltd 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.

<b>Assessors Name:</b>	Gill Clulow
<b>Signature:</b>	
<b>Date:</b>	20/04/2021

# Merkur Slots, 40-41 Queens Road, Hastings, TN34 1RE



# Merkur Slots, 40-41 Queens Road, Hastings, TN34 1RE – Shop frontage example

