

APPLICATION FOR A BETTING PREMISES LICENCE - GAMBLING ACT 2005
BOYLESPORTS (UK) LIMITED: 86A QUEEN STREET, MORLEY, LEEDS, LS27 9BU

CASE OUTLINE

APPENDICES

Appendix 1: LARA

Appendix 2: Relevant due diligence and compliance documents and policies

Appendix 3: Layout plan

Appendix 4: Customer Interaction E-Learning Template for staff at Boylesports

INTRODUCTION

1. Boylesports (UK) Limited have an operating licence issued by the UK Gambling Commission which allows them to operate betting shops (and bingo premises) in England, Wales and Scotland. The Gambling Commission, in determining whether to issue an operating licence to a company, will check whether the business will uphold the licensing objectives and if it is suitable to carry out the activities that the licence will allow. In assessing the suitability of a business, the Commission considers its ownership, finances, integrity and competence. The Gambling Commission assess policies that are in place to make sure that the licensing objectives will be followed; there is an understanding of the legislation overall; evidence that all arrangements will meet social responsibility requirements.
2. Currently Boylesports operate 51 licensed betting shops in the United Kingdom, and have a further 5 licences which are in the development stage and not yet currently trading. In addition, they have 2 licences in the Isle of Man and 350+ premises licences to operate throughout Ireland.
3. They have never been refused an application when applying for permission.
4. They have had no reviews of their premises licences, either in Ireland, Isle of Man or the United Kingdom. They have had no regulatory issues in relation to their retail units. Attached to this note are the compliance documents which they rely upon. These have been signed off by the Gambling Commission in the UK as part of their operating licence application. They have been relied upon by a number of licensing authorities throughout the UK as best practice to show compliance with the regulatory framework and promotion of the licensing objectives.

5. Prior to lodging the application in Morley, Boylesports have looked carefully at the Leeds City Council Gambling Act 2005 Statement of Licensing Policy 2022-2024. As a result of looking at this document and carrying out considerable local research, Boylesports have also prepared a Local Area Risk Assessment. The latest version of this is attached to this note at Appendix 1.
6. The preparation of the Local Area Risk Assessment is a key part of understanding any local risks and ensuring that extra care is taken to deal with localised issues. These documents should be a 'living' document. The LARAs provided by the applicant have been described previously as "best practice".
7. The number of betting offices in Morley has reduced. Until May 2023 there were 4 trading licences in Morley:
 - William Hill - 5 Windsor Court
 - William Hill - High Point House, Queen Street
 - BetFred - 86c Queen Street
 - Ladbrokes – Morley Market, Queen Street
8. The William Hill unit at 5 Windsor Court has recently been closed (May 2023)
9. If the Boylesports application for 86a Queen Street, Morley is granted there will not be an increase in Betting Shop licences, compared to the position that has existed for a number of years. There will be a return to 4 trading licences in Morley. It has never been suggested during the period when four traded that these units had any issues whatsoever.
10. A point of note is that all of the responsible authorities have been served with a notice of this application and have raised no representations. There is no suggestion from the statutory advisors that the applicant will not be able to trade in a way which will be reasonably consistent with the licensing objectives. This is the statutory test as set out later in this note.
11. There are no representations received from local people, local businesses or ward councillors.
12. In addition, the applicant has secured planning permission by your colleagues in the planning department. No additional conditions or restrictions have been placed on the grant of planning permission.

BACKGROUND

13. Betting premises are subject to a high degree of regulation to ensure they support the licensing objectives.

- Premises and their management and operation are subject to the Gambling Commission's extensive Licence Conditions and Codes of Practice applicable to betting premises operating licences.
- Premises licences are subject to mandatory conditions which are deemed as being appropriate for premises of this nature.
- This is what the primary legislation believes is needed for operators to be able to trade responsibly.

14. Boylesports will ensure compliance with the Licence Conditions and Codes of Practice through:

- Robust policies (attached).
- Training/refresher-training of all staff.
- Independent age verification testing.
- Mystery shopping.
- Venue audits.
- Offer to engage with community/neighbourhood groups.
- Offer to engage with local ward councillors.
- Strong local management oversight and support.

Children

15. No under 18s are permitted. There will be prominent Think 21 signage in the premises and those appearing under 21 will be requested to provide a valid ID. In addition, there will be periodic mystery shopping and venue audits to ensure that underage policies are being complied with.

Vulnerable people.

16. The applicant is sensitive to the presence of vulnerable people in the area. The applicant will ensure that alcohol/drugs/intoxication is not permitted on the premises. Sufficient staff will be at the premises to provide oversight of customers and gambling. They will engage with the customers. Drug and alcohol awareness and conflict management training will take place. There will be CCTV throughout the premises and social responsibility messaging. Significant information will be provided to help with problem gambling and liaison with gambling care providers. The Local Area Risk Assessment will regularly be updated to incorporate any changes in local risk.

17. It is important to note that Boylesports have traded 350+ premises in Ireland and 51 premises in the UK. Throughout their trading history, it has been determined by the Gambling Commission (due to the grant of operating licences) and by each Licensing Authority with the grant of each premises licence, that the company operates in a way which is consistent with the licensing objectives in relation to the prevention of

children and vulnerable people from being put at risk. No applications have ever been refused, and the company has not seen any review of their premises licences.

LEEDS CITY COUNCIL STATEMENT OF GAMBLING ACT POLICY 2022-2024

The Licensing Objectives

1.2 The council will carry out its functions under the Act with a view to aiming to permit the use of premises for gambling in so far as it is reasonably consistent with the three licensing objectives set out at Section 1 of the Act. The licensing objectives 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 persons from being harmed or exploited by gambling

1.4 The council will follow any regulations and statutory guidance issued in accordance with the Act and will have regard to any codes of practice issued by the national gambling regulator, the Gambling Commission.

1.5 The council is aware that in making decisions about premises licences it should aim to permit the use of premises for gambling in so far as it thinks it is:

- in accordance with any relevant code of practice issued by the Gambling Commission
- in accordance with any relevant guidance issued by the Gambling Commission
- reasonably consistent with the licensing objectives and
- in accordance with this document.

The Licensing Framework

5.2 The Gambling Commission issues operators licences and personal licences. Any operator wishing to provide gambling at a certain premises must have applied for the requisite personal licence and operator licence before they can approach the council for a premises licence. In this way the Gambling Commission is able to screen applicants and organisations to ensure they have the correct credentials to operate gambling premises. The council's role is to ensure premises are suitable for providing gambling in line with the three licensing objectives and any codes of practice issued by the Gambling Commission. The council also issues various permits and notices to regulate smaller scale and or ad hoc gambling in various other locations such as pubs, clubs and hotels.

The Licensing Objectives

11.1 The Gambling Commission will take a lead role in keeping gambling crime free by vetting all applicants for personal and operator licences. The council's main role is to try and promote this area with regard actual premises. Thus, where an area has known high levels of organised crime the council will consider carefully whether gambling premises are suitable to be located there (see paragraph 14.8 and 14.9) and whether conditions may be required such as the provision of door supervision (see paragraph 14.31).

13.1 This licensing objective means preventing children from taking part in most types of gambling. The council will therefore consider whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances/machines, segregation of areas etc.

13.5 The council is aware of the difficulty in defining the term 'vulnerable person'. In most recent literature it is not a term that is used, with the term 'adults at risk of abuse or neglect' or 'adults at risk' being the preferred terms.

13.6 The Gambling Commission, in its Guidance to Local Authorities, does not seek to offer a definition for the term 'vulnerable people' but will, for regulatory purposes assume that this group includes people:

'who gamble more than they want to, people who gamble beyond their means, elderly persons, and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, or because of the influence of alcohol or drugs.'

13.26 In the case of premises licences the council is aware of the extensive requirements set out for operators in the Gambling Commission's Code of Practice regarding social responsibility. In this document the Gambling Commission clearly describe the policies and procedures that operators should put in place regarding:

- Combating problem gambling
- Access to gambling by children and young people
- Information on how to gamble responsibly and help for problem gamblers
- Customer interaction
- Self-exclusion
- Employment of children and young people

Premises Licences

14.25 The council is aware that the Secretary of State has set mandatory conditions and default conditions and the Gambling Commission has set Licence Conditions and Codes of Practice which are necessary for the general good conduct of gambling premises, therefore it is unlikely that the council will need to impose individual conditions imposing a more restricted regime in relation to matters that have already been dealt with.

14.26 Where there are specific risks or problems associated with a particular locality, or specific premises, or class of premises, the council will attach individual conditions to address this.

14.28 Decisions about individual conditions will be made on a case by case basis, although there will be a number of control measures the council will consider using, such as supervision of entrances, 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 in this policy. The council will also expect the applicant to offer his/her own suggestions as to the way in which the licensing objectives can be met effectively

14.29 Where certain measures are not already addressed by the mandatory/default conditions or by the applicant, the council may consider licence conditions to cover issues such as:

- Proof of age schemes.
- Supervision of entrances.
- Supervision of machine areas.
- A reduction in the number of betting machines (betting premises).
- The manning of premises.
- Physical separation of areas.
- Location of entrance points.
- Notices/signage.
- Specific opening hours.
- A requirement that children must be accompanied by an adult (in premises where children are allowed).
- Enhanced DBS checks of the applicant and/or staff.
- Staff training in brief intervention, conflict resolution, basic knowledge of mental health, learning disabilities and addiction, including substance misuse.
- Support to people with gambling addiction, including brief intervention.
- Policies to address seasonal periods where children may more frequently attempt to gain access to premises and gamble such as pre and post school hours, half term and school holidays.
- Policies to address the problems associated with truant children who may attempt to gain access to premises and gamble.
- Obscuring windows where appropriate and labelling premises so it's clear that they are gambling premises.

Betting Premises

19.1 Betting premises are premises such as bookmakers where various types of gambling are authorised to take place. The Act contains a single class of licence for betting premises however within this single class there are different types of premises which require licensing such as high street bookmakers, bookmakers located in self-contained facilities at race courses as well as the general betting premises licences that track operators will require.

19.2 The council will specifically have regard to the need to protect children and vulnerable people from harm or being exploited by gambling in these premises. The council will expect applicants to satisfy the authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the premises.

THE LAW

18. As an experienced licensing sub-committee with legal advice will be aware, the Gambling Act sets out a different approach to the question of grant than the Licensing Act 2003. The approach relevant to gambling is detailed at Section 153 of the Gambling Act 2005:

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

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

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

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

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

19. The following points should be noted:

- The test is mandatory: “a licensing authority shall ...”
- The obligation to “*aim to permit*” where (a) – (d) are satisfied is described by the Gambling Commission in its Guidance as “*the licensing authority’s primary obligation*”
- As the Guidance states: “Any refusal should be for reasons which demonstrate that the licensing objectives will not or are unlikely to be met”. That means demonstrated by evidence.
- Conversely, the following considerations are legally irrelevant to the determination of an application for a premises licence:
 - A dislike of gambling.
 - A general notion that it is undesirable to allow gambling premises in an area.
 - Moral or ethical objections to gambling.
 - The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality are irrelevant to licensing.
 - Planning considerations (see section 210 Gambling Act 2005).
 - Nuisance (see Guidance by Gambling Commission).

REPRESENTATION AND CONDITION REQUEST

20. There is one valid representation by Grace Lawrenson, Senior Policy Development Officer of the Financial Inclusion Team. She invites the licensing sub-committee to refuse the application, or at the very least to attach a significant number of conditions to the licence. The applicant has offered to meet the objector to explain the nature of their operation and all of the compliance documents supplied to her and to the licensing sub-committee. We would ask the licensing sub-committee to take into account the comments below to the conditions requested.

21. CCTV will be installed to the guidance of the West Yorkshire Police. CCTV will cover all areas of the premises accessible to the public (excluding toilets), including all entrances and exits to the premises. CCTV footage will be retained for a period of 31 days, and made available to any authorised officer of the police or licensing authority.
Boylesports will provide full coverage of the shop and will provide 31 days retention. The police have not objected and it is not necessary for this to be a condition on the licence when offered voluntarily.
22. A self-exclusion scheme will be in operation in the premises, and for any customers who have self-excluded from Boyle Sports' existing shops in the wider area, such self-exclusion shall also carry over and apply to this shop.
Self-exclusion is an opt-in process, and the customer must make the decision of which shops they self-exclude from. This should not be a condition on the licence.
23. The licensee shall participate in a local Betwatch or similar scheme, where available.
If available Boylesport will participate. This should not be a condition on the licence.
24. Gamcare and NHS Northern Gambling Service promotional materials will be displayed in the premises and staff will be sufficiently trained to assist those customers who require assistance and further support with their gambling.
Display materials will be provided in accordance with national policies, we cannot have different policies for different shops within differing Local Authorities. However, Gamcare is clearly one of the main providers. All UK shop managers and assistant managers have completed Gamcare's eLearning course as attached, and this is ongoing for new starters. This should not be a condition on the licence.
25. The premises licence holder and staff will work with specialistic gambling treatment services and debt advice agencies in Leeds to receive specific training on gambling harm and identification of vulnerable people.
As above, training provided by Gamcare. This should not be a condition on the licence.
26. The premises licence holder and staff will maintain links with specialist gambling treatment services and debt advice agencies and provide information to customers and referrals, as appropriate.
This should not be a condition on the licence.
27. The operating hours should be in line with other gambling premises on Queen Street, Morley, and should not fall outside of these hours.
This should not be a condition on the licence.
28. The licence holder will adhere to the Safe Bet Alliance Voluntary Code of Safety and Security.

This is a dated document, Boyles meet everything within it within their own security measures. This should not be a condition on the licence.

29. The licence holder will regularly audit their Local Area Risk Assessment, social compliance policies and procedures by shop staff and area management and maintain a record of all audits undertaken.

Policy documents are updated and audited as shown in examples, LARA is updated at least annually once open. This should not be a condition on the licence.

30. There will be induction and refresher training for all staff on social compliance and the Local Area Risk Assessment. Records of all such training will be maintained.

The compliance team record all staff training, and the shop team are trained on their own LARA details. This should not be a condition on the licence.

31. The premises licence holder and staff will support local schemes and initiatives in Morley by working with local businesses through any relevant local forums.

Boylesports are happy to attend and engage with local initiatives such as BIDs or retail forums. This should not be a condition on the licence.

32. The Gambling Commission in their advice to licensing authorities highlight that conditions should only be attached to premises licences if they are **NECESSARY**. The current existing licences in Morley have no additional conditions attached to the licences other than the Mandatory conditions created under the LCCP. It would therefore be disproportionate to impose any additional conditions on this premises licence should it be granted.

33. This is echoed in the Leeds Policy at paras 14.25 and 14.26 as detailed above.

CONCLUSIONS

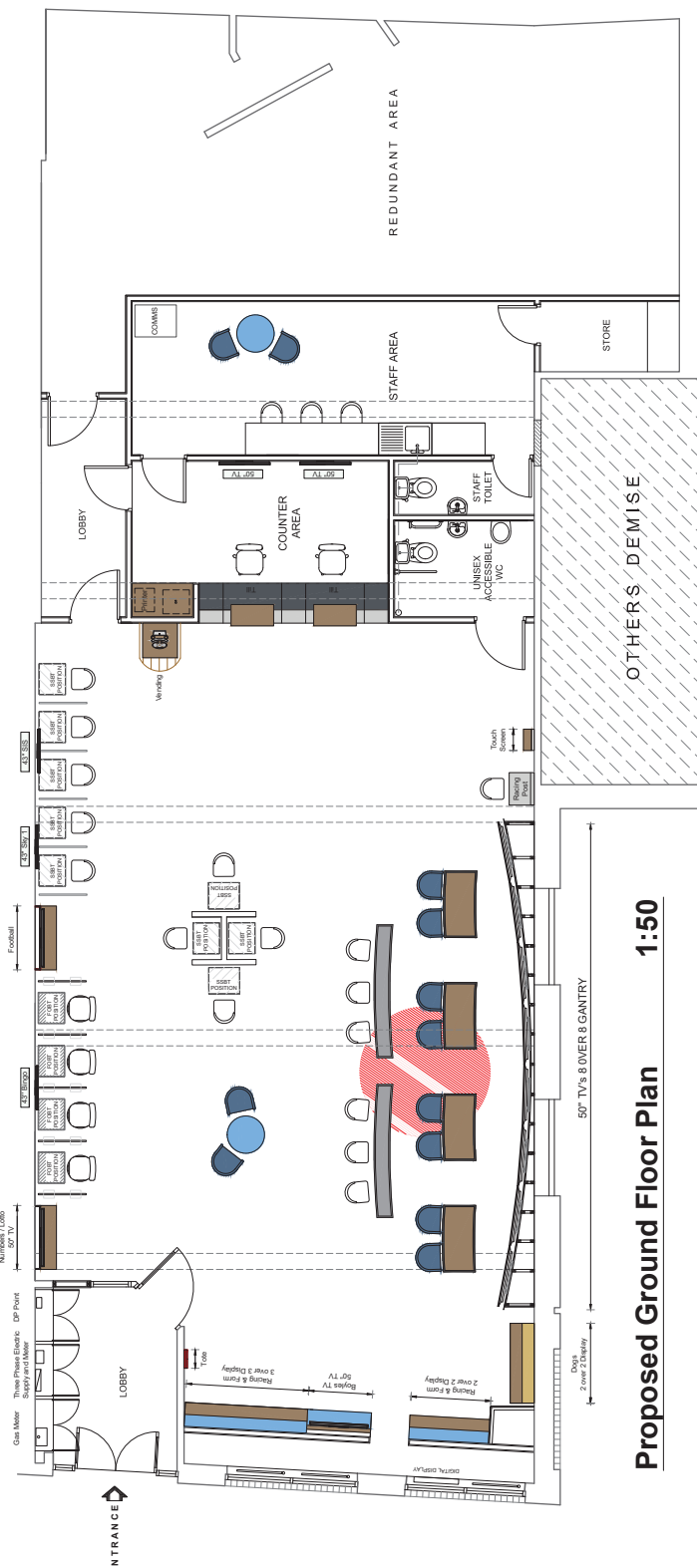
34. The applicant's policies and procedures and local LARA follow industry best practice and Gambling Commission Guidance. The track record of the applicant and the proposed use of the premises as a betting shop goes significantly further than "consistency" with the licensing objectives: it promotes the licensing objectives as well as any betting shop can reasonably be expected to do.

35. There has been one representation received to the grant of the application. There is no evidence to suggest that the application should not be granted. In addition the applicant is committed to working closely with any agency in the area. It would be disproportionate to impose conditions on a premises licence when the applicant will be offering to deal with these voluntarily.

36. For all the above reasons the application should be granted with no additional conditions attached.

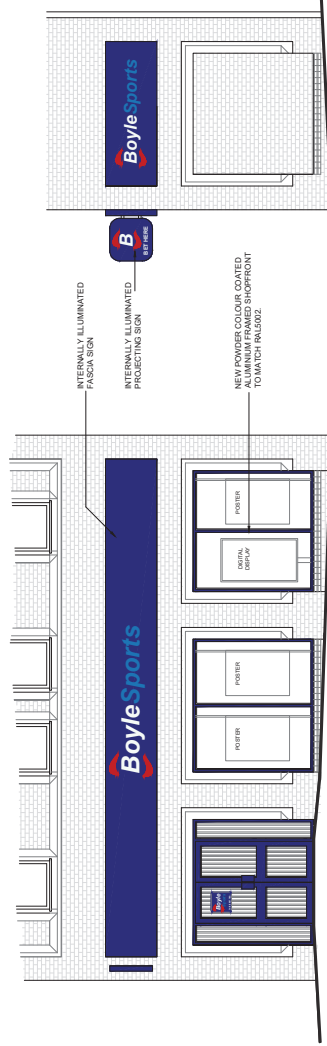
PADDY WHUR
St James House
28 Park Place
Leeds
LS1 2SP

TOTAL GROUND FLOOR AREA	270.0m ² (gross)	2,908.382 (gross)
CUSTOMER AREA	147.7m ² (gross)	1,617.552 (gross)
	122.4m ² (net)	1,317.562 (net)

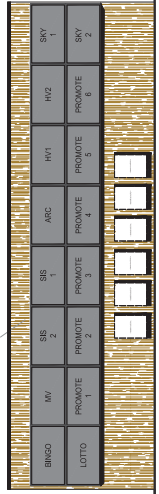
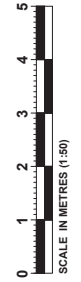


Proposed Ground Floor Plan 1:50

FASCIA SIGN ONE	Height = 0.96m	Length = 9.32m
FASCIA SIGN TWO	Height = 0.96m	Length = 2.70m
COUNTER	Area = 13.4m ²	Front Linear = 4.81m
STAFF AREA	Area = 15.6m ²	
STAFF TOILET	Area = 2.6m ²	
STORE	Area = 9.2m ²	
CUSTOMER TOILETS	Area = 4.7m ²	



Proposed Front and Side Elevations 1:50



Tv Gantry Elevation 1:50

C	20/03/21	Revisions only amended
B	17/03/21	TV Gantry and Shopfront amended
A	09/03/21	Minor internal amendments
Rev	Date	Description



86A QUEEN STREET
MORLEY
LS27 4HE

PROPOSED PLAN,
SHOPFRONT ELEVATIONS
AND GANTRY DETAILS

Drawn	Date	Scale
JAM	07/02/2023	1:50 @ A1
Ground Floor Area	270.0M ²	
Drawing Number	QUN/MOR/02	Revision C

FINAL LAYOUT

LOCAL GAMBLING RISK ASSESSMENT



PREMISES INFORMATION

Premises Name:	BoyleSports - Morley
Premises Address:	86a Queen Street, Morley, Leeds
Premises Post Code:	LS27 9BU
Premises Licence Number:	Application
Type of Premises:	Betting Office
Local Authority Area:	Leeds City Council

COMPANY INFORMATION

Company Name:	BoyleSports (UK) Ltd
Trading Name:	BoyleSports
UKGC Operating Licence No:	000-003536-N-330159-001

INITIAL ASSESSORS DETAILS

Person Completing Assessment:	MSC-DipSurv MRICS MCIQB MIOB
Company Role:	Director of Property & Development, UK
Date of Original Assessment:	29 August 2023

LEGISLATION RELATING TO THIS RISK ASSESSMENT

The primary legislation is The Gambling Act 2005. Within that, the specific requirements are set out within the Licence Conditions and Codes of Practice (LCCP).

The Gambling Act 2005 - Licensing Objectives:

The Gambling Act 2005 sets out the 3 licensing objectives, which are:

1. Preventing gambling from being a source of crime or 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.
3. Protecting children and other vulnerable people from being harmed or exploited by gambling.

On 8th May 2015, the Gambling Commission published an updated LCCP, which introduce a requirement for gambling operators to undertake a local risk assessment of the area surrounding their premises. More Specifically the following:

LCCP Social Responsibility Ordinary Code Provision 10.1.1 states:

Assessing local risk

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences. This provision came into force on 6th April 2016.

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
2. Licensees must review (and update as necessary) their local risk assessments:
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

LCCP Social Responsibility Ordinary Code Provision 10.1.2 states:

Sharing local risk assessments

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences. This provision came into force on 6th April 2016.

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Local Authority Gambling Policy Document

Leeds City Council - Statement of Licensing Policy 2022-2024

Purpose of this Document

The purpose of this document, is to set out areas of potential risk, associated with the normal operation of a betting office, in this specific location. Thereafter, to set out both control and mitigation factors, which will address, or reduce that risk, having regard to both the licensing objectives, from the Gambling Act 2005, and also matters raised in the local authority gambling policy document. The contents of this document are also designed to assist shop colleagues, in understanding and carrying out their duties, in a compliant and socially responsible manner - highlighting any specific local aspects which may influence how that is undertaken.

