

**William Hill Organization
Licence application**

**Unit 5 Windsor Court
Morley**

**Hearing Date 10th June 2013
Civic Hall
Leeds
LS1 1UR**



Proposed Premises



FACILITIES

- 645 SQFT OF CUSTOMER AREA
- 17 Screen Gantry providing pictures and information for Horse & Greyhound Racing, Numbers events and Sporting events.
- CUSTOMER PRICE ACCESS TERMINAL (Providing access to Horse & Greyhound Racing, Numbers events and Sporting events prices)
 - Provision for SELF SERVICE BETTING TERMINAL (Allowing access to Horse & Greyhound Racing, Numbers events and Sporting events in 11 languages increasing to 30 by August 2013)
- 71 LINEAR FEET OF PAPER SPACE. (Providing information on the Horse and Greyhound races).
- 3 TABLES & SEATING FOR 15.
- UNISEX DISABLED WC.

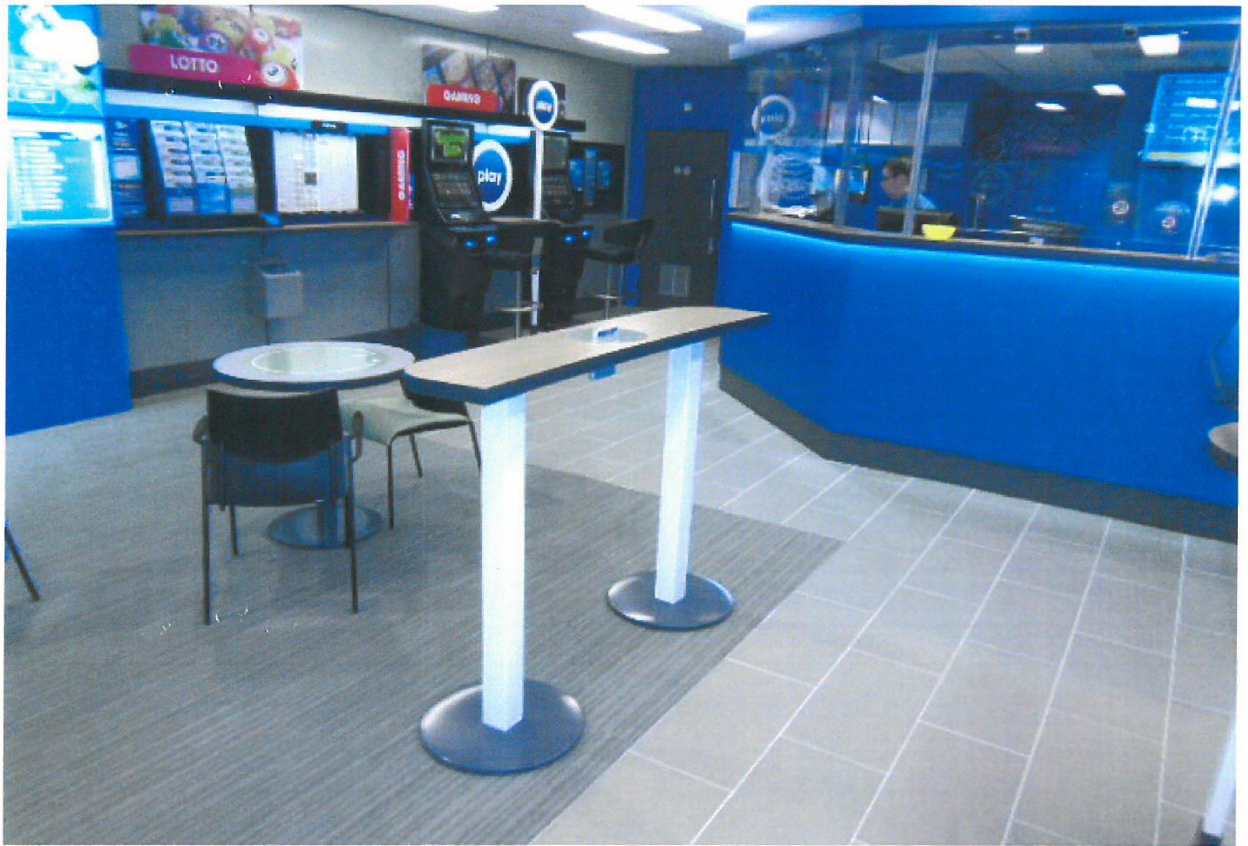
The logo for William Hill is displayed on a blue gradient background. The word "William" is written in a yellow, cursive script font, while "HILL" is in a bold, white, sans-serif font. A thin yellow horizontal line is positioned below the word "William". Below the logo, the tagline "THE HOME OF BETTING" is written in a white, all-caps, sans-serif font.

