



HILLINGDON  
LONDON



# NOTICE OF HEARING

## Licensing Sub- Committee

**Date:** MONDAY 27 OCTOBER  
2025

**Time:** 10:00

**Venue:** COMMITTEE ROOM 6,  
CIVIC CENTRE, HIGH  
STREET, UXBRIDGE, UB8  
1UW

**Meeting  
Details:** If this is a public hearing, then the  
public and press are welcome to  
attend and observe the meeting.

For safety and accessibility, security measures will be conducted, including searches of individuals and their belongings. Attendees must also provide satisfactory proof of identity upon arrival. Refusal to comply with these requirements will result in non-admittance.

This meeting may be broadcast on the Council's YouTube channel. You can also view this agenda online at [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk)

### Councillors on the Sub-Committee:

Councillor Darran Davies  
Councillor Kelly Martin  
Councillor Barry Nelson-West

### IMPORTANT INFORMATION

On receipt of this notice, you **MUST** notify the Committee Clerk (contact details below) by the following date:

**Thursday 23 October 2025**

If you don't notify you may lose your right to speak at the hearing. When notifying you must confirm:

- 1) Whether you intend to attend or to be represented by someone at the hearing;
- 2) If you consider a hearing to be unnecessary and;
- 3) Whether to request that another person attends (other than your representative) as a witness

**Published:** Friday, 10 October 2025

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**Putting our residents first**

Lloyd White  
Head of Democratic Services  
London Borough of Hillingdon,  
Phase II, Civic Centre, High Street, Uxbridge, UB8 1UW

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# Agenda

## CHAIRMAN'S ANNOUNCEMENTS

### Hearing Protocol

- 1 Apologies for Absence
- 2 Declarations of interest in matters coming before this meeting
- 3 To confirm that the items of business marked Part I will be considered in Public and items marked Part II will be considered in Private
- 4 Matters that have been notified in advance or urgent

### Part I - Members, Public and Press

	<b>Title of Report / Address of application</b>	<b>Ward</b>	<b>Time</b>	<b>Page</b>
<b>5</b>	APPLICATION FOR A NEW BINGO PREMISES LICENCE: 'MERKUR SLOTS', PART GROUND FLOOR, 62 STATION ROAD, HAYES, UB3 4DF	Hayes Town	10:00	3 - 68

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## Order of proceedings – applications

The Chairman of the Sub-Committee will open the hearing by introducing the Councillors, explaining the purpose of the proceedings and the general procedure. The Chairman will then check that there are no additions or alterations to the list of those appearing at the hearing.

**Introduction by the Regulatory Services/Licensing Officer**



**The Applicant / Licence Holder**



**Responsible Authorities (if present)**



**Other Parties (residents etc...)**



### **DISCUSSION LED BY THE SUB-COMMITTEE**

The Chairman will lead the discussion. This will be a chance for all parties to provide comments on any submissions that have been made to the Sub-Committee.



**Closing remarks from each party**



**Sub-Committee deliberates**



**Chairman announces the decision**

The Council's Regulatory Services/Licensing Officer will introduce the report and will outline the matter before the Sub-Committee, giving any relevant background information. The Sub-Committee may ask questions of the officer.

The Applicant, licence holder or the person representing him/her will be invited to address the Sub-Committee. They will be allowed sufficient time to present his/her case. The Sub-Committee may ask questions.

Responsible Authorities will be invited to address the Sub-Committee and will be allowed sufficient time. The Sub-Committee may ask questions of the Responsible Authorities.

Other parties will be invited to address the Sub-Committee. Where there are a number of parties making similar representations the Chairman will expect the parties to nominate a spokesperson to make the representations and all will be allowed sufficient time. The Sub-Committee may ask questions of the Other Parties.

The Chairman will invite the Responsible Authorities and Other Parties to make brief closing remarks on the application. The Applicant / licence holder makes the final closing remarks.

The Sub-Committee will remain in the room to deliberate and make their decision, with only the Legal Advisor and the Clerk to the Sub-Committee remaining. All others present will be asked to leave the room. If the meeting is being broadcast, any filming will be stopped for this part.

Parties may return to the room when invited to do so and the Chairman will announce the decision. The Chairman will remind the Applicant / licence holder that the decision will be sent to them in writing. There can be no further questions or statements.

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# Agenda Item 5

## APPLICATION FOR A NEW BINGO PREMISES LICENCE: 'MERKUR SLOTS', PART GROUND FLOOR, 62 STATION ROAD, HAYES, UB3 4DF

<b>Committee</b>	Licensing Sub-Committee
<b>Officer Contact</b>	Lois King, Principal Licensing Officer
<b>Papers with report</b>	<ul style="list-style-type: none"><li>• Appendix 1 – Application Form &amp; Supporting Information</li><li>• Appendix 2A – Representation from Christine O'Hara-Carnduff</li><li>• Appendix 2B – Confirmation of date of receipt of Representation</li><li>• Appendix 3 – Map showing Gambling Premises in Hayes Town</li><li>• Appendix 4 – Relevant sections of Licence Conditions &amp; Codes of Practice (LCCP)</li><li>• Appendix 5 – Table of Categories of Gaming Machines</li></ul>
<b>Ward affected</b>	Hayes Town

### SUMMARY

To consider representations in respect of a new bingo premises licence for the premises, 'Merkur Slots', part ground floor, 62 Station Road, Hayes, UB3 4DF. The application has attracted one representation from an interested party.

### RECOMMENDATION

The Licensing Sub-Committee has the following options:

1. Grant the application for the premises licence subject to the mandatory conditions and default conditions (pursuant to sections 167 and 168 of the Act) or
2. Grant the application for the premises licence subject to the mandatory conditions but excluding specific default conditions and/ or attach additional conditions.
3. Reject the application.

### INFORMATION

- 1.1 An application for a new gambling (bingo) premises licence was received by the Licensing Service on 16 June 2025.

The applicant is:

Merkur Slots UK Limited  
Second Floor  
Matrix House  
North Fourth Street  
Milton Keynes  
MK9 1NJ

A copy of the application form, the plans, their Local Area Risk Assessment, Form A Notice, Merkur Slots UK Limited's Operational Standards document and Working Together document can be found at **Appendix 1**.

- 1.2 In accordance with the legislation, the application was sent to the responsible authorities:

- The Gambling Commission
- The Metropolitan Police Service
- H M Revenue & Customs
- London Fire & Emergency Planning Authority
- Child Protection Service, LBH
- Environmental Health Authority, LBH
- Planning Authority, LBH

There were no representations received from the responsible authorities.

- 1.3 The application was advertised in accordance with the Gambling Act 2005 (Premises Licence and Provisional Statement) Regulations 2007 both on the premises and in the local newspaper. The 28-day consultation period started from the date the application was received. The application was also posted on the council's website and in addition was sent to Ward Councillors.
- 1.4 Following the advertisement of the application, the following representations were received from Interested Parties:
  - Christine O'Hara-Carnduff, Local Resident – **Appendix 2A**
- 1.5 The period for consultation and the making of representations in respect of this application ended on 14 July 2025.
- 1.6 Although the date on the document in **Appendix 2A** is given as 17 July 2025, it was confirmed by Riviane Araujo, Complaints and Enquiries Officer at the London Borough of Hillingdon, that the online submission was made on Sunday 13 July 2025 (**Appendix 2B**). The Council's complaints team have five working days to claim and progress cases and in the case of Christine O'Hara-Carnduff's representation, it was claimed and assigned on 17 July 2025.
- 1.7 The applicant has made a standard premises licence application for a bingo premises licence and is therefore applying for standard of times of operation for a bingo premises.
- 1.8 The applicant has an Operating Licence issued by the Gambling Commission.

## OFFICER'S OBSERVATIONS

- 2.1 This is an application for a new Bingo Gambling Premises Licence under Section 159 of the Gambling Act in respect of 'Merkur Slots' situated at part ground floor 62 Station Road, Hayes, UB3 4DF. The location is in Hayes Town centre, and the premises was previously a Barclays Bank.
- 2.2 A bingo premises licence allows the holder of the licence to provide facilities for playing bingo on the licensed premises. Persons operating a bingo premises must hold a bingo operating licence from the Gambling Commission and must seek a premises licence from the licensing authority.
- 2.3 A bingo premises licence holder is entitled under the Act to make available for use a number of category B3 and B4 gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. The applicant's legal representatives have stated that the machine plan included with the application (**Appendix 1**) shows their clients intended

layout of the premises and the number and location of machines which their client expects to offer. It should be noted that the machine plan is for illustrative purposes only, should not be attached to the bingo premises licence and is subject to change. The applicant's legal representatives have stated that the number of machines offered will adhere to the permitted ratios as set out under the Gambling Act 2005 at all times.

- 2.4 The applicant has not specified the hours for trading in their application, but their legal representatives have confirmed that they are applying for the default hours under the Gambling Act 2005 which are to provide bingo facilities between 09:00 hours and midnight. There are no restrictions on access to gaming machines in bingo premises, even outside bingo operating hours.
- 2.5 **Other Licensed Gambling Premises nearby (shown on a map appended as Appendix 3)**

Premises	Address	Type	Operating times
1.Ladbrokes	Boleyn Court 9 Botwell Lane Hayes UB3 2BL	Betting Shop	Mon-Sat: 07:30-22:00 Sun: 08:30-22:00
2.William Hill	2 Botwell Lane Hayes UB3 2AA	Betting Shop	Mon-Sat: 07:30-22:00 Sun: 08:00-22:00
3.Admiral	32-36 Station Road Hayes UB3 4DD	Adult Gaming Centre	24 hours, 7 days a week
4.William Hill	57 Station Road Hayes UB3 4BA	Betting Shop	Mon-Fri: 07:30-22:00 Sat: 07:30-22:00 Sun: 09:00-22:00
5.Paddy Power	39 Station Road Hayes UB3 4BE	Betting Shop	Mon-Fri: 07:30-22:00 Sat: 07:00 – 22:00 Sun: 07:30-22:00
6.Jennings Bet	19b Station Road Hayes UB3 4BD	Betting Shop	Mon-Sat: 08:00-22:00 Sun: 09:00-22:00
7. Little Vegas	Part of 14/16 Station Road Hayes UB3 4DA	Adult Gaming Centre	24 hours, 7 days a week

## **CODES OF PRACTICE**

- 3.1 The Licence Conditions and Codes of Practice (LCCP) sets out the Gambling Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within the second part of the LCCP. **Appendix 4** details the relevant Social Responsibility and Ordinary Codes relevant to bingo premises and access to gambling by children and young persons.

## **GUIDANCE ISSUED BY THE GAMBLING COMMISSION**

- 4.1 The Gambling Commission has produced the 'Guidance for Local Authorities' in relation to the 2005 Act. The information in this section of the report relates to the relevant points within the Guidance which members may wish to consider.

### **Objective 1 – Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.**

- 4.2 **At Paragraph 5.3 it states:** *“Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator’s own risk assessment or the local area profile carried out by the licensing authority.”*
- 4.3 **At Paragraph 5.5 it states:** *“In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.”*
- 4.4 **At Paragraph 5.8 it states:** *“In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act.”*
- 4.5 **At Paragraph 5.10 it states:** *“Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.”*

### **Objective 2 – Ensuring that gambling is conducted in a fair and open way.**

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

*the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.”*

### **Objective 3 – Protecting children and other vulnerable persons from being harmed or exploited by gambling**

- 4.7 **At Paragraph 5.13 it states:** *“In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age restricted (for example bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.”*
- 4.8 **At Paragraph 5.17 it states:** *“The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define ‘vulnerable persons’ but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.”*
- 4.9 **At Paragraph 5.18 it states:** *“Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority’s policy statement. Any such considerations need to be balanced against the authority’s objective to aim to permit the use of premises for gambling.”*

### **Section 153 principles**

- 4.10 **At Paragraph 5.19 it states:** *“S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:*
- a. in accordance with any relevant code of practice under s.24 (the LCCP)*
  - b. in accordance with any relevant guidance issued by the Commission under s.25 (this guidance)*
  - c. reasonably consistent with the licensing objectives (subject to a and b above)*
  - d. in accordance with the licensing authority’s statement of licensing policy (policy statement) (subject to a to c above).”*
- 4.11 **At Paragraph 5.20 it states:** *“Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this guidance, any relevant Commission code of practice, its own statement of licensing policy, and the licensing objectives.”*
- 4.12 **At Paragraph 5.22 it states:** *“In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:*
- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application*

- s.210 (1) of the Act states that ‘in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building’.

### **Premises Licence conditions**

- 4.13 **At Paragraph 9.3 it states:** “Conditions on premises licences should relate only to gambling, as considered appropriate in the light of the principles to be applied by licensing authorities under s.153. Accordingly, if the Commission’s Licence conditions and codes of practice (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not appropriate to impose the same through conditions on a premises licence.”
- 4.14 **At Paragraph 9.25 it states:** The following mandatory conditions apply to all premises licences:
- the summary of the premises licence issued by the licensing authority must be displayed in a prominent place on the premises. In England and Wales this must include a summary of the terms and conditions of the premises licence.
  - the layout of the premises must be maintained in accordance with the plan that forms part of the premises licence.
  - neither National Lottery products nor tickets in a private or customer lottery may be sold on the premises in England and Wales. Sale of National Lottery and private lottery tickets are prohibited in Scotland.
- 4.15 **At Paragraph 9.27 it states:** “s.169 of the Act gives licensing authorities:
- the ability to exclude from premises licences any default conditions that have been imposed under s.168
  - the power to impose conditions on premises licences that they issue.”
- 4.16 **At Paragraph 9.28 it states:** “Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission’s codes of practice and this guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.”
- 4.17 **At Paragraph 9.29 it states:** “Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.”
- 4.18 **At Paragraph 9.30 it states:** “Where there are risks associated with a specific premises or class of premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.”
- 4.19 **At Paragraph 9.31 it states:** “Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:



- *relevant to the need to make the proposed building suitable as a gambling facility*
- *directly related to the premises (including the locality and any identified local risks) and the type of licence applied for*
- *fairly and reasonably related to the scale and type of premises*
- *reasonable in all other respects.”*

**4.20 At Paragraph 9.32 it states:** *“The Act sets out certain matters that may not be the subject of conditions:*

- *s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition*
- *s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation*
- *s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)*
- *s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.”*

## **Bingo**

**4.21 At Paragraph 18.1 it states:** *Bingo is not given a statutory definition in the Act although two types of bingo are commonly understood:*

- *cash bingo, where the stakes paid make up the cash prizes that are won*
- *prize bingo, where various forms of prizes are won, not directly related to the stakes paid.*

**4.22 At Paragraph 18.2 it states:** *The game and rules of bingo have evolved to the point where, despite the absence of any formal industry standard, the way in which bingo is played is broadly similar throughout Great Britain. Bingo is equal chance gaming. The Commission has published its view of what bingo is and how it differs from other forms of gambling. This can be found in our guidance [How bingo is defined](#) (this advice does not form part of the Guidance to licensing authorities). This advice was developed with the support of key stakeholders from the bingo industry.*

**4.23 At Paragraph 18.3 it states:** *Cash bingo is the main type of bingo played in commercial bingo premises. They also offer prize bingo, largely as games played in the intervals between main stage games. This means that only premises with a bingo premises licence, or a large casino premises licence issued under the Act (where the operator holds a bingo as well as a casino operating licence), will be able to offer bingo in all its forms.*

**4.24 At Paragraph 18.4 it states:** *As well as commercial bingo premises, bingo can be found in other gambling premises. Prize bingo is traditionally a game played in arcades, especially seaside amusement arcades, or at travelling funfairs. For these operators, prize bingo is subject to the allowances for prize gaming in the Act. This means that, subject to limits on participation fees and prizes, adult gaming centres, licensed and unlicensed family entertainment centres, and travelling fairs, (or any premises with a prize gaming permit) are able to offer prize gaming, which includes prize bingo. In this form of gaming, the nature of the prize must not be determined by reference to the number of people playing the game, and the nature or the size of the prize must not be determined by reference to the amount paid for or raised by the gaming. See [Part 27 of this guidance](#) for a fuller discussion of prize gaming.*

- 4.25 **At Paragraph 18.5 it states:** *Licensing authorities need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. An operator may choose to vary their licence to exclude a previously licensed area of that premises, and then apply for a new premises licence, or multiple new premises licences, with the aim of creating separate premises in that area. Essentially providing multiple licensed premises within a single building or site. Before issuing additional bingo premises licences, licensing authorities need to consider whether bingo can be played at each of those new premises.*
- 4.26 **At Paragraph 18.6 it states:** *Under the Act, children and young persons (anyone up to the age of 18) cannot be employed in providing any facilities for gambling on bingo premises, and children (under 16) cannot be employed, in any capacity, at a time when facilities for playing bingo are being offered. However, young persons, aged 16 and 17, may be employed in bingo premises (while bingo is being played), provided the activities on which they are employed are not connected with the gaming or gaming machines. Licensing authorities are able to find information about the restrictions that apply in [Licence conditions and codes of practice](#) (LCCP).*
- 4.27 **At Paragraph 18.7 it states:** *Children and young people are allowed into bingo premises; however, they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. [Social Responsibility \(SR\) code 3.2.5](#)(3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling.*
- 4.28 **At Paragraph 18.8 it states:** *S.172(7), as amended, provides that the holder of a bingo premises licence may make available for use a number of category B gaming machines not exceeding 20 percent of the total number of gaming machines on the premises. For example, a premises with a total of 25 gaming machines available for use can make five or fewer category B3 gaming machines available on that premises. Premises that were licensed before 13 July 2011 are entitled to make available eight category B gaming machines, or 20 percent of the total number of gaming machines, whichever is the greater. There are no restrictions on the number of category C or D machines that can be made available. Regulations state that category B machines at bingo premises are restricted to sub-category B3 (SI 2007/2158: [Categories of Gaming Machine Regulations 2007](#)) ([opens in new tab](#)) (but not B3A) and B4 machines. Licensing authorities should ensure that gambling machines are made available for use in a manner consistent with our guidance within Part 16. For the purpose of calculating the category B machine entitlement in gambling premises, gaming machines should only be counted if they can be played simultaneously by different players without physical hindrance. This includes tablets.*
- 4.29 **At Paragraph 18.9 it states:** *The gaming machines must remain within the licensed area covered by the premises licence. In the unusual circumstance that an existing bingo premises covered by one premises licence applies to vary the licence and acquire additional bingo premises licences (so that the area that was the subject of a single licence will become divided between a number of separate licensed premises) it is not permissible for all of the gaming machines to which each of the licences brings an entitlement to be grouped together within one of the licensed premises.*
- 4.30 **At Paragraph 18.10 it states:** *Equipment operated by a bingo operating licence for the purpose of playing bingo, for example what are currently known as mechanised cash bingo, electronic bingo terminal (EBTs) and video bingo terminals (VBTs), will be exempt from controls on gaming machines provided they comply with any conditions set by the Commission and, in the case of EBTs, do not hold gaming machine content.*

4.31 **At Paragraph 18.11 it states:** *An EBT that offers gaming machine content in addition to bingo content is considered to be a gaming machine and would count towards the total number of gaming machines or towards the offering of bingo. Any EBTs that do not offer gaming machine content would not count towards the number of gaming machines.*

4.32 **At Paragraph 18.12 it states:** [Social Responsibility Code Provision 3.5.6](#) requires that all non-remote casino (and bingo and betting licences except those at a track) and holders of gaming machine general operating licences for adult gaming centres must offer self-exclusion schemes to customers requesting such a facility. There is also an [Ordinary Code provision at 3.5.7](#). The full details can be found within the LCCP.

#### 4.33 **Mandatory conditions**

**At Paragraph 18.19 it states:** *A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.*

**At Paragraph 18.20 it states:** *No customer shall be able to enter bingo premises directly from a casino, an adult gaming centre or betting premises (other than a track).*

**At Paragraph 18.21 it states:** *Over 18 areas, within bingo halls that admit under-18s, must be separated by a barrier with prominently displayed notices stating that under-18s are not allowed in that area and with adequate supervision in place to ensure that children and young people are not able to access these areas or the category B or C machines. Supervision may be done either by placing the terminals within the line of sight of an official of the operator or via monitored CCTV.*

**At Paragraph 18.22 it states:** *Any admission charges, the charges for playing bingo games and the rules of bingo must be displayed in a prominent position on the premises. Rules can be displayed on a sign, by making available leaflets or other written material containing the rules, or running an audio-visual guide to the rules prior to any bingo game being commenced.*

**At Paragraph 18.23 it states:** *Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.*

#### 4.34 **Default conditions**

**At Paragraph 18.24 it states:** *Bingo facilities in bingo premises may not be offered between the hours of midnight and 9am. However, there are no restrictions on access to gaming machines in bingo premises.*

##### **Controlling where gaming machines may be played - bingo**

4.35 **At Paragraph 18.25 it states:** *The following policy objectives summarise the key elements that underpin the approach to controlling where gaming machines may be played:*

- *with very few low-risk exceptions, non-remote gambling should be confined to dedicated gambling premises*
- *the distinctions between different types of licensed gambling premises are maintained*
- *gambling activities are supervised appropriately*

- within casino, bingo and betting premises, gaming machines are only made available in combination with the named non-remote activity of the operating licence.