In preparing this assessment, BoyleSports have considered the relevance of a number of physical and environmental factors. In this context, environmental factors include the physical location of potential sites of influence, this includes schools, health care facilities, faith buildings, residential areas, other gambling premises and other licensed premises.

Local Area Profile

The betting office falls within the Morley South ward, within the Leeds City Council area. The Leeds metropolitan borough area has a total population of 812,000 people. Morley South Ward has a resident population of 24,000 and the urban area of Morley has a resident population of 32,600 (all figures from 2021 Census).

Crime - There were 263 crimes reported within a 1 mile radius of LS27 9EB in June 2023. Most crimes occurred on, or near, Trafalgar Gardens. By way of comparison, in the Leeds city centre, there were 1,505 crimes reported within a 1 mile radius of LS1 6LH in June 2023. Most crimes occurred on, or near, Duncan Street. In both the wider Morley locality and Leeds city centre, the most prevalent type of crime, by far, is classified as "violence or sexual offences".

Drug & Alcohol Misuse - According to the National Drug Treatment Monitoring System (NDTMS), the number of adults in treatment for addiction in the Leeds metropolitan borough area was 5,855 in 2021-22. This includes 2,645 adults suffering from opiate abuse, 735, non-opiate only and 565 non-opiate and alcohol combined. However, this is a reduction of 245 from the recent peak in 2017-18, when the number was 6,100 adults in treatment.

Homelessness - According to the Leeds City Council Homelessness & Rough Sleeping Strategy 2019 – 2022, the number of statutory homelessness acceptances has reduced from 530 acceptances in 2015 to 367 in 2017. Leeds has experienced a rise in rough sleeping from 6 in 2010 to 28 in 2017, however, it still remains joint lowest out of the core cities at 0.08 out of every 1,000 - 8 core cities were assessed (Leeds, Birmingham, Manchester, Newcastle, Bristol, Sheffield, Liverpool, and Nottingham).

Deprivation - According to the English indices of deprivation 2019, Leeds ranks 92nd out of 317 local authority areas.

Sources - <https://www.ons.gov.uk/visualisations/customprofiles/draw/> & <https://www.crime-statistics.co.uk/postcode/ls27%209eb> & <https://www.ndtms.net/View/Adult> & <https://www.leeds.gov.uk/docs/Homelessness%20and%20Rough%20Sleeping%20Strategy.pdf> & <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

Potential Sites of Influence

Schools/Youth Venues: Asquith Primary School (Primary), Horsfall Street. Morley Victoria Primary School (Primary), Victoria Street. Bruntcliffe Academy (Secondary), Bruntcliffe Lane. St Francis Catholic Primary School, Morley (Primary). Highcliffe Road. Seven Hills Primary School (Primary), Appleby Way. The Morley Academy (Secondary), Fountain Street. Fountain Primary School (Primary), Fountain Street.

Vulnerable Persons Services: Windsor House Group Practice (GP Practice), Corporation Street. The Dekeyser Group Practice (GP Practice), Little Fountain Street. South Queen Street Medical Centre (GP Practice), South Queen Street. Morley Elderly Action, Wesley Street. St Annes Community Services, Bruntcliffe Way. The Salvation Army, Ackroyd Street.

Faith Buildings: St Mary's in The Wood URC, Commercial Street. National Spiritualist Church, Zoar Street. Morley Church of Christ, Zoar Street. Church of the Nazarene, Albion Street. Zion Independent Chapel, Haydn Close. Morley Community Church, Merlyn-Rees Avenue. St Francis of Assisi RCC, Westfield Road. Central Methodist Church, Wesley Street. Vision Church, Commercial Street. New Horizons Church, Commercial Street. St Paul's Church, King Street. The URC (Yorkshire Province), St Pauls Street. Kingdom Hall of Jehovah's Witnesses, Bruntcliffe Road.

Licensing Act 2003 - Public houses: Seven Hills, Brunswick Street. Oscars, Queen Street. Prospect, Queen Street. The Royal, Station Road. Station Hop, Station Road. The Queen Hotel, Queen Street. The Picture House, Queen Street. Truth Hurts Brewery & Tap, South Parade. Commercial Inn, Commercial Street. Topsy Cow, Middleton Road. Morley Services Club, High Street. Carriers Arms, Glen Road. Morley Dashers, High Street. The Miners Arms, Albert Road.

Gambling Act 2005 - Betting Offices: BetFred, Queen Street. William Hill, Queen Street. Ladbrokes, Queen Street.

Potential Risk	Related Licensing Objective	Risk Level	Control System	Risk Mitigation	Reviewed
Possible Money Laundering	Preventing gambling from being a source of crime or disorder.	Medium	Operational management, training and robust policies	BoyleSports has a written Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) policy document and undertakes compliance training with all shop staff, in addition to other shop operations training when they start in their role. There is clear guidance on what constitutes suspicious activity and also at what stage it should be escalated to line management and the nominated MLRO, by email (MLRO@boylesports.com), if appropriate.	29-Aug-23
Shop Security, and Violence in the Workplace	Preventing gambling from being a source of crime or disorder.	Medium	Operational Management and Shop design	Each premise is subject to a separate security risk assessment carried out by an accredited Assessor. Local factors (including crime trends) are considered as part of this assessment and proportionate control measures/physical security measures are installed accordingly. All BoyleSports shops are fitted with a networked HD CCTV system and have a third-party security monitoring system in place.	29-Aug-23
General Crime and Disorder	Preventing gambling from being a source of crime or disorder.	Medium	Operational management, training and robust policies	BoyleSports are committed to providing a safe environment for all our shop teams to work in and customers to enjoy their betting experience as such there is a written policy in relation to unruly or abusive customers, which all staff are trained on. Shop teams also have access to a central security team, a remote monitoring service (with panic buttons), their line management support structure and the local police/SNT.	29-Aug-23
Alcohol Consumption or Drug Misuse	Preventing gambling from being a source of crime or disorder.	Medium	Operational management, training, robust policies and shop design	Consumption of Alcohol on the premises is prohibited under the premises licence conditions. BoyleSports takes a 'zero tolerance' approach to both the consumption of alcohol and any drug misuse on the premises. Regular toilet and shop checks are carried out throughout the day and any suspicious activity raised with the line management and security teams - so if necessary, CCTV footage can be reviewed. The customer toilet is also fitted with a mag-lock device which allows access control by staff behind the counter.	29-Aug-23
Underage Gambling	Protecting children and other vulnerable people.	Medium	Operational management, training and robust policies	Gambling is an age restricted product and BoyleSports operate a 'Think 21' Policy. Comprehensive staff training and guidance, is provided to all shop staff, on this matter. There is requirement to log all 'Think 21' Challenges on a central system, via the EPOS till and line management have visibility to allow additional focus should it be required. 'Over 18's Only' notices are displayed at the shop entrance and BoyleSports use 'Serve Legal' to carry out independent 3rd party testing, to allow any training needs to be highlighted and addressed.	29-Aug-23

Potential Risk	Related Licensing Objective	Risk Level	Control System	Risk Mitigation	Reviewed
Protection of the Vulnerable	Protecting children and other vulnerable people.	Medium	Operational management, training and robust policies	Guidance is issued to shop colleagues on vulnerability (the inability or limited ability of people to control their actions). This includes those clearly under the influence of drink or drugs, those with mental health issues and those with possible addictive gambling issues. BoyleSports takes a holistic approach to customers and is aware that the Equalities Act precludes the exclusion of any group for generalised reasons. However, support and guidance is provided to shop colleagues by the line management and the security/compliance teams. All Responsible Gambling interactions are logged via the EPOS till system and reviewed by the line management and the security/compliance teams. BoyleSports also operates a self-exclusion scheme and collates information centrally on this too.	29-Aug-23
Proximity to Schools/Youth Venues	Protecting children and other vulnerable people.	Low	Operational management, training and robust policies	This document highlights the proximate Schools/Youth Venues, so that the shop team are fully aware, and can ensure that the 'Think 21' policy is applied appropriately and effectively. There are no adjacent Schools/Youth Venues and it is not expected that the location will increase the usual level of risk associated with underage gambling.	29-Aug-23
Proximity to Vulnerable Persons Services	Protecting children and other vulnerable people.	Low	Operational management, training and robust policies	This document highlights the proximate Vulnerable Persons Services and Faith Buildings, so that the shop team are fully aware, and can ensure that the 'Think 21' policy is applied appropriately and effectively. There are no adjacent Schools/Youth Venues and it is not expected that the location will increase the usual level of risk associated with underage gambling.	29-Aug-23
Proximity to Licensing Act 2003 Premises	Protecting children and other vulnerable people.	Medium	Operational management, training and robust policies	The greatest risk is believed to be, the potential for a customer whose judgement is impaired through alcohol, attempting to place bets. Staff are trained to assess customer behaviour, in particular, whether there is a risk that a persons judgement is impaired through drink. If they believe that it is, they will be refused service. The betting shop is located in a busy town centre, which contains numerous alcohol licensed premises, so effective implementation of this assessment, is seen as an important tool to mitigate any risk.	29-Aug-23

Potential Risk	Related Licensing Objective	Risk Level	Control System	Risk Mitigation	Reviewed
Proximity to Gambling Act 2005 Premises	Protecting children and other vulnerable people.	Low	Operational management, training and robust policies	There are a number of other Gambling Act 2005 licensed premises within the wider locality. However, the number of betting offices in the wider locality has decreased over the past several years and in this location, it is not believed that there is any additional risk presented by trading a well operated and compliant betting office in this location. BoyleSports staff are also trained in player safety and undertake Responsible Gambling and Recognising Problem Gambling Interaction training.	29-Aug-23
Shop Management and Customer Complaints	Ensuring that gambling is conducted in a fair and open way.	Low	Operational management, training and robust policies	BoyleSports provide staff training on shop management, customer interaction and complaints handling. The BoyleSports rules are displayed in all shops, and they contain information on dispute resolution. There is also an internal escalation process, through the line management structure, which aims to resolve issues as expeditiously as possible. BoyleSports are also members of IBAS (Independent Bookmakers Arbitration Service) and in the unlikely event that a complaint escalates to IBAS, the company agrees to be bound by their decision.	29-Aug-23

Physical Aspect	Potential Risk	Risk Level	Control System	Risk Mitigation	Reviewed
Shop Frontage	Criminal damage and statutory compliance.	Low	Shop Design	All marketing will comply with LCCP and advertising standard regulations - Including all statutory notices. The shop front will have internally formed window beds, which restrict visibility into the shop and detract from them being attractive to younger/vulnerable people.	29-Aug-23
Entrance	Ensuring that underage/vulnerable people are identified expeditiously.	Medium	Shop Design	The unit has a lobbied entrance to the left hand side of the shop front, which affords good visibility from inside the shop and in particular the counter, where there is a clear line of sight. In addition, this area will be covered by a HD CCTV with an overt monitor behind the counter.	29-Aug-23

Physical Aspect	Potential Risk	Risk Level	Control System	Risk Mitigation	Reviewed
Counter Position	Blind spots, lines of sight and general shop management.	Medium	Shop Design	The counter has been designed to maximise visibility throughout the shop. There is also a dedicated staff area, which will act as a staff 'safe haven'.	29-Aug-23
General Layout	Positioning of machines and other shop components - Blind Spots, lines of sight and general shop management.	Medium	Shop Design	All machines - gaming machines (GM's) and self service betting terminals (SSBT's), with the exception of the furthest SSBT from the counter, which is behind the 'H' shaped pod will have clear and unobstructed lines of sight from the counter to allow monitoring throughout. In addition, it is further proposed that this area (including the partially obscured SSBT) will be covered by a HD CCTV with an overt monitor behind the counter.	29-Aug-23
Security/CCTV	Maintain safe environment and ensure issues are captured for evidential purposes.	Medium	Shop Design	There will be a 'mag-lock' fitted to the customer toilet, activated by a switch behind the counter, to control access. There will be a full HD CCTV system installed internally to ensure coverage of all key areas within the shop. There will be an overt monitor and the system can be accessed remotely by the security team. We also install a remote monitoring system via our security provider AMCO (Live Talk) which provides two way audio monitoring and staff are issued with mobile panic pendants.	29-Aug-23

Assessment Review	
Frequency of Review:	Date Review Next Due: 29 August 2024
Signature of Assessor:	Date: 29 August 2023

Compliance Training Manual



GB Retail Staff

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Document History

Version No.	Author	Description	Date
.01		Initial draft	05/09/2019
.02		Initial draft	24/09/2019
.03		Updates from review applied.	26/09/2019
0.4		Updates from operations review added.	30/10/2019
0.5		Section 9 RG update and section 10 updates from operations review.	11/11/2019
0.6		Addition of Compliance Weekly Report screenshots to appendices	13/11/2019
0.7		Updates from operations review added.	22/11/2019
V1.0		Review and acceptance of track changes	25/11/2019
V1.1		Annual Review	22/01/2021
V1.2		Manual cover page update and addition of section 3.1 'Premises Licence'.	26/02/2021
V1.3		Update of MLRO information (D. Smith Removal), Weekly Compliance Report, Policies location, and Responsible Gambling Addition of Recycled Winnings, 9.3 MOSES, 15.0 Marketing, and Appendix 2.	21/03/23

1.0 The Gambling Commission

Under the Gambling Act 2005, The Gambling Commission was created to provide regulation to the gambling industry. The Gambling Commission's work is funded mainly by license fees from the gambling industry.

Since 1 September 2007, the Gambling Commission has issued new licences to organisations and individuals who provide facilities for Gambling. BoyleSports (UK) Limited has been awarded an Operator's Licence, whilst Personal Management Licence (PML) have been issued to certain individuals working in the Gambling Industry who hold key managerial positions.

The Gambling Commission has specified conditions under which the above licences are granted, and has also issued Codes of Practice which are directly linked to achieving the three main licensing objectives which are:

- 1. To prevent Gambling from being a source of crime or disorder, being associated with crime or being used to support crime.**
- 2. To ensure that Gambling is conducted in a fair and open way.**
- 3. To protect children and other vulnerable people from being harmed or exploited by gambling.**

The Gambling Commission has legal powers to monitor licence holders, powers to search, confiscate relevant material and question staff. Should you be visited by someone from the Gambling Commission, you should confirm their ID and once they have been satisfactorily identified, co-operate with their requests.

The Gambling Commission, Local Authority and BoyleSports Compliance auditors will be making regular announced and unannounced visits to all of our premises, so all staff must ensure that they are aware of their responsibilities under The Gambling Act.

2.0 Licensing Objectives

Under the Gambling Act 2005, there are three main objectives of the Gambling Commission which can be identified as follows:

- 1. To stop gambling from being a source or being associated with crime, disorder and being used to support crime.**

Aims:

The Commission licenses operating companies and key employees within the industry with the following aims:

1. To train staff to make them aware of obligations required in crime prevention under the Proceeds of Crime Act 2001 ('POCA')
2. Build and maintain good working relationships with all governing bodies including Local Authorities, and law enforcement.
3. To pursue any offence under the Act including any illegal gambling, cheating at gambling and permitting - underage -children to gamble.

The Commission also aim to prevent gambling being a source of disorder. Under this secondary objective, the Commission will have a key role, including:

1. Where persistent problems arising from disorder at gambling premises, they will consider in conjunction with the Licensing authority whether the premises licence should be renewed.
2. Ensure that gambling is conducted in a fair and open way i.e., by ensuring that rules are adequately displayed.
3. To prevent children or vulnerable people having easy access to gambling.

Local Licensing Authorities have the power to attach conditions to our individual premises licences where they have concern that the licensing objectives are not being met. These may include:

- 1. Restriction on opening hours**
- 2. Requiring door supervision**

2.1 To ensure that gambling is operated in a fair and open manner

Aims:

Under this objective, the Gambling Commission will ensure that not only is gambling fair, but that the rules operated at BoyleSports are transparent to our customers.

These aims will be achieved by ensuring that:

1. Operating and Personal Licenses are issued only to those organisations and people who can demonstrate that they are suitable for offering gambling facilities.
2. BoyleSports must ensure that our rules are displayed in a prominent position in our premises and that the information contained within these rules is easily understandable and fair.
3. All gaming machines or other equipment/software meet standards as set by the Gambling Commission.
4. The results of events on which gambling takes place are made readily available to the public.
5. Advertising codes are put in places that prevent customers from being misled.

2.2. To protect children, young and vulnerable people from the effects of gambling

Aims:

The Gambling Commission aims to protect children from being harmed or exploited from gambling. It is the objective of the Gambling Commission that **Children and young people under the age of 18** should not be permitted to gamble and should be prevented from entering gambling premises operated by BoyleSports.

IT WILL BE A CRIMINAL OFFENCE TO INVITE, CAUSE OR PERMIT A CHILD OR YOUNG PERSON TO GAMBLE

To achieve this objective, we:

1. Train staff to prevent children or young people entering premises by advocating a “**THINK 21**” policy.
2. Train staff to request identification of any person or persons who appears to be under the age of 21.

Protecting vulnerable persons from being harmed or exploited by gambling

Vulnerability can be permanent, temporary or intermittent. Life events or changes to an individual customer’s circumstances may mean that a person becomes more or less vulnerable to experiencing gambling harms. Those circumstances could include health, capability, resilience, bereavement, loss of income or other factors.

It will not always be obvious or clear to the company when such events have occurred, but knowing our customers, and ensuring staff ask questions when there are potential signs of vulnerability, will help to determine whether those individual circumstances present an increased risk and take preventative action where appropriate.

1. Potential Vulnerabilities:

As part of ‘know your customer’, we will consider the factors that might make an individual more vulnerable to experiencing gambling related harm as outlined in the Customer Interaction Formal Guidance¹. Factors include:

¹ <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/customer-interaction-formal-guidance-for-premises-based-operators#non-remote-vulnerability>

- **personal and demographic** - if the individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from a brain injury or medication or has an addiction
- **situational** - if the individual is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances
- **behavioural** - if an individual has a higher than standard level of trust or high appetite for risk
- **market-related** - if an individual is engaged in an activity which is highly complex; that they have a lack of knowledge and/or experience of the market
- **access** - if an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia.

2. People who gamble beyond their means.

The aim of the Gambling Commission is to protect such people from harm and exploitation. BoyleSports (UK) Limited will however be expected to contribute to organisations which offer assistance to people who are or may be affected by problems relating to gambling. Organisations which BoyleSports may be expected to support are those such as Gamblers Anonymous, GamCare or BeGambleAware.

BoyleSports (UK) Limited provide and offer Self Exclusion forms with the aim of assisting and protecting potential vulnerable persons.

3.0 Licenses

There are different types of licenses required to operate a Licensed Betting Office:

- **Premises** – issued by the Local Authority.
- **Personal** – issued to certain members, to ensure that they are suited to run the Company. These will normally be issued to people who have control over the company and who are ultimately responsible for the overall direction and strategies of the company in relation to, for example, finance, marketing, and compliance.
- **Operating** – issued by the Gambling Commission to each and every Betting Shop Operator. For example, BoyleSports has an operating licence issued by the Gambling Commission.

All applications for any of the above licences are subject to suitability assessments based on the following:

- **Integrity** – personal licensees records to be checked if required from any source for no criminal activities.
- **Competence** – all staff are required to be properly trained in their roles and carrying out their duties.

3.1 Premises Licence

All trading LBOs have a set of documents stored on site that together make up the premises license. They include the following:

1. A summary of the premises licence
2. The full premises licence
3. A plan of the premises - Often attached to the full licence but not always.

These documents are held in perpetuity, and have no expiry date, as such, they are not replaced. Their retention on the premises, in a location known to all of the LBO team, is of the utmost importance.

These 3 documents are of critical importance to the legality of trading your LBO and their location should be made clear to all members of the LBO team.

The Gambling Act 2005 requires that the summary of the premises licence is displayed in a prominent place within the premises. This should be in a 'see through' clip frame within the counter area - in a position allowing it to be clearly visible by people standing at the counter.

The full premises licence and plan should also be kept in the clip frame behind the summary, in order that all the documents are together, and their location is known. From time to time you may be required to remove the documents to show to any of the following, subject to proper identification:

- Licensing/Enforcement Officer from the Local Authority
- Licensing/Enforcement Officer from the Gambling Commission
- Police Officer

Once the documents have been checked, they should be replaced in the clip frame immediately, to avoid them being mis-placed.

If you are in doubt as to the credence of the visitor, you should contact your Line Manager, the BoyleSports Security team, or the Police.

If any of the documents are missing you should immediately contact your Line Manager, as well as the Property & Development team, who will be able to arrange for the purchase of a replacement from the Local Authority.

All LBO teams and Line Managers should be aware of any additional and/or specific licensing conditions attached to each premises licence. It is possible that different LBOs will have different conditions and these conditions need to be known by all members of the LBO team including relief staff. It is suggested that if a Licence has extra conditions included that these are printed out and placed on the employee notice board, to ensure that all team members are fully aware of the additional conditions.

3.2 Standards Expected of Licensed Holders

Licensed holders must implement policies and procedures to encourage social responsibility throughout the organisation. Rules and codes of practices developed by BoyleSports (UK) Limited must include and address the following:

1. Preventing underage gambling.
2. Ensure information is made readily available for customers in relation to responsible gambling.
3. Try and ensure good relationships between staff and customers, so as to diagnose and understand customer's behaviour in relation to problem gambling.
4. Ensure Self exclusion procedures are in operation to help assist vulnerable people.
5. A commitment to contribute to research, treatment and education for problem gambling.
6. Financial – licence holders are required to have sufficient funds to cover any liabilities.
7. Equipment – gaming machines and other equipment are fair and pass the Gambling Commission's technical standards before being made available to the public.

3.3 Licence Holders

All licensed operators are required to operate under licence conditions and codes of practice to ensure that the licensing objectives of the Gambling Commission are not put at risk.

The Gambling Commission expects the following:

1. Business to be conducted honestly and fairly.
2. Licence Holder to act with due care and attention.
3. Ensure that information provided to customers is clear and not misleading.
4. The three key licensing objectives are controlled with adequate systems and procedures.

5. Financial resources are maintained adequately.

6. Any breaches or suspected breaches of the Gambling Act are reported to the Gambling Commission and/or Police.

4.0 Gambling Debts

Gambling debts are legally enforceable, and the customer is able to take legal action against the Bookmaker to resolve disputes. It is therefore imperative that staff check all bets prior to acceptance to ensure the bet conforms to our rules and procedures.

In cases of disputes, all disputes should be referred to your regional manager, who will investigate the claims further.

Staff should not admit any liability on a bet under any circumstances without prior approval from Head Office.

The law states that gambling is an enforceable contract and that debts owing under a gambling transaction are potentially legally enforceable. This will mean the following:

1. Customers can issue court proceeding to recover a bet if we refuse to pay out or there is a dispute over it.
2. We may not be able to rely on the palpable error rule in a court of law if we make a mistake in the odds we offer customers.
3. All odds written on slips must be checked to ensure that they are correct.

5.0 Proceeds of Crime Act (POCA)

One of the objectives of the Gambling Commission is **“to stop gambling being a source or being associated with crime, disorder and being used to support crime.”**

5.1 Proceeds of Crime Act (POCA)

Under the Proceeds of Crime Act 2002, we are under an obligation to report gambling activities of individuals whose lifestyle is wholly/ substantively supported by the proceeds of criminal activity.

5.2 Which customers may we be obliged to report?

Customers who bet significant amounts on a regular basis and you suspect have a lavish lifestyle with no apparent source of legitimate income.

Please note, BoyleSports do not place an overreliance on recycled winnings. In relation to any AML/POCA, customer due diligence, or enhanced customer due diligence reviews, we must not place an overreliance on recycled winnings (recycled winnings can be defined as re-staked winnings, also known as 'turnover' or 'churn').

5.3 What questions should Staff ask themselves?

Staff should ask themselves what information they know about a customer for certain:

1. Does the customer work?
2. Does the Customer own a successful, legitimate business?
3. Does the Customer have known family wealth?
4. Has the Customer recently been released from prison?
5. Does the Customer associate himself with other known criminals?

If you answer “**NO**” to questions 1, 2 and 3 or “**YES**” to questions 4 and 5, then you must contact your regional manager for advice.

5.4 Collecting Information

To help establish and know your customers better, try the following:

1. Ask questions, but not too obvious. **Do not make formal enquiries which will arouse suspicion and possibly alert the customer concerned.**
2. Observe at the customer’s mannerisms.
3. Establish who the customer associates with.
4. Is the customer known in the area? Is there any gossip or local knowledge of the customer in question?

6.0 Money Laundering

Money laundering is a term used to describe a process whereby criminals attempt to conceal the true origins or source of their criminal activity.

6.1 What activities undertaken by customers may indicate money laundering?

Examples include:

1. Unusual betting patterns with an almost guaranteed return or little risk i.e., betting £1,000 on a 1/20 favourite.
2. Betting regularly on odds on favourites.
3. Betting regularly significant amounts and when the customer wins, they ask for payment by cheque.
4. When an unknown customer asks for payment by cheque.
5. Stakes are unusually high or out of the ordinary for a known customer who is believed to be spending beyond their known means.
6. A customer who regularly selects several runners in an event, and as long as one of the selections wins, they are willing to forfeit other stakes.
7. Customers who regularly bet significant amounts and regularly select non-runners.
8. Money inserted into a machine and then collected with very little or no play. In the case of cheques, Head Office will need to be informed of the request for cheque in order to process. It will be expected that the customer will be asked to provide ID before a cheque is issued. This will especially be the case for strangers or non-regular customers.

If any of the above examples listed in **points 1 to 8** occur on a regular basis, you should contact the MLRO at MLRO@BoyleSports.com

Money laundering is a serious offence and it is a criminal offence to provide assistance to anyone attempting to launder money.

All staff employed by BoyleSports have responsibility under anti-money laundering legislation to ensure that bets placed with BoyleSports are not facilitating money laundering or the proceeds of crime.

6.2 How do I contact our Money Laundering Reporting Officer (MLRO)?

You can contact the MLRO at MLRO@BoyleSports.com. Upon receiving information from staff, the MLRO will determine whether a formal disclosure to the appropriate agency is required.

6.3 What should a member of staff do if they suspect money laundering?

If you suspect money laundering is occurring, contact the MLRO at MLRO@BoyleSports.com immediately. If the suspicions are well founded, our MLRO will pursue the matter further.

Please note it is a criminal offence for you to know or have reasonable suspicion of someone who is money laundering and fail to report this.

Once you have reported your suspicions to the MLRO, your responsibilities have been fulfilled and you should take no further action unless instructed.

Under no circumstances should a customer be made aware that they are the subject of a report to the MLRO. **It is an offence under the Money Laundering Regulations to “Tip Off” a suspected money launderer.**

7.0 Irregular/Suspicious Betting

This relates to encountered information that might indicate suspicious betting activity and the use of such information.

1. You must report any indicators of irregular and/or suspicious betting to the Trading department. They will review the information received and escalate to the Compliance department where they feel irregular and/or suspicious betting has occurred.
2. As an employee of BoyleSports, you are not permitted to use information related to irregular and/or suspicious betting encountered or obtained from customer activity or otherwise, for the purpose of placing bets with BoyleSports or any other bookmakers.

8.0 Age Verification

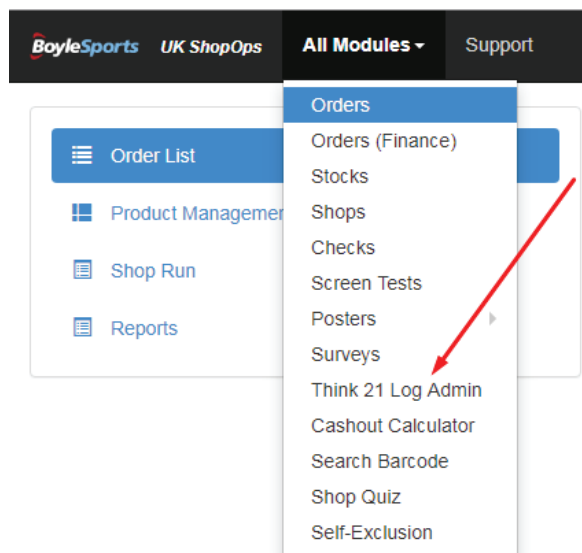
To -protect children and young people -from the effects of gambling, the law states that no one under the age of 18 must enter a licensed betting shop. These include children under the age of 18 who may be with their parents as their parents place a bet. **IT IS A CRIMINAL OFFENCE FOR CHILDREN TO BE ON OUR PREMISES EVEN IF ACCOMPANIED BY AN INDIVIDUAL WHO IS OVER 18 OR AN ACCOMPANING PARENT OR GUARDIAN.**

Often it may be difficult to establish how old someone is and if you are uncertain, always ask for identification.

REMEMBER OUR COMPANY POLICY IS “THINK 21”. If someone looks under the age of 21, you must ask for ID which should be one of the following:

1. Driving licence.
2. Passport.
3. Validate card
5. EU card.
6. Pass logo (citizen card).

The interaction should be logged in the [Shop Ops portal](#) “Think 21” module at the time of the exchange and associated details recorded.



8.1 Procedure for Underage Customers

Under 18 – Customers who cannot produce any identification must be removed from the premises immediately. These rules also apply to any children who are accompanied by an adult (Over 18), parent or guardian. These children must be asked to leave the premises immediately.

Bets – all bets that have been inadvertently taken from an under 18 will have to be returned to them. If an under 18 has placed a bet, the full name of the child and contact details of his/her parents must be obtained and passed onto the UK Head Office, (172 Stratford Road, Shirley, Solihull, B90 3BQ) so that the parents or legal guardian of the child can be contacted and informed that their children have placed or attempted to place bets in our premises.

Advertising – advertising by the Company will not be aimed at children or other vulnerable people.

9.0 Responsible Gambling

If you have a suspicion that a customer may be displaying problem gambling signs as detailed in your Responsible Gambling training, you should discuss the customer with the shop manager who then should discuss with the regional manager immediately.

It is important that you remain safe at all times.

9.1 Safer Gambling Customer Interactions

It is important that we identify customers who may be at risk of harm using varied markers and behaviours and that we ensure that customer interactions are conducted when required.

The markers and behaviours that we should look out for should not be based on financial thresholds alone. Such behaviours may include one or more of the following factors:

- a) **Time and spend indicators:** amount and frequency of time and deposits, length of stay on premises, leaving and returning to the premises, increasing length of sessions or escalation in deposit levels, large losses, declined payments, appearing to spend more than they originally intended.
- b) **Behavioural indicators,** such as signs of distress, agitation, aggression, sadness, and desperation. Changes which could be an indication that gambling is having a negative impact on a customer's wellbeing.
- c) **Use of gambling management tools:** previous Self-Exclusions, or playing through machine alerts, previous customer interactions.
- d) **Customer-led contact:** information or hints from customers, frequent complaints about not winning, or talking about the negative impacts about their gambling.
- e) **Play indicators:** chasing losses, erratic betting patterns, gambling on higher risk products or unusual markets or outcomes, significant in-play betting.
- f) **A 'big win' or a windfall:** high staking following a win.
- g) **Affordability:** Customer's informing us of changes to the circumstances in their discretionary income.
- e) **Vulnerability:** Customer's informing us of potential vulnerabilities such as significant life events, personal or situational difficulties, mental health & health concerns, and learning difficulties.

Where an interaction has been identified as required, it's critical that we conduct the interaction in private, discreetly and in as timely a manner as possible. Customers are more likely to open up if we've built a rapport with them and they're in a friendly comfortable environment.

For some customers, making them aware of your concern will be enough to prompt them to reflect and make a change. Others might require more support or advice.

If you're unsure how to approach the matter, escalate to the Safer Gambling Team: playersafety@boylesports.com.

Interactions should cover a range of points, in order to:

- a) prompt the customer to think about their gambling
- b) understand more about the customer
- c) offer information on gambling management tools and help and support
- d) if necessary, obtain evidence in order to assess the customers affordability
- e) if necessary, impose restrictions on the customer's activity

Open questions (e.g., "How do you feel about your gambling lately?") rather than closed ("Are you comfortable with your gaming?") should be used to encourage clients to reflect on their activity and encourage them into self-correcting any problematic behavior.

The outcome of Safer Gambling Interactions should be recorded in the Safer Gambling Interaction Record found in [Appendix 2](#) If you are approached by a customer who indicates they may have an issue:

- You can discreetly direct them to the area in your shop which contains the relevant Problem Gambling leaflets
- Politely let them know we have self-exclusion forms available
- Inform the Manager on the day immediately
- Remember, never ask a customer if they have a gambling problem

You should make a note of the number of customers you have spoken to on your weekly return sheet, where possible you should either file an incident report form (preferable) or make a note in the shop diary, recording who you spoke to and what was said or agreed.

Never attempt to advise a customer, only pass on the professional support contact information you have. It is important to remember that you have not been trained to counsel customers.

9.1 Self-Exclusion Requirements:

Information on where to seek help regarding gambling can be found in Boylesports Responsible Gambling Leaflets and shop posters.

The customer has the right to be seen privately while discussing self-exclusion and does not have to request to self-exclude while in the shop. If the customer wishes to self-exclude without visiting the shop they can do so by contacting customer services at care@boylesports.com

An up to date photograph must be obtained for easy identification and the self-exclusion form signed by the customer.

Once a customer has requested and signed a self-exclusion agreement, this is immediate and lasts for a minimum of 6 months and a maximum of 12 months. The self-exclusion extends to not just betting from the actual premises and 4 other premises.

Upon expiry of the customer’s initial exclusion period chosen by them, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again.

When a customer chooses not to renew the self-exclusion and makes a proactive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, we must always allow the customer the opportunity of a 24-hour cooling off period prior to allowing them to return to gamble.

In light of the 24-hour cooling off period the customer is required to complete the return to betting form.**9.2 Self-Exclusion Procedures:**

9.2.1 Customer exhibits concerning behaviour:

Manager	Approaches, regarding suspected problem gambling.
Manager	Provides problem gambling leaflets, and explains the existence, and implication of self-exclusion, including not only will customer not be allowed to gamble but also be restricted entry to his/her 5 selected branches. The customer should be given time to consider the options, if they do not wish to exclude themselves straight away, they should be given a copy of the agreement to take away.

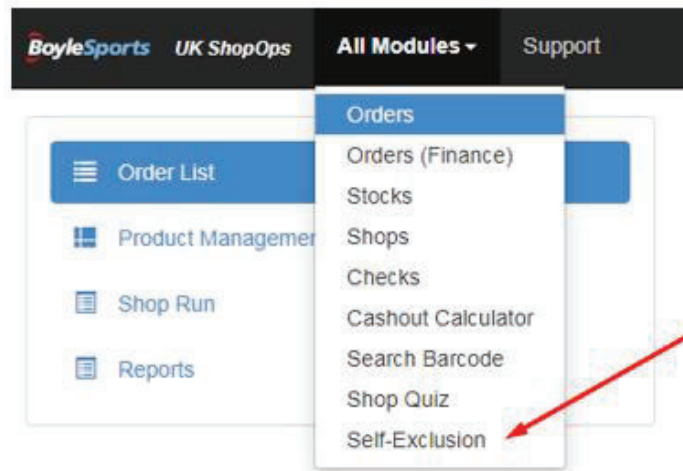
9.2.2 Customer requests self-exclusion

Customer	Requests exclusion either immediately or after return.
Manager	Explain self-exclusion cannot be revoked during the 6 or 12 months specified on the agreement by the customer. Must also inform the customer at the expiry of the agreement should they wish to gamble with us, they will be required to fill out a return to betting form and wait 24-hours (cooling off period) before they may gamble.
Customer and Manager	Complete the self-exclusion agreement; customer must decide how long they wish to be excluded for, (6 or 12 months). Customer must supply recent photograph to assist identification.

Manager

Retains original white copy and forwards white copy to the Irish Head Office (Customer Services c/o: BoyleSports, Finnabair Industrial Park, Dundalk, Co. Louth, Ireland) bottom copy (normally pink) is returned to customer. All employees including new recruits during the exclusion period to be notified of exclusion. Complete weekly reports. Exclusion must be uploaded to the [Shop Ops portal](#).

After a customer completes a self-exclusion form you will need to copy the details from the form into the ShopOp's Portal Self-Exclusion module.



For full process details please see the 'UK Retail ShopOp's Portal Self-Exclusion End User Guide' that has been distributed to all shops.

If you have any queries on this process, please contact the Retail Self-Exclusion team at retailse@boylesports.com.

9.2.3 At the end of the chosen exclusion period:

Customer	Requests review and exclusion to be lifted. Required to complete return to betting form.
Manager	Reminds the customer should they wish to gamble with us, they will be required to fill out a return to betting form and wait 24-hours (cooling off period) before they may gamble. Upon completion the return to betting form (white copy) should be sent to the Irish Head Office (Customer Services c/o: BoyleSports, Finnabair Industrial Park, Dundalk, Co. Louth, Ireland)

Or:

Customer	Request extension to self-exclusion agreement and fills in new agreement.
Manager	Follows procedure above for new agreement.

Or:

Customer	Does not return after self-exclusion period.
Manager	After 6 months has passed the exclusion agreement can be considered to be expired and exclusion lifted.

9.3 Multi Operator Self Exclusion Scheme

BoyleSports are members of MOSES (Multi Operator Self Exclusion Scheme). This scheme allows retail customers in Great Britain to Self-Exclude from betting in one or multiple licensed operators retail outlets for a one-year period. Please see <https://self-exclusion.co.uk/>

MOSES should be cited for any customers who carry out a BoyleSports retail exclusion.

When your shop receives a MOSES exclusion for a customer you (the Shop Manager) will receive a notification email. Once this notification has been received, please ensure you and your staff familiarise yourselves with the details and picture present on the exclusion. The exclusion will be present in the UK ShopOp's portal under the 'Self-Exclusion' section.

10.0 Machines –Fixed Odd Betting Terminals (FOBT's)

It is important to protect children and other vulnerable persons from being harmed or exploited by gambling. It is also important to keep crime or proceeds of crime out of our business.

With this in mind, machines in our shops are subject to the following standards:

10.1 Anti-Money Laundering Software

Anti-money laundering software has been installed in all our gaming machines. Fraud and/or anti money laundering notices may be displayed on your back-office computer:

If your back-office computer displays a warning message you should then undertake one of the following:

a) Establish whether the customer is a regular (i.e., bets with the company regularly) and ascertain the reasons why the customer has not bet all of the money he/she has inserted. If you are happy with his/her answers, please pay the customer.

OR

b) If the customer is not regular or a complete stranger or you are not satisfied as to why the customer has withdrawn his/her money from the machine without sufficient plays, please check the cash inserted into the machine. In particular, please check for suspicious notes or coins. If, however you feel that your safety is at risk from doing this, please inform the customer that you require clearance from Head Office and contact the Security Department for further advice.

The **Anonymous Player Awareness System** (APAS) alerts you if the player behaviour is more likely to become a problem session. The principle of this is to alert you before the player actually has a problem.

1. **Chaotic Play Alert** :- *multiple instances (>10) of Cash Insertions (>£5) during a session. At current parameters, Chaotic Play alerts occur in 2.3% of all sessions*
2. **Extended Losing session alert** – *Session duration >30 minutes and player loss >£250. (circa 1.3% of sessions per week).*

You should pay closer attention to these sessions where an alert has been triggered and be prepared to interact with the customer if they display any further triggers or their behaviour changes.

10.2 Maximum Stakes and Pay-outs

Following legislation change in April 2019, machines are subject to a maximum stake of £2 and a maximum pay out of £500 within one spin. Higher staking roulette games are no longer available.

All employees should all be aware that all machines have information available both from the main menu and inside each game containing;

1. GamCare Telephone number and contact details.
2. No under 18 Play sign.
3. Pay-out limit on the machine – i.e., £500
4. Percentage pay-out to the customer for each game played at every staking level.
5. Direction towards the help pages on the machine.

11.0 Recording, Reporting and Disclosure of Information

BoyleSports is required to abide by the three Gambling Act 2005 Licencing Objectives:

Ensuring that gambling is conducted in a fair and open way.

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

Protecting children and other vulnerable persons from being harmed or exploited by gambling

To ensure these objectives are being upheld, regular visits will be made by management to the premises to make sure that compliance is being enforced.

Compliance and incident forms must be completed weekly and sent to UK head office (172 Stratford Road, Shirley, Solihull, B90 3BQ)

12.0 Shop Managers Guidance

Please note that all bets at £50 or greater must be tagged.

12.1 The Weekly Compliance Return:

The weekly compliance return and incident reports are an integral part of our compliance programme, they are required to be completed in the appointed manner as part of our commitment to our licence requirements, therefore they should be completed as required, as failure to do so may have serious consequences.

This return must be -completed in the ShopOp's portal every Monday – See Appendix 1.

12.1 Under 18s Incidents:

If you have an incident of an under 18 being present in the shop you must in addition to asking them to leave make a "Think 21" logging at the time of the exchange and record the number of such incidents each day. Please see the ShopOp's Portal "Think 21" logging process under section 8.0 'Age Verification', and Appendix 1.

Under 18's incidents are broken down into two distinct areas, reportable and non-reportable incidents, where an incident is reportable the manager or person dealing should fill the incident report document – the same business day. Within the report should be sufficient information to assist the company in identifying any issues which may have occurred and reasons for the report.

Reportable under 18's incidents are those where individuals known to be under the age of 18, or those who provide insufficient/ unsatisfactory identification when requested, attempt to gamble or successfully gamble before being challenged.

Non reportable incidents are those where those who are known or suspected to be under 18 attempt to enter the premises but not gamble.

These also included incidents where young persons may seek to loiter or enter our premises. This activity will not require a report unless police assistance is required to move the young person's along.

12.3 Responsible Gambling Incidents

The number of each individual incident per day should be recorded as per the under 18's above.

Should a customer you know to be self-excluded seek to gamble in or enter the premises you should make a note of this and fill in a report detailing the incident and individual concerned.

Any individual seeking to return to gambling after their initial period of self-exclusion is required to complete a Return to Betting form confirming his/her intention to return to betting before any bets are accepted. This form must be returned to the Irish Head Office (Customer Services c/o: BoyleSports, Finnabair Industrial Park, Dundalk, Co. Louth, Ireland), a brief report should also be filed noting this has occurred.

12.4 Police Assistance

We accept it is extremely rare for any shops to require police assistance, especially so without first contacting the Security Department, however where police assistance is required, or where Police attend for any reason, regardless of the Security Department already being aware, all incidents should be recorded and a report filed on the day noting the brief reasons why the police needed to attend and the outcome. Where possible the number of incidents should be recorded under the relevant headings.

12.5 Money Laundering

You should already be aware of the details of what to look out for in relation to money laundering and the proceeds of crime, which are contained within section 6.0 of this training manual. In the event you have serious concerns that your customers are predominantly funding their lifestyle/ gambling from illegal activity, you should try to find out as much detail as possible about them, for example, often you may hear gossip in the shop or throw away remarks. If you hear anything or are still concerned you should contact your regional manager for further advice or email the MLRO at MLRO@BoyleSports.com. You should record the number of such reports in your Weekly Compliance Returns. No separate report is required for this section.

13.0 Official and Internal Visits

Official Visits

The total number of official visits per day from each of the listed persons should be recorded and a report filed noting what the official did and what if anything they requested or asked from or of you. As with previous company rules, you must always seek identification and notify UK Head Office prior to and in the event of any person claiming to be an official requiring access to any sensitive part of the premises, including behind the counter, if they are genuine officials, they will understand this security requirement.

Internal Visits

In the event of any internal visits from Head Office employees or the company internal auditor(s) you should note the number of such visits per day. No separate report need be filed. However, if you are unsure the person is from head office, you must check before allowing access behind the counter.

Please do not note electricians or repair persons, they should be noted in the shop diary.

14.0 Policies

Policies location

BoyleSports policies are available on the BoyleSports SharePoint. at [https://boylesports.sharepoint.com/sites/BoyleSportsShops/SitePages/Policies\(1\).aspx](https://boylesports.sharepoint.com/sites/BoyleSportsShops/SitePages/Policies(1).aspx) under 'Compliance & Risk' , then 'Policies' on the drop down menu.

You can also locate Banknote procedure and the Drug & Alcohol Policy at <https://boylesports.sharepoint.com/sites/BoyleSportsShops/SitePages/Policies.aspx>.

These policies are for your reference and are confidential BoyleSports documentation. They should not be printed out or distributed outside of the company. They are for staff reference only.

15.0 Marketing

Only marketing content which is received from BoyleSports under direction from the marketing department can be displayed in your shop.

All marketing content which is displayed in shops under direction from the marketing department has been passed through the 'Promotions Compliance Review Process' to ensure compliance with codes and regulations for varying regulators and bodies (Gambling Commissions LCCP's, ASA, CMA, etc.).

All marketing content will contain Social Responsibility (SR) information such as 18+, Support Organisation Signposting, SR Messaging, along with Significant Terms, and T&C's Apply information.

No staff member should display unapproved, handmade, or amended marketing content in their shop. Only marketing content received from BoyleSports under direction from the marketing department should be used in your shop.

Appendix 1 – The Weekly Compliance Return

To file your Weekly Compliance Returns please go to the UK ShopOp’s portal. Please see the below link:

<https://portal.boylesports.com/UKShopOps/home/Login> You can make your Weekly Compliance Returns in the ‘Add logs’ section of UK ShopOp’s portal at the following link.

<https://portal.boylesports.com/UKShopOps/Compliance> (Please go to the ‘All Modules’ menu and choose ‘Compliance Report’ from the drop down menu).

In this section you can choose your Shop under ‘Branch name’ and the one of the following categories to report on from the ‘Report Category’ section.

- Think 21
- Under 18’s
- Responsible Gambling
- FOBT Alert Logging
- Police Assistance
- Money Laundering
- Official Visit
- Internal Visit

All interactions and must be logged on the day of the interaction.

It is advisable where an incident(s) has occurred on a particular day to note these as the week progresses to avoid mistakes.

The weekly returns are designed to run concurrent with your shop figure reporting weeks for ease of use.

Compliance Report Form

Branch Name:	<input type="text" value="Blackheath"/>	Employee:	<input type="text"/>
Date:	<input type="text" value="28/03/2023"/>	Incident Time:	<input type="text"/>
Details			
<input type="text"/>			
Report Category	<input type="text" value="Select Category"/>		
<input type="button" value="Save"/>			

This Manual must be read annually by all staff. Once read it must be signed and dated below. By signing you are confirming that you have read this manual in full and that you have asked your line manager or Regional Manager any questions that you are unsure of.

Print Name	Signature	Date



Safer Gambling Interaction Record

Boylesports wants to ensure that gambling remains an enjoyable and entertaining experience for our customers. From time to time, we may check in with customers because we care and want to ensure their activity is affordable as well as fun.

When having one of these conversations with a customer, please do so discreetly, this must be done away from the counter.

Shop Name:		Date:	
Completed By:		Customer:	

Observation:

What prompted the interaction with the customer? Was there an increase in activity, unusual behaviour, instructed by Head Office or simply a courtesy contact? Provide details below:

Interaction:

Talk to the customer to prompt them to think about their gambling levels and for you to find out more. This provides us with an opportunity to raise awareness on Safer Gambling and more information and support if needed.

Provide details of the conversation. How did the customer respond, were they comfortable with their gambling levels?	
Make a note of any affordability or vulnerability concerns.	

If relevant, provide a summary on the discussion on Self Exclusion options and help organisations.	
--	--

Fund their Gambling:

During your conversation, ensure you ask the customer the following questions.