William HILL
THE HOME OF BETTING









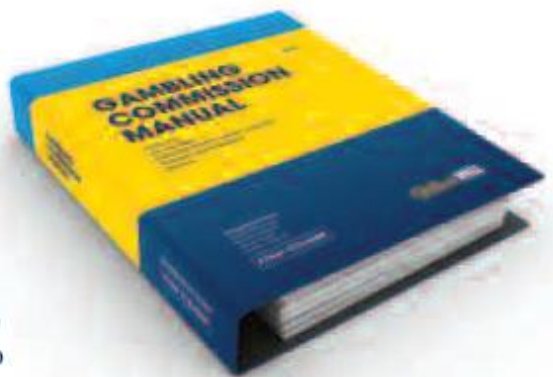
Security Measures

- **CCTV – Digital state of the art, Overt and Covert Cameras which includes a face recognition door camera.**
- **CCTV monitor in customer area and staff area.**
 - **Staff Safe (is a monitored audible alarm system which staff can use for assistance).**
 - **Safe insert with time delay.**
- **Safe Haven area behind counter which will have an additional telephone line.**
- **Full Security Screened Counter with communication holes.**
 - **Full Staff Training Package.**
 - **Roller shutter at front.**
 - **Steel Security Door to rear.**

The logo for William Hill, featuring the word "William" in a yellow cursive script and "HILL" in a white, bold, sans-serif font, all set against a blue background.

THE HOME OF BETTING

Welcome to your NEW Gambling Commission Manual.



Please forward the old manual to your DOM for safe disposal.

This manual has been designed as a tool to help you to manage the implementation of gambling regulations in your shop.

It is an essential reference guide for all your shop team to make use of – so please keep it safe and located where everyone in your shop can find it – even guests and / or relief team members.

The new updated version contains all current processes to follow.

Officers from the Gambling Commission or your local authority may visit your shop to assess compliance with regulatory requirements. Your training and this manual enable you to answer their questions.

All members of your team should read and familiarise themselves with the content.

The manual is split into the following sections:

- **Crime Free:** Anti Money Laundering, Proceeds of Crime & Sporting Integrity
- **Fair and Open:** Fair Deal Rules, Customer Queries, Local Promotions, Display Guide, Data Protection and Gaming Machines
- **Protecting Children and the Vulnerable:** Responsible Gambling, Self-Exclusion and Think 21
- **Processes and Reporting:** correct reporting reference charts
- **Glossary**

In order to demonstrate your understanding of the content you will receive workbooks to complete. 6 copies will be delivered to each shop – if you have more team members you can request additional copies from your Area Training Officer. Each member of the team must complete the activities in the workbook individually. Each colleague has 3 WEEKS to complete their workbooks.

Once the workbook has been completed each individual is to complete a marksense form – signing to say they have completed the content and scan this through the EPOS system following the guidelines. The completed workbook for each team member is to be placed in the Distance Learning: Regulatory Training File.

After all the workbooks have been completed, your DTCs / ATOs will visit each shop to conduct an in-shop assessment on any member of the team who is present when they visit. The assessment will be based on the subject areas covered in the workbooks.

These assessments are designed to ensure that all workbooks have been completed and also that all the content has been understood. The score on the assessment will be allocated to the shop not the individual – so it is really important that you ensure all your team fully understand the content of each section and the workbooks.

We hope you find the enclosed Manual helpful.