- 4.36 **At Paragraph 18.26 it states:** *The Act and associated regulations set out a comprehensive regulatory framework for controlling gaming machines. By linking different machine entitlements to different types of premises, the framework seeks to ensure the number and power (in terms of stakes, prizes and speed of play) of machines is proportionate to the premises. For such a framework to have any meaningful effect it must be possible for regulatory authorities and consumers to distinguish between different gambling premises.*
- 4.37 **At Paragraph 18.27 it states:** *The [LCCP](#) requires [\(Social Responsibility Code Provision 9\)](#) that gaming machines are only made available in combination with the named non-remote activity of the operating licence. So, unless a bingo premises operator offers substantive facilities for non-remote bingo it should not make gaming machines available for use on the premises in question. To contain the unavoidable risk to the licensing objectives associated with gaming machines, premises which offer machines must be appropriately supervised.*
- 4.38 **At Paragraph 18.28 it states:** *The current regulatory framework prescribes that category B gaming machines may only be made available in licensed gambling premises and not in locations which may prompt more ambient gambling such as pubs. Maintaining distinctions between different gambling venues allows individuals to make a deliberate choice whether to enter that particular gambling environment. In carrying out their functions under the Act licensing authorities should satisfy themselves that a premises applying for or licensed for bingo is operating or will operate in a manner which a customer would reasonably be expected to recognise as a premises licensed for the purposes of providing facilities for bingo.*
- 4.39 **At Paragraph 18.29 it states:** *Licensing authorities are not being asked to impose a ‘one size fits all’ view of how a bingo premises should look and function. Rather they are ensuring that a premises licensed for the purposes of providing facilities for bingo is operating as such and is not merely a vehicle to offer higher stake and prize gaming machines.*
- 4.40 **At Paragraph 18.30 it states:** *In exercising its functions under the Act, a licensing authority should take account of the relevant code of practice on ‘controlling where gaming machines may be played’. It is specifically obliged to do so when exercising functions under section 153 of the Act. In circumstances where a licensing authority considers an existing premises is not compliant with these general requirements, they should contact the Commission at the earliest opportunity.*
- 4.41 **At Paragraph 18.31 it states:** *Both the Commission and licensing authorities have the power to attach specific conditions to operating or premises licences in circumstances where additional assurance is required. The Commission favours the approach of general conditions for all supplemented by operator-specific conditions in cases where novel or contentious operating models are used which include the provision of gaming machines. This is to deliver the policy objectives above and ensure the risk to the licensing objectives is minimised.*
- 4.42 **At Paragraph 18.32 it states:** *In the Commission’s view the above approach would ideally be adopted at licensing stage. Licensing authorities should ensure that they request all the*



*information required from an applicant for a new premises or for a variation to an existing premises in order to satisfy themselves as to the matters set out at s153 of the Act. This includes the codes of practice and this guidance. The approach of adding case specific conditions can equally be deployed in respect of an existing unit where concerns arise or when changes are made to the operating model.*

## **HILLINGDON'S GAMBLING POLICY**

- 5.1 The information in this section of the report relates to the relevant sections within the London Borough of Hillingdon's Statement Gambling Policy which members should consider.

### **General Principles**

- 5.2 **At Paragraph 5.6 it states:** *"Under the Act, the Licensing Authority has no discretion to grant Premises Licences in circumstances where that would mean departing from the Gambling Commission Guidance and Codes of Practice and this Licensing Authority's own Statement of Licensing Principles. Therefore, our primary focus shall be to aim to permit the use of premises for gambling in so far as we think it is:*

- i) In accordance with any relevant Code of Practice issued by the Gambling Commission.*
- ii) In accordance with any relevant Guidance issued by the Gambling Commission.*
- iii) Consistent with the Licensing Objectives.*
- iv) In accordance with this Statement of Licensing Principles."*

- 5.3 **At Paragraph 5.7 it states:** *"The Council appreciates that gambling can be an emotive subject but acknowledges and endorses the Gambling Commission Guidance that "moral objections to gambling are not a valid reason to reject applications for premises licences " (except as regards any "no casino resolution") and also that unmet demand is not a criterion for a Licensing Authority."*

### **Location**

**At Paragraph 5.19 it states:** *"The Gambling Commission Guidance stipulates that demand issues cannot be considered in relation to the location of premises but that considerations made in terms of the licensing objectives can."*

- 5.4 **At Paragraph 5.20 it states:** *"In accordance with the Gambling Commission's Guidance for Local Authorities, this Licensing Authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder."*
- 5.5 **At Paragraph 5.21 it states:** *"The authority has not adopted any specific policy in relation to areas where gambling premises should not be located. Should any such policy be decided upon, this policy statement will be updated accordingly. It should be noted that any such future policy will not preclude any application being made with the onus upon the applicant showing how any potential concerns can be overcome."*
- 5.6 **At Paragraph 5.22 it states:** *"Each case will be decided on its merits and will depend, to a large extent, on the type of gambling that it is proposed will be offered on the premises."*

- 5.7 **At Paragraph 5.23 it states:** *"If an applicant can demonstrate appropriate measures to overcome concerns, that will be taken into account by the Council."*

### **Conditions**

**At Paragraph 5.24 it states:** "Any conditions attached to licences will be proportionate and will be:

- (i) Relevant to the need to make the proposed building suitable as a gambling facility
- (ii) Directly related to the premises and the type of licence applied for
- (iii) Fairly and reasonably related to the scale and type of premises and
- (iv) Reasonable in all other respects"

**At Paragraph 5.28 it states:** "Decisions upon individual conditions will be made on a case-by-case basis, although there will be a number of control measures this licensing authority will consider utilising should there be a perceived need, such as the use of door supervisors, supervision of adult gaming machines, appropriate signage for adult-only areas etc. There are specific comments made in this regard under each of the licence types below."

**At Paragraph 5.29 it states:** "This policy acknowledges that there are conditions that the licensing authority cannot attach to premises licences:

- (i) Any condition on the premises licence which makes it impossible to comply with an operating licence condition.
- (ii) Conditions relating to gaming machine categories, numbers, or method of operation.
- (iii) Conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated).
- (iv) Conditions in relation to stakes, fees, winning or prizes."

### **Bingo Premises**

- 5.8 **At Paragraph 5.35 it states:** *Bingo is a class of equal chance gaming and is permitted in alcohol licensed premises and in clubs provided it remains below a certain threshold, otherwise it will be subject to a bingo operating licence which will have to be obtained from the Gambling Commission.*
- 5.9 **At Paragraph 5.36 it states:** *The holder of a Bingo Operating Licence will be able to provide any type of bingo game including cash and prize bingo. Where bingo is permitted in alcohol licensed and non-gambling premises, this must not become a predominant commercial activity; otherwise a bingo operating licence will be required.*
- 5.10 **At Paragraph 5.37 it states:** *Commercial bingo halls will require a bingo premises licence from the Council. Amusement arcades providing prize bingo will require a prize gaming permit from the Council.*
- 5.11 **At Paragraph 5.38 it states:** *In each of the above cases it is important that where children are allowed to enter premises licensed for bingo, in whatever form, they are not allowed to participate in any bingo game, other than on category D machines. When considering applications of this type the Council will therefore take into account, among other things,*

*the location of the games or machines, access to those areas, general supervision of the premises and the display of appropriate notices.*

5.12 **At Paragraph 5.39 it states:** *The Licensing Authority recognises that there is no ban on children or young people having access to Bingo premises, that it is illegal for Under 18s to play or use Category B and C machines and that they cannot be employed in providing facilities for gambling or bingo premises. In any event, children under 16 cannot be employed in any capacity at a time when facilities for playing bingo are being offered. 16 and 17 year olds may be employed while bingo is taking place provided the activities on which they are employed are not connected with the gaming or gaming machines. Where children aged 16 and 17 are employed in bingo premises, the Licensing Authority would expect to see sufficient controls restricting access to Category B and C machines.*

5.13 **At Paragraph 5.40 it states:** *A limited number of gaming machines may also be made available at Bingo licensed premises. **A list of categories of gaming machines is on page 43 category C or above machines are available in premises to which children are admitted, the licensing authority will seek to ensure that:***

- (i) All such machines are located in an area of the premises separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance.*
- (ii) Only adults are admitted to the area where these machines are located.*
- (iii) Access to the area where the machines are located is supervised.*
- (iv) The area where the machines are located is arranged so that it can be observed by staff of the operator or the licence holder and*
- (v) At the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under the age of 18.*

5.14 **At Paragraph 5.41 it states:** *The Council will expect applicants to offer their own measures to meet licensing objectives however appropriate measures / licensing conditions may cover issues such as:*

- *Proof of age schemes.*
- *CCTV – this should be of sufficient quality that it will use evidence.*
- *the provision of entrances/machine areas*
- *physical separation areas*
- *location of entry*
- *notices/signage*
- *specific opening hours*
- *self-exclusion schemes - these are schemes whereby individuals who acknowledge they have a gambling problem ask to be barred from certain premises*
- *provision of information leaflets/helpline numbers for organisations such as GamCare*

*This list is not mandatory, nor exhaustive, and is merely indicative of example measures that the Council can consider implementing.*

5.15 **At Paragraph 5.43 it states:** *With regard to segregation of Category B and C machines from Category D machines, there is a requirement that there must be clear segregation between these types of machine so that children do not have access to Category B or C*

*machines and the Licensing Authority will take into account any guidance issued by the Gambling Commission in the light of any regulations made by the Secretary of State.*

### **Gaming Machines**

- 5.16 **At Paragraph 6.5 it states:** *“A gaming machine can cover all types of gambling activity, which can take place on a machine, including betting on virtual events. A machine is not a gaming machine if the winning of a prize is determined purely by the player’s skill. However, any element of chance imparted by the action of the machine would cause it to be a gaming machine.”*
- 5.17 **At Paragraph 6.7 it states:** *“There are four classes of gaming machines: Categories A, B, C and D, with category B further divided into sub-categories B1, B2, B3, B3A and B4. Appendix 5 sets out the current maximum stakes and prizes that apply to each category.*
- 5.18 **At Paragraph 6.8 it states:** *“The Gambling Act also prescribes the maximum number and category of gaming machines that are permitted in each type of gambling premises.”*

The table, below, shows the maximum number and category of gaming machines that are permitted at a bingo premises:

BINGO PREMISES	MAXIMUM OF 20% OF THE TOTAL NUMBER OF GAMING MACHINES WHICH ARE AVAILABLE FOR USE ON THE PREMISES FOR CATEGORIES B3 AND B4.  NO LIMIT ON CATEGORY C AND CATEGORY D MACHINES
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## **LEGAL CONSIDERATIONS**

### **THE GAMBLING ACT 2005**

- 6.1 When considering an application for a grant of a new Bingo Premises Licence, the Sub-Committee shall carry out its functions with a view to taking steps it considers appropriate for promoting the licensing objectives. Section 1 of the Gambling Act 2005 creates three licensing objectives:
1. Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime;
  2. Ensuring that gambling is conducted in a fair and open way, and
  3. Protecting children and other vulnerable persons from being harmed or exploited by gambling

### **Statutory aim to permit gambling**

- 6.2 **The guidance issued by the Commission states at Paragraph 1.19:**

*“The Act places a legal duty on both the Commission and licensing authorities to aim to permit gambling, insofar as it is considered to be reasonably consistent with the licensing objectives.*



*The effect of this duty is that both the Commission and licensing authorities must approach their functions in a way that seeks to regulate gambling by using their powers, for example, powers to attach conditions to licences, to moderate its impact on the licensing objectives rather than by starting out to prevent it altogether."*

- 6.3 An application for a new premises licence may be made pursuant to s.159 of the Act.
- 6.4 All applications will be decided on a case-by-case basis.
- 6.5 Where relevant representations are made and not withdrawn, the Licensing Authority must hold a hearing to determine the application, unless all are agreed that such a hearing is unnecessary s.162 (2).
- 6.6 Section 153(1) of the Act provides that licensing authorities should aim to permit the use of premises for gambling in so far as they think it:
  - (i) in accordance with any relevant code of practice under section 24;
  - (ii) in accordance with any relevant guidance issued by the Gambling Commission under section 25;
  - (iii) reasonably consistent with the licensing objectives; and
  - (iv) in accordance with the authority's statement of licensing policy.
- 6.7 Section 153(2) of the Act goes on to state that in "determining whether to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide.
- 6.8 Relevant representations are those that relate to the effect of the granting of the application on the promotion of the licensing objectives made by an interested party or responsible authority that have not been withdrawn and are not, in the opinion of the relevant licensing authority, frivolous or vexatious s.162(3) Gambling Act 2005.
- 6.9 The Sub-Committee can only consider matters within the application that have been raised through representations from interested parties and responsible authorities. Interested parties will include persons who:
  - (i) Live sufficiently close to premises carrying out gambling activities;
  - (ii) Have business interests that might be affected; and
  - (iii) Represent persons listed above.
- 6.10 The Act, via regulations also imposes mandatory and default conditions that promote the licensing objectives. There are no default conditions in relation to ACG's.
- 6.11 In respect of the imposition of Conditions by the Licensing Authority, Section 169 (4) states that a "licensing authority may not attach a condition to a premises licence which prevents compliance with a condition of the operating licence which authorises the holder to carry out the activity in respect of which the premises licence is granted".
- 6.12 The decision determined by the Sub-Committee will be accompanied with clear, cogent reasons for that decision, having had due regard to being reasonably consistent with the Licensing Objectives; the Human Rights Act 1998; any relevant code of practice under Section 24 of the Gambling Act 2005; any relevant guidance issued by the Commission under Section 25 of the Gambling Act 2005; and this Statement of Policy. The decision

and the reasons for that decision will be sent to the Applicant and those who have made relevant representations as soon as practicable.