Ask the customer how they fund their Gambling. Is it with salary / savings / inheritance etc.	
Ask the customer what their occupation is, what is it that they work at	

Outcome:

Make note of what happened next and if further action of monitoring is required.

How did the customer respond to the interaction? Were they happy with the discussion?	
What did you or the customer do next? Monitor the account where applicable.	

When an interaction is not conducted:

There might be times where we observed behaviour and decided an interaction was not required; or where an interaction was prompted but did not take place. It's equally as important for us to make a record of these cases.

Provide details of why an interaction was not required.	
Provide details of why the interaction didn't take place and how you followed up.	



Policies and Procedures

*Protection of children & other vulnerable
persons.*

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Document History

Version No.	Author	Description	Date
1.5		Inclusion of information on layout of gambling premises and UK age verification clarity.	05/09/2019
1.6		Annual review	15/02/2021
1.7		Annual review – update of T&C’s link, references of Responsible Gambling (RG) updated to Safer Gambling (SG). Addition of the link to the GC’s protection of children and other vulnerable persons information	11/08/2022
1.8		Annual review – 2 additions made in section 1.6 ‘Proactive measures in place that serve to protect vulnerable customers’ at Head of Safer Gambling’s request.	14/09/2023

1.1 Introduction

This document outlines how BoyleSports protect children and other vulnerable persons within Great Britain.

This Commissions information on [protection of children and other vulnerable persons](#) has been consulted as part of this policy.

1.2 Prevention and treatment of gambling-related harm

BoyleSports take seriously and are committed to the prevention and treatment of gambling-related harm. As such we make an annual social responsibility donation to BeGambleAware (Charity No 1093910) and other charities detailed on the [Commissions list of approved RET organisations](#). These are voluntary charitable donations to support research, harm-prevention and treatment of problem gambling.

1.3 Online prevention of underage gambling

To prevent underage gambling, an automated Age and Identity verification check occurs at the point of registration. In the case that we are unable to ascertain a match to an 18's or over database the account is automatically suspended, and a physical copy of ID will be requested from the customer which must be provided -before the account suspension is removed.

Our efforts must be complimented by user behaviour, so we ask that if young people have access to a computer with Internet access, that our customers take care to keep their username, password and deposit details confidential and ensure to log out of their BoyleSports account.

There are also a number of internet filtering software's which can be installed on a customer's computer to protect minors. Such software provides the ability to control content displayed, block websites and set up passwords to prevent gambling websites being available to underage persons.

E.g.

- [Net Nanny](#)
- [CyberPatrol](#)

This information is available on our web sites under our '[Be Responsible](#)' pages.

Under our contractual terms service to under 18's is prohibited. Our terms state that the use of the Website or Service by a minor is prohibited. Customers warrant that they are over 18 years of age (or such other higher minimum legal age in their jurisdiction). We reserve the right to require the customer to provide proof of age documentation at any time and that their account may be

suspended by BoyleSports at any time until satisfactory proof of age documentation is produced. Where it is not possible to be satisfied that the customer is above the minimum age to gamble, the customer's account will be suspended whilst procedures continue to establish the customer's age, or the account could be cancelled, and all stakes returned. In the event we discover the customer is under 18 or the legal age for gambling in the jurisdiction they are resident the customer's stake will be returned to the customer and we shall not be obliged to pay any winnings which might otherwise have been payable in respect of the bet.

This information is available in our web site [Terms and Conditions](#) as point 1.1 under section 'C. Your BoyleSports Account. Please also see point 3.4.2 under section 'F. Others'.

1.4 Retail prevention of underage gambling

We prohibit gambling for under 18's in our Licenced Betting Offices (LBO's). This is part of our contractual terms known as Shop Rules. These rules are posted for customer review in all BoyleSports LBO's.

In our Shop Rules Condition J of 'Conditions of Acceptance of Bets' we state 'Under no circumstance will business be conducted with persons who are under 18 years of age. Age verification will be requested if deemed necessary by our staff at any time. Each customer warrants that any proof of age documentation produced to us is complete and authentic. The right to void any bet with a person less than 18 years of age is retained.

We do not permit under 18's on our retail premises.

In our LBO's we also adhere to the Think 21 policy, whereby if a customer looks under 21 our shop staff will request the customer to provide identification for age verification. All our retail shops carry out a daily online Think 21 logging process. Each shop reports challenges made to customers and the outcome.

BoyleSports also employ [Serve Legal](#) for ID compliance testing. The Serve Legal service provides mystery shoppers who carry out age related testing. This testing helps us ensure our shops meet their obligations and this testing is carried out for all BoyleSports LBO's. All Serve Legal interactions are reviewed on a weekly basis by the senior retail management team. The senior team then send out summaries and commentary to the shops that were visited by the Serve Legal team during that period.

BoyleSports also carries out UK Retail premises Risk Assessments to review shop layout and floor plans to ensure we prevent access to gambling by underage individuals.

1.5 Online & Retail underage gambling training

BoyleSports carry out training for all staff in our digital and retail divisions. BoyleSports staff training is carried out via multiple methods, such as training personnel, and online training portals. The latest

training to address under 18's was our Safer Gambling training that was carried out for all retail staff. Any new retail staff receive the training as part of our new employee induction process. Further SG training takes place periodically.

1.6 Proactive measures in place that serve to protect vulnerable customers

There are several proactive online & retail measures in place to ensure customers are fully aware of all Safer Gambling (SG) features available to them, and to protect vulnerable customers:

- Regular SG training provided to all customer facing staff.
- Periodic SG email mailshot to all active clients on database.
- Issuance of an SG detailed mail triggered following any SG related query received.
- Strict pre-approved scripts provided to all customer facing employees, interacting with clients who may contact to discuss SG matters or make the proactive decision to return to gambling having had a previous self-exclusion.
- Issuance of an SG detailed mail triggered following the reactivation of a previously self-excluded account, and a default automated deposit limit of £500 per month is put in place for returning online customers.
- Immediate closure of accounts should any client display signs of suffering with mental health issues that may affect their gambling patterns.
- Non-customers who mention SG/Self-Exclusion (SE) are entered into a watch list database which is reviewed on a regular basis.
- Auto extension of client's exclusions to ensure accounts cannot be accessed without client's proactive measures (following expiration).
- BoyleSports are also part of the UK NOSES (National Online Self Exclusion Scheme) and use the associated GAMSTOP software which allows customers from the UK (England, Scotland, Wales and Northern Ireland) to place a blanket exclusion via a public facing website (www.gamstop.co.uk) on all operator/bookmakers web sites. We give details of this facility in our web site footers, 'Be Responsible' sections of our web sites, and at the end of all BoyleSports customer exclusion journeys.
- BoyleSports are also a member of MOSES (Multi Operator Self Exclusion Scheme). This scheme allows retail customers in Great Britain to SE from betting in one or multiple licensed operators retail outlets for a one-year period. Please see <https://self-exclusion.co.uk/>
- We also take part in Safer Gambling Week (SGW). During this week we remind both our online and retail customer base of the Safer Gambling (SG) features available to them. This information is distributed through but not limited to the following, posters, leaflets, online banners, retail screens, retail Betting and Gaming Machine banners, blogs, social media (Twitter & Facebook), print media (Newspapers), Boyle Studio, customer emails. We also display the SGW logo with the above distribution methods.
- A process has been implemented to identify potential vulnerabilities divulged through customer-led contact via Keyword detection.
- GB customers are subject to velocity thresholds to limit the amount they can spend in a short period of time with lower thresholds set on 18-24 year olds.

All SG related customer interactions via email and chat are reviewed daily to ensure all the correct actions were taken, allowing for any required internal agent correctional action to be taken in real time.

All customer SE reactivations calls are recorded and reviewed daily to ensure customers are fully comfortable with their decision to return to gambling, and that all the SG features available were highlighted to them (following cooling off period).

Within retail we provide SE forms to allow customers to take a positive action approach to exclusion. Customers can SE without having to visit our retail premises by calling our Customer Service number 0800 22 00 66 and requesting a SE form to be posted or emailed to them.

Our SE Forms allow for a customer to SE from the local area for a period of 6 or 12 months. Customers can enter a SE immediately upon request.

After the expiration of a SE request the SE will remain in place for a further 6 months unless the customer takes positive action to return to gambling. The customer must contact BoyleSports via phone or in person to request the removal of their SE.

When a BoyleSports customer chooses to return to gambling after their SE expiration date the customer is given a one day to cool off period before being permitted to gamble again.

Any attempted breach of a SE is reported to our Customer Service teams who will then contact the other shops in that area and those listed on the customers SE form and highlight the breach and ask for increased vigilance. Any attempted breach is also reported to MOSES to allow them to notify operators in the area.

For record keeping we use an online portal which records all SE information. The information is stored for the required length of the SE and a further 6 months, then archived.



Drug and Alcohol Policy

BoyleSports Drug and Alcohol Policy.

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Document History

Version No.	Author	Description	Date
0.1		Initial draft	18/12/2020
0.2		Review	29/12/2020
1.0		Approved following review by all stakeholders (Terry Minford, Lee Otter, Gordon Downey, Mark Hesketh)	07/01/2021

1.1 Introduction

BoyleSports is committed to providing a safe, healthy and productive working environment for all employees, contractors, customers and visitors involved in its operation. This policy sets out the company's aims in reducing and managing alcohol and drug problems in the workplace.

The consumption of alcohol or drugs on BoyleSports premises is prohibited and must be discouraged through positive action by employees when it is either observed or drawn to their notice. The consumption of alcohol by any person employed in a BoyleSports betting office is prohibited, as is working under the influence of non-prescribed drugs or other controlled substances. Any breach of this policy may result in disciplinary action and could result in dismissal.

1.2 Alcohol Management Policy

BoyleSports Premises licence conditions make clear that the consumption of alcohol within a betting shop is prohibited. It is also a social responsibility requirement not to allow customers who are obviously incapacitated following the consumption of alcohol to gamble, to reduce the risk of them gambling, and not to allow them to remain on the premises if clearly intoxicated.

The vast majority of customers are well aware of the restriction on alcohol, but a minority will try to disregard this rule. Also, the emergence of street drinking in some parts of the UK and Ireland greatly increases the risk of someone bringing alcohol into the premises in some places.

To help you to understand what you can do to support the enforcement of our no alcohol policy, please see the helpful points below:

- Ensure that your team understand that alcohol (particularly open cans and bottles containing alcohol) cannot be brought into any part of the shop or left in entrances.
- Escalate issues with any customer continuing to flout the rule to your regional manager with a view to barring them from the premises.
- Make sure that if there is street drinking near your shop that your customers are clear on the policy.
- Make yourself aware of any alcohol banning orders in force in your local community / area.
- If you become aware that an alcohol banning order near you is being breached and not enforced by the authorities, please escalate to your regional manager for attention.
- Remember to record any instances where you have challenged someone on the weekly compliance sheet, this ensures that there is a record of proactive enforcement by you and your team.
- Where there is an immediate threat to colleagues or immediate assistance is needed with regulatory responsibilities to prevent a breach of the peace, then police/Gardai assistance should be sought.

Should you have any further questions related to the above, please contact your regional manager for guidance.

1.3 Drugs and Controlled Substances Management Policy

The police/Gardai consider the failure of employees to take responsible action when they are aware that the use of drugs or the passing of drugs is taking place on BoyleSports premises to be grounds for opposing the renewal of our Premises, Operating and Personal Licences. This could have very serious consequences for BoyleSports. Furthermore, the police/Gardai may bring criminal charges against an individual employee.

The seriousness with which BoyleSports views this matter cannot be overemphasised. It is imperative that if you have reason to believe that drugs of any type are being traded, passed or used on company premises, you must telephone and inform Security and your regional manager.

You must also record the details in the notes section of a (daily incident form/ weekly compliance sheet), then contact the local police/Gardai directly to report the incident. Failure to inform Security in the stated circumstances may be viewed as gross misconduct.

Should you have any further questions related to the above, please contact your regional manager for guidance.



Policies and Procedures

Gambling Fairness, Complaints & Disputes.

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Document History

Version No.	Author	Description	Date
1.5	██████████	Addition of Live Chat customer contact option to online & retail, and 8-week timeframe for customer ADR contact	05/01/21

1.1 Introduction

This document outlines how BoyleSports conduct business in a fair and open way in relation to the protection of customer funds, complaints and disputes.

1.2 Consumer rights and contractual terms

BoyleSports are committed to operating our business fairly and in a responsible way.

We adhere to consumer rights in line with the Irish Consumer Protection Act 2007 and the UK Consumer Rights Act 2015. We work to ensure our customers are protected from false or misleading claims and that we adhere to the fair and open UK Gambling Commission (UKGC) licensing objectives.

Our contractual terms exist for both our online and retail business. Our online [Terms and Conditions](#) are available on all BoyleSports web sites. Our retail Terms and Condition are known as 'Shop Rules' which are posted in all BoyleSports Licenced Betting Offices.

Any material changes to our contractual terms are notified to our online customers base through email notifications and/or pop-up messaging on customer login where we provide access to the updated contractual terms. In retail our contractual terms updates are signified by a date change visible at the top of the posted shop rules.

All of our marketing promotions follow the UKGC and the UK Competition and Markets Authority (CMA) fair and transparent terms and practices guidelines. All online and retail promotional copy contain the significant/key Terms and Conditions (T&C's) for the promotion. In our online business, where space does not permit significant/key T&C's to be displayed the full promotional T&C's are one click away. All significant/key T&C's go through our compliance team for sign-off review. Our compliance team review the significant/key terms to ensure they clearly outline any promotional restrictions to ensure the customer can make an informed decision and that all significant terms are transparent. The compliance team also review associated promotional imagery to ensure the significant/key terms are displayed in a clear and prominent manner.

1.3 Protection of customer funds

Regarding segregation of funds, customer funds are secured in bank accounts separate from and not accessible by the company.

In the event of insolvency customers will be able to withdraw funds but there is no absolute guarantee that all funds will be repaid, which meets the requirements for the protection of customer funds at the 'medium' level of protection as defined by the Gambling Commission. This is verified and subject to controls by an external auditor. For further information, you can click [here](#).

This information is provided to all BoyleSports customers as part of our web site [Terms and Conditions](#). Please see point 1.2 under section 'D. Your Finances'.

The below message is displayed to all new UK accounts after registration completion. This message must be accepted for a UK customer to be able to deposit with BoyleSports.

Protection Of Customer Funds

Great News!

BoyleSports are putting customer funds first.

As per our licence with the UKGC, we want to inform you about the funds we hold for you, and the extent of protection. Customer funds are secured in bank accounts separate from and not accessible by the company. In other words, even in the event of insolvency you will be able to withdraw funds but there is no absolute guarantee that all funds will be repaid, which meets the requirements for the protection of customer funds at the 'medium' level of protection as defined by the Gambling Commission. This is verified and subject to controls by an external auditor. For further information, you can click [here](#).

Please tick to confirm you have acknowledged.

Continue **Cancel**

1.4 Online complaints and disputes

Where a BoyleSports customer has a complaint or dispute we ask they contact Our Customer Service department in the first instance, which will endeavour to settle the query. The contact details are BoyleSports Customer Services (Finnabair Industrial Park, Dundalk, Co. Louth), email care@boylesports.com, [Live Chat](#), or freephone ROI Customer Care on 1800 22 00 66, UK 0800 22 00 66 or International +35342 93 93 168.

If, having spoken to a member of the Customer Service department, the customer query or complaint is not resolved, the customer can ask for the query/complaint to be escalated to a manager or supervisor. Our manager/supervisor will investigate the query/complaint in more detail and contact the customer with an update within 48 hours. The customer will be given the name and status of the person to whom their query/complaint has been sent to. Please note that any calls to our Customer Service department or to our managers/supervisors may be monitored or recorded for training and quality management purposes and to assist us in quick and effective resolution of queries.

Any complaints which have not been resolved to the customers satisfaction by use of our complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner can be submitted to:

Non-UK Registered Customers: Can escalate their concerns in writing, prior to taking any other steps, to Independent Betting Adjudication Service (a UK adjudication service supported by SIS) ("IBAS"). We agree to be bound by any decision reached by the IBAS, so long as the full facts have been submitted by the customer and BoyleSports. Further information on how to register customer complaints can be found at www.ibas-uk.com. IBAS provides a free-of-charge service and rules on complaints about betting and gaming transactions; but it does not deal with service-related

problems.

Furthermore, customers can escalate their concerns to the Gibraltar Gambling Commissioner for his consideration. We fully co-operate with any investigations the Gibraltar Gambling commissioner may undertake and any rulings that they may choose to make will be fully adhered to. Further information on how to register a complaint can be found at www.gibraltar.gov.gi/remotegambling

UK Registered Customers: Can escalate their concerns in writing, prior to taking any other steps, to Independent Betting Adjudication Service (a UK adjudication service supported by SIS) ("IBAS"). We agree to be bound by any decision reached by the IBAS, so long as the full facts have been submitted by the customer and BoyleSports. Further information on how to register customer complaints can be found at www.ibas-uk.com. IBAS provides a free-of-charge service and rules on complaints about betting and gaming transactions; but it does not deal with service-related problems.

Alternatively, all European customers can submit complaints through the Online dispute resolution (ODR) platform <http://ec.europa.eu/odr> The platform will facilitate the resolution of the dispute, complaints submitted to the platform will be dealt with by approved alternative dispute resolution (ADR) providers.

This information is provided to all BoyleSports customers as part of our web site [Terms and Conditions](#). Please see point 1 – 3.2 under section 'U Your Concerns & Complaints'.

BoyleSports records details of all UK complaints that have gone through the complaint's procedure.

1.5 Retail complaints and disputes

Should a customer have any concern over a bet or claim, or a complaint or dispute, we ask that they consult our shop manager in the first instance and they will make every effort to settle the query. However, if the customer is not entirely satisfied or believe they have been treated unfairly we ask that they request to speak with a regional manager or write to our Head Office (Finnabair Industrial Estate, Dundalk, Co. Louth) or email care@BoyleSports.com, or [Live Chat](#), enclosing full details of the query, -alternatively customers can free phone Customer Care on 1800 44 00 00, UK 0800 22 00 66 or International +35342 93 93 168. This will receive our prompt attention. Any complaints which have not been resolved to the customers satisfaction by use of our complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner, they should submit their dispute to IBAS (Independent Betting Arbitration Service, a UK independent adjudication service). Their decision is final, provided the full details have been submitted by both sides. When it is clear what the customer's intentions were then we will endeavour to settle the bets as to their intended instructions, i.e. the customer's previous betting patterns will be taken into consideration.

This information is contained with our retail shop rules which are posted in all BoyleSports Licenced Betting Offices.



**BE
FEARLESS**

**STAY
DYNAMIC**

**MAKE
PERSONAL
CONNECTIONS**

**STRIVE FOR
EXCELLENCE**

**MANAGER'S
OPERATIONS GUIDE
UK**

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NEW STARTERS

STEP BY STEP GUIDE

For all new starters a step by step training guide must be followed. All training material can be found in the Training Folder on your desktop. It is broken down into four different sections: New Starter, 8 Week, 6 Month and Deputy Manager. Managers are to take full ownership of all Staff Training

Print 2 Week Sign off Sheet

- Print off the 2 Week sign off sheet: (located in the Training folder New Starter Section)
This 2 week sign off sheet must be followed step by step, day by day, no exceptions

2 Week Sign Off Sheet For New Starters - Day by Day		
Please only sign the end of each section if the section is fully understood		
Cashiers Name:	Shop:	Start Date:
Day 1	Y/N	Comments
Has their induction been completed, and paperwork returned to HR?		
Have you bought them a notebook locally to keep notes together?		
Write bet type onto page 1 of their notebook, bets in Yankee, Lucky 15 etc.		
Ask candidate to pick up a sample of each slip and stick into notebook		
Read some of the Staff Notice Board, H&S and Policys and Procedures		
Location of Fire Extinguishers, first Aid Box		
Uniform as per the Daily Checklist Black/Navy/Dark brown leather shoes only		
Attendance and time keeping who to call if sick, swap numbers		
Cash dispersal limits and importance of not discussing Boylesports business		
Shop security locking door, location of panic buttons, watch AMCO video		
Slow counters, show pictures daily and how to avoid it happening		
Log onto till, no float just translating and getting used to the system		
Cash check completion, stake and payout limits		
We have covered all items in day 1 and candidate fully understands them:		
Manager:	Candidate:	

Cashier Training Manual

- All new starters will receive a copy of this manual. This needs to be signed off section by section once each section is read and understood in full. This Manual is broken into two Sections 8 week and 6 month. For the eight week assessment Sections 1 - 8 need to be read and understood in full. For the 6 month assessment the remainder of this manual Section 9 – 19 need to be read and understood in full along with the first 8 sections.

Send weekly feedback, use the sheet in the training folder as a guide

- This feedback needs to be sent every week, a few bullet points letting your Regional Manager know how they are getting on. If they move to other shops, please liaise with that Manager as to what needs to be covered and how they have performed working in another shop.

Print out Who does what directory

- This directory must be printed out for all new starters. Please go through this directory with Trainee and explain the different departments.

NEW STARTERS

WEEKLY TRAINEE FEEDBACK FORM



Weekly Trainee Feedback:

Name:

Shop:

Date:

Bets taken and translated last week:

Cash Variance last Week:

Cash Variance YTD:

Hours spent training last Week:

What was covered (please list):

1)

2)

3)

4)

5)

General Feedback:

How are they getting on, what are they good at, What do they need to work on, how are they getting on with Manual... etc, etc??

NEW STARTERS

WHO DOES WHAT FOR NEW STARTERS

DEPARTMENT CONTACTS

To call any of these departments, dial **00353 429393 (+ extension number)**

Department	Extension/Email	Queries
BAC	Extension: 173 Email: bac@boylesports.com	<ul style="list-style-type: none"> • Permission to Lay
Sports Info Line (SIL)	Extension: 200 Email: sportsinformationline@boylesports.com	<ul style="list-style-type: none"> • Content Re-Entry • Empty Bets • Quoting All prices • Market Events • Settlement Queries
Helpdesk	Extension: 157 Email: helpdesk@boylesports.com	<ul style="list-style-type: none"> • Tvs, Screens and Tills. Hardware and Audio. • All technical/hardware issues regarding TV screens, e.g. no power, no signal, blank screens, Boyle TV, SKY, CST, Virtuals/Bingo/Lotto not displaying
Printers	Contact Tel: 01224 518701	<ul style="list-style-type: none"> • Supplies ie. ink, drum kits, waste cartridge
Screens	Extension: 111 Email: seniorscreenstaff@boylesports.com	<ul style="list-style-type: none"> • Content only Queries relating to content on screens such as prices/selections/offers. • NOT for technical issues.
Terminals SSBT, FOBT	Email: helpdesk@boylesports.com Email: security@boylesports.com	<ul style="list-style-type: none"> • Hardware issues Note/coin acceptor, screen issues, damaged terminals etc. • Bet Queries • Game play issues, ticket reprints. Credit not registering, fraudulent activity etc.
Maintenance Log	Extension: 114/148 Email: hqshopops@boylesports.com	<ul style="list-style-type: none"> • All maintenance issues must be logged on the Sharepoint
Shop Operations	Extension: 074/106 Email: cbishop@boylesports.com amartin@boylesports.com	<ul style="list-style-type: none"> • Stationary • Catering • Bins • Cleaners
Security	Extension: 277 Email: security@boylesports.com	<ul style="list-style-type: none"> • All shop security issues • SSBT/Machine Bet Queries, safes, ambiguous customers, undercounter inserts
Customer Service	Extension: 168 Email: csteam@boylesports.com Extension: 169 Email: csseniorteam@boylesports.com	<ul style="list-style-type: none"> • Account issues • Withdrawals
Payroll	Extension: 144 Gina 143 Kayleigh 131 Claire Email: payroll@boylesports.com	<ul style="list-style-type: none"> • All pay and Holiday Queries
Finance	Extension: 140 Email: treasury@boylesports.com	<ul style="list-style-type: none"> • Float Check Clearance
Events/Tickets	Email: Ticket Request on SharePoint efitzpatrick@boylesports.com	<ul style="list-style-type: none"> • Tickets for events Horse/Greyhound meetings etc.
Marketing	Extension: 246 Email: RetailMarketing@boylesports.com	<ul style="list-style-type: none"> • Internal Marketing • Poster Queries • Sponsorship requests
BoyleXtra	Email: Xtra@boylesports.com	<ul style="list-style-type: none"> • BoyleXtra issues • Additional BoyleXtra Cards
HR	Extension: 104 Jackie 110 Ailbhe 257 Natasha Email: hr@boylesports.com	<ul style="list-style-type: none"> • HR Related Queries • Eye Tests

STAFF TRAINING GUIDE

8 WEEK

STEP BY STEP GUIDE

Print Off the 8 Week sign off sheet: (located in the Training folder 8 Week Section)

- The 8 week sign off sheet is to be signed by both the Manager and the Candidate once the section has been covered in full. This is to show the candidate has a full understanding of what has been covered.