Good luck,

The Compliance Team

Gambling Commission Shop Team Training Approach Summary

When	What
<p>Day 1, Day 2 – before entering the shop (Workshop based in remote venue)</p>	<ul style="list-style-type: none"> - Who are the Gambling Commission - Three types of license - The Three Key Areas - Implications of Non-Compliance - William Hill Compliance Team - Keeping Gambling crime free <ul style="list-style-type: none"> ➤ Proceeds of Crime ➤ What to look out for - Being open and fair <ul style="list-style-type: none"> ➤ Fair Deal Rules ➤ Make sure the price is right - Protecting children and the vulnerable <ul style="list-style-type: none"> ➤ What does vulnerable look like ➤ If someone is drunk, on drugs or mentally unstable ➤ Age verification ➤ Approved identification ➤ Guess their Age (activity) ➤ Know when to say no ➤ Two types of incident ➤ Report attempted underage Gambling ➤ Self Exclusion ➤ Report Self Exclusions
<p>Day 3 onwards In –Shop</p>	<p>CSA completes additional inshop training with colleagues (using LBO Manual and Distance Learning folders) in order to complete Training Log 1. The CSA and the Duty Manager both sign the CSA off against the following:</p> <ul style="list-style-type: none"> - 'I understand my responsibilities in relation to the Gambling Commission' - 'I can easily locate the Yellow Box file (Social Responsibility/ Self Exclusion) and am reviewing the content at the start of each shift' <p>Training Log 2 which covers Weeks 4-8 replicates the above sign off, so there is a double-check that the knowledge is being retained and implemented.</p> <p>Training Log 3 which covers Weeks 8-12. The CSA and Duty Manager both sign the CSA off against the following:</p> <ul style="list-style-type: none"> - 'I consistently apply the Think 21 policy, approaching customers, checking and verifying ID' - 'I know how to complete an Incident report and what information needs to be included and how to process it' - 'I check the Self Exclusion, Yellow Box File at the start of every shift' - 'I understand my responsibilities in relation to the Gambling Commission'
<p>Week 12 Workshop Based</p>	<p>CSA completes a probationary written assessment which contains some questions focussed around Gambling Commission issues.</p>

<p>Week 12 - 15 In Shop Week 16 Keeping Compliant Workshop</p>	<p>Training Log 4, replicates the Training Log 3 sign off, so there is a double check that the knowledge is being retained and implemented. Acts as a recap of what they have covered and learnt so far. Contains a 'True or False' exercise based on common issues.</p>
<p>Weeks 16-26 In Shop</p>	<p>Training Log 5, is a much lengthier detailed sign off which covers the following:</p> <ul style="list-style-type: none"> - 'I understand my responsibilities in relation to the Gambling Commission and understand the implications of non-compliance' - 'I regularly review the Gambling Commission Manual and ensure all procedures are being consistently followed in the LBO' - 'I manage Think 21 and actively approach customers and verify the ID given' - 'I am aware of the compliance documentation which needs to be completed e.g. Daily Totals Report and I know how to complete them' - 'I understand the Self Exclusion process and know how to complete a Self Exclusion form' - 'I know how to complete an Incident Report accurately providing all the information needed' - 'I understand what Staff Led Interaction means and know how best to approach a customer who may be vulnerable' - 'I understand the key indicators of Money Laundering and POCA and can explain what action needs to be taken if I suspect this has occurred in an LBO' - 'I understand the importance of the company Fair Deal Rules when dealing with customer complaints/ concerns and can do so in a fair and appropriate manner' - 'I understand the process to follow if Gambling Commission Officer or other Local Authority Representative (e.g. Local licensing, police etc visits and LBO'
<p>Week 26 Workshop Based</p>	<p>CSA completes a final written assessment which contains some questions focussed around Gambling Commission issues.</p>
<p>Ongoing training methods are reviewed regularly to ensure the right training approach is being used, to ensure we meet our responsibilities.</p> <p>Continuous learning and development is conducted via distance learning as follows:</p> <ul style="list-style-type: none"> ✓ 3 – 4 Cycles per year of Gambling Commission focused workbooks, which all shop based staff are required to complete. Content is determined by ensuring all topics are covered regularly, patterns in reporting and any new changes colleagues need to be aware of. ✓ Shop Teams are given 3 weeks to complete workbooks and then register completion via EPCS ✓ Weekly reports highlight who has/has not completed, target of 100% completion by end of Week 3 ✓ Any gaps highlighted to Area Training Officer who chases up at a local level ✓ District Training Co-ordinators, visit every shop in their patch and check that all books have been completed and then carry out GC focussed testing to check for knowledge and understanding of GC principles and responsibilities. ✓ DTC reports back any issues, which the Area Training Officer will deal with at a local level. This could be in the form of additional training, or escalation of issue to Senior Management. 	



Vulnerability

The third licensing objective says we are to aim 'to protect children and other vulnerable persons from being harmed or exploited by gambling'. Vulnerability refers to the inability or limited ability of people to control their actions.

Vulnerable people may be:

- **Clearly under the influence of drink or drugs**

Do not accept a bet or allow anyone to play the gaming machines if they are obviously intoxicated! Ask them to leave the premises.



- **With mental health issues**

If you suspect that a customer has mental health issues, be considerate of their situation whilst approaching them. Do not ignore customers who mention having personal problems/health problems which might impact on their ability to control their gambling. Raise the issue. Discuss it with the Duty Manager; contact your DOM/Compliance for advice.



- **With gambling issues**

Consider your customers and the behaviours/betting habits they display. React to any symptoms which might indicate potential gambling issues. Every time you approach someone to discuss responsible gambling, record it to evidence the care you show your customers.





Responsible Gambling Interactions

All conversations/interactions you have with customers regarding responsible gambling issues should be recorded.

The following are examples of Responsible Gambling interactions which should be reported via Incident Report Forms.



Examples of Responsible Gambling Interaction prompts:

- Regular customers whose stakes increase significantly over a short period of time.
- Customers placing a number of large bets on one occasion. Customers repeatedly approaching the shop team to load more and more money on the machines.
- Customers who approach the shop team to ask about the self-exclusion process.
- Customers commenting on how gambling negatively influences their life.
- Customers displaying signs of distress whilst gambling (remember to approach customers displaying aggressive behaviour only when it is safe to do so. Consider it next time they visit before they are able to gamble).
- Customers who spend a prolonged period of time in the shop; gambling continually without a break; gambling on more than one machine at the time; leaving the shop repeatedly to obtain more money to spend; individuals who appear to be chasing their loses.
- Customers who self-excluded in the past and have now resumed gambling.
- Customers whose potential gambling issues were brought to the shop team's attention by their colleagues/relatives.
- Customers known to be excluded in other WH shops.
- Customers you suspect placing bets on behalf of other vulnerable persons (U18 / self-excludees).
- Customers commenting / complaining about their loses.
- Customers who mention being addicted to gambling / not being able to control their gambling levels.
- Clearly intoxicated individuals (bets should be refused and they should be asked to leave the shop).

Keep in mind that it is not an exhaustive list. You will know your customers better than anyone and discuss these issues naturally with some of them without even considering them to be reportable. Record the great actions you take on a daily basis.

There will be instances where symptoms displayed may cause you concern but you might not be sure how to deal with the matter. Contact Compliance/ DOM and notify them about your concerns.



Vulnerability is a challenging subject and it might be that you feel uncomfortable approaching some customers or that you are unsure if any action is needed. You are not a counsellor so you can't solve their problem but you can point out what help is available. Do not ignore it! Contact your Line Manager or the Compliance Team on 72 3608 and discuss your observations. Protect your customers and our licences.

When you consider approaching a customer to talk about responsible gambling, the following should be taken into account:

- Can you communicate effectively with the customer?
- Can you deal with the situation discreetly?
- Are you safe in doing so? Consider the health and safety of those in the shop at the time.
- Consider the customer's comfort. Is it the right time?
- If appropriate, offer a Responsible Gambling leaflet as well as discussing GamCare and Self-Exclusion.

Reporting

- Remember to complete a Responsible Gambling Interaction report regardless of the outcome of the interaction. You should complete a report not only if you approach a customer but also when a customer approaches you.
- Mark the incident on the Daily Totals Report.

Responsible Gambling		Number of Incidents				
8) No. of Self-Exclusions Completed	1	2	3	4	5+	
9) No. of Responsible Gambling Interactions (IRF)	1	2	3	4	5+	
10) No. of Self-Exclusion Breaches (IRF)	1	2	3	4	5+	
11) No. of Self-Exclusion Reviews Completed	1	2	3	4	5+	



Responsible Gambling Interaction

EXAMPLE 1

- A regular customer was playing a gaming machine all day.
- He started to get agitated and display symptoms of stress first hitting the machine a few times and then swearing and shouting.
- He left the shop clearly upset and returned with money in hand and continued playing. This continued until the shop closed.
- When he left the Duty Manager noticed that the balance on the back office implied the customer was losing an unusually high amount for them.
- Next day the customer returned and approached the gaming machine immediately. He seemed calmer than the day before and the Duty Manager decided to approach him as the CSA had already started work.
- He offered the customer a cup of tea and sat down with him in the corner away from the other customers and explained the Self-exclusion process to him talking through the Responsible Gambling leaflet and Gamcare.
- The customer thanked him and said he will consider it all and discuss it with his wife and will return tomorrow.
- He left the shop and the Duty Manager filled in an Incident Report Form and scanned it through the till. The Incident was also marked as a Responsible Gambling Interaction on the Daily Totals Report.

LESSON

Make sure you are careful when approaching a customer you consider to be having gambling problems. It might be dangerous to approach someone who is behaving in an agitated way. However, we should try and speak to them if they come into the shop again and are calm. Do not ignore these customers. If in doubt about what to do contact your DDM or Compliance.



EXAMPLE 2

- A relief manager identified a customer she knew to be excluded from other shops in the district.
- The customer was regularly visiting this shop and spending substantial amounts on the gaming machines.
- The relief manager informed the shop manager about this and they approached the customer to ask if they were OK and if they wanted to extend their existing exclusion to cover this shop as well.
- The customer stated that they do not wish to exclude and continued gambling.
- A Responsible Gambling Interaction was reported.

LESSON

Inform your customers of the options available to them. It is their choice if they wish to exclude or not. We need to make ourselves available should they wish to discuss Self Exclusion.



Self-Exclusion

- **Self-Exclusion**
- **Self-Exclusion Request**
- **Self-Exclusion Review**
- **Self-Exclusion Breach**



Self-Exclusion Request

All team members must be able to demonstrate a full understanding of the self-exclusion process. If a customer wants to self-exclude it is the role of the Duty Manager to deal with the initial conversation and the signing of forms.

- **DISCREET** - A customer should be given the opportunity to discuss self-exclusion in private.
- **CHECKLIST** - The Duty Manager should follow the step by step process in the self-exclusion pack and ensure that each box on the checklist at the top right of the form can be ticked. Self excluding customers must be given a copy of the yellow 'Information for self-excluded customers' leaflet.
- **BONUS CLUB CARD** - Ask the customer if they wish to surrender their card.
- **SE PERIOD** - Once the self-exclusion form is completed and signed by the customer and the Duty Manager it is valid until the review process is completed or for 6 months after expiry date.
- **EXPIRY DATE** - The self-exclusion period is 12 months. Example: Form signed on **12/01/11** the self-exclusion period is 12 months up to include **12/01/12**.
- **PHOTOGRAPH** - A photograph is compulsory. Team members are required to know their nearest photo service provider so they can advise customers. The AOM can authorise forms accepted without a photo under certain circumstances. Contact the covering AOM BEFORE the form is signed. (Only if the customer shows signs of distress or no other option available)
- **DISTRIBUTION** - The self-exclusion forms and photograph need to be photocopied in colour and distributed immediately to additional premises of choice. (If you don't know how this works in your district speak to your DOM). Contact the shops to ensure the form has been received. The shop should be contacted to confirm the form was received and is in place. A copy of the form must be available in the shop.
- **ADDITIONAL PREMISES FORM** - Should list the shop names and addresses for the customer's information. The relevant copies should be posted. (Yellow - Customer, Blue - DOM, Green - Compliance.)
- **MORE THAN 6 SHOPS** - Should the customer wish to exclude from more than 6 shops - contact the AOM for authorisation before signing the form. (Follow the process outlined in the step by step exclusion procedure in your blue customer self-exclusion interaction pad)
- The self-exclusion is valid once the form is signed by both parties. The Self-Exclusion and Additional Premises Forms should be processed through the till for 1p each.



Self-Exclusion Review

Following the 12 months self-exclusion period, the self-excludee has 6 months to review his exclusion. In that period they still remain excluded until the review is completed. If they gamble during these 6 months without being approached it will be classified as a SE Breach and the incident should be reported. After the further 6 months the individual is no longer excluded.

Reviewing the form in the shop

If the customer excluded on 01/01/12, their exclusion period will be up to and including 01/01/13. From 01/01/13 they have 6 months to review. They remain excluded during these 6 months and must be approached if they enter any of the shops they excluded from. The customer can complete their review in ANY of the shops covered by the exclusion agreement.

THERE ARE TWO OPTIONS AVAILABLE.

YOU DON'T NEED TO RETURN TO THE SHOP TO RENEW YOUR EXCLUSION ONCE IT HAS EXPIRED. SELF-EXCLUSIONS CAN BE EXTENDED FOR A FURTHER 12 MONTHS BY PHONING 0800 169 3352.

REVIEW SECTION: *(To be completed after the expiry date shown above)*

I wish to extend my exclusion period for a further 12 months and have completed a new Self-Exclusion Form

I wish to resume use of William Hill PLC Group Company betting facilities following a 24 hour cooling off period

CUSTOMER SIGNATURE: _____ **DATE:** _____

This self-exclusion applies to William Hill PLC Group Companies only. If you wish to exclude from other operators' facilities please contact them directly. If you require confidential help or advice regarding your exclusion please ring GamCare on 0845 6000 133

- RESUME GAMBLING

The customer ticks the tick box on the bottom of their self-exclusion form and signs it. They must then leave the shop for a 24h cooling-off period before they are allowed to gamble. Ensure that all shops covered by the agreement are aware of the review and forward the forms to the DOM. The form should be processed through the till and posted to the DOM for safe disposal. If you are unable to process the form through the till - contact the Compliance Team for the purpose of updating the central register.



- EXTEND SELF-EXCLUSION FOR ANOTHER 12 MONTHS

The customer ticks the tick box on the bottom of their self-exclusion form and signs it. A new form should be completed and a new photograph obtained (unless the one on the old form is a good likeness and is sufficient to identify the individual)

Both forms (the reviewed one and the newly completed one) should be processed through the till. Other shops covered on the old and on the new agreement must be made aware of the actions taken.

Once a review is completed, it should also be marked on the Daily Totals Report.

11) No. of Self-Exclusion Reviews Completed	1	2	3	4	5+
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Reviewing the form via the SE Helpline

(08001693352 – details available on the Information for Self-excluded Customers leaflet)

If the customer wishes to discuss their existing exclusion or should they wish to extend it for another 12 months but does not wish to enter the shop, they can contact the Compliance Team directly via the Helpline.

The form will be reviewed centrally and new copies will be distributed to relevant shops via post with directions as to actions which need to be taken. Should you receive a self-exclusion reviewed by compliance – please confirm by contacting them on 72 3608.

Expired forms

If the customer excluded on 01/01/12, their exclusion period will be up to and including 01/01/13. They remain excluded and should review their exclusion if they return to the shop up to and including 01/07/13.

The exclusion expires on 02/07/13. They can now enter the shop and gamble. What a great opportunity for a Responsible Gambling Interaction!



Self-Exclusion Breach

Customers can exclude for a period of 12 months. Attempts to enter the premises or to gamble during their exclusion will be classified as breaches. Should the self-excludee attempt to gamble during the 6 month review period and does not wish to complete a review or should they gamble before review was completed, it is also classified as a breach and should be reported as such.

How can you optimise the customer's chances of being identified?

- Know the self-exclusion procedure.
- Make sure that all forms are present in the shop and that new forms are communicated effectively to other team members.
- Check the yellow folder at the beginning of every shift.
- Debit card transactions should be monitored and customers whose names match the self-exclusion records challenged.
- Know your customers, review the forms in relation to monitored customers, new customers and strangers who might not have provided photos in the past.

Once identified, the excludees should be approached in a discreet but firm manner. Self-excluded customers have to be asked to leave the premises immediately after being identified.

Bets placed by self-excluded customers will stand. Losing bets are not to be refunded but winnings must be paid in full.

Report the incident by completing a Self-exclusion Breach report. Remember, we need the following details:

- NAME! (very important when dealing with persistent breaches)
- Why they were not identified?
- Were they able to gamble?
- How long they were able to gamble for? How often did they visit the shop before being identified?
- Approx amounts spend/gambling preferences
- Payment of winnings made?

	10) No. of Self-Exclusion Breaches (IRF)	1	2	3	4	5+
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TYPE OF INCIDENT									
2) H&S Hazard- Helpdesk Not Informed	3) H&S Verbal Abuse/Violence – Police Not Called	4) H&S Incident/Accident	5) Age Verification – Category A	9) Responsible Gambling Interaction	10) Self-Exclusion Breach	12) Police Called	14) Official Visit	15) Other Relevant Incident	
					■				

Sometimes you will approach individuals you suspect of being excluded but, because of a potential change in their appearance, you cannot be certain. When approached, they may deny their identity and are unable to verify otherwise by providing ID. Ask these individuals to leave and complete a Responsible Gambling Interaction report.

Remember to also approach individuals you suspect of placing bets on a self-excludee's behalf. If they admit placing bets on behalf of self-excludees, refuse the transaction. If they say that the bets are their personal bets, accept them, stress the importance of support for self-excludees and report these conversations as Responsible Gambling Interactions.



Self-Exclusion Case Studies

EXAMPLE 1

- Rob visited the shop on a regular basis and gambled small amounts.
- The shop team changed about 6 months ago.
- After a recent promotions, the manager recognised Rob's details and matched them with a self-exclusion form.
- Rob was approached and he admitted being excluded.
- He was asked to leave the shop.
- A self-exclusion breach report was completed .

LESSON

Once identified a self-excludee must be asked to leave.
Report only incidents in your shop

EXAMPLE 2

- Adam Jones self-excluded from the shop for 12 months on 14th January 2010.
- He didn't try to come in during his self-exclusion period.
- On Monday 21st February 2011 he came in to the shop and started to play on one of the gaming machines.
- The Duty Manager recognised him and checked the yellow file.
- He informed Adam that he needed to complete a Self-exclusion Review as he remains self-excluded for up to 6 months from the expiry date.
- They filled in the 'Review' section and Adam got his winnings paid and left the shop to adhere to the 24h cooling-off period.
- The Duty Manager completed an Incident Report Form and also marked it on the Daily Totals Report.
- He returned next day and resumed gambling.

LESSON

Remember to follow correct Self-exclusion review procedures.



Think 21

- **Think 21 Policy**
- **ID Verification**
- **Successful Challenges**
- **Category A/Category B**
- **Correct Reporting**



Think 21 Policy

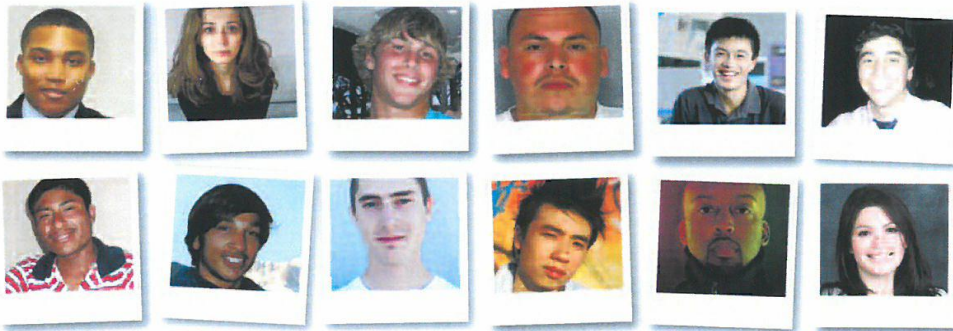
The Law states that to enter an LBO you must be at least 18 years old.

The Think 21 policy reduces the risk of underage gambling taking place.

Every young individual entering the premises must be asked for ID that confirms they are at least 18 years old.

- Once approached, the individual must provide an acceptable form of photographic ID and if unable to do so must leave the premises.
- **Anyone who cannot produce an acceptable form of identification must be removed from the premises immediately.**

It is every team member's duty to Think 21!



**How old do you Think they are?
Have a guess and double
check on page 52.**



ID Verification

Once challenged, the individual must produce ID. Please ensure that you check the document carefully for the following information. The process of ID verification requires the following information to be checked:

- **Is it an acceptable form of ID?**
Information regarding acceptable proof of ID can be found on ALBOS.
If in doubt - call the Compliance team on 72 3608

- UK or International Passport Book



- Full or provisional UK only Driving Licence



- **Pass Hologram Logo Cards:**
- **Citizens Card**
- **Connexions Logo**
- **Validate Card**



- **Does the photograph match the individual?**
A number of breaches occur because an individual is using another person's ID.
- **Does the date of birth confirm the individual is 18 or older?**
The date can be found on ALBOS on a daily basis. Press F3 and double RED
- **Is the document valid?** It is within every team member's discretion to refuse a form of ID if they are suspicious about the authenticity of the document.

Do not accept ID if you are not 100% satisfied with it

THE DOOR.

shop exterior



We've listened to your feedback and redesigned the various door signs to replace them with one easy to use panel.

This includes:

- Opening/Closing times
- No Smoking
- No Under 18s
- Think 21 Policy
- Security Notices
- Emergency Contact details
- Customer Helpline
- Phone & Website details

Please display the door sign centrally and at head height.

If you have been advised by your District Manager or Security you can display this sign on an adjacent glass panel, so your view of who is coming into your shop isn't blocked.

THE INFORMATION NOTICES.

INFORMATION NOTICES NEED TO POSITIONED IN A PROMINENT AREA OF YOUR SHOP.

What you'll need:

- Rules x2
- Excellence in Customer Service
- Responsible Gambling Dispenser and Flyers
- Crime Stoppers Dispenser and Flyers

Information and Statutory Notices are only instance where notices or posters can be applied to laminate surfaces - nothing else should appear on laminate.

Magtape should be used on metal panels and blue tack when on laminate surfaces.



THE STATUTORY NOTICES.



THESE NOTICES SHOULD BE POSITIONED ADJACENT TO THE DOOR SO THAT THEY'RE CLEARLY VISIBLE TO ALL WHO ENTER OR LEAVE THE SHOP.

What you'll need:

- SA2 Security Notices
- Responsible Gambling Dispenser and Flyers

Additional notices may be displayed if agreed with your DOM or Security e.g. No Baseball Caps etc. These can be ordered from the Poster ³¹ Helpline on F/Net 2960.

NB Failure to follow any of the above procedures could have very serious consequences for the Company, the Manager and the Personal Licence holders. Sanctions could include disciplinary action, fines to the individual and/or Company, prosecution and/or revocation of an Operating Licence or Personal Licence

7.2 Persons Wearing School Uniform

It is not appropriate for persons wearing items of school uniform to enter our Licensed Betting Offices. Any such persons must be asked to leave immediately, even if they offer to prove they are aged 18 or over.

7.3 Customer Interaction

7.3.1 Customer Led Interaction

In circumstances where a customer notifies us that they are not in control of their gambling or where a relative expresses concern about a customer's gambling behaviour they must be informed of the sources of advice and help available:

1. Give them a copy of the leaflet on responsible gambling.
2. Encourage them to telephone the GamCare National Helpline (0845 6000 133)
3. Make them aware of the possibility of self-exclusion

All incidents of customer led interaction must be recorded on the Retail Compliance Daily Totals Report.

7.3.2 Staff Led Interaction

Generally the onus is on our customers to recognise that they may have a gambling problem and to decide to take the necessary positive steps to address this.

A difficult and subjective judgment has to be made when LBO staff consider that a customer's behaviour may indicate problem gambling, but the customer has **not** intentionally indicated this to staff or asked for help.

The amount of money an individual can afford to lose varies enormously from person to person, as does the frequency with which they choose to bet. There is no clear mode of behaviour marking problem gambling.

Frequency and losses are not, on their own, consistent indicators of a problem.