- 6.13 The Council in its capacity as Licensing Authority has a duty to have regard to its public sector equality duty under s.149 of the Equality Act 2010. In summary s.149 provides that a Public Authority must, in the exercise of its functions, have due regard to the need to:
- (i) Eliminate discrimination harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (ii) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - (iii) Foster good relations between persons who share relevant protected characteristics and persons who do not.
- 6.14 Section 149(7) of the Equality Act 2010 defines nine relevant protected characteristics examples are: race, sex, age, disability, gender reassignment and religious beliefs.
- 6.15 Officers have provided the Sub-Committee with recommendations related to this application. Subject to the above-mentioned factors having been properly considered, the Sub-Committee may depart from the recommendations if there are good reasons for doing so. The Sub-Committee is advised that such departures could give rise to an appeal or judicial review
- 6.16 Interested parties, Responsible Authorities and the Applicant have the right to appeal the decision of the Licensing Sub-Committee to the Magistrates' Court within a period of 21 days beginning with the day on which the applicant was notified by the Licensing Authority of the decision to be appealed against.

## **BACKGROUND DOCUMENTS:**

The Gambling Act 2005

Licence Conditions and Codes of Practice by the Gambling Commission

Guidance for Local Authorities issued by the Gambling Commission

The London Borough of Hillingdon's Statement of Gambling Policy

**Application for a premises licence  
under the Gambling Act 2005 (standard form)**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

**Part 1 – Type of premises licence applied for**

Regional Casino ☐

Large Casino ☐

Small Casino ☐

Bingo ☒

Adult Gaming Centre ☐

Family Entertainment Centre ☐

Betting (Track) ☐

Betting (Other) ☐

Do you hold a provisional statement in respect of the premises? Yes ☐ No ☒

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

**Part 2 – Applicant Details**

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

**Section A**

**Individual applicant**

1. Title: Mr ☐ Mrs ☐ Miss ☐ Ms ☐ Dr ☐ Other (please specify)

2. Surname: Other name(s):

*[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]*

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person. ☐

*[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

**Section B****Application on behalf of an organisation**

6. Name of applicant business or organisation:

**MERKUR Slots UK Ltd**

7. The applicant's registered or principal address:

**Second Floor  
Matrix House  
North Fourth Street  
Milton Keynes  
MK9 1NJ**

8(a) The number of the applicant's operating licence (as given in the operating licence):

**003266-N-103444**

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

**N/A**

9. Tick the box if the application is being made by more than one organisation. ☐

*[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

**Part 3 – Premises Details**

10. Proposed trading name to be used at the premises (if known):

**MERKUR Slots**

11. Address of the premises (or, if none, give a description of the premises and their location):

**Part Ground Floor  
62 Station Road  
Hayes  
UB3 4DF**

12. Telephone number at premises (if known): **N/A**

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

**The premises are located in part of the ground floor of a former Barclays bank.**

14(a) Are the premises situated in more than one licensing authority area?

**No**

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made:**

**N/A**

#### **Part 4 – Times of operation**

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case?

**No**

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

**N/A**

#### **Part 5 – Miscellaneous**

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued):

**ASAP**

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence?

**No**

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application. ☐

19(a). Do you hold any other premises licences that have been issued by this licensing authority?

**No**

19(b). If the answer to question 19(a) is yes, please provide full details:

**N/A**

20. Please set out any other matters which you consider to be relevant to your application:

**Merkur Slots UK Ltd have full authority to provide licensed gaming by the provision of an Operating Licence granted by the Gambling Commission.**

**The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are applied and policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.**

**The applicant has comprehensive measures to ensure that all gambling remains socially responsible, which includes detailed staff training on matters such as the protection of the vulnerable, including homeless individuals and young persons.**

**The applicant is an experienced licenced operator providing a large estate of gambling premises across the United Kingdom.**

**A copy of Merkur Slots UK Limited's Operational Standards has been provided in support of the application and full copies of the Applicant's policies and procedures are available, if required.**

#### **Part 6 – Declarations and Checklist (Please tick)**

We confirm that, to the best of our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.



We confirm that the applicant(s) have the right to occupy the premises.



Checklist:



- Payment of the appropriate fee has been made/is enclosed ☒
- A plan of the premises is enclosed ☒
- I/ we understand that if the above requirements are not complied with the application may be rejected ☒
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities ☒

### Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: **Poppleston Allen**

Capacity: **Solicitors for & on behalf of the applicant**

Date: **16 June 2025**

22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name:

Date:

Capacity:

### Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

**Aaron Newbold**

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

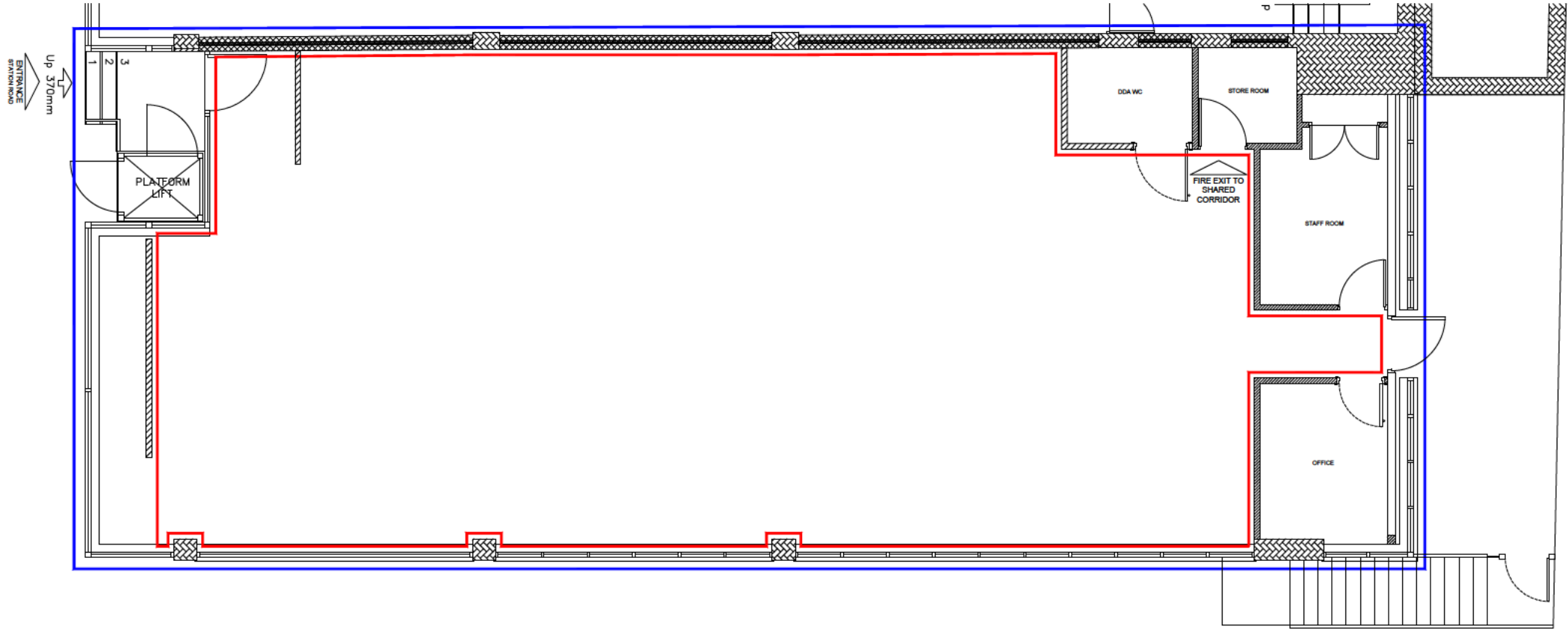
**0115 9487406**




24. Postal address for correspondence associated with this application:

**Poppleston Allen  
27 Stoney Street  
The Lace Market  
Nottingham  
NG1 1LS**

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

**a.newbold@popall.co.uk**




LICENSE PLAN LEGEND		REVISIONS		FIT OUT TYPE		REFERENCE DRAWINGS		
LINE TYPE	LINE TYPE DESCRIPTION	REV 00:		LICENSING				
	AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.			PROJECT		SCALE		
	EXTENT OF PREMISES			MERKUR SLOTS 62 STATION ROAD HAYES UB3 4DF		1:100		
<b>GAMBLING ACT 2005 LICENSING PLAN</b> 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.				DESCRIPTION		DRAWN BY		COPYRIGHT IS RESERVED BY MERKUR CASINO UK AND IS ISSUED ON THE CONDITION THAT IT IS NOT COPIED OR DISCLOSED BY OR TO ANY UNAUTHORISED PERSONS WITHOUT PRIOR CONSENT FROM MERKUR CASINO UK.
				PROPOSED LICENCE PLAN		LR		
						DATE		
						02/06/25		
						DRAWING No.	REVISION	
						914-PL-106	02	



PLEASE NOTE: SPACERS ARE NOT GAMING MACHINES



REVISIONS REV 00:	FIT OUT TYPE LICENSING	REFERENCE DRAWINGS		
	PROJECT MERKUR SLOTS 62 STATION ROAD HAYES UB3 4DF	SCALE 1:100		
		DRAWN BY MG		
		DATE 02/06/25		
	DESCRIPTION PROPOSED MACHINE PLAN	DRAWING No.	REVISION	
914-PL-105		01		

# Merkur Slots, Part Ground Floor, 62 Station Road, Hayes, UB3 4DF

## Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise:	Part Ground Floor, 62 Station Road, Hayes, UB3 4DF
Local Authority:	London Borough of Hillingdon
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-031 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, Second Floor Matrix House, North Fourth Street, Milton Keynes, MK9 1NJ
Name and Title of Assessor:	Ewelina Lesner – Internal Compliance Auditor and Amanda Kiernan – Head of Compliance
Date of Assessment:	05/06/2025
Review Date:	On opening in conjunction with local staff