Eight Week Sign Off Sheet For New Starters		
Please only sign the end of each section if the section is fully understood		
Cashiers Name:	Shop:	Start Date:
Induction	Y/N	Comments
Uniform, Clean and Ironed, No tight leg trousers, Shoes must be dark, No trainers		
Good Attendance and Time Keeping. Who to ring and Phone Numbers of Staff		
Location of Telephone Numbers and who to ring - different departments		
Think 21 policy, ID accepted and logged on Intranet		
Staff Notice Board, Evacuation, Fire Extinguishers, Panic Buttons, AMCO		
Bet Acceptance Procedure, Green Pen Usage and Payout Procedures		
Cash Handling, Sheet to be sent off and Cumulative Amount.		
Codes of Conduct, No Betting, No Credit Betting, Confidentiality		
Responsible Gambling and Compliance		
Debit Card Policy		
Set up and Market Shop, Shop tidies, Check Toilets		
Good Understanding of SSBT and FOBT		
The Candidate Understands all the Information in this Section in full:		
Manager:	Candidate:	

Print of the Epos, Customer Service and Observation Assessments: (located in the Training folder 8 Week Section)

The EPOS, Customer Service and Observation Assessments must be gone through in full with the candidate so they have a full understanding of each. Complete a mock assessment prior to sending candidate forward to be assessed.

8 Week EPOS Assessment			
Please ask Cashier to Perform each of the tasks Below :			
Standard Required	Yes	No	Comments
Open/ Close Cashier Till			
Change Password			
Suspend Till for when leaving Till point			

Eight Week Customer Service Assessment				
SECTION ONE: BASIC CUSTOMER SERVICE				
OBSERVATION POINTS:	A	B	C	COMMENTS
Does the cashier greet customers with a smile, good eye contact and body language?	Excellent	Satisfactory	Work needed	
Does the cashier greet the customers by saying hello? Are they polite and friendly?	Excellent	Satisfactory	Work needed	
Does the cashier use the names of customers when greeting them?	Excellent	Satisfactory	Work needed	
Does the cashier say thank you to the customer at the end of the transaction?	Excellent	Satisfactory	Work needed	

Eight Week Observation Assessment				
OBSERVATION ASSESSMENT				
OBSERVATION POINTS	A	B	C	COMMENTS
Staff Notice Board Has this been read in full and all contents understood?	Excellent	Satisfactory	Work Needed	
Robbery prevention guide. Has this been read in full, signed and all content understood?	Excellent	Satisfactory	Work Needed	

8 WEEK

PREPARING FOR ASSESSMENT DAY

Once the Trainee has completed the first eight weeks, they will now be given a date to be assessed. To ensure the candidate is ready for the assessments the Cashier Training Manual should be signed once each section has been covered and understood. Ask the candidate questions at the end of each section, to make sure they have a full understanding prior to moving onto the next section. Print off the EPOS, Customer Service and Observation Assessments and go through these in full with the candidate. For Assessment day, the candidate needs:

- Managers Auditing Report completed covering three days business. For 8-week staff pay outs of £50 or more must be signed by 2 people
- Up to date Cash Variance sheet printed

There will be a written assessment on the day of assessment. All questions in this assessment are covered in the Training Manual between section 1 to 8 so ensuring each section is read and understood will contribute significantly to how well you perform in the assessment. Epos, Customer Service and Observation Assessments will also be completed on the day.

Managers Auditing Report							
SHOP:				REGIONAL MANAGER:			
AUDITING MANAGER:				DATE:			
PLEASE DO NO DELETE ANY CELLS HIGHLIGHTED IN GREY							
PRICE CHECK	Staff	Manager on Duty	Date	Amount with prices	Checked	UnChecked	%
						0	#DIV/0!
						0	#DIV/0!
						0	#DIV/0!
						0	#DIV/0!
	SHOP TOTALS				0	0	0
PAYOUT £50	Staff	Manager on Duty	Date	Total P/O	Checked	UnChecked	%
						0	#DIV/0!
						0	#DIV/0!
						0	#DIV/0!
						0	#DIV/0!
	SHOP TOTALS				0	0	0
PAYOUT £100	STAFF	Manager on Duty	Date	Total P/O	Checked	UnChecked	%
						0	#DIV/0!
						0	#DIV/0!
						0	#DIV/0!
						0	#DIV/0!
	SHOP TOTALS				0	0	0
PAYOUT £250	STAFF	Manager on Duty	Date	Total P/O	Checked	UnChecked	%
						0	#DIV/0!
						0	#DIV/0!
						0	#DIV/0!
						0	#DIV/0!
	SHOP TOTALS				0	0	0

Once 8 Week Assessment is passed all Payouts of £100 or more must be checked and initialled prior to payment.
All Payouts of £250 or more must be checked and initialled by two members of staff prior to payment.

Eight Week Pass Rates

1. Eight Week Customer Service Assessment	Pass Level = 60%
2. Eight Week Observation Assessment	Pass Level = 80%
3. Eight Week Written Assessment	Pass Level = 80%
4. Eight Week EPOS Assessment	Pass Level = 100%
5. Managers Auditing Report	Price Checking = 80% Minimum Checking Payouts = 100%

STAFF TRAINING GUIDE

6 MONTH

STEP BY STEP GUIDE

Print Off the 6 Month sign off sheet: (located in the Training folder 6 Month Section)

- The 6 month sign off sheet is to be signed by both the Manager and the Candidate once the section has been covered in full. This is to show the candidate has a full understanding of what has been covered.

Six Month Sign Off Sheet For New Starters		
Please only sign the end of each section if the section is fully understood		
Cashiers Name:	Shop:	Start Date:
Revision	Y/N	Comments
Uniform Clean, Ironed, No Jeans or tight leg trousers, Dark Shoes, No trainers		
Importance of Good Attendance & Time Keeping. Who to ring & Phone Numbers		
Head Office Telephone Numbers with all different departments		
Think 21 policy, ID accepted and logged on Intranet		
Staff Notice Board, Evacuation, Fire Extinguishers, Panic Buttons, AMCO		
Bet Acceptance Procedures, Green Pen Usage and Payout Procedures		
Cash Handling, When Sheet has to be sent to RM and When to Phone		
Codes of Conduct, No Betting, No Credit Betting, Confidentiality		
Responsible Gambling and Compliance		
Debit Card Policy, Cashback, Contactless, Chip & Pin		
Set up and Market Shop, Shop tidies & Toilet Checks throughout the Day		
Great Understanding of SSBT and FOBT		
The Candidate Understands all the Information in this Section in full:		
Manager:	Candidate:	

Print of the Epos, Customer Service and Observation Assessments: (located in the Training folder 6 Month Section)

- The EPOS, Customer Service and Observation Assessments must be gone through in full with the candidate so they have a full understanding of each. Complete a mock assessment prior to sending candidate forward to be assessed.

Six Month EPOS Assessment			
Please ask Cashier to perform each of the tasks Below :			
Standard Required	Yes	No	Comments
Open and Close Business Day			
Check £49.99			
Check £29.99			

Six Month Customer Service Assessment				
SECTION ONE: BASIC CUSTOMER SERVICE				
OBSERVATION POINTS:	A	B	C	COMMENTS
Does the cashier greet customers with a smile, good eye contact and body language?	Excellent	Satisfactory	Work needed	
Does the cashier greet the customers by saying hello? Are they polite and friendly?	Excellent	Satisfactory	Work needed	
Does the cashier use the names of customers when greeting them?	Excellent	Satisfactory	Work needed	
Does the cashier say thank you to the customer at the end of the transaction?	Excellent	Satisfactory	Work needed	

Six Month Observation Assessment				
OBSERVATION ASSESSMENT				
OBSERVATION POINTS	A	B	C	COMMENTS
Staff Notice Board Has this been read in full and all contents understood?	Excellent	Satisfactory	Work Needed	
Robbery prevention guide. Has this been read in full, signed and all content understood?	Excellent	Satisfactory	Work Needed	

6 MONTH

PREPARING FOR ASSESSMENT DAY

The Six-Month assessment takes the same structure as the 8 week assessment.

For assessment day the candidate needs:

- Managers Auditing Report completed covering three days business.
- Up to date Cash Variance sheet printed.

There will be a written assessment on the day. All questions covered in this section are in the Cashiers Training manual so how well you perform is dependant on the time you spend reading this manual. Epos, Customer Service and Observation Assessments will also be completed on the day.

6 Month Written Assessment:

85% Pass Rate

-
- Learn off the remainder of the training Manual
 - Trading Principles (full section)
 - Staking Permed Quadpots and Placepots
 - Sport in depth: Football, Golf etc
 - Staking TTC Doubles, Trebles, Four Folds and RFC doubles
 - Prices (what's better and worse)

6 Month Epos Assessment:

100% Pass Rate

-
- **Please get activated as Manager** (email the Helpdesk for this) so you have Manager's privileges and can practice the managing side of things on your own till, so in the event you need to open and close you become as comfortable with this as putting up the newspapers

6 Month Customer Service Assessment:

90% Pass Rate

-
- Plenty of interaction needed
 - Manners
 - Make customers feel appreciated
 - Use of the shop equipment
 - Offering quick picks
 - Polite and friendly
 - Product Knowledge

6 Month Observation Assessment:

85% Pass Rate

-
- Payout and green pen procedures
 - Health and safety (evacuation & panic buttons)
 - Cash differences
 - Use of Managers monitors
 - Staff and shop presentation

Managers Auditing Report:

Minimum 80% Pass Rate Price Checking

100% Pass Rate Checking Payouts

DEPUTY MANAGER

STEP BY STEP GUIDE

The Trainee Deputy Manager (TDM) training programme takes approximately thirteen weeks and a full day assessment follows. The assessment is provided to the TDM in advance of the assessment so the individual knows exactly what will be covered on the day. The TDM will be provided with a Deputy Managers Training Manual which is to be followed step by step.

Print Out Practical Training Guide: (located in the Training folder Deputy Manager Section)

- This needs to be signed off in full by the Manager and the Candidate week by week. All paperwork needs to be printed out and placed in a folder ready for the assessor to take away with them on the day of the assessment.

Week 1 - Shop Presentation and Marketing		
Take responsibility for the full marketing of the shop.		
<ul style="list-style-type: none"> Ensure Newspapers are neatly displayed and wipe-cleans are neat and clear. Ensure all Posters both internally and externally are current and following latest Briefer. Ensure Football & Numbers section are up to date are displaying latest coupons and numbers. Ensure Daily Special posters is printed and on Display along with BX leaflets available. Ensure all dispensers are full and slips in correct holders. Ensure all TVs are in correct layout with correct channel and clear picture including the text screens. Make sure audio is at a suitable level throughout the day. 		
<i>No Sellotape to be used anywhere in the shop.</i>		
Complete a Shop Presentation Checklist and include any actions from the "No" responses and what is required to improve the standard. Checklist to go in your practical guide folder		
TDM:	Manager:	Date

Print out EPOS Assessment: (located in the Training folder Deputy Manager Section)

- EPOS Assessments must be gone through in full with the candidate so they have a full understanding of it. Complete a mock assessment prior to sending candidate forward to be assessed.


Deputy Manager Epos Assessment				
TDM Name:		Assessor Name:		
TDM Signature:		Assessor Signature:		
Please get TDM to perform each of the below tasks with a full understanding of each				
Section 1: Getting Started and Daily Tasks				
Standard Required	Yes	No	Comments	
Open the System as Shop Manager				
Check all unpaid bets for the past 7 days				
Check for Empty bets and adjust accordingly				

Print out Deputy Manager Assessment: (located in the Training folder Deputy Manager Section)

- Unlike the 8 week and 6-month assessment the Deputy Manager assessment is given in advance of the assessment day, so candidate knows exactly what is going to be covered. Complete a mock assessment on candidate prior to assessment day to ensure candidate is fully prepared.

DEPUTY MANAGER

STEP BY STEP GUIDE

				
Deputy Manager Assessment				
Please Circle Yes, No or N/A where appropriate				
A Candidate can receive up to Five 'NO' Responses and still pass.				
A 'NO' Response marked with a * will result in an automatic Fail.				
Name:		Assessor:		
Shop:		Date:		
Opening the Shop				
	Does the Candidate arrive in the shop and ready for work for their due start time?	Yes	No	N/A
	Do all other members of staff arrive in the shop on time and ready for work?	Yes	No	N/A
	If any member of staff is late does the candidate address the problem correctly?	Yes	No	N/A
	Upon entering the shop do all members of staff log onto the Epos system immediately?	Yes	No	N/A
*	Is the Candidate the only person to open the safe?	Yes	No	N/A
*	Does the Candidate disperse the cash correctly throughout the day?	Yes	No	N/A
	Are TVs in shop turned on approx. 10 mins before the shop is open?	Yes	No	N/A
	Are SSBTs and FOBTs Eod completed before Shop is opened? Has note and coin check been completed and logged before 11am?	Yes	No	N/A
*	Is the shop opened on time?	Yes	No	N/A
Section Score				

Deputy Manager Training Manual

- The TDM must actively follow the sections listed in the Deputy Manager Training Manual below as the Practical Training Guide needs to be signed off by the Shop Manager during week nine.
 - Week 1: Cover Section 1
 - Week 2: Cover Section 2
 - Week 3: Cover Section 3
 - Week 4: Cover Section 4
 - Week 5: Cover Section 5
 - Week 6: Cover Section 6
 - Week 7: Cover Sections 7 and 8
 - Week 8: Cover Section 9
 - Week 9: Recap and Practical Guide to be signed off by Shop Manager
 - Week 10: Cover Sections 10 and 11
 - Week 11: Cover Sections 12 and 13
 - Week 12: Recap and TDM Sign Off Sheet to be completed by Shop Manager.
 - Week 13: Recap and Mock Assessment to be completed by Shop Manager.

Preparing for Assessment Day

The Deputy Manager Assessment has a different format to both the 8 week and 6 month assessment. There is no written exam and the assessment is given to Candidate before the assessment. The best way to prepare for the assessment is by following the Step to Step guide each step of the way. Complete Mock assessments to ensure you are confident in all areas.

For assessment day the candidate needs:

- Practical Training Folder with all sections fully completed
- EPOS Assessment Completed in full

The Deputy Manager Training Manual also needs to be signed off by both the Manager and the Candidate when the candidate is competent on each chapter. Ask the candidate questions before you sign the candidate off on a chapter.

All Candidates need to be managing alongside a Manager at least once a week.

HELPFUL HINTS

Staff Training:

As the Manager of the shop it is very important to give your staff all the help and encouragement needed with training. Here are a few tips to help with this:

1. Identify one staff member who is good at training and nominate them to help with any new starters. Remember to delegate efficiently, you can not do everything so delegation is so important but as Shop Manager you must always be responsible for all staff training in your shop and ensure that this gets done
2. Encourage staff to keep training and move on to Deputy Manager and beyond, let them know they will be given all the training needed to develop
3. Every day, staff depending on what stage they are at on their training path should be given tasks to learn
4. Quiet times like morning and night the trainee should be reading their manual and you should be talking them through this or follow up to make sure other members of staff are doing this. Follow training instructions and ask questions at the end of each section of the Training Manual
5. Have a weekly chat with your trainees to see how they feel they are getting on and is there any areas where there feel they need extra help

When the team are well trained, they are more likely to enjoy their job a well trained team takes the pressure off the Manager. Please use any quiet time productively to train the shop team.



THINK 21

Think 21 - Staff Training

It is the duty of all staff to ensure that no under-age gambling takes place in any of our premises. Think 21 is a campaign of BoyleSports best practice to ensure that no under-age gambling takes place within our shops. As you know, it is an offence under the Betting Act to make or accept a bet from a person under the age of 18 years.

Don't Forget – If you or members of your shop team are in any doubt about a person's age do not serve them unless they can present ID.

What is Think 21?

Simply put – You need to Think 21 – If a customer is in your shop appears to be under 21, they must prove they are over the age of 18 to place a bet. All persons over the age of 18 are welcome to place bets in any of our stores nationwide but by thinking 21 we provide the company and you a safety net. There is a similar and successful procedure in place when buying alcohol that you may be familiar with – the guideline in this industry is to verify age of anybody that looks under the age of 21 to make sure they are allowed to buy alcohol.

Acceptable Forms of ID

There are currently 3 forms of ID that we can accept to verify age:

- Passport
- Driver's Licence
- Police Age Card

Unfortunately these are the only official forms of ID that we can accept.

Other forms of ID that may be presented but are not acceptable include (please note this is non-exhaustive)

- Student ID
- Public Transport ID (Bus Passes etc.)
- Social Welfare ID
- Non-Photo Government Documents

Before accepting the ID please check the following.

- Has it been altered in any way and that it contains the PASS hologram.
- Does the photo look like the person presenting it.
- The actual Date of Birth on the ID – Always ask the holder to state their date of birth.

THINK 21

What is Think 21?

The reality is that judging the age of our customers can sometimes be challenging – so our policy is when in doubt we must ask for one of the three forms of ID listed on the previous page. This campaign should be backed up with relevant notices displayed at all your shop entrance points. Don't forget – If a customer appears to be under 21 they must prove they are over 18. This safeguard removes any ambiguity as to "is he/she 18?" from staff members and moves the onus onto the person to prove that they are in fact 18 if they don't look 21.

What happens when you ask for ID?

- When you have to check for ID they must provide one of the three acceptable IDs listed on previous page
- When you check the ID – make sure it has not been altered or amended in anyway
- Ensure it is the person photographed
- Check the DOB and ask the holder to repeat it

Should any customer fail to provide the correct ID you should refuse them service and politely ask them to leave. You can inform them they can return with the appropriate ID at a later stage and you can serve them then. If the customer refuses to leave the premises please refer to your Regional Manager for advice or contact the Security Department. When you have to ask for ID from any customer – please ensure the Think 21 log has been filled in completely in the ShopOps portal whether or not they are under/over 18.

What shop Managers must do:

- Brief your shop team on ID checking - particularly with members of staff that may be new or are not familiar with your shop
- Periodically remind other members of staff in the shop on the Think 21 policy
- Display Think 21 poster in an area behind the counter that all shop staff can see as a reminder
- Ensure the Think 21 (formerly the under 18s log) is kept up to date and that all members of staff record any ID requests and the outcome in it as they happen in the ShopOps portal
- Please also remember that no children are allowed on the premises and this must be monitored
- **NO ID – No Service**



THINK 21

Example Think 21 Log

WHEN YOU ENGAGE A CUSTOMER WITH THINK 21, YOU ARE REQUIRED TO LOG THE INTERACTION IN THE SHOP OP'S PORTAL AT THE TIME IT TAKES PLACE.

Date	Time	Customer Name	Short Description	ID Presented	Attempted Before?	Staff Member
5/7/16	15.35	P Mullins	Tall, Brown hair, looks young	Driver's License – did not look real. Refused service.	Yes, have seen him before and was asked to return when 18	R Walsh.
15/7/16	12.33	G Elliott	Short, black hair, glasses	Police age card – all ok. Served customer	No – presented ID when requested all ok	D Welds

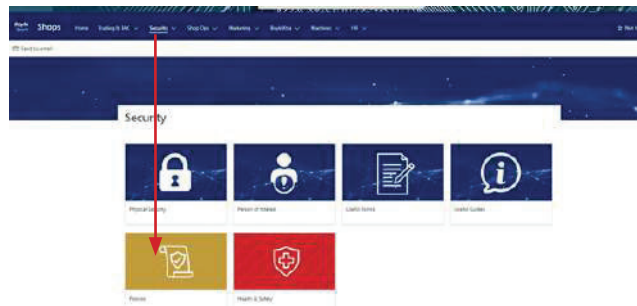
USER GUIDE

Sharepoint Compliance Policies and Procedures

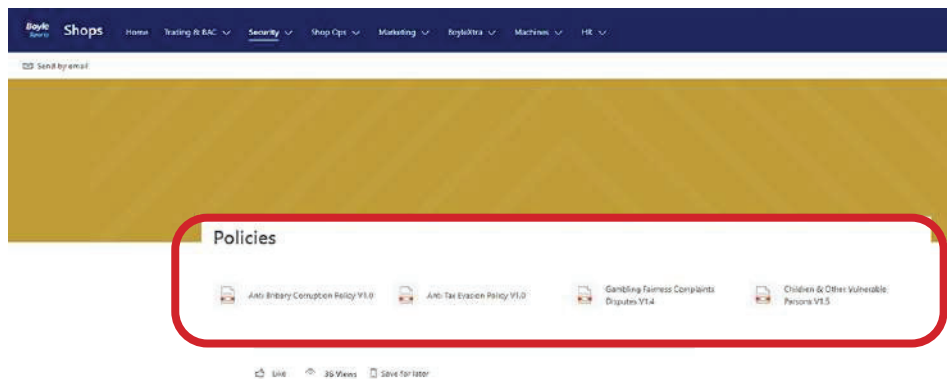
This document outlines where shop staff can locate the BoyleSports Compliance Policies and Procedures. These Policies and Procedure versions are updated from time to time and new Policies and Procedures added, therefore we recommend you regularly check for updates.

Where can I find the BoyleSports Compliance Policies and Procedures

You can locate the BoyleSports Compliance Policies and Procedures on the Sharepoint under 'Security', then 'Policies'. Please see the below screenshot.



The Policies and Procedures can be read by clicking on documents available.



Please note these are BoyleSports Internal Policies and Procedures and should not be copied, reproduced, distributed, transmitted, or displayed.

What should I do if I have any questions?

If you have any questions please contact the compliance team at compliance@boylesports.com

Useful Links

BoyleSports Sharepoint: <https://boylesports.sharepoint.com/sites/BoyleSportsShops>

Compliance Policies: <https://boylesports.sharepoint.com/sites/BoyleSportsShops/SitePages/Policies.aspx>

UK TRAINING MANUAL

1.0 The Gambling Commission

Under the Gambling Act 2005, The Gambling Commission was created to provide regulation to the gambling industry. The Gambling Commission's work is funded mainly by license fees from the gambling industry.

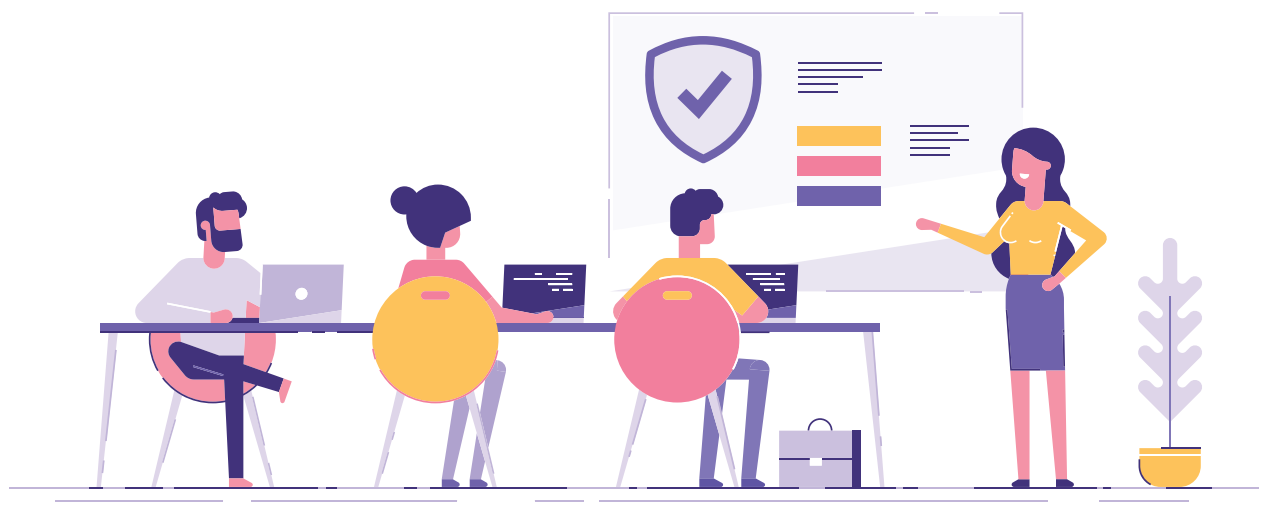
Since 1st September 2007, the Gambling Commission has issued new licences to organisations and individuals who provide facilities for Gambling. BoyleSports (UK) Limited has been awarded an Operator's Licence, whilst Personal Management Licence (PML) have been issued to certain individuals working in the Gambling Industry who hold key managerial positions.

The Gambling Commission has specified conditions under which the above licences are granted, and has also issued Codes of Practice which are directly linked to achieving the three main licensing objectives which are:

- 1. To prevent Gambling from being a source of crime or disorder, being associated with crime or being used to support crime**
- 2. To ensure that Gambling is conducted in a fair and open way**
- 3. To protect children and other vulnerable people from being harmed or exploited by gambling**

The Gambling Commission has legal powers to monitor licence holders, powers to search, confiscate relevant material and question staff. Should you be visited by someone from the Gambling Commission, you should confirm their ID and once they have been satisfactorily identified, co-operate with their requests.

The Gambling Commission, Local Authority and BoyleSports Compliance auditors will be making regular announced and unannounced visits to all of our premises, so all staff must ensure that they are aware of their responsibilities under The Gambling Act.



UK TRAINING MANUAL

2.0 Licensing Objectives

Under the Gambling Act 2005, there are three main objectives of the Gambling Commission which can be identified as follows:

To stop gambling from being a source or being associated with crime, disorder and being used to support crime.

Aims:

The Commission licenses operating companies and key employees within the industry with the following aims:

1. To train staff to make them aware of obligations required in crime prevention under the Proceeds of Crime Act 2002 ('POCA')
2. Build and maintain good working relationships with all governing bodies including Local Authorities, and law enforcement
3. To pursue any offence under the Act including any illegal gambling, cheating at gambling and permitting underage children to gamble

The Commission also aim to prevent gambling being a source of disorder. Under this secondary objective, the Commission will have a key role, including:

1. Where persistent problems arising from disorder at gambling premises, they will consider in conjunction with the Licensing authority whether the premises licence should be renewed
2. Ensure that gambling is conducted in a fair and open way i.e. by ensuring that rules are adequately displayed
3. To prevent children or vulnerable people having easy access to gambling

Local Licensing Authorities have the power to attach conditions to our Individual premises licences where they have concern that the licensing objectives are not being met. These may include:

1. **Restriction on opening hours**
2. **Requiring door supervision**

2.1 To ensure that gambling is operated in a fair and open manner

Aims:

Under this objective, the Gambling Commission will ensure that not only is gambling fair, but that the rules operated at BoyleSports are transparent to our customers.

These aims will be achieved by ensuring that:

1. Operating and Personal Licenses are issued only to those organisations and people who can demonstrate that they are suitable for offering gambling facilities
2. BoyleSports must ensure that our rules are displayed in a prominent position in our premises and that the information contained within these rules is easily understandable and fair
3. All gaming machines or other equipment/software meet standards as set by the Gambling Commission
4. The results of events on which gambling takes place are made readily available to the public
5. Advertising codes are put in places that prevent customers from being misled

UK TRAINING MANUAL

2.2 To help children, young and vulnerable people from the effects of gambling

Aims:

The Gambling Commission aims to protect children from being harmed or exploited from gambling. It is the objective of the Gambling Commission that **Children and young people under the age of 18** should not be permitted to gamble and should be prevented from entering gambling premises operated by BoyleSports.

IT WILL BE A CRIMINAL OFFENCE TO INVITE, CAUSE OR PERMIT A CHILD OR YOUNG PERSON TO GAMBLE

To achieve this objective, we:

1. Train staff to prevent children or young people entering premises by advocating a **"THINK 21"** policy
2. Train staff to request identification of any person or persons who appears to be under the age of 21

Protecting vulnerable persons from being harmed or exploited by gambling

The Commission does not define **"Vulnerable persons"**. BoyleSports (UK) Limited has interpreted vulnerable persons as someone falling into one of the following categories

1. People who may not be able to make informed or balanced decision about gambling i.e. People suffering from mental health problems, learning disability or suffering from drug misuse
2. People who gamble beyond their means

The aim of the Gambling Commission is to protect such people from harm and exploitation. BoyleSports (UK) Limited will however be expected to contribute to organisations which offer assistance to people who are or may be affected by problems relating to gambling.

Organisations which BoyleSports may be expected to support are those such as Gamblers Anonymous, GamCare or BeGambleAware.

BoyleSports (UK) Limited have already introduced Self Exclusion forms with the aim of assisting and protecting potential vulnerable persons.

UK TRAINING MANUAL

3.0 Licenses

There are different types of licenses required to operate a Licensed Betting Office:

- **Premises** Issued by the Local Authority
- **Personal** Issued to certain members, to ensure that they are suited to run the Company. These will normally be issued to people who have control over the company and who are ultimately responsible for the overall direction and strategies of the company in relation to, for example, finance, marketing and compliance
- **Operating** Issued by the Gambling Commission to each and every Betting Shop Operator. For example, BoyleSports has an operating licence issued by the Gambling Commission

All applications for any of the above licences are subject to suitability assessments based on the following:

- **Integrity** Personal licensees records to be checked if required from any source for no criminal activities
- **Competence** All staff are required to be properly trained in their roles and carrying out their duties.

3.1 Premises Licence

All trading LBOs have a set of documents stored on site that together make up the premises licence. They include the following:

1. A summary of the premises licence
2. The full premises licence
3. A plan of the premises - Often attached to the full licence but not always.

These documents are held in perpetuity, and have no expiry date, as such, they are are not replaced. Their retention on the premises, in a location known to all of the LBO team, is of the utmost importance.

These 3 documents are of critical importance to the legality of trading your LBO and their location should be made clear to all members of the LBO team.

The Gambling Act 2005 requires that the summary of the premises licence is displayed in a prominent place within the premises. This should be in a 'see through' clip frame within the counter area - in a position allowing it to be clearly visible by persons stood at the counter.

The full premises licence and plan should also be kept in the clip frame behind the summary, in order that all the documents are together and their location is known. From time to time you may be required to remove the documents to show to any of the following, subject to proper identification:

1. Licensing/Enforcement Officer from the Local Authority
2. Licensing/Enforcement Officer from the Gambling Commission
3. Police Officer

Once the documents have been checked, they should be replaced in the clip frame immediately, to avoid them being mis-placed.

If you are in doubt as to the credence of the visitor you should contact your Line Manager, the BoyleSports Security team or the Police.

UK TRAINING MANUAL

If any of the documents are missing you should immediately contact your Line Manager, as well as the Property & Development team, who will be able to arrange for the purchase of a replacement from the Local Authority.

All LBO teams and Line Managers should be aware of any additional and/or specific licensing conditions attached to each premises licence. It is possible that different LBOs will have different conditions and these conditions need to be known by all members of the LBO team including relief staff. It is suggested that if a Licence has extra conditions included that these are printed out and placed on the employee notice board, to ensure that all team members are fully aware of the additional conditions.

3.2 Standards Expected of Licensed Holders

Licensed holders must implement policies and procedures to encourage social responsibility throughout the organisation. Rules and codes of practices developed by BoyleSports (UK) Limited must include and address the following:

1. Preventing underage gambling
2. Ensure information is made readily available for customers in relation to responsible gambling
3. Try and ensure good relationships between staff and customers, so as to diagnose and understand customer's behaviour in relation to problem gambling
4. Ensure Self exclusion procedures are in operation to help assist vulnerable people
5. A commitment to contribute to research, treatment and education for problem gambling
6. Financial – licence holders are required to have sufficient funds to cover any liabilities
7. Equipment – gaming machines and other equipment are fair and pass the Gambling Commission's technical standards before being made available to the public.

3.3 Licence Holders

All licensed operators are required to operate under licence conditions and codes of practice to ensure that the licensing objectives of the Gambling Commission are not put at risk.

The Gambling Commission expects the following:

1. Business to be conducted honestly and fairly
2. Licence Holder to act with due care and attention
3. Ensure that information provided to customers is clear and not misleading
4. The three key licensing objectives are controlled with adequate systems and procedures
5. Financial resources are maintained adequately
6. Any breaches or suspected breaches of the Gambling Act are reported to the Gambling Commission and/or Police.

3.4 Licensing Related Matters

If you have any queries relating to licensing, or issues in your LBO that could create a risk to the Premises Licence, please contact your line manager in the first instance. If necessary, they will contact the Property & Development team, who will be able to provide further support, if required. This includes any follow up with Local Authority Licensing Officers, Gambling Commission officers, Police Licensing Officers and the like, in relation to any shop visit or licensing query which occurs.

All visits and queries should be flagged by the shop manager to their line manager, who in turn should notify the Property & Development Team. If a formal response is required, the Property & Development team will liaise with the line management team to agree an appropriate response. However, it is important that no formal responses are issued directly by the shop teams.

UK TRAINING MANUAL

4.0 Gambling Debts

Gambling debts are now legally enforceable, and the customer is now able to take legal action against the Bookmaker to resolve disputes. It is therefore imperative that staff check all bets prior to acceptance to ensure the bet conforms to our rules and procedures.

In cases of disputes, all disputes should be referred to your regional manager, who will investigate the claims further.

Staff should not admit any liability on a bet under any circumstances without prior approval from Head Office.

The law now states that gambling is an enforceable contract and that debts owing under a gambling transaction are potentially legally enforceable. This will mean the following:

1. Customers can issue court proceeding to recover a bet if we refuse to payout or there is a dispute over it
2. We may not be able to rely on the palpable error rule in a court of law if we make a mistake in the odds we offer customers
3. All odds written on slips must be checked to ensure that they are correct



UK TRAINING MANUAL

5.0 Proceeds of Crime Act (POCA)

One of the objectives of the Gambling Commission is

“to stop gambling being a source or being associated with crime, disorder and being used to support crime.”

5.1 Proceeds of Crime Act (POCA)

Under the Proceeds of Crime Act 2002, we are under an obligation to report gambling activities of individuals whose lifestyle is wholly/ substantively supported by the proceeds of criminal activity.

5.2 Which customers may we be obliged to report?

Customers who bet significant amounts on a regular basis and you suspect have a lavish lifestyle with no apparent source of legitimate income.

5.3 What questions should Staff ask themselves?

Staff should ask themselves what information they know about a customer for certain:

1. Does the customer work?
2. Does the Customer own a successful, legitimate business?
3. Does the Customer have known family wealth?
4. Has the Customer recently been released from prison?
5. Does the Customer associate himself with other known criminals?

If you answer **“NO”** to questions 1, 2 and 3 and **“YES”** to questions 4 and 5, then you must contact your regional manager for advice.

5.4 Collecting Information

To help establish and know your customers better, try the following:

1. Ask questions, but not too obvious. Do not make formal enquiries which will arouse suspicion and possibly alert the customer concerned.
2. Look at his mannerisms.
3. Establish who the customer associates with
4. Is the customer known in the area? Is there any gossip or local knowledge of the customer in question?

UK TRAINING MANUAL

6.0 Money Laundering

Money laundering is a term used to describe a process whereby criminals attempt to conceal the true origins or source of their criminal activity.

6.1 What activities undertaken by customers may indicate money laundering?

Examples Include:

1. Unusual betting patterns with an almost guaranteed return or little risk i.e. betting £1,000 on a 1/20 favourite.
2. Betting regularly on odds on favourites
3. Betting regularly significant amounts and when the customer wins, they ask for payment by cheque
4. When an unknown customer asks for payment by cheque
5. Stakes are unusually high or out of the ordinary for a known customer who is believed to be spending beyond their known means
6. A customer who regularly selects several runners in an event, and as long as one of the selections wins, they are willing to forfeit other stakes
7. Customers who regularly bet significant amounts and regularly select non-runners
8. Money inserted into a machine and then collected with very little or no play. In the case of cheques, Head Office will need to be informed of the request for cheque in order to process. It will be expected that the customer will be asked to provide ID before a cheque is issued. This will especially be the case for strangers or non-regular customers

If any of the above examples listed in **points 1 to 8** occur on a regular basis, you should contact the MLRO at MLRO@BoyleSports.com

Money laundering is a serious offence and it is a criminal offence to provide assistance to anyone attempting to launder money.

All staff employed by BoyleSports have responsibility under anti-money laundering legislation to ensure that bets placed with BoyleSports are not facilitating money laundering or the proceeds of crime

6.2 Who is our Money Laundering Reporting Officer (MLRO)?

[David Smith](#), is the Company's MLRO. Upon receiving information from staff he will determine whether a formal disclosure to the appropriate agency is required.

6.3 What should a member of staff do if they suspect money laundering?

If you suspect money laundering is occurring, contact the MLRO at MLRO@BoyleSports.com immediately. If the suspicions are well founded, our MLRO will pursue the matter further.

Please note it is a criminal offence for you to know or have reasonable suspicion of someone who is money laundering and fail to report this.

Once you have reported your suspicions to the MLRO, your responsibilities have been fulfilled and you should take no further action unless instructed.

It is important to note that under no circumstances should a customer be made aware that they are the subject of a report to the MLRO.

It is an offence under the Money Laundering Regulations to "Tip Off" a suspected money launderer.

UK TRAINING MANUAL

7.0 Irregular/Suspicious Betting

This relates to encountered information that might indicate suspicious betting activity and the use of such information.

1. You must report any indicators of irregular and/or suspicious betting to the Trading department. They will review the information received and escalate to the Compliance department where they feel irregular and/or suspicious betting has occurred.
2. As an employee of BoyleSports, you are not permitted to use information related to irregular and/or suspicious betting encountered or obtained from customer activity or otherwise, for the purpose of placing bets with BoyleSports or any other bookmakers.

8.0 Age Verification

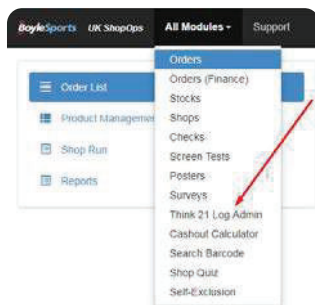
To help children and young people know the effects of gambling, the law states that no one under the age of 18 must enter a licensed betting shop. These include children under the age of 18 who may be with their parents as their parents place a bet. **IT IS A CRIMINAL OFFENCE FOR CHILDREN TO BE ON OUR PREMISES EVEN IF ACCOMPANIED BY AN INDIVIDUAL WHO IS OVER 18 OR AN ACCOMPANING PARENT OR GUARDIAN.**

In these modern times it is hard to establish how old someone is and if you are uncertain, always ask for identification.

REMEMBER OUR COMPANY POLICY IS "THINK 21".

If someone looks under the age of 21, you must ask for ID which should be one of the following:

1. Driving licence
2. Passport
3. Validate card
4. EU card
5. Pass logo (citizen card)



The interaction should be logged in the [Shop Ops portal](#) "Think 21" module at the time of the exchange and associated details recorded.

8.1 Procedure for Underage Customers

Under 18 – those who cannot produce any identification must be removed from the premises. These rules also apply to any children who are accompanied by an adult (Over 18), parent or guardian. These children must be asked to leave the premises immediately.

Bets – all bets that have been inadvertently taken from an under 18 will have to be returned to them. If an under 18 has placed a bet, the full name of the child and contact details of his/ her parents must be obtained and passed onto the UK Head Office, (172 Stratford Road, Shirley, Solihull, B90 3BQ) so that the parents or legal guardian of the child can be contacted and informed that their children have placed or tried to place bets in our premises.

Advertising – advertising by the Company will not be aimed at children or other vulnerable people.

UK TRAINING MANUAL

9.0 Responsible Gambling

If you have a suspicion that a customer may be displaying problem gambling signs as detailed in your Responsible Gambling training, you should discuss the customer with the shop manager who then should discuss with the regional manager immediately.

It is important that you remain safe at all times.

If you are approached by a customer who indicates they may have an issue:

1. You can discreetly direct them to the area in your shop which contains the relevant Problem Gambling leaflets
2. Politely let them know we have self-exclusion forms available
3. Inform the Manager on the day immediately
4. Remember, never ask a customer if they have a gambling problem

You should make a note of the number of customers you have spoken to on your weekly return sheet, where possible you should either file an incident report form (preferable) or make a note in the shop diary, recording who you spoke to and what was said or agreed.

You should also record the incident or suspicion by emailing compliance@boylesports.com, including details of any action taken, the date and time of the incident/report

Never attempt to advise a customer, only pass on the professional support contact information you have. It is important to remember that you have not been trained to counsel customers

9.1 Self-Exclusion Requirements

Information on where to seek help regarding gambling – Responsible Gambling Leaflets. Customer has the right to be seen privately while discussing self-exclusion.

Photograph for self-exclusion form for easy identification – this is a requirement.

Once a customer has requested self-exclusion, this is to last for 6 or 12 months and extends to not just betting but from the actual premises and 4 other premises. This is to ensure we are assisting with the local region requirements.

Upon expiry of the customer's initial exclusion period they may opt to review their exclusion. In these circumstances we must always allow the customer the opportunity of a 24-hour cooling off period prior to allowing them to return to gamble.

In light of the 24-hour cooling off period the customer is required to complete the return to betting form.

UK TRAINING MANUAL

SELF-EXCLUSION PROCEDURES

9.2 Self-Exclusion Procedures

9.2.1 Customer exhibits concerning behaviour:

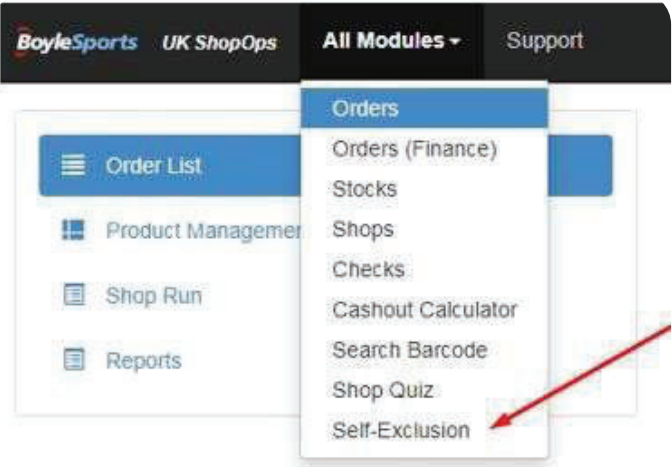
Manager	Approaches, regarding suspected problem gambling.
Manager	Provides problem gambling leaflets, and explains the existence, and implication of self-exclusion, including not only will customer not be allowed to gamble but also be restricted entry to his/her 5 selected branches. The customer should be given time to consider the options, if they do not wish to exclude themselves straight away, they should be given a copy of the agreement to take away.

9.2.2 Customer requests self-exclusion

Customer	Requests exclusion either immediately or after return.
Manager	Explain self-exclusion cannot be revoked during the 6 or 12 months specified on the agreement by the customer. Must also inform the customer at the expiry of the agreement should they wish to gamble with us, they will be required to fill out a return to betting form and wait 24-hours (cooling off period) before they may gamble. <u>Manager informs customer if 6 months after the expiry of the agreement, the customer has not been in contact the exclusion will be deemed as lifted.</u>
Customer and Manager	Complete the self-exclusion agreement; customer must decide how long they wish to be excluded for, (6 or 12 months). Customer must supply recent photograph to assist identification.

UK TRAINING MANUAL

SELF-EXCLUSION PROCEDURES

<p>Manager</p>	<p>Retains original white copy and forwards white copy to the Irish Head Office (Customer Services c/o: BoyleSports, Finnabair Industrial Park, Dundalk, Co. Louth, Ireland) bottom copy (normally pink) is returned to customer. All employees including new recruits during the exclusion period to be notified of exclusion. Complete weekly reports. Exclusion must be uploaded to the Shop Ops portal.</p> <p>After a customer completes a self-exclusion form you will need to copy the details from the form into the ShopOp's Portal Self-Exclusion module.</p>  <p>For full process details please see the 'UK Retail ShopOp's Portal Self-Exclusion End User Guide' that has been distributed to all shops.</p> <p>If you have any queries on this process, please contact the Customer Service team at CSTeam@boylesports.com or Tel: 0035342 9393168.</p>
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UK TRAINING MANUAL

SELF-EXCLUSION PROCEDURES

9.2.3 At the end of the chosen exclusion period:

Customer	Requests review and exclusion to be lifted. Required to complete return to betting form.
Manager	Reminds the customer should they wish to gamble with us, they will be required to fill out a return to betting form and wait 24-hours (cooling off period) before they may gamble. Upon completion the return to betting form (white copy) should be sent to the Irish Head Office (Customer Services c/o: BoyleSports, Finnabair Industrial Park, Dundalk, Co. Louth, Ireland)

Or:

Customer	Request extension to self-exclusion agreement and fills in new agreement.
Manager	Follows procedure above for new agreement.

Or:

Customer	Does not return after self-exclusion period.
Manager	After 6 months has passed the exclusion agreement can be considered to be expired and exclusion lifted.

UK TRAINING MANUAL

10.0 Machines – Fixed Odd Betting Terminals (FOBT's)

It is important to protect children and other vulnerable persons from being harmed or exploited by gambling. It is also important to keep crime or proceeds of crime out of our business.

With this in mind, machines in our shops are subject to the following standards:

10.1 Anti-Money Laundering Software

Anti-money laundering software has been installed in all our gaming machines. Fraud and/ or anti money laundering notices will be displayed on your back-office computer should the following occur in larger staking sessions:

Less than 25% of the total credit inserted into the machines has been played, i.e. a customer has inserted £1,000, but then the customer wants to collect after only staking £250.00 or less.

If the above scenarios occurs, your back-office computer will display a warning message and you should then undertake one of the following:

- a) Establish whether the customer is a regular (i.e. bets with the company regularly) and ascertain the reasons why the customer has not bet all of the money he/she has inserted. If you are happy with his/her answers, please pay the customer.

OR

- b) If the customer is not regular or a complete stranger or you are not satisfied as to why the customer has withdrawn his/her money from the machine without sufficient plays, please check the cash inserted into the machine. In particular, please check for suspicious notes or coins. If however you feel that your safety is at risk from doing this, please inform the customer that you require clearance from Head Office and contact the Security Department for further advice.

The Anonymous Player Awareness System alerts you if the player behaviour is more likely to become a problem session. The principle of this is to alert you before the player actually has a problem.

1. Chaotic Play Alert

Multiple instances (>10) of Cash Insertions (>£5) during a session. At current parameters, Chaotic Play alerts occur in 2.3% of all sessions

2. Extended Losing session alert

Session duration >30 minutes and player loss >£250. (circa 1.3% of sessions per week).

You should pay closer attention to these sessions where an alert has been triggered and be prepared to interact with the customer if they display and further triggers or their behaviour changes.

UK TRAINING MANUAL

10.2 Maximum Stakes and Payouts

From the recent legislation change in April 2019, machines are subject to a maximum stake of £2 and a maximum payout of £500 within one spin. Higher staking roulette games are no longer available.

All employees should all be aware that all machines have information available both from the main menu and inside each game containing;

1. GamCare Telephone number and contact details
2. No under 18 Play sign
3. Payout limit on the machine – i.e. £500
4. Percentage payout to the customer for each game played at every staking level
5. Direction towards the help pages on the machine

11.0 Recording, Reporting, and Disclosure of Information

Objectives:

1. Gambling is seen to be fair
2. To help children and vulnerable people know the effects of gambling
3. Visits to be made by management to the premises to make sure that compliance is being enforced
4. Compliance and incident forms to be completed on a weekly basis and sent to UK head office ([172 Stratford Road, Shirley, Solihull, B90 3BQ](#)) on a weekly basis in the prescribed format

UK TRAINING MANUAL

12.0 Shop Manager's Guidance

12.1 The Weekly Compliance Return:


The weekly compliance return and incident reports are an integral part of our compliance programme, they are required to be completed in the appointed manner as part of our commitment to our licence requirements, therefore they should be completed as required, as failure to do so may have serious consequences.

This return must be emailed to hquk@boylesports.com every Monday.

- In the box next to branch name and code, the name of the shop you are working in should be inserted. In the example provided below 'Blackheath 1002' has been entered
- Next to week ending, the last day of the working week should be inserted as example below
- Number of incidents reported each week should match the number of incidents recorded in each section on the sheet.
- Manager on Duty – The acting manager on duty each day must record their name in this section


It is advisable where an incident(s) has occurred on a particular day to note these as the week progresses to avoid mistakes.

The weekly returns are designed to run concurrent with your shop figure reporting weeks for ease of use.

		Compliance Returns					
Weekly Compliance Return							
Branch Name and Code:	BlackHeath 1002	Week Ending:	23/08/2020				
Number of Incidents to be Reported this week:	2						
Manager On Duty							
	Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Name of Manager on Duty each day	Joe Bloggs	Mary Ryan	Joe Bloggs	Joe Bloggs	John Doe	Mary Ryan	Joe Bloggs
Under 18's Or Those With No Proof of Age When Challenged							
	Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number Entering premises	1	1	0	0	0	0	0
Number of people successfully gambling who subsequently had no proof of age when asked	0	0	0	0	0	0	0

UK TRAINING MANUAL

The Weekly Compliance Return:

		Compliance Returns						
Weekly Compliance Return								
Branch Name and Code:		Week Ending:						
Number of Incidents to be Reported this week:								
Manager On Duty								
		Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Name of Manager on Duty each day								
Under 18's Or Those With No Proof of Age When Challenged								
		Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number Entering premises								
Number of people successfully gambling who subsequently had no proof of age when asked								
Think 21								
		Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number of people who provided ID to prove legal age								
Number of people who were unable to provide ID to prove legal age								
Responsible Gambling								
		Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number of Self Exclusion enquires								
Number of Self Exclusions completed								
Number of known breaches of Self Exclusion								
Number of Self Excluded customers seeking return to betting after period has expired								
Number of customers spoken to regarding their gambling or directed to help Leaflets etc.								
Number of Report sent with name if known								
FOBT Alert Logging								
		Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number of Responsible Gambling engagements reported								
Number of Money Laundering incidents reported								
Number of Customers discussed with Head office								
Police Assistance								
		Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number Concerning Under 18's								
Number Concerning Responsible Gambling								
Number Concerning Bet Disputes								
Number of Reports Sent								
Money Laundering								
		Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number of Incidents Reported								
Number of Customers Discussed With Head office								
Official Visits								
		Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number of Gambling Commission Visits								
Number of Local Authority officer Visits								
Number of Customs And Excise officer Visits								
Number of Company Auditor Visits								
Internal Visits								
		Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number of Other Non Company Internal Visits, e.g. Maintenance, Repair Works, Machine Engineers etc..								
Number of Internal Company Visits								
Signature:		Date:						

UK TRAINING MANUAL

12.2 Under 18's Incidents:


If you have an incident of an under 18 being present in the shop you must in addition to asking them to leave make a "Think 21" logging at the time of the exchange, and record the number of such incidents each day. Please see the ShopOp's Portal "Think 21" logging process under section 8.0 'Age Verification'.

Under 18's incidents are broken down into two distinct areas, reportable and non-reportable incidents, where an incident is reportable the manager or person dealing with the incident should fill the incident report document - that day. Within the report should be sufficient information to assist the company in identifying any issues which may have occurred and reasons for the report.

Reportable under 18's incidents are those where individuals known to be under the age of 18, or those who provide insufficient/ unsatisfactory identification when requested, attempt to gamble or successfully gamble before being challenged.

Non reportable incidents are those where those who are known or suspected to be under 18 attempt to enter the premises but not gamble.

These also included incidents where young persons may seek to loiter or enter our premises. This activity will not require a report unless police assistance is required to move the young person's along.

			
Under 18's (Think 21)			
Any Under 18's (Think 21) incidents must be completed on day of incident. A Separate report must be filled in for each incident.			
Compliance Report Return - Under 18's (Think 21)			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - Under 18's (Think 21)			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - Under 18's (Think 21)			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - Under 18's (Think 21)			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			

UK TRAINING MANUAL

12.3 Think 21 Logging

Any incidents where you have had to ask a person present in your shop to produce ID to prove their age must be recorded daily.

This section is broken down into two parts. Persons who were able to prove their age by producing ID and Persons who were unable to prove their age with no ID.

Both incidents must be logged on the Think 21 portal also.



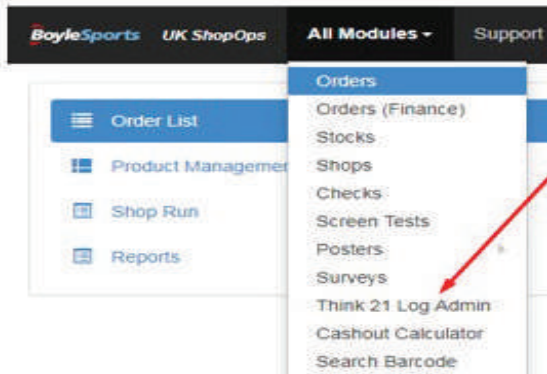
Think 21 Logging

Any Interactions with customers who produced ID to confirm over 18 must be logged on day.

Branch Name:					Branch Code:			
Employee:					Date:			
DATE	STAFF NAME	NAME	ADDRESS	DOB	FORM OF ID	ID NO.	ID TIME	BRIEF DISCRPTION

The interactions should also be logged in the Shop Ops portal "Think 21" module at the time of the exchange and associated details recorded.

<http://portal.boylesports.com/UKShopOps/home/Login>




UK TRAINING MANUAL

12.4 Responsible Gambling Incidents

The number of each individual incident per day should be recorded as per the under 18's section.

Should a customer you know to be self-excluded seek to gamble in or enter the premises you should make a note of this and fill in a report detailing the incident and individual concerned.

Any individual seeking to return to gambling after their initial period of self-exclusion is required to complete a Return to Betting form confirming his/her intention to return to betting, before any bets are accepted. This form must be returned to the Irish Head Office (Customer Services c/o: BoyleSports, Finnabair Industrial Park, Dundalk, Co. Louth, Ireland), a brief report should also be filed noting this has occurred.

		
Responsible Gambling		
Any Responsible Gambling incidents must be completed on day of incident A Separate report must be filled in for each incident.		
Compliance Report Return - Responsible Gambling		
Branch Name:		Employee:
Date:		Incident Time:
Full detailed Report of Incident to be filled in below		
Compliance Report Return - Responsible Gambling		
Branch Name:		Employee:
Date:		Incident Time:
Full detailed Report of Incident to be filled in below		
Compliance Report Return - Responsible Gambling		
Branch Name:		Employee:
Date:		Incident Time:
Full detailed Report of Incident to be filled in below		
Compliance Report Return - Responsible Gambling		
Branch Name:		Employee:
Date:		Incident Time:
Full detailed Report of Incident to be filled in below		

UK TRAINING MANUAL

12.5 FOBT Alert Logging


The following outlines the required shop staff actions to an FOBT alert when a customer's game play or terminal usage triggers an alert within your shop. It is important that all alerts are actioned and accounted for as we strive to ensure customers safety whilst using Boylesports FOBT's.

Several alerts can display on the FOBT back office in relation to customer's terminal usage and it is important to understand the required action for each for them.

Types of FOBT alerts:

- Voluntary time/spend alerts
- Chaotic play alert
- Default time limit alert
- Extended session loss alert


Any interaction between a staff member and a customer in relation to the FOBT alerts or customer behaviour will need to be accounted for on your shop's weekly compliance sheet. Provide as much information as you can, along with the nickname that the individual has been tagged as on the back office. A Separate report must be filled in for each incident.

			
FOBT Alert Logging			
Any interactions with customers based on FOBT Alerts must be completed on day of incident. A Separate report must be filled in for each incident.			
Compliance Report Return - FOBT Alert Logging			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - FOBT Alert Logging			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - FOBT Alert Logging			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - FOBT Alert Logging			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			

UK TRAINING MANUAL

12.6 Police Assistance


We accept it is extremely rare for any shops to require police assistance, especially so without first contacting the Security Department, however where police assistance is required, or where Police attend for any reason, regardless of the Security Department already being aware, all incidents should be recorded and a report filed on the day noting the brief reasons why the police needed to attend and the outcome. Where possible the number of incidents should be recorded under the relevant headings.

			
Police Assistance			
Any incidents requiring Police Assistance must be recorded on day of incident. A Separate report must be filled in for each incident.			
Compliance Report Return - Police Assistance			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - Police Assistance			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - Police Assistance			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - Police Assistance			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			

UK TRAINING MANUAL

12.7 Money Laundering

You should already be aware of the details of what to look out for in relation to money laundering and the proceeds of crime, which are contained within this training manual. In the event you have serious concerns that your customers are predominantly funding their lifestyle/ gambling from illegal activity, you should try to find out as much detail as possible about them, for example, often you will hear gossip in the shop or throw away remarks. If you hear anything or are still concerned you should contact your regional manager for further advice or email the MLRO at MLRO@BoyleSports.com. You should record the number of such reports on your return form. A separate report is required for each incident.


			
Money Laundering			
Any concerns with Money Laundering in shop must be recorded on day of incident. A separate report must be filled in for each incident			
Compliance Report Return - Money Laundering			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - Money Laundering			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - Money Laundering			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - Money Laundering			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			

UK TRAINING MANUAL

13.0 Official and Internal Visits

13.1 Official Visits


The total number of official visits per day from each of the listed persons should be recorded and a report filed noting what the official did and what if anything they requested or asked from or of you. As with previous company rules, you must always seek identification and notify UK Head Office prior to and in the event of any person claiming to be an official requiring access to any sensitive part of the premises, including behind the counter, if they are genuine officials they will understand this security requirement.

			
Official Visits			
Record any Official Visitors to shop on day of visit. A separate report must be filled in for each visit			
Compliance Report Return - Official Visits			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Official visit and by whom to be filled in below			
Compliance Report Return - Official Visits			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Official visit and by whom to be filled in below			
Compliance Report Return - Official Visits			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Official visit and by whom to be filled in below			
Compliance Report Return - Official Visits			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Official visit and by whom to be filled in below			

UK TRAINING MANUAL

13.2 Internal Visits

In the event of any internal visits from Head Office employees or the company internal auditor(s) you should note the number of such visits per day. A separate report is required for each incident. If you are unsure the person is from head office, you should check before allowing access behind the counter.

			
Internal Visits			
Record any Internal Visitors to shop on day of visit. A separate report must be filled in for each visit			
Compliance Report Return - Internal Visits			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Internal Visit and by Whom to be filled in below			
Compliance Report Return - Internal Visits			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Internal Visit and by Whom to be filled in below			
Compliance Report Return - Internal Visits			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Internal Visit and by Whom to be filled in below			
Compliance Report Return - Internal Visits			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Internal Visit and by Whom to be filled in below			

UK TRAINING MANUAL

14.0 Policies

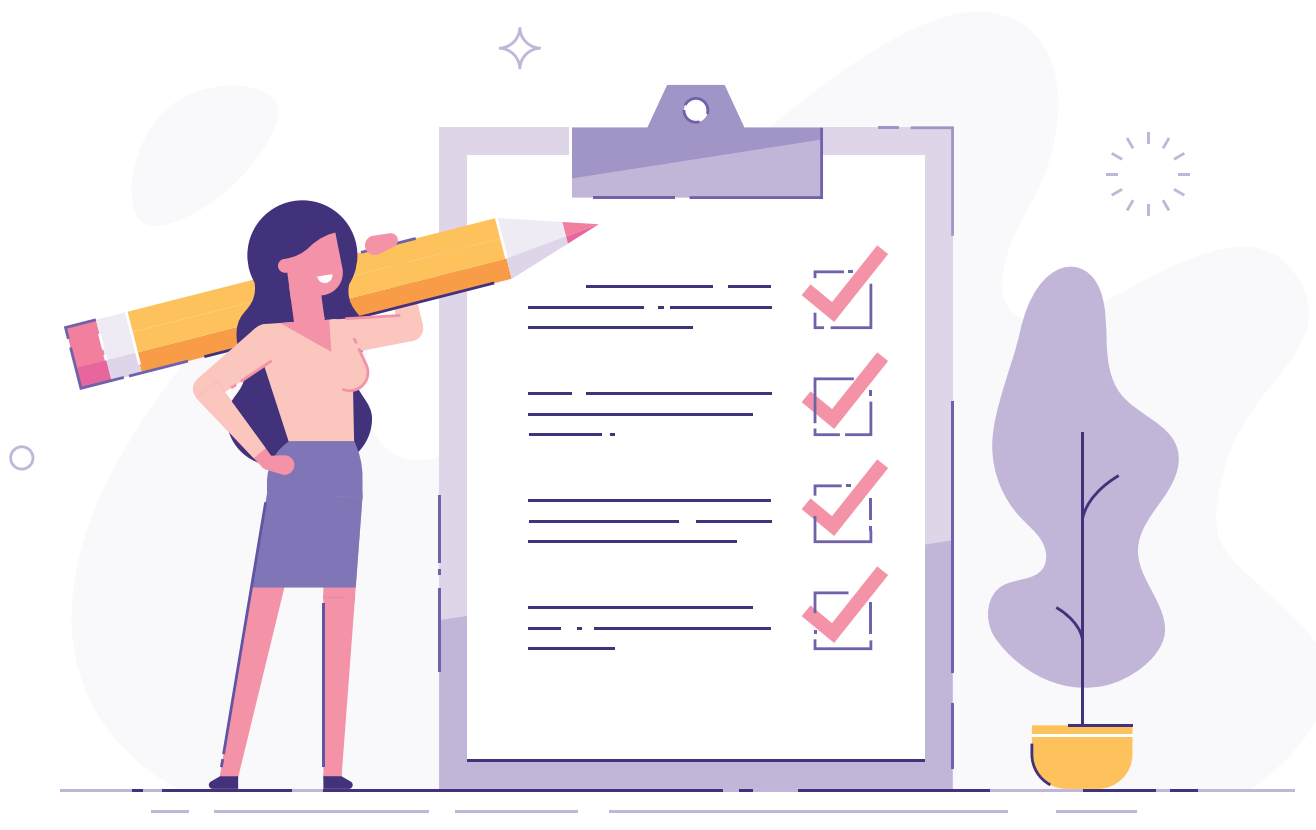
Policies location

BoyleSports policies are available on the BoyleSports Sharepoint

<https://boylesports.sharepoint.com/sites/BoyleSportsShops> under 'Security', then 'Policies' tab.

These policies are for your reference and are confidential BoyleSports documentation.

They should not be printed out or distributed outside of the company. They are for staff reference only.



RESPONSIBLE GAMBLING GUIDE

Responsible Gambling

- For the vast majority of people, gambling will always be a fun leisure activity but for some, it can become a problem
- It is our job, as a responsible gambling operator, to ensure we have the safeguards and services in place to minimise or prevent customers from developing a problem with their betting
- Your training, plus the tools we have in place, will help prevent the occurrences of problem gambling developing

What is this guide for?

- Increase your knowledge and understanding of Responsible Gambling
- Give you the information and tools you need to identify and support people who may have a gambling problem

Social bettors are your betting shop regulars

- Social bettors make up the vast majority of your betting shop customer base
- Social bettors consider a bet to be a valid form of recreational activity
- They maintain full control over the time, money and energy they spend on betting
- They consider the cost of betting to be payment for entertainment
- They are open with family and friends about their betting

Recognising a Problem Gambler

- Problem gambling is behaviour related to betting which causes issues for the individual and those around them, including family and friends
- There is no one sign that a person may have a gambling problem, it may not even be that obvious
- However there are some signs you should look for:
 - Betting on every race and anxious if a bet is missed
 - Betting large stakes at start of visit and finishing with small bets
 - Showing extreme anxiety or pressure when watching a race or sporting event
 - Finding it difficult to stop betting at closing time
 - Asking for credit or another customer for money
 - Trigger words used like "no money left to do the shopping" or "that's the holiday cancelled"

RESPONSIBLE GAMBLING GUIDE

What should you do first?

- If you **have a suspicion** that a customer may be displaying problem gambling signs, you should discuss the customer with the shop manager who then should discuss with the regional manager immediately
- It is important that you remain safe at all times
- If you are **approached by a customer** who indicates they may have an issue:
 - You can discreetly direct them to the area in your shop which contains the relevant Problem Gambling leaflets
 - Politely let them know we have self-exclusion forms available
 - Inform the Manager on the day immediately
 - Remember, **never** ask a customer if they have a gambling problem

What should you do next?

- You should also **record the incident** or suspicion by emailing compliance@boylesports.com, including details of any action taken, the date and time of the incident/report
- Never attempt to advise a customer, only pass on the professional support contact information you have. It is important to remind staff that they have not been trained to counsel customers
- This training is designed to inform staff of the process if approached by a customer who conveys they have a gambling problem and **not to have staff provide professional support**

Self-Exclusion step-by-step guide

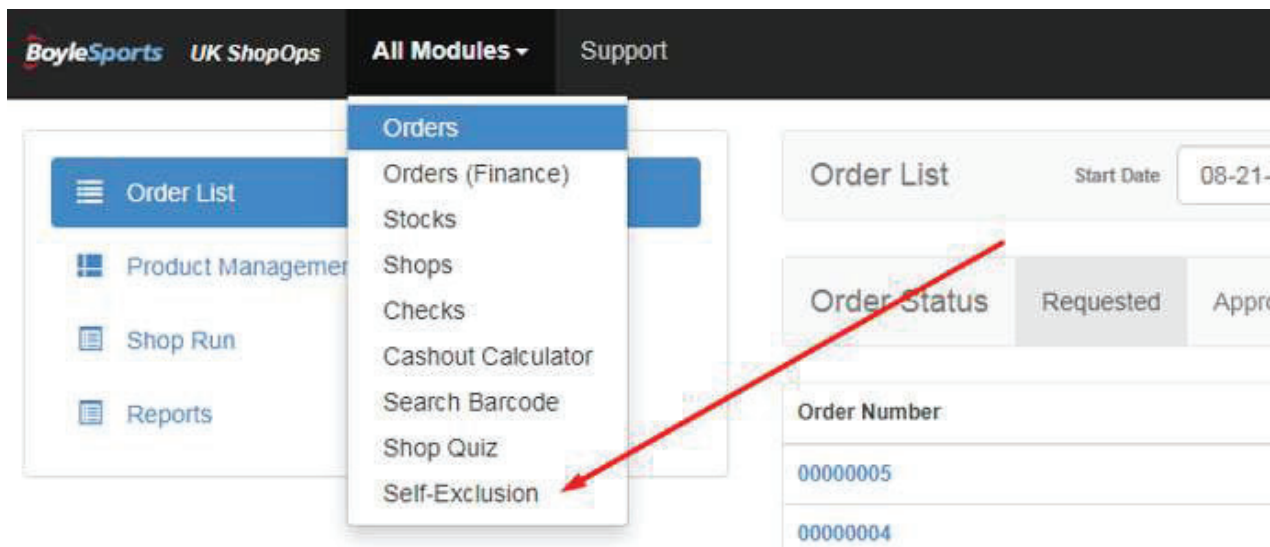
- Every shop must have a self-exclusion booklet which contains sets of 2 pages:
 - 1 page for a Head Office copy (white)
 - 1 page for customer copy (pink)
- If a customer requests a Self-Exclusion form, please remember to treat it with absolute discretion
 - 1** Give the customer a (2-part) Self-Exclusion form, explaining all sections which need to be completed
 - 2** Ask customer to return completed form with Passport photo*
 - 3** Give the completed form and photo to your shop manager
- * A **photo is a compulsory** inclusion with the form for identification purposes. This is particularly important if the customer wishes to exclude from additional shops. The self-exclusion will be invalid without this photo

RESPONSIBLE GAMBLING GUIDE

Self-Exclusion – Online Portal

- After a customer completes a self-exclusion form you will need to copy the details from the form into the ShopOp's Portal Self-Exclusion module.

The ShopOp's portal can be accessed at <http://portal.boylesports.com/UKShopOps/>



- For full process details please see the 'UK Retail ShopOp's Portal Self-Exclusion End User Guide v1.docx' that has been distributed to all shops.
- If you have any queries on this process please contact the Customer Service team CSTeam@boylesports.com or [Tel: 0035342 9393168](tel:00353429393168).

End of Exclusion

- If a customer wishes to start betting at the end of their self-exclusion, they are required to sign a Return to Betting form
- This form is a record that the customer is aware their self-exclusion has expired and wishes to re-commence betting with BoyleSports in the shops the customer self-excluded from
- The customer can only bet with BoyleSports from the completion of the form
- The form must be filled in by the customer with staff member present
- The form must be signed by the customer and witnessed by the staff member dealing with the query
- Every shop should have a Return to Betting booklet which contains sets of 3 pages:
 - 1 page for a Head Office copy (white)
 - 1 page for customer copy (pink)
 - 1 page for a shop copy (blue)

RESPONSIBLE GAMBLING GUIDE

Self-Exclusion Timelines

- A customer can self-exclude for a minimum of 6 and maximum of 12 months
- After the exclusion ends the customer must return and fill out a new self-exclusion form if they want it to continue, otherwise it will automatically lapse 6 months after this time
- If they have specified another time period, (e.g. "Life"), this will not apply. They still need to return or call Customer Service after exclusion expiry and complete a new form
- When the self-exclusion has ended (and they choose not to complete a further self-exclusion form) the customer must complete a Return to Betting Form before they are allowed to place a bet again
- Please inform the customer that the agreement is between them & BoyleSports only. They will need to self-exclude with other operators directly or via MOSES (Multi-Operator Self-Exclusion Scheme)

Updated UK Customer Self-Exclusion Form

Maximum of 5 shops (Shop signed in plus 4 others). All shops is not an option.

Photo now mandatory or agreement void

Two sections to help identify the customers online account/BoyleExtra Account. Box 1 is to ensure no BoyleExtra related items are sent to the customer during exclusion including prizes etc.

The customer must fill in the 2nd box to have exclusion extended to online accounts. First box is for retail BoyleExtra identification only.

RESPONSIBLE GAMBLING GUIDE

Customer Return To Betting Form



I, _____, confirm that my self-exclusion dated ___ / ___ / _____ to ___ / ___ / _____ has now expired.

I am happy to return to betting with BoyleSports. I understand that my previous exclusion is now no longer in effect and if I wish to continue self-exclusion I must complete a new request and provide up to date details and photographs.

I also understand that any new self-exclusion will only be in effect from the completion of new self-exclusion agreement and any bets placed from the signing of this form until the new self-exclusion stand win or lose.

Signed: _____ Witness: _____ (Shop Manager)
Date: ___ / ___ / _____ Date: ___ / ___ / _____


All copies of this form will be retained by BoyleSports and will be treated in the strictest of confidence.

Support Available For Problem Gambling

- Support is available for people affected by problem gambling
- The main information provider is BeGambleAware.org
- The National Gambling Helpline Freephone number is [0808 8020 133](tel:08088020133)
- A Live Chat option is also available at <https://www.begambleaware.org/>
- If a customer mentions directly or indirectly the possibility or thought of self-harming, you must act immediately :
 - Call your Regional manager and security, who will take the appropriate action
 - Ensure the customer is aware of the location of Problem Gambling literature
 - Do not serve the customer if they attempt to place any more bets
- Once the customer has been assisted, make a record by sending details to compliance@boylesports.com

RESPONSIBLE GAMBLING GUIDE

Leaflet - fFor Self-Excluded Customers



Information for self-excluded customers.

More information overleaf

WHEN THE **FUN** STOPS **STOP**
BeGambleAware.org

18+

Information for self-excluded customers.

Self-exclusion is a tool available to help those who find it difficult to gamble responsibly. For more help, support, and advice on how to gamble responsibly, call the National Gambling Helpline on 0800 8020 133 or visit be gamble aware.org

Now that you have chosen to self-exclude, please remember the following important points:

- Please read the self-exclusion form thoroughly. If there is anything you do not understand please call our Customer Service Department on 0800 22 00 66.
- Our staff will endeavour to assist you and prevent you from gambling if required, but the onus lies with you. Please do not attempt to enter our shops.
- Photo identification needs to be provided in order for you to enter into a self-exclusion agreement. Supplying a photograph assists our staff greatly in identifying you as a self-excluded customer. If your appearance changes markedly from the photograph provided, please consider supplying us with an up to date photograph.
- The self-exclusion applies to the shops requested on the self-exclusion form (maximum 5). Where no further shops are indicated we will endeavour to extend the self-exclusion to shops local to your provided address and any online account disclosed. Please allow up to 7 days for the exclusion to be fully applied to additional branches and accounts.
- This self-exclusion applies only to BoyleSports group companies. To be excluded from any of our competitors contact the Multi-Operator Self Exclusion Scheme (MOSES) helpline on 0800 294 2060.
- The period of self-exclusion is for either 6 or 12 months. After this time has expired you can extend your exclusion for a further 6 or 12 months by calling 0800 22 00 66. Alternatively, you can return to the shop and complete another self-exclusion form. Renewal of your exclusion can continue for as long as you feel it necessary.
- If at the end of the self-exclusion period, you wish to resume use of BoyleSports gambling facilities, you will be asked to sign a return to betting form. A further one-day 'cooling off' period will apply before you will be allowed to gamble.

WHEN THE **FUN** STOPS **STOP**
BeGambleAware.org

18+

RESPONSIBLE GAMBLING GUIDE

Leaflet - For Responsible Gambling



Please Gamble Responsibly

NEED HELP?

CALL THE NUMBER BELOW, VISIT THE WEBSITE, OR DOWNLOAD THE GAMBLING THERAPY APP
FULL DETAILS PROVIDED OVERLEAF

NATIONAL GAMBLING HELPLINE
0808 8020 133
begambleaware.org

WHEN THE **FUN** STOPS **STOP**

BeGambleAware.org

18+

Gambling should be an exciting and enjoyable form of entertainment for all our customers.

However, if you recognise that you or someone close to you is showing any of the following signs it could be that a problem is starting to develop:

- Continuing to gamble to try and win back previous losses until all money is gone
- Borrowing money to continue gambling
- Hiding the extent of gambling from family and friends
- Suffering financial difficulties caused by gambling
- Neglecting the welfare of themselves and their family as a result of gambling
- Feeling unable to take a break when gambling for prolonged periods of time for fear of missing out on a win

For immediate help and support in confidence, please call the **NATIONAL GAMBLING HELPLINE** free on **0808 8020 133**, visit the website at www.begambleaware.org or download the Gambling Therapy app (see below).


The helpline is operated by the charity GambleAware, a leading national provider of free information, advice and support for anyone affected by problem gambling.

Further information is also provided on their website at:
www.begambleaware.org

Our commitment to responsible gambling provides you with the facility to set personal spend and time limits on our gaming machines to help manage your play. An automatic reminder is also displayed once a fixed period of time or spend has been reached to further assist you.

Alternatively, if a complete restriction from gambling is required, there is also the option to 'self-exclude' yourself from the premises for a renewable period of 6 or 12 months - just ask a member of staff for details. Or if you wish to extend this to all betting operators in your local area, contact the Multi-Operator Self Exclusion Scheme (MOSES) helpline on 0800 294 2050.

DOWNLOAD THE GAMBLING THERAPY APP TODAY!



Get it on Google Play | Download on the App Store

RESPONSIBLE GAMBLING GUIDE

In Shop Point Of Sale

- All shops should be displaying the A3 perspex wall mounted unit featuring backing sheet and the two Responsible Gambling leaflets
- This unit should be easily accessible to your customers and placed near the door where possible



FOBT ALERTS

The following outlines the types of FOBT alerts and the actions that are required by the shop staff when a customer's game play or terminal usage triggers one within your shop. Its important that all alerts are actioned and accounted for as we strive to ensure customers safety whilst using BoyleSports FOBT's.

Several alerts can display on the FOBT back office in relation to customer's terminal usage and it is important to understand the required action for each for them.

Types of FOBT alerts:

- A customer can either pay by card or hand over cash to a staff member.
- Voluntary time/spend alerts
- Default time limit alert
- Chaotic play alert
- Extended session loss alert

Staff's Actions to FOBT Alerts

Several staff actions or requirements may arise or result on the back FOBT alerts being triggered from a customers FOBT game play. The actions and requirements on the staff are a fundamental part of ensuring responsible gambling and customer safety while using BoyleSports FOBT's.

The following are the actions and requirements by shop staff in relation to FOBT Alerts and responsible gambling. There are three stages need to be strictly followed:

1. Customer sets a limit for time/spend during the FOBT game play session.
 - Take note and monitor the customers behaviour during the session
2. An initial alert being triggered by a customer during the session and opts to continue game play past the alert.
 - Customer's behaviour should be monitored while using the terminal from then forward
 - i. How is the customer behaving?
 - ii. Should you approach the customer and ask if they are ok?
 - iii. Do you feel comfortable doing so?
3. Same customer triggers the same alert for a second time during the game play session
 - Customer should be approached if you feel comfortable in doing so
 - i. Ask the individual if they would like a Tea/Coffee and if they are ok?
 - Customer should be tagged on the back office and business should be closed monitored
 - i. If you are unsure how to tag a customer, then please refer to the customer tag manual
4. If customers behaviour/losses start to become a concern, then you need to contact your Regional Manager or Retail Machine Manager
 - RM or RMM will provide instruction to the best of course of action following a review of the individuals gameplay business levels with the staff member

FOBT ALERTS

Any interaction between a staff member a customer in relation to the FOBT alerts or customer behaviour will need to be accounted for on your shop's weekly compliance sheet. Provide as much information as you can, along with the nickname that the individual has been tagged as on the back office.

FOBT Alert Logging							
	Mon	Tues	Weds	Thurs	Fri	Sat	Sun
Number of Responsible Gambling engagements reported							
Number of Money Laundering incidents reported							
Number of Customers discussed with Head office							



FOBT Alert Logging

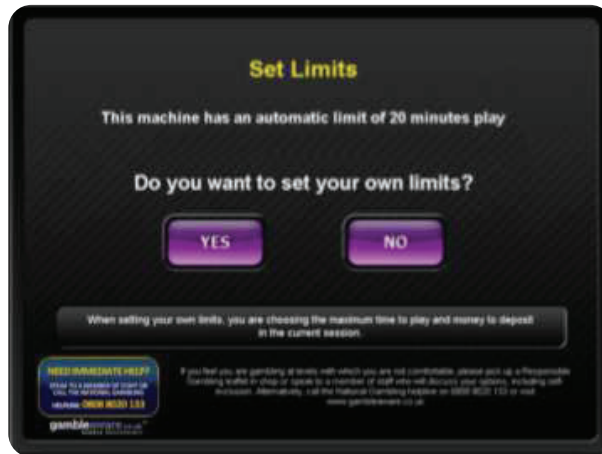
Any interactions with customers based on FOBT Alerts must be completed on day of incident.
A Separate report must be filled in for each incident.

Compliance Report Return - FOBT Alert Logging			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Interaction to be filled in below			
Compliance Report Return - FOBT Alert Logging			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - FOBT Alert Logging			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			
Compliance Report Return - FOBT Alert Logging			
Branch Name:		Employee:	
Date:		Incident Time:	
Full detailed Report of Incident to be filled in below			

FOBT ALERTS

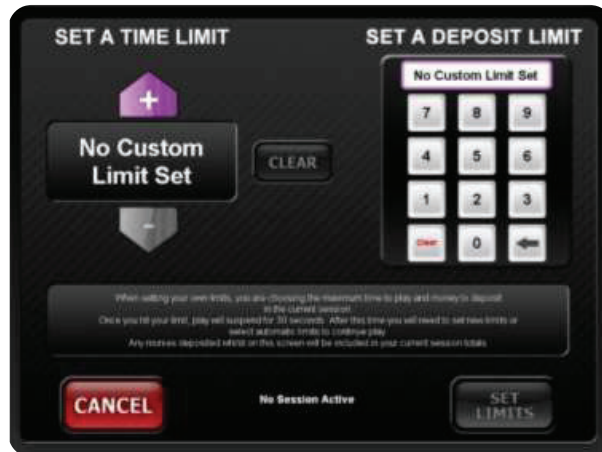
Voluntary time/spend Limit

When a customer first inserts credit to an FOBT at the start of a gameplay session, a pop-up alert will appear on the terminals for the customer. This alert will ask the customer if they want to set a time limit to their gameplay



If the customer does not wish to set a time limit and selected 'No' on the pop-up, then the pop-up will disappear, and the default time limit reminder of 20 minutes will apply. No back-office alert will display to this action.

If the customer has decided to set a voluntary time limit by pressing the 'Yes' button, then the below pop-up gets displayed on the terminals screen.



At this stage, the customer set the following:

- Set a Time limit
- Set a Spend limit
- Set both limits
- Cancel
 - In which case default time limit reminders will apply

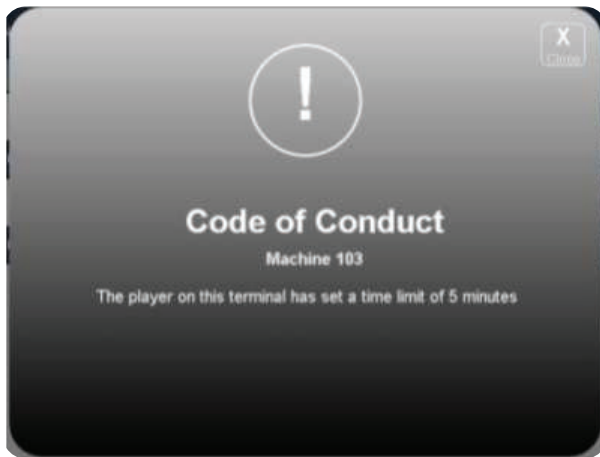
FOBT ALERTS

Once any of the above limits have been set by a customer and the 'Set Limits' button has been pressed, an appropriate Back-Office alert will be triggered to alert a member of staff.

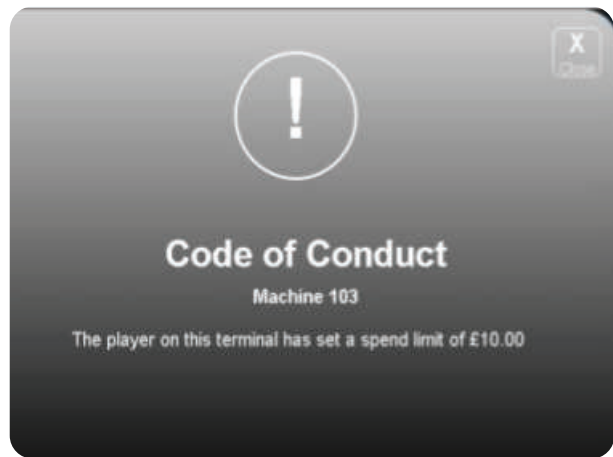
Alerts will not be triggered on the back office if a customer has pressed 'Cancel' button to dismiss the Set Limits popup.

Regardless of whether a customer has set voluntary limits, the default time limit reminders will still apply and will be triggered after every 20 minutes during active session.

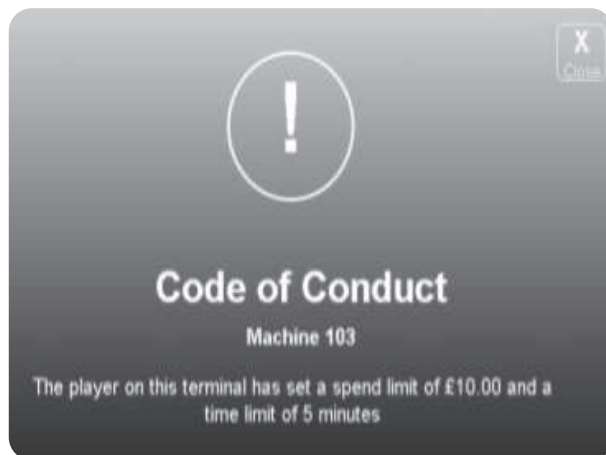
The below alert will display on the Back-Office if a customer has set a time limit.



The following alert will display on the Back-Office if a customer has set a spend limit.



The below alert will display on the Back-Office if a customer has set a time and spend limit.



FOBT ALERTS

Voluntary Spend Limit Breach - Terminal Alert

This alert gets displayed on the terminal after a voluntary spend limit, that was set by the customer, has been triggered. The customer at this stage is being presented with three options:



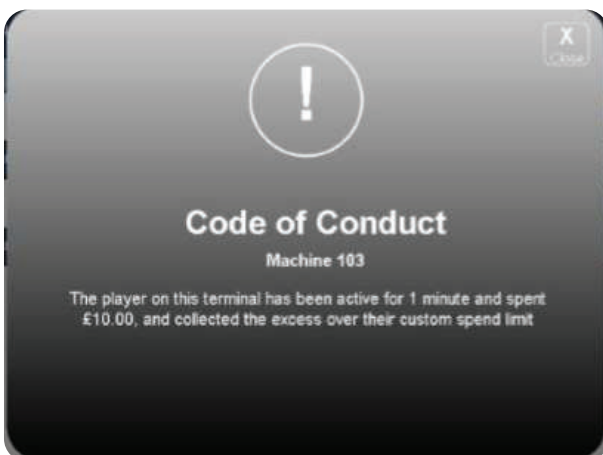
1. Collect Excess
- Prints a ticket for the remainder of the credit
2. Continue with defaults
- Default time limit remainders will take place
3. Set your limits
- Customer can set new limits

If the customer selects the 'continue with defaults' or 'set your limits options, then a cool-off period will apply. The customer will be able to continue with the game play once the cool-off period has concluded.

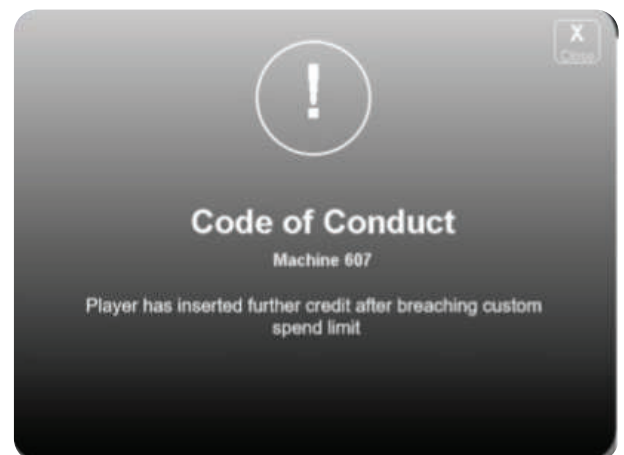


Voluntary Spend Limit Breach - Terminal Alert

The below alert will display on the back office if a customer has triggered a set spend limit.



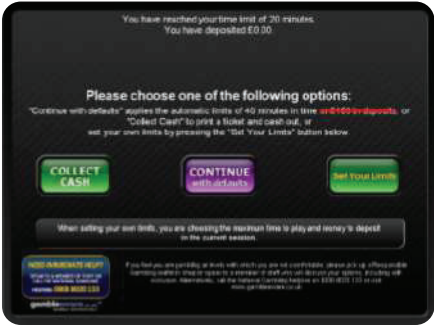
The below alert will display on the back office when a customer adds further credit after breaching the voluntary customer spend limit.



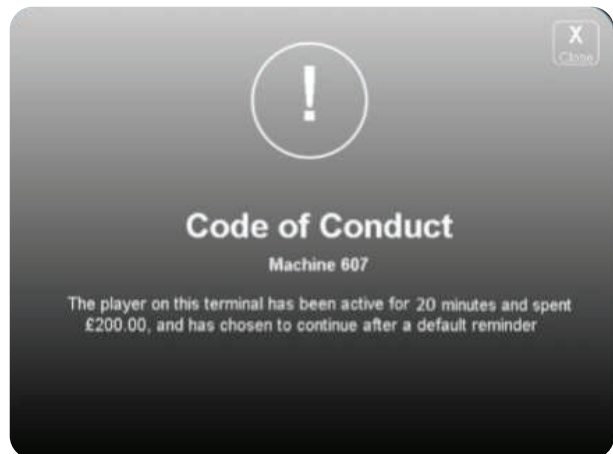
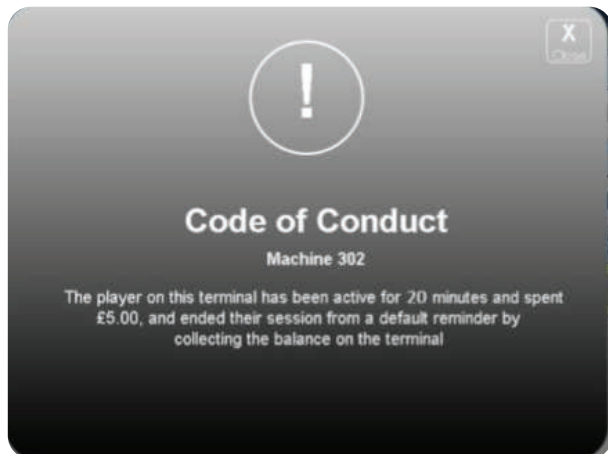
FOBT ALERTS

Default Time Limit reminder - Terminal Alert

This alert gets displayed to a player every 20 minutes regardless of whether voluntary limits have been set or player has decided not to set limits for a current session.

1.  Collect Cash
- This will end the current session
2. Continue with defaults
- Default limit reminders for time will take place
3. Set your limits
- A player can set new voluntary limits

Default Time Limit reminder - Back Office Alert



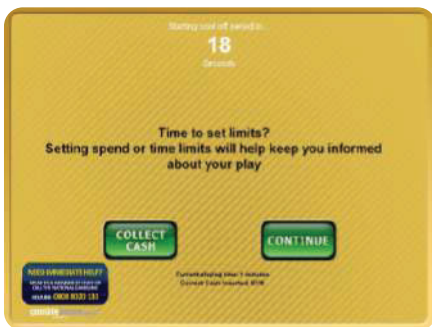
FOBT ALERTS

Chaotic Play Alerts

When more than 10 instances of cash (£5 or more) being inserted on multiple occasions during a session.

Chaotic Play - Terminal Alert

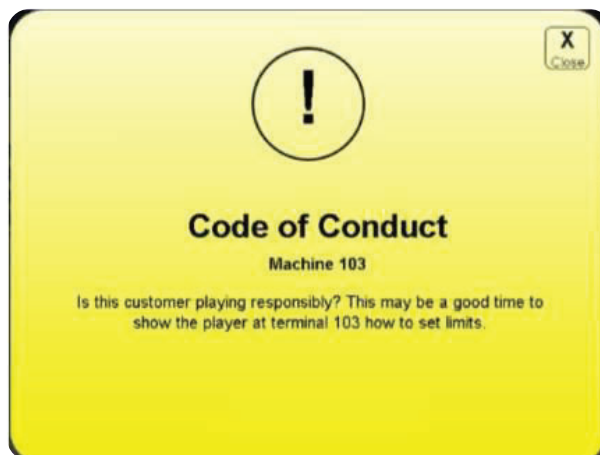
The Chaotic player behaviour alert can triggered by a customer only once per single session if its criteria has been met. The initial alert message remains on screen for up to 20 seconds. At this stage, the player can either:



1. Collect Cash
- This will end the current session
2. Continue
- Continue play

Chaotic Play - Back Office Alert

Below is the back-office alert that appears when a Chaotic Play Alert is triggered on one of your shops FOBT's.



FOBT ALERTS

Extended Session Lose Alert

When current loss levels are equal or exceeded £250 threshold as well as session time is equal or has exceeded 30 minutes threshold for a single session.

Extended Session Losing - Terminal Alert

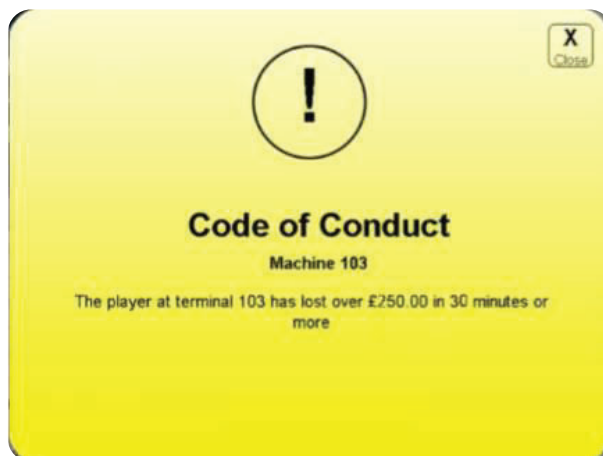
Extended Session Losing alert can be triggered only once per single session if its criteria have been met first. The initial alert message remains on screen for up to 20 seconds. At this stage, the player can either:



1. Collect Cash
- This will end the current session
2. Continue
- Continue play

Extended Session Losing - Back Office Alert

Below is the back-office alert that appears when a Extended Session Lose Alert is triggered on one of your shops FOBT's.



Subject title – GamCare Customer Interaction eLearning: Course Enrolment Details

Operators of the National Gambling Helpline, GamCare, are offering you access to GamCare's Customer Interaction eLearning course as part of Boylesports Employer Multi Pass agreement.

What does the eLearning cover?

In this course, learners will consider gambling behaviour, their role in identifying gambling related harm in customers and how to implement social responsibility actions in their business. With a thought-provoking mix of video, case study and scenario materials to test knowledge and challenge existing practise, the course will help learners to recognise the signs of gambling related harm and better support and engage with vulnerable customers as a result. Participants will learn to:

- Understand the impacts of gambling related harm and the industry's social responsibility
- Recognise signs of gambling related harm, including vulnerabilities that make people more at risk of experiencing harm
- Understand effective ways to approach and record a safer gambling interaction as well as what types of intervention may be appropriate to different customers
- Recognise what gambling support services are available and how to signpost to safer gambling tools and support

Who is the eLearning for?

The course is aimed at customer-facing staff working in entry level or middle management roles in land-based and online gambling environments.