

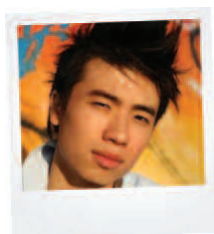
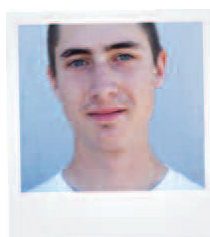
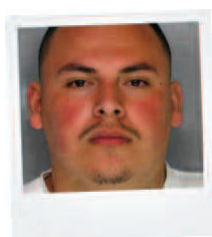
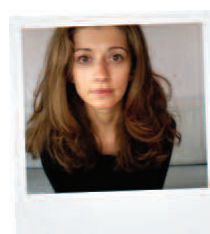
AGE VERIFICATION.

Think 21

The UK 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. Young looking youths 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 leave the premises.

We need to Think 21 and ask for ID where necessary before a youth gambles – either at the counter or at a machine. Challenge on entry is the gold standