

Premise Address: Merkur Casino,

59 Summer Street, Aberdeen AB10 1SJ

Operator Licence - Merkur casino Entertainment UK Ltd 62997

Casino Premises Licence Number: 051
Premises with Alcohol Licence: ACO393

1. Introduction

This Local Risk Assessment has been completed as per Social Responsibility Code Provision 10.1.1 (Assessing Local Risk).

Merkur Casino UK is an experienced operator in the gambling industry with over 220 locations throughout the UK in various sectors including AGC's, High Street Bingos and Traditional Bingo Clubs.

The Merkur Casino Entertainment UK Ltd (62997) licence has been held since January 2024. The Merkur Casino in Aberdeen is the first Casino Merkur have operated and the premise will operate under a Non-Remote 1968 Act Casino Operating Licence (converted under the Gambling Act 2005).

It is regulated by the United Kingdom Gambling Commission (UKGC).

To support Merkur Casino in the operation of the Casino several consultants and support services have been employed including;

David Mills (Casino Compliance)
Paul Sculpher (Paul Sculpher Consultants Ltd)
Marieanne Carmody (Gamsafe Consultancy)

The gambling industry is regulated by the Gambling Commission established under The Gambling Act 2005. The Gambling Commission's licensing objectives are:

- A) Preventing Gambling from becoming a source of crime and disorder, being associated with crime or disorder, or being used to support crime
- B) Ensuring that Gambling is conducted in a fair and open way
- C) Protecting Children and other Vulnerable Persons from being harmed or exploited by Gambling

These principles have been embedded into Merkur Casino company policies, procedures, risk assessments and corporate culture. Merkur Casino has also reviewed the Aberdeen City Licensing Board Gambling Act 2005 Policy Statement 6th Edition Jan 2022-25

Gambling Statement of Licensing Principles - 2022-2025

Merkur Casino is a member of both the Betting and Gaming Council (BGC) and the National Security Association (NCSA), both of which are Non-Governmental Casino Industry Associations. Merkur Casino is committed to the BGC's Social Responsibility program (Playing Safe) and participates in SENSE (the casino industry's multi-operator self-exclusion scheme). Merkur Casino will take part in test purchasing undertaken by the BGC. Merkur Casino will participant in the NSA COIN scheme which is primarily a casino industry crime prevention initiative. These activities are all additional to the development of, and adherence to, the casino's detailed and effective Safer Gambling Policy which has been prepared in accordance with the Gambling Commission's License Conditions and Codes of Practice (LCCP).

Charitable Contributions

(including annual contribution for gambling research, prevention, and treatment)
Merkur Casino contributes to Gambling Charities on an annual basis in the areas of Research,
Prevention/Treatment and Treatment (Gamcare, GambleAware and YGAM).



Key Personnel – Responsibilities and Licenses

The person with overall responsibility for Daily Operations under the Gambling Act 2005 is Colin Liddle (General Manager). Completion of the Local Risk Assessment is the responsibility of Amanda Kiernan (Head of Compliance) who also ensures that reviews are carried out and that any immediate resulting actions are followed through.

Casino License Holders

Casino Managers hold Personal Management Licenses (PML) issued by the Gambling Commission and Personal Licenses (Licensing (Scotland) Act 2005) issued by Local Authorities.

All other Casino staff who hold the job function of handling equipment related to gaming within the premises hold a Personal Functional License (PFL)

All external security contractors are registered with the Security Industry Association (SIA). At the Merkur Casino Aberdeen external security contractors are supplied by Granite Elite, Bucksburn, Aberdeen AB21 9FD.

Designated Premises Supervisor

The Designated Premises Supervisor for the Merkur Casino Aberdeen is Colin Liddle (General Manager), who is responsible for ensuring that daily Operations are Compliant with the relevant UK Legislation (Primarily Licensing Act Scotland 2005 and where applicable the Gambling Act 2005).

Staff Training

All staff at Merkur Casino undergo training in relation to Social Responsibility and Anti-Money Laundering on a minimum 6 month's cycle. The training is conducted on a face-to-face basis in a group setting followed 6 months later by Individual online learning (and repeated) with training records and test results held at each individual site (relevant to the staff member) and Head Office. All staff have access to Corporate Policy and Training Documents through their individual login to the Merkur Training platform system.

2. Overview of Merkur Casino Aberdeen

Location

Merkur Casino Aberdeen is located at 59 Summer Street Aberdeen AB10 1SJ, in the City Centre Area (situated in the Midstocket/Rosemount Ward). This is a mixed business, Retail and Residential area in the City Centre. Entry to the Casino is a street level entrance and due to its city centre location customers arrive by multiple means (driving, walking and public transport).

Statement of Licensing Policy

Under the Licensing Act Scotland 2005 Merkur Casino Gaming has considered the Statement of Licensing Policy (objectives of the Licensing Act Scotland 2005 – The Prevention of Crime and Disorder, Securing Public Safety, The Prevention of Public Nuisance, Protecting and Improving Public Health and The Protection of Children from Harm) issued by the Aberdeen City Licensing Board updated November 2023). The next review will be published within the three-year cycle. This document is a legal requirement for Local Authorities and has been prepared in accordance with the provisions under Section 6 of the Licensing Act Scotland 2005.

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Local Statistics

Merkur Casino Aberdeen is not situated within a Cumulative Impact Area (CIA). Crime levels within Aberdeen City Centre are higher than those in the wider Aberdeen area. The Casino is situated in the Midstocket/Rosemount Ward which is ranked 3228 in the Scottish Index of Multiple Deprivation in January 2020 (it must be noted that the wider Aberdeen City area is ranked at 13). The Casino has robust Anti-Money Laundering and Safer Gambling Policies in place and all staff are trained on a sixmonthly basis.

https://www.gov.scot/publications/scottish-index-multiple-deprivation-2020/ Casino Operation



Merkur Casino Aberdeen has a 24hr Premises License issued under the Gambling Act 2005 (current opening hours 18:00 – 05:00 Monday – Thursday, Friday to Sunday 14:00 to 06:00 with the retail sale of alcohol permitted between 11:00 – 06:00 Monday – Saturday 12:30–06:00 Sunday, current alcohol serving is Monday – Thursday 18:00 – 04:30), Friday to Sunday 14:00 – 05:30. The casino offers facilities relating to gaming (live tables and slots), poker and food & beverage. Merkur Casino has an average attendance of 139 with the busiest nights Thursday (when poker is played), Friday and Saturday. Merkur Casino Aberdeen has a maximum occupancy of 330 which is detailed in the Annual Fire Risk Assessment. Occupancy numbers are monitored through our reception procedures.

Merkur Casino Aberdeen has an internal and external (External covers main entrances only) CCTV system which is accessible to Management during opening hours and nominated members of management 24/7. Currently images are retained for a maximum 31 days. Entry to the casino is via a street level entrance which is manned during opening hours by trained receptionists and by additional SIA staff at peak trading hours.

The casino is spacious and well laid out with good sight lines and there is a high percentage of experienced and well-trained staff. Safer Gambling leaflets are available in all internal areas with clear signage. The clientele of the casino is mixed male/female across all age groups and the majority of the casino clientele would be considered to be leisure based. Most customers are from the local Aberdeen area and Management carry out regular interactions with the aim of identifying both Gambling and Non-Gambling related Harms (Social Responsibility Code Provision 3.4.1).

Parking for the casino is in the Summer Street carpark which is accessible to the casino via the street level entrance on Summer Street.

Risk Assessment

IMPACT AND PROBABILITY RISK MATRIX						
Impact of Event Occurring	Very High (A)	30	35	40	45	50
	High (B)	25	30	35	40	45
	Medium/High (C)	15	25	30	35	40
	Medium (D)	10	15	25	30	35
	Low (E)	5	10	15	20	30
		Low (1)	Medium (2)	Medium/High (3)	High (4)	Very High (5)
. B	Probability of Event Occurring					

Licensing Objective -

Preventing Gambling from becoming a source of crime and disorder, being associated with crime or disorder, or being used to support crime (Gambling Act 2005/Licensing Act Scotland 2005)

Potential Risk (Risk Rating C4):

As a city centre venue, the casino may attract groups of people that behave inappropriately – drug/alcohol abuse, anti-social behaviour.

Mitigation/Governance (Managed Risk D2):

- Company Policies available to all staff on company PC's via MyMerkur/MerkurDrive
- Merkur Casino Aberdeen operates an open-door policy. Subject to being over 18, guests are
 allowed on the premises to socialise or game subject to our internal controls. Once a guest
 plays up to a maximum of £1500 or wishes to cash out £1500, they are invited to take
 membership and must provide valid, government issued ID. Once a membership has been
 created, entry will be logged by the receptionist upon each visit.



- At reception all new members and those who wish to enter as a 'non-member' are asked if they have self-excluded from gambling. All 'non-members' are made aware of our threshold policy after which a formal membership must be created.
- Non-member's play is monitored according to our AML and SG policies. Requirement to produce ID is at the discretion of the management in accordance with those policies and mandatory above the £1500 threshold limit.
- Trained SIA door staff are employed at peak times and are always trained in conflict resolution with trained Receptionists on duty during opening hours. It is a mandatory condition that there is 1 SIA Door Supervisor from 11pm until 5am (or close, whichever is earlier) with 1 at each entrance from 1am until 5am (or close, whichever is earlier). The casino has 1 entrance staffed by 1 SIA Door staff between 21:30 05:00 Monday to Thursday, 2 SIA door staff on Friday and Saturday (1 between 21:30 06:00 and 1 between 01:30 06:00) and 1 SIA door staff on Sunday between 21:30 06:00.
- Zero tolerance to the use or supply of drugs or other illegal substances and/or anti- social behaviour on the premises.
- Regular patrolling of the venue to deter substance abuse and anti-social activity.
- Management and staff are trained in ensuring there is responsible alcohol consumption within
 the venue and that service or entry is refused for any customers that may be intoxicated and
 or considered vulnerable. A Responsible Alcohol Policy is available on all company PC's via
 MyMerkur/MerkurDrive.
- Liaison with the Local Aberdeen City Licensing Officer and Positive Engagement with Local and National Initiatives.

Potential Risk (Risk Rating B4):

The casino will attract the attention of money launderers, those who contemplate robbery or who engage in other criminal activity.

Mitigation/Governance (Managed Risk D2):

- Company Policies are available to all staff on company PC's-via MyMerkur/MerkurDrive
- Robust trigger mechanisms for CDD, EDD and the use of Cash (detailed in Company Safer Gambling and Anti-Money Laundering Policies).
- Oversight throughout the company using the three-tiered approach (see AML Policy and AML Risk Assessment for more information).
- Staff receive twice yearly AML training- six monthly cycle using an online learning platform
 and an experienced company trainer face to face. This training is reviewed, as a minimum,
 on a yearly basis to ensure it aligns with any changes in LCCP, GC advice and/or relevant
 research which may be beneficial to reference.
- Sufficient levels of trained and experienced staff to monitor the casino and its customers during opening hours.
- CCTV coverage Managers have access to a full CCTV system during opening hours.
- The design of the casino which is spacious and well laid out with good sight lines and there is a high percentage of experienced and well-trained staff.
- Regular patrolling of the venue including toilets (and other quieter areas within the venue) to deter illegal and or anti-social activity.
- Use of C6 Acuris upon entry whereby all new members are screened against PEP/Sanctions databases and for signs of Adverse Media before entry is permitted.
- Effective Suspicious Activity Reporting (SAR) Scheme.



- Merkur Casino Aberdeen operates an open-door policy. Subject to being over 18, guests are
 allowed on the premises to socialise or game subject to our internal controls. Once a guest
 plays up to a maximum of £1500 or wishes to cash out £1500, they are invited to take
 membership and must provide valid, government issued ID. Once a membership has been
 created, entry will be logged by the receptionist upon each visit.
- At reception all new members and those who wish to enter as a 'non-member' are asked if
 they have self-excluded from gambling. All 'non-members' are made aware of our threshold
 cash out policy after which a formal membership must be created.
- Non-member's play is monitored according to our AML and SG policies. Requirement to produce ID is at the discretion of the management in accordance with those policies and mandatory above the £1500 threshold limit.

Licensing Objective -

Protecting Children and other Vulnerable Persons from being harmed or exploited by Gambling (Gambling Act 2005/Licensing Act Scotland 2005)

Potential Risk (Risk Rating B4):

The operation of the casino in the city centre may attract children, young people, and other vulnerable persons from the local area.

Mitigation/Governance (Managed Risk D2):

- Company Policies available to all staff on company PC's MyMerkur/Merkur Drive.
- Challenge 25 Policy The company operates a challenge 25 Policy across all its UK Venues.
- Merkur Casino Aberdeen operates an open-door policy. Subject to being over 18, guests are
 allowed on the premises to socialise or game subject to our internal controls. Once a guest
 plays up to a maximum of £1500 or wishes to cash out £1500, they are invited to take
 membership and must provide valid, government issued ID. Once a membership has been
 created, entry will be logged by the receptionist upon each visit.
- At reception all new members and those who wish to enter as a 'non-member' are asked if
 they have self-excluded from gambling. All 'non-members' are made aware of our threshold
 policy after which a formal membership must be created.
- Trained Reception staff are present at the casino entrance throughout opening hours and SIA badged staff are present during peak hours.
- Participation in a national test purchasing scheme operated by the Betting and Gaming Council.
- CCTV Coverage Managers have access to a full CCTV system during opening hours.
- All external signage and entrances are designed to not be appealing to the young and vulnerable. All signage and marketing (internal and external) are checked by Compliance before display.
- Reception staff daily upon the start of their shift review the SENSE database, any new
 additions to the database are screened against the membership database and the company
 adheres to mandated SENSE procedures regarding breaches. All new members are screened
 against the SENSE database upon their first visit.
- SENSE and Company Self-Help leaflets are available at prominent locations in the venue.
- Staff receive twice yearly Social Responsibility training six monthly cycle using an online learning platform and an experienced company trainer face to face. This training is reviewed, as a minimum, on a yearly basis to ensure it aligns with any changes in LCCP, GC advice and/or relevant research which may be beneficial to reference.



Potential Risk (Risk Rating B4):

The operation of a casino attracts those with gambling problems, including those who have already self-excluded from other casinos.

Mitigation/Governance (Managed Risk D2):

The casino has adopted the following control mechanisms:

- Company Policies available to all staff on company PC's MyMerkur/MerkurDrive.
- Reception staff regularly review the SENSE database, any new additions to the database are screened against the membership database and the company adheres to mandated SENSE procedures regarding breaches. All new members are screened against the SENSE and Company databases upon their first visit.
- SENSE and Company Self-Help leaflets are available at prominent locations in the venue.
- Merkur Casino Aberdeen operates an open-door policy. Subject to being over 18, guests are
 allowed on the premises to socialise or game subject to our internal controls. Once a guest
 plays up to a maximum of £1500 or wishes to cash out £1500, they are invited to take
 membership and must provide valid, government issued ID. Once a membership has been
 created, entry will be logged by the receptionist upon each visit.
- At reception all new members and those who wish to enter as a 'non-member' are asked if they have self-excluded from gambling. All 'non-members' are made aware of our threshold policy after which a formal membership must be created.
- The company carries out Social Responsibility Interactions as per the LCCP for land-based operators 'Premises based customer interactions' 3.4.1.
- Staff receive twice yearly Social Responsibility training- six monthly cycle using an online learning platform and an experienced company trainer face to face. This training is reviewed, as a minimum, on a yearly basis to ensure it aligns with any changes in LCCP, GC advice and/or relevant research which may be beneficial to reference.

Potential Risk (Risk Rating B4):

Aberdeen Grammar School is in close proximity to the casino.

Governance (Managed Risk D2):

- Aberdeen Grammar School is approximately 1000 meters+ away from the casino and is not within direct sight. No other children's venues are near the casino.
- Company Policies available to all staff on company PC's MyMerkur/MerkurDrive.
- Challenge 25 Policy The company operates a challenge 25 Policy across all its UK Venues.
- Merkur Casino Aberdeen operates an open-door policy. Subject to being over 18, guests are
 allowed on the premises to socialise or game subject to our internal controls. Once a guest
 plays up to a maximum of £1500 or wishes to cash out £1500, they are invited to take
 membership and must provide valid, government issued ID. Once a membership has been
 created, entry will be logged by the receptionist upon each visit.
- At reception all new members and those who wish to enter as a 'non-member' are asked if they have self-excluded from gambling. All 'non-members' are made aware of our threshold cash-out policy after which a formal membership must be created.
- Trained Reception staff are present at the casino entrance throughout opening hours and SIA badged staff are present during peak hours.
- Participation in a national test purchasing scheme operated by the Betting and Gaming Council.
- CCTV Coverage Managers have access to a full CCTV system during opening hours.



- All external signage and entrances are designed to not be appealing to the young and vulnerable. All signage and marketing (internal and external) are checked by Compliance before display.
- Staff receive twice yearly Social Responsibility training- six monthly cycle using an online learning platform and an experienced company trainer face to face). This training is reviewed, as a minimum, on a yearly basis to ensure it aligns with any changes in LCCP, GC advice and/or relevant research which may be beneficial to reference.

Potential Risk (Risk Rating C4):

The presence of Bars, Nightclubs and Restaurants could lead to vulnerable people being in close proximity to the casino late at night possibly under the influence of alcohol.

Mitigation/Governance (Managed Risk D2):

The casino has adopted the following control mechanisms:

- Company Policies available to all staff on company PC's MyMerkur/MerkurDrive.
- Merkur Casino Aberdeen operates an open-door policy. Subject to being over 18, guests are
 allowed on the premises to socialise or game subject to our internal controls. Once a guest
 plays up to a maximum of £1500 or wishes to cash out £1500, they are invited to take
 membership and must provide valid, government issued ID. Once a membership has been
 created, entry will be logged by the receptionist upon each visit.
- At reception all new members and those who wish to enter as a non-member (walk-in) are asked if they have self-excluded from gambling. All non-members are made aware of our threshold policy after which a formal membership must be created.
- Trained SIA door staff are employed at peak times and are trained in conflict resolution with trained Receptionists always on duty during opening hours.
- Management and staff are trained in ensuring there is responsible alcohol consumption within
 the venue and that service or entry is refused for any customers that may be intoxicated and
 or considered vulnerable. A Responsible Alcohol Policy is available on all company PC's –
 MyMerkur/MerkurDrive.
- Sufficient levels of trained and experienced staff to monitor the casino and its customers during opening hours.
- CCTV coverage Managers have access to a full CCTV system during opening hours.
- The design of the casino which is spacious and well laid out with good sight lines and there is a high percentage of experienced and well-trained staff.

Licensing Objective -

Ensuring that Gambling is conducted in a fair and open way (Gambling Act 2005)

Potential Risk (Risk Rating D3): The facilities the casino offers and its positioning in the leisure market attracts customers who have not been to a casino before and do not know how to play casino games.

Governance (Managed Risk E2): The casino has adopted the following control mechanisms:

- 'How to Play' leaflets are displayed in prominent locations around the casino.
- Trained staff who are experienced in casino games.

Potential Risk (Risk Rating D3):

Customers may not be aware of the rules under which gaming is operated.

Governance (Managed Risk E2):

The casino has adopted the following control mechanisms:

• House Edge' leaflets and the casino rules are displayed around the venue.



- Table signage displaying minimums, maximums and decks in use etc. are displayed.
- Trained and experienced management and staff (PML and PFL holders licensed by The Gambling Commission).

Potential Risk (Risk Rating D3):

Customers are not aware of how to make a complaint.

Governance (Managed Risk E2):

The casino has adopted the following control mechanisms:

- Merkur Casino's complaint process is clearly laid out in the casino rules which are easily available and accessible within the casino in the 'Customer Disputes' Leaflets.
- Licensing Objective The Protection of Public Health (Licensing Act Scotland 2005).

Potential Risk (Risk Rating B4):

The operation of the casino may attract vulnerable persons from the local area.

Mitigation/Governance (Managed Risk D2):

The casino has adopted the following control mechanisms:

- Cyrenians Homeless and Addiction Centre is in close proximity to the casino.
- Company Policies available to all staff on company PC's MyMerkur/MerkurDrive.
- Merkur Casino Aberdeen operates an open-door policy. Subject to being over 18, guests are
 allowed on the premises to socialise or game subject to our internal controls. Once a guest
 plays up to a maximum of £1500 or wishes to cash out £1500, they are invited to take
 membership and must provide valid, government issued ID. Once a membership has been
 created, entry will be logged by the receptionist upon each visit.
- At reception all new members and those who wish to enter as a non-member are asked if they
 have self-excluded from gambling. All non-members are made aware of our threshold policy
 after which a formal membership must be created.
- Trained SIA door staff are employed at peak times, and are always trained in conflict resolution, alongside trained Receptionists on duty during opening hours. It is a mandatory condition that there is 1 SIA Door Supervisor from 11pm until 5am (or close, whichever is earlier) with 1 at each entrance from 1am until 5am (or close, whichever is earlier). The casino has 1 entrance staffed by 1 SIA Door staff between 21:30 05:00 Monday to Thursday, 2 SIA door staff on Friday and Saturday (1 between 21:30 06:00 and 1 between 01:30 06:00) and 1 SIA door staff on Sunday between 21:30 06:00
- Zero tolerance to the use or supply of drugs or other illegal substances and/or anti- social behaviour on the premises.
- Regular patrolling of the venue to deter substance abuse and anti-social activity.
- Management and staff are trained in ensuring there is responsible alcohol consumption within
 the venue and that service or entry is refused for any customers that may be intoxicated and
 or considered vulnerable. A Responsible Alcohol Policy is available on all company PC's –
 MyMerkur/MerkurDrive

The Local Area Risk Assessment will be reviewed annually as part of the Regulatory compliance Audit or when a significant change is identified (Such as a change in the Aberdeen City Licensing Board Statement of Licensing Policy etc.).