## Local Area Profile Risk Factors

Local Risk Profile:	The premise, a former Barclays Bank is situated at 62 Station Road. The postcode is within the Hayes Town ward/electoral division, which is in the constituency of Hayes and Harlington. Is located just 3-minutes' walk away from Hayes Town centre. Train station is within 0.1 mile away and Heathrow Airport 2.5 miles away. Nearby occupiers include KFC and other restaurants, coffee shops, pharmacies, banks, amongst several other retailers. The Old Crown Pub is located opposite the premises. The YMCA is a short distance from the premise. Hayes Town ward has a very large concentration of residents that are aged 20-30, this age group are classed as potentially vulnerable to being effected by gambling harm.
Establishments of note:	KFC restaurant, 60 Station Rd, Hayes UB3 4DF; Hayes & Harlington Station, Station Approach, Hayes UB3 4BX
Adjoining premises:	62 Station Road, UB3 4DF is located next to KFC restaurant. No premise on the other site as bridge is running across the canal.
Crime statistics:	(Data: Mar 2024 - Feb 2025) Annual total crime rate in local area is 249 per thousand population. This can be rated as 7 out of 10 or high crime level compared to other local areas in England and Wales. Annual total crime rate in Hillingdon is 89 per thousand population, which can be rated as 4 out of 10 or low crime level compared to other local authority districts in England and Wales. Below are annual crime rates by crime type. Figures represent the number of crimes of a certain type per thousand population and indicate the relative ratings of the local area for a specific crime type compared to other local areas. Violence and sexual offences 58.8 (6/10), Anti-social behaviour 57.5 (7/10), Public order 25.4 (7/10), Theft from the person 21.4 (5/10), Other theft 15.4 (6/10), Shoplifting 12 (4/10), Drugs 10.7 (6/10), Robbery 10 (8/10), Vehicle crime 10 (6/10), Burglary 9.36 (7/10), Criminal damage and arson 8.69 (5/10), Bicycle theft 6.68 (7/10), Other crime 2.01 (4/10), Possession of weapons 1.34 (4/10). ( <i>Crystalroof.co.uk</i> )
Population:	Across the UK, the gender split is roughly equal at 49% male, 51% female. This address in Hayes and Harlington constituency is broadly in line with those figures, with 52% male. 72% of residents that are single. ( <i>streetcheck.co.uk</i> )
Culture:	The main ethnic group is White British, representing 20% of the population. On average, 37% of the population in London belong to the White British ethnic group. Other ethnic groups are: Black African 17%, Other Asian 16%, Indian 9%, Other White 8%, White Irish 6%, Pakistani 6%, Other 6%, Black Caribbean 4%, Other Black 2.6%, Mixed 1.7%, Arab 1.7%, Roma 0.9%. The main religions are Christian and Muslim, each representing 35% of the population. On average, 41% of the population in London belong to the Christian religion and 15% belong to Muslim. Other religions are: No Religion 11%, Hindu 9%, Religion Not Stated 7%, Buddhist 0.9%, Jewish 0.9%, Other Religion 0.9%. ( <i>Crystalroof.co.uk</i> )
Unemployment:	Full-Time Employee 10.5%, Part-Time Employee 5.7%, Self Employed 0.9%, Unemployed 19%, Full-Time Student 21.9%, Retired 4.7%, Looking After Home or Family 3.8%, Other 33.5%. ( <i>streetcheck.co.uk</i> )
Deprivation:	Index of Multiple Deprivation - 7/10. This is used to characterise the deprivation levels of the neighbourhoods. It takes into account the following domains: Income Deprivation Domain - 7/10, Employment Deprivation Domain - 5/10, Education, Skills and Training Deprivation Domain - 6/10, Health Deprivation and Disability Domain - 3/10, Crime Domain - 9/10, Barriers to Housing and Services Domain - 10/10, Living Environment Deprivation Domain - 8/10, Income Deprivation Affecting Children Index (IDACI) - 7/10, Income Deprivation Affecting Older People Index (IDAOPI) - 8/10. ( <i>Crystalroof.co.uk</i> )
Local Police:	Station Road, Hayes, UB3 4DF is within the Hayes Town policing neighbourhood, under the Metropolitan Police Service force area. Police Station address: 755 Uxbridge Road, UB4 8HU. During due diligence the police have advised this areas has a few issues with ASB, alcohol and drug abuse. Current policing priorities include: Violent crimes related to females; targeting street drinking, begging & ASB and the tower blocks being subject to drug dealing, noise, rough sleepers and ASB leaving residents feeling unsafe.
Age Verification Test results:	Age verification test purchasing, and mystery shopper visits are frequently carried out by third party companies - ServeLegal and Store Checker. All venues receive 2 or 3 random test visits per year.
Independent Security Reviews	MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area. Key comments from the reports include: 'Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.' 'MERKUR Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards'. 'The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to'.

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

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

## Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration London Borough of Hillingdon Council local authority Statement of Gambling Policy (2025 – 2028) and Hillingdon Council Borough Profile.

### Environmental Factors

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

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p><b>Unemployment:</b> Full-Time Employee 10.5%, Part-Time Employee 5.7%, Self Employed 0.9%, Unemployed 19%, Full-Time Student 21.9%, Retired 4.7%, Looking After Home or Family 3.8%, Other 33.5%. (<i>streetcheck.co.uk</i>)</p> <p><b>Deprivation:</b> Index of Multiple Deprivation – 7/10. This is used to characterise the deprivation levels of the neighbourhoods. It takes into account the following domains: Income Deprivation Domain – 7/10, Employment Deprivation Domain – 5/10, Education, Skills and Training Deprivation Domain – 6/10, Health Deprivation and Disability Domain – 3/10, Crime Domain – 9/10, Barriers to Housing and Services Domain – 10/10, Living Environment Deprivation Domain – 8/10, Income Deprivation Affecting Children Index (IDACI) – 7/10, Income Deprivation Affecting Older People Index (IDAOP) – 8/10. (<i>Crystalroof.co.uk</i>)</p> <p><b>Schools and Education</b> The British International School, 27-37 Station Rd, UB3 4DX International School of Learning, 1st, 10a Station Rd, UB3 4DA Botwell House Catholic Primary School, Botwell Ln, UB3 2AB Iqra Academy, 52 Coldharbour Ln, Hayes Town, UB3 3EP Lake Farm Park Academy, Botwell Common Rd, UB3 1JA Minet Infant School, Avondale Dr, UB3 3NR Minet Junior School, Avondale Dr, UB3 3NR Wonderland Nursery, 150 Clayton Rd, UB3 1RX Global Academy, The Old Vinyl Factory 1 Record Walk, UB3 1DH Cranford Park Academy, Phelps Way, UB3 4LQ Dr Triplett's CofE Primary School, Hemmen Lane, UB3 2JQ Harlington School, Pinkwell Lane, Harlington, UB3 1PB</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 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 Hayes Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP, and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy Age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p> <p>Age verification test purchasing, and mystery shopper visits are frequently carried out by third party companies – ServeLegal and Store Checker. All venues receive 2 or 3 random test visits per year.</p>



	<p>Guru Nanak Sikh Academy, Springfield Road, UB4 0LT  Nanaksar Primary School, Springfield Road, UB4 0LT  Pinkwell Primary School, Pinkwell Lane, UB3 1PG  Oxfordian College, The Winning Box, Aquis House, 27-37 Station Rd, UB3 4DX  Rayners College London, 10a Station Rd, UB3 4DA  Uxbridge College – Hayes Campus, College Way, Coldharbour Ln, UB3 3BB</p> <p><b>Community Centres and Youth Centres</b>  Haya Community Centre, 90 East Ave, UB3 2HR  YMCA Youth Programmes, 72-74 Station Rd, UB3 4DQ  Crane Youth and Community Association, Fuller Way, UB3 4LW  Harlington Young Peoples Centre, Pinkwell Ln, UB3 1PB</p> <p><b>Parks, playgrounds and sports/leisure facilities</b>  Lake Farm Country Park, Dawley Rd, UB3 1EJ  Barra Hall Park Bandstand, Freemans Ln, UB3 2NJ  Crane Park, Watersplash Ln, UB3 4QX  Minet Country Park, Springfield Rd, UB4 0LL  Botwell Leisure Centre Playground, East Ave, Hayes Town, UB3  Botwell Green Sports and Leisure Centre, East Ave, UB3 2HW  Taekwon-Do Academy, Labour Hall, Pump Ln, UB3 3NB  Energie Fitness, 20 Blyth Rd, UB3 1BY  The Nest Climbing, The Nest Climbing, Material Walk, UB3 1DP  Maiwand art of Warriors MMA, Fairey Corner, UB3 4HW  Shaolin Gym Kung Fu, 65 Wentworth Cres, UB3 1NW  Harlington Sports Centre, Pinkwell Ln, UB3 1PB</p> <p><b>Vulnerable and addiction support services</b>  The Addictions Counselling Service, Unit 4, Business Part, Sandow Cres, UB3 4QH</p> <p><b>Homeless shelters and food banks</b>  Dastak Welfare Foundation, 2nd Floor, The Winning Box, 27-37 Station Rd, UB3 4DX</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b>  Botwell Medical Centre, 238 Botwell Ln, UB3 2AP  Townfield Doctors Surgery, 34 College Way, UB3 3DZ  Kincora Doctors Surgery, 134 Coldharbour Ln, UB3 3HG  Travel Clinic Hayes Hillingdon, 24 Coldharbour Ln, UB3 3EW  PRAKASH RAJ AYURVEDIC SEVA CENTRE, Station Rd, UB3 4DD  HESA Medical Centre, 52 Station Rd, UB3 4DS  Hayes Medical Centre, 157 Old Station Rd, UB3 4NA  North Hyde Practice, 167 N Hyde Rd, UB3 4NS  Homewatch Care Limited, 19 Coldharbour Ln, UB3 3EA  Quest Recovery Services, Westminster Business Centre, Printing House Ln, UB3 1AP  Laurels Care, Aquis House, 27-37 Station Rd, UB3 4DX  Telzom, Access Self Storage, 1 Nestles Ave, UB3 4UZ</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 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>A Proof of Age scheme is in place with application forms available in the venue.</p> <p>The Gambling Commission has published its 2024 Young People and Gambling Report – its annual study into children’s and young people’s exposure to, and involvement in, all types of gambling.</p> <p>The research was conducted in schools, with pupils completing online self-completion surveys in class. The study collected data from a sample of 3,869 11- to 17-year-olds between January and June 2024.</p> <p>Headline statistics include:  27 percent of young people spent their own money on gambling in the 12 months prior to taking part in the survey, the most common types of gambling activity that young people spent their own money on were legal or did not feature age restricted products, namely: arcade gaming machines such as penny pushers or claw grab machines (20 percent) placing a bet for money between friends or family (11 percent) playing cards with friends or family for money (5 percent) 21 percent of young people were spending their own money on regulated forms of gambling (which includes some activities that are legal and played within licensed premises), and 15 percent on unregulated forms of gambling (gambling activities which fall outside the remit of the Gambling Commission)</p> <p>the proportion of young people scoring 4 or more on the DSM-IV-MR-J, representing a young person experiencing problem gambling, has seen a statistically significant increase from 0.7 percent in 2023 to 1.5 percent in 2024. <a href="https://www.gamblingcommission.gov.uk/news/article/2024-young-people-and-gambling-report">https://www.gamblingcommission.gov.uk/news/article/2024-young-people-and-gambling-report</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> <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>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p>
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	<p><b>Pawnbrokers and Loan Shops</b>  H&amp;T Pawnbrokers, 46 Station Rd, UB3 4DD  H&amp;T Pawnbrokers, 9 Coldharbour Ln, UB3 3EA  Cash Converters, 13 Botwell Ln, UB3 2AB</p> <p><b>Gambling premises</b>  Admiral Casino: Hayes, 32-36 Station Rd, UB3 4DD  Little Vegas, 14-16 Station Rd, UB3 4DA  Ladbroke's, 9, 13 Botwell Ln, UB3 2AB  Betfred, 1 Dawley Rd, UB3 1LS  Paddy Power, 39 Station Rd, UB3 4BE  William Hill, 57 Station Rd, UB3 4BA  William Hill, 2 Botwell Ln, Hayes Town, UB3 2AA  Jennings Bet, 19b Station Rd, UB3 4BD</p> <p><b>Public Houses and Alcohol Licensed Premise</b>  The Old Crown, 81 Station Rd, UB3 4BG  Captain Morgans Hayes, 9 Clayton Rd, Harlington, UB3 1AX  The Botwell Inn, 25-29 Coldharbour Ln, Hayes Town, UB3 3EB  Pub Punjabi, 10 Coldharbour Ln, UB3 3HE  The Woolpack, Dawley Rd, UB3 1EJ  The Music Box, Bourne Ave, UB3 1QT  The Great Western, Dawley Rd, UB3 1NF</p> <p><b>Residential Areas</b>  The area containing Station Road, Hayes contains a higher-than-average level of social housing – 80% of household spaces, predominantly of single-person households. This contrasts with the national average of just under 17.5%. The area containing Station Road, Hayes consists predominantly of caravans or other mobile and temporary dwellings</p> <p><b>Bus stops and other Transport links.</b>  Hayes &amp; Harlington train station, Hayes UB3 4BX  Clayton Road (Stop M), Hayes UB3 4DF  Hayes Town Centre (Stop D)  Hayes Town Centre (Stop P)  Botwell Green (Stop SP)  Blyth Road Hayes (Stop Z4)  Hayes &amp; Harlington Station (Stop L)  Hayes &amp; Harlington Station (Stop E)</p> <p><b>Locally Identified Premises</b>  None</p> <p><b>Regular Festivals, Town Events and Mass Gatherings</b>  There are no reported specific events or announcements for mass gatherings at Station Road in Hayes.</p>	<p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enable an informed choice and take a risk-based approach to harm minimization.</p> <p><b>Customer Interaction</b>  Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare &amp; encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as Self-Exclusion.</p> <p>Whilst most customers can enjoy and manage their gambling, Merkur Slots recognises it has a duty of care to those who struggle to manage their gambling and may be experiencing harm from gambling. Accordingly, we provide a self-exclusion facility for those customers that wish to request an exclusion for a fixed period, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months. During the exclusion process the person is guided towards gambling support services.</p> <p>Merkur Slots are members of both the Bingo Association and BACTA industry self-exclusion schemes which adhere to the below LCCP codes:  LCCP 3.5 – Self-exclusion  3.5.1 – Self-exclusion – non remote SR code  3.5.2 – Self-exclusion non-remote ordinary code  3.5.6 – multi-operator non-remote SR code  3.5.7 – multi-operator non-remote ordinary code</p> <p>Once a person has entered the self-exclusion scheme their image will appear on the Smart Tablet exclusion carousel. Staff are required to view the carousel at the start of every shift to ensure they are aware of any new exclusions so they may recognise the person should they attempt to enter the premises during their exclusion period. Any such attempts to enter the premise are recorded as a breach on the Smart Tablet.</p>
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Once the self-excluded period has ended and the person wishes to return to the premise, they are required to engage in a reinstatement interview to discuss their return to gambling, following this they enter a 24-hour cooling-off period before their self-exclusion is lifted and they can return to the premise. Any previously self-excluded person returning to the premise to gamble will be noted as an at-risk customer requiring close monitoring of their gambling behaviour with regular interactions.

All customer interactions are recorded on the 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.*

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.

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

#### **Gamcare Annual Report 2023-2024**

*GamCare's National Gambling Helpline received a record 55,228 calls and online chats from people experiencing gambling harm in 2023-24 – a 25% increase from the previous year – according to the charity's Annual Report.*

*<https://www.gamcare.org.uk/news-and-blog/news/gamcare-releases-annual-report-following-record-breaking-year-of-support-on-the-national-gambling-helpline/>*



		<p><b>Deprivation</b> Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm.</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted; therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p><b>Homelessness</b> Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>Merkur Slots staff are aware of where rough sleepers sleep and beggars loiter in the local area and actively prevent them from entering the premise, including close monitoring of individuals spending coins/low level amounts on a frequent basis.</p> <p>Should loitering increase due to extended hours additional notices will be added about loitering without play not being tolerated.</p>
Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime.	<p><b>Crime statistics:</b> (Data: Mar 2024 – Feb 2025) Annual total crime rate in local area is 249 per thousand population. This can be rated as 7 out of 10 or high crime level compared to other local areas in England and Wales. Annual total crime rate in Hillingdon is 89 per thousand population, which can be rated as 4 out of 10 or low crime level compared to other local authority districts in England and Wales. Below are annual crime rates by crime type. Figures represent the number of crimes of a certain type per thousand population and indicate the relative ratings of the local area for a specific crime type compared to other local areas. Violence and sexual offences 58.8 (6/10), Anti-social behaviour 57.5 (7/10), Public order 25.4 (7/10), Theft from the person 21.4 (5/10), Other theft 15.4 (6/10), Shoplifting 12 (4/10), Drugs 10.7 (6/10), Robbery 10 (8/10), Vehicle crime 10 (6/10), Burglary 9.36 (7/10), Criminal damage and arson 8.69 (5/10), Bicycle theft 6.68 (7/10), Other crime 2.01 (4/10), Possession of weapons 1.34 (4/10). (<i>Crystalroof.co.uk</i>)</p>	<p><b>Premise Security and violence in the workplace</b> <i>Poor security control measures which may increase vulnerability to crime. Failure to protect employee and customers from harm during the hours of late-night opening.</i></p> <p>Merkur Slots Hayes is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures will be installed.</p> <p>Merkur Slots Hayes 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</p>



	<p><b>Local Police:</b> Station Road, Hayes, UB3 4DF is within the Hayes Town policing neighbourhood, under the Metropolitan Police Service force area. Police Station address: 755 Uxbridge Road, UB4 8HU. During due diligence the police have advised this areas has a few issues with ASB, alcohol and drug abuse. Current policing priorities include: Violent crimes related to females; targeting street drinking, begging &amp; ASB and the tower blocks being subject to drug dealing, noise, rough sleepers and ASB leaving residents feeling unsafe.</p> <p><b>Public Houses and Alcohol Licensed Premise</b> The Old Crown, 81 Station Rd, UB3 4BG Captain Morgans Hayes, 9 Clayton Rd, Harlington, UB3 1AX The Botwell Inn, 25-29 Coldharbour Ln, Hayes Town, UB3 3EB Pub Punjabi, 10 Coldharbour Ln, UB3 3HE The Woolpack, Dawley Rd, UB3 1EJ The Music Box, Bourne Ave, UB3 1QT The Great Western, Dawley Rd, UB3 1NF</p> <p><b>Pawnbrokers and Loan Shops</b> H&amp;T Pawnbrokers, 46 Station Rd, UB3 4DD H&amp;T Pawnbrokers, 9 Coldharbour Ln, UB3 3EA Cash Converters, 13 Botwell Ln, UB3 2AB</p> <p><b>Gambling premises</b> Admiral Casino: Hayes, 32-36 Station Rd, UB3 4DD Little Vegas, 14-16 Station Rd, UB3 4DA Ladbroke's, 9, 13 Botwell Ln, UB3 2AB Betfred, 1 Dawley Rd, UB3 1LS Paddy Power, 39 Station Rd, UB3 4BE William Hill, 57 Station Rd, UB3 4BA William Hill, 2 Botwell Ln, Hayes Town, UB3 2AA Jennings Bet, 19b Station Rd, UB3 4BD</p> <p><b>Residential Areas (impacted by Anti-Social Behaviour)</b> Police priority: Targeting street drinking, begging and all ASB within the Ward in partnership with the Council's Anti-social Behaviour Team.</p> <p>Action taken: Frequent patrols of ASB hotspots take place, alcoholic drinks have been seized, we endeavour to issue community protections warning notices when the opportunities arise, criminal behaviour orders have been submitted for at least 1 prolific offender, more 1 x stop and search which led to the issue of a Community Resolution for cannabis possession Males moved on in Botwell Leisure Centre for drinking alcohol, 5x stop searches for suspected cannabis use. Males moved on alley by Subway, East Ave Known street drinker issued with a Community Protection Notice Leaflet drop residential blocks warning about cannabis use Address on Little Road visited with council following ASB</p>	<p>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 the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local 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 SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operates an internal security alert system and are registered with trade associations for crime bulletins (BACTA and Association).</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 Hayes 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 SMART Tablet Incident App.</p>
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	<p>complaints, venue has been closed down Plans to fix gate to carpark behind Methodist church, funding available and bid being submitted Attempting to get fobs for Venue who are not replying to applications likely for other persistent offender will follow.</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>Should there be an increase in people congregating outside the premise due to extended trading hours, appropriate signage will be displayed to deter people from loitering.</p> <p>Additional signage 'leave quietly' will be added to advise customers to respect local residents.</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> <p>Merkur Slots has a designated Anti Money Laundering Officer (AMLO), and AML policies with clear escalation and reporting processes.</p> <p>Where there are pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.</p> <p>SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.</p> <p>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.</p> <p>Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.</p> <p>Adequate staff will always be maintained and subject to regular review and risk assessment.</p> <p>Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member.</p> <p>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</p>
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		<p>reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.</p> <p>Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.</p> <p>Merkur Slots Hayes 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.</p> <p>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.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.</p> <p>Operating 24hrs removes the risk of venue staff opening and closing the venue. MERKUR operate a 'refresh period' in all 24hr venues that allows for any cash empties and refills to take place when the venues are closed to the public.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarm will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p><b>Alcohol and Drugs</b>  Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.  'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the SMART Tablet Incident App and depending on severity will be reported to the police.</p>
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		<p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems where available will be deployed during times of public houses closing.</p> <p><b>Money Lending</b> Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p> <p><b>Late Night Operation</b> Maglock systems are often made available for staff to deploy at any point in time to protect against crime or disorder and are always deployed during times of public houses closing.</p> <p>Dedicated Regional Night Managers are employed to support venues with security incidents.</p> <p>Area Manager's operate a late-night rota system to ensure the 'late night contact number' is monitored so venues always have an Operational Manager to call upon for support with any issues during late night operation.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock where available and intruder alarms are installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.</p>
Ensuring that gambling is conducted in a fair and open way		<p><b>Gaming Machine and Supervision</b> 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).</p> <p>Bingo will be available by means of Bingo tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p><b>Customer Complaints</b> <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p>

		<p>Merkur Slots operates 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.</p> <p>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.</p> <p>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.</p> <p><b>Marketing</b> Merkur Slots promotes 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).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, think 25, opening times and promotional activity.</p> <p>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><b>Places of worship and Religious Buildings</b>            United Apostolic Church, 286 Church Rd, UB3 2LQ            Hayes Town Chapel, St Mary's Rd, UB3 2LN            Loveworld Hayes Church, 141 Church Rd, UB3 2LE            The Baptist Church, 136 Coldharbour Ln, UB3 3HG            Immaculate Heart of Mary Church, Botwell Ln, UB3 2AB            Hayes Methodist Church, 4 Station Rd, UB3 4DA            Living Church, The Old Vinyl Factory, 1 Record Walk, UB3 1DH            Hayes Elim Christian Centre, Keith Rd, UB3 4HP            Harlington New Church Hall, UB3 4JF            Quba Masjid &amp; Education Centre, Golden Cres, UB3 1AQ            Hayes Muslim Centre, 3 Pump Ln, Hayes Town, UB3 3NB            Hayes Sikh Gurdwara, Golden Cres, UB3 1AQ            Hope UK Church, Keith Rd, UB3 4HP            Hillingdon Borough Central Masjid, Unit 1, Johnson Industrial Estate, Silverdale Rd, UB3 3BA</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 takes 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 has attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots works with YGAM (Young Gamers and Gamblers Education Trust) and Betknowmore to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>Merkur Casino has a dedicated Learning and Development Team and a Safer Gambling team that deliver face to face compliance and social responsibility training. Safer Gambling team review and evaluate the effectiveness of training.</p> <p>Gambling Accredited training completed by members of management that hold Personal Management Licences (PML).</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance and annually: 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 via MyMerkur intranet. Venue Managers review compliance logs weekly, Area Managers Monthly, Safer Gambling team monthly and Compliance Auditors annually.</p>
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## Merkur Slots Hayes Premise Layout

<b>Premise level:</b>	Merkur Slots Hayes will be a ground floor premise.
<b>Premise frontage:</b>	Merkur Slots Hayes will be a property 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 Hayes 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>- 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 Hayes 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 Hayes 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 Tablets offering a range of Bingo products and Live calling. Bingo Tablets 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 Hayes will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.


## Additional Comments

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

None of our operational venues have been subject to review proceedings.

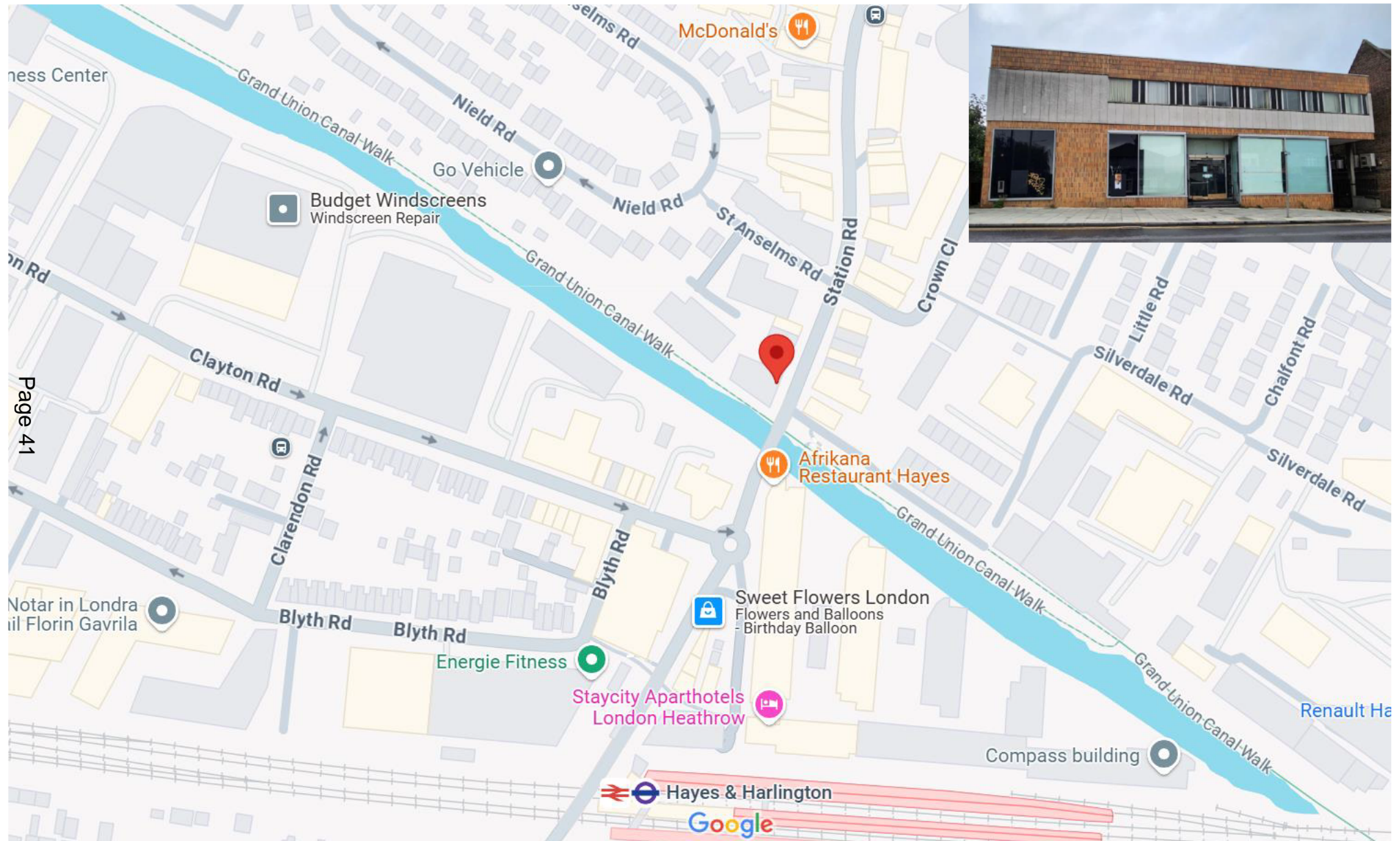
This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Merkur Slots is a national operator and employs several standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance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

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

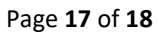
Assessors Name:	Amanda Kiernan
Signature:	
Date:	05/06/2025



# Merkur Slots, Part Ground Floor, 62 Station Road, Hayes, UB3 4DF, map:



## Page 42





## Merkur Slots – Shop frontage example:



## NOTICE OF APPLICATION FOR A PREMISES LICENCE

*This notice is issued in accordance with regulations made under section 160 of the Gambling Act 2005*

Notice is hereby given that **MERKUR Slots UK Limited**

of the following address: **Second Floor  
Matrix House  
North Fourth Street  
Milton Keynes  
MK9 1NJ**

the number of whose operating licence is **003266-N-103444** has made an application for a **Bingo Premises Licence**.

The application relates to the following premises

**MERKUR Slots  
Part Ground Floor  
62 Station Road  
Hayes  
UB3 4DF**

The application for a premises licence has been made to the following licensing authority:

**The Licensing Service  
London Borough of Hillingdon  
Civic Centre  
Uxbridge  
UB8 1UW  
W: [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk)**

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

The following person connected with the applicant is able to give further information about the application:

**Aaron Newbold  
Poppleston Allen  
37 Stoney Street  
The Lace Market  
Nottingham  
NG1 1LS  
E: [a.newbold@popall.co.uk](mailto:a.newbold@popall.co.uk)  
T: 0115 9487406**

**Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 14 July 2025**

# Merkur Slots UK Limited

## Operational Standards



### THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

- 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 persons from being harmed or exploited by gambling

**Objective 1** - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

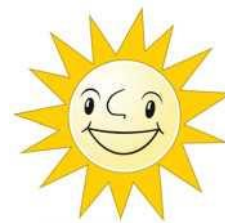
- Merkur Slots UK Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Merkur Slots UK Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Merkur Slots UK Limited premises operate digital CCTV and customer areas are supervised.
- Merkur Slots UK operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Merkur Slots UK premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Merkur Slots UK Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots UK employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Merkur Slots UK operate a robust late night working policy, which is fully supported by a fulltime Night Manager.
- Merkur Slots UK does not operate a single-manning policy between 10pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

**Objective 2** - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

# Merkur Slots UK Limited

## Operational Standards



- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers complete a comprehensive 13 week induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during their employment to ensure that potential issues can be addressed at the earliest opportunity.

### **Objective 3** - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and ServeLegal are our third-party independent partner for compliance testing. Test results are reported to the Gambling Commission.
- All licensed premise employees receive induction and six-monthly refresher training during their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- Merkur Slots UK have a Safer Gambling Team dedicated to supporting venues with meeting this licensing objective and their socially responsible requirements.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements, and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, prevention, and treatment (RPT) of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both online and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits, Safer Gambling Workshops and Annual Conferences.

# WORKING TOGETHER



Accredited by the Global  
Gambling Guidance Group

**THE MERKUR FAMILY**





# PART OF THE MERKUR GROUP

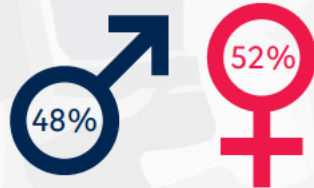
## A Strong Partner For More Than 60 Years



**MERKUR**  
**CASINO**

MERKUR Casino UK is a subsidiary of the family run MERKUR Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the MERKUR Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best entertainment.

MERKUR Casino UK employs over 2,000 people in over 220 High Street gaming centres.



**52% of employees are female**  
**48% of employees are male**

MERKUR Slots is the main UK brand. All MERKUR Cashino and Cashino Gaming venues will be rebranded into this new name over time. Our venues represent the very best in terms of exciting 'slot gaming' entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.



**MERKUR**  
**SLOTS**



# MYTHBUSTERS

## We Are Not Betting Shops

MERKUR Casino UK is one of the UK's largest operators of High Street Adult Gaming Centres (AGCs) and High Street bingo venues. AGCs are often, unfortunately, put into the same category as betting shops. This is because there is a widespread misunderstanding of how AGCs operate and who our customers are. We want to address these misconceptions and demonstrate that a new AGC on your local high street is a good thing. Public concerns surrounding betting shops were largely due to the presence of Fixed Odds Betting Terminals (FOBTs). Our venues do not offer these types of machines. Our machines offer low stakes ranging from 10p to a maximum of £2, plus a variety of bingo products are also available. These machines have been around for many, many years.

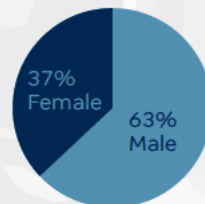


Our AGCs are where people come to spend their spare change, have a game of bingo and enjoy their favourite pastime in convenient locations.

The market on the high street has evolved with venues now providing electronic bingo tablets.



Our machines operate at low stakes.



Our venues appeal to all ages with our membership gender database split of 63% male & 37% female.



Our teams remain with the customers on the venue floor rather than behind a counter.

We provide complimentary refreshments, teas and coffees, to customers and our AGCs do not offer or sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.





# OUR OPERATION

## We Are Not Noisy Neighbours

Whilst we sit within the leisure sector, noise levels are very low and limited from our venues. We currently operate 24 hours in over 150 venues.



Our machines generate low levels of noise.



We do not have tannoy systems that you find in seaside amusement centres.



We only play background music like at any other high street shop.



We do not offer or serve alcohol in our High Street Bingo premises.



Our customer base after midnight is predominantly the local entertainment workforce and shift workers who like to relax after their busy shifts.



Customers tend to visit on their own or in couples. We rarely see large groups.



# RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

## Think 25 Messaging



## Players in Venue



## We Are Not A Problem

Being a responsible operator is high priority across the MERKUR group and in the UK, MERKUR Casino is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

### GAMBLING COMMISSION

MERKUR Casino is regulated by the Gambling Commission and Licensing Authorities

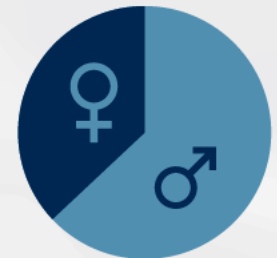


We do not sell or serve alcohol in our venues. We provide complimentary refreshments, teas and coffees, to customers. Our staff will not allow anyone into the premises who appears to be intoxicated.



Our venues operate a Think 25 policy whereby any persons who look under 25 have to produce a form of photo ID.

Our venues appeal to all ages with our membership gender database split of 63% Male / 37% Female



We are subject to regular independent test purchases and are consistently at the average leisure pass rate.

# SOCIAL RESPONSIBILITY MEASURES IN PLACE



## In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business MERKUR Casino also has a number of socially responsible gambling tools, and management and training initiatives that include:



All staff complete on-boarding and six-monthly refresher training on “The Essentials of Compliance and Social Responsibility” and “Safeguarding Children and Vulnerable People”.



Dedicated Learning & Development Team and National training centres.

SMARThub tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.



All data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



Our Category B3 machines support safer gambling by having time and limit settings available to customers.

## Compliance



## Training Centre



## Online Training







## Machine Messaging



## Customer Interaction Training



# SOCIAL RESPONSIBILITY MEASURES IN PLACE

## All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling. Our recent commitments include: Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.



MERKUR Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our MERKUR 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business.

MERKUR Casino UK also engages with the Bingo Association, Bacta and Gambling Business Group bodies.



- Senior Manager representation from MERKUR Group.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.



- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Safer Gambling Committee.

# BENEFITS TO THE HIGH STREET



## Benefits for your High Street include:



Over 90% of new MERKUR Slots venues occupy former vacant units.



Investment from £100,000 to £250,000 in long-standing vacant venues.



Linked trips with other shops helping to support other businesses.



Local jobs for between 6 and 12 people depending on the hours of operation.



Increased footfall to the High Street.



We provide an important natural surveillance on the high street, particularly late into the evenings.



# COMMUNITY & CHARITY

## MERKUR Initiative

Supporting Local Charities and Good Causes



Amongst other charities, some of your donations have helped:



MERKUR Casino UK has raised in excess of  
£1.4 million for good causes since 2005

### Please contact us

For press enquiries:  
email [martha@sourcemc.co.uk](mailto:martha@sourcemc.co.uk)  
phone +44 (0) 7796 614137

MERKUR Casino UK  
Second Floor  
Matrix House  
North Fourth Street  
Milton Keynes  
MK9 1NJ

phone 01908 351200  
email [info@merkur-casino.com](mailto:info@merkur-casino.com)



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[← Back](#)

Task summary

Case reference	2095-4186-5123-7608
Task reference	2668-2721-3755-8306
Case manager	Riviane Araujo
Task owner	Lois King
Case type	Corporate Complaint
Date requested	2025-07-17T08:43:15.390Z
Task target	2025-07-31T08:43:03.706Z
Task description	<p>Service request - investigate and send response (service) Dear Team, Could you please arrange for this case to be investigated and responded to? Many thanks Regards Riviane Araujo Name: Christine O'Hara-Carnduff Email: [REDACTED] Phone: [REDACTED] Address: 32 32 Clayton Road 32 Clayton Road UB3 1AZ</p>

Case details

Complaint

Which Hillingdon Council service does your complaint relate to?

Corporate

## Complaint

How would you like to make the complaint

Myself

## Your details

First name

Christine

Last name

O'Hara-Carnduff

Email address

[REDACTED]

Confirm email address

[REDACTED]

Telephone / mobile number

[REDACTED]

## Your address

32

32 Clayton Road

32 Clayton Road

Hayes

UB3 1AZ

## Complaint

Complaint title

Gambling licence for former Barclays Bank  
Hayes UB3

Details of complaints

It has recently been brought to my attention that there is an application by purchasers who have bought the old

Barclays Bank Station road Hayes.

Originally we were told it was going to be flats but now we see there is an application for two floors of gambling. One slot machines and another a bingo hall. My concern is firstly we as residents on Clayton Road already struggle with parking issues. Despite having permits in place people simply take no notice of this and still park up. Traffic enforcement officers are hardly ever visible in our area. There simply will not be any parking for anyone coming to this gambling building. There is a small under ground car park but nothing else so I think our street will get more abuse and nothing done about it. Secondly why do we need another gambling premises in the high street? We already have 2 slot machines venues along side so many betting shops. Why are we in a time when there is very little money, Hayes is not an affluent area, but yet we are encouraging gambling? Thirdly I do want the type of clientele that gambling and betting shops encourage to be on the corner of my street. I have young children to be concerned about. These are my issues and concerns for the area.

What can we do to resolve this from your perspective

I totally object to the up holding of a gambling licence for these premises and given my concerns above that Hillingdon council will see fit to not grant it.

Have you contacted the Council and/or a Service area about this matter previously

No

If you have any supporting documents you can upload them here

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**From:** [Riviane Araujo](#)  
**To:** [Lois King](#)  
**Subject:** Re: Corporate Complaint - Licensing Services reference: 2095-4186-5123-7608 Task assignment: Corporate Complaint - Licensing Services reference: 2095-4186-5123-7608  
**Date:** 17 July 2025 13:01:27  
**Attachments:** [image001.png](#)  
[Outlook-ahh534s.png](#)

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Hello Lois,

The complaint was submitted online on Sunday, 13 July.

13/07/2025 09:24	Christine O'Hara-Carnduff	Case - New	Case initiated: Corporate complaint	Public
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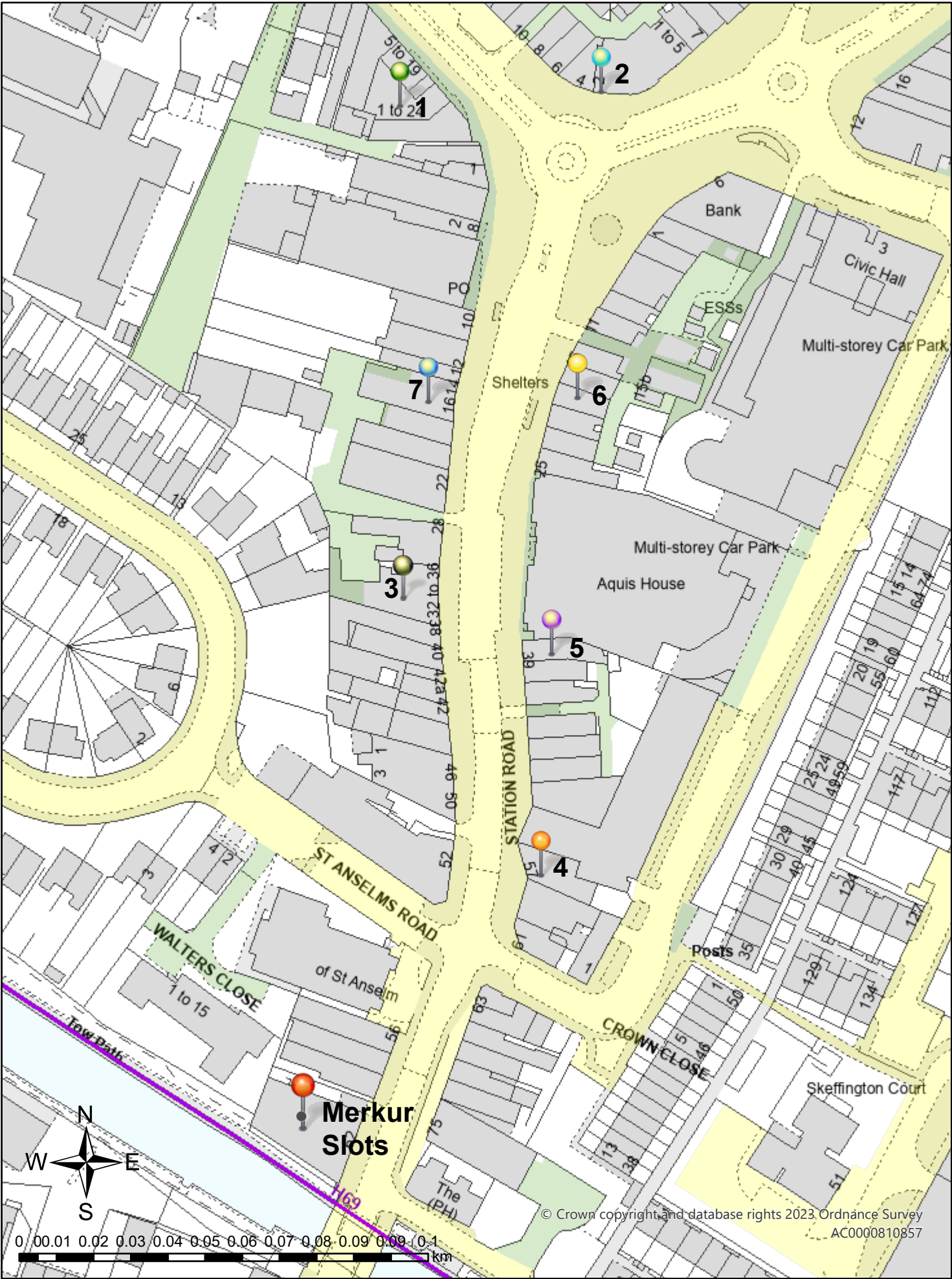
The Complaints team has five working days to claim and progress cases, so this one was claimed and assigned today, 17 July.

I hope it helps.

Kind regards,  
**Riviane Araujo**  
Complaints and Enquiries Officer  
Hillingdon Council - Corporate Services  
Civic Centre, High Street, Uxbridge, UB8 1UW,  
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Map Notes

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### 3.2.5 - Bingo and FEC SR code

### Appendix 4

#### Social responsibility code

##### Applies to:

All non-remote bingo and family entertainment centre licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
  - a. checking the age of apparently underage customers
  - b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
  - c. taking action when there are unlawful attempts to enter the adult-only areas.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
  - a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
  - b. the legal requirements on returning stakes and not paying prizes to underage customers; and
  - c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
6. Licensees must only accept identification which:
  - a. contains a photograph from which the individual can be identified
  - b. states the individual's date of birth
  - c. is valid
  - d. is legible and has no visible signs of tampering or reproduction.
7. All licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional [guidance on the information requirements](#) contained within this section.

### 3.2.6 - Bingo and FEC ordinary code

#### Ordinary code

##### Applies to:

All non-remote bingo and family entertainment centre licences.

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 25 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission<sup>1</sup> and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional [guidance on the information requirements](#) contained within this section.

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<sup>1</sup> These matters are to be reported to us online via our '[eServices](#)' digital service on our website.



## CATEGORIES OF GAMING MACHINES

CATEGORY	MAXIMUM STAKE	MAXIMUM PRIZE
<b>A</b>	Unlimited	Unlimited
<b>B1</b>	£5	£10,000*
<b>B2</b>	£100 (in multiples of £10) £2 effective April 2019	£500
<b>B3</b>	£2	£500
<b>B3A</b>	£2	£500
<b>B4</b>	£2	£400
<b>C</b>	£1	£100
<b>D**</b>	-	-
<b>D</b> non-money prize (other than crane grab machine)	30p	£8
<b>D</b> non-money prize (crane grab machine)	£1	£50
<b>D</b> money prize (other than a coin pusher or penny falls machine)	10p	£5
<b>D</b> combined money and non-money prize (other than coin pusher or penny falls machines)	10p	£8 (of which no more than £5 may be a money prize)
<b>D</b> combined money and non-money prize (coin pusher or penny falls machine)	20p	£20 (of which no more than £10 may be a money prize)

\* Category B1 where the prize value available through its use is wholly or partly determined by reference to use made of one or more other subcategory B1 machines, no more than £20,000

\*\* Category D machines with a 10p stake are entitled to offer prizes of up to £5 in cash, or up to £5 in cash and £3 in non-monetary prizes. Category D machines with a 30p stake can offer £8 in non-monetary prizes only.

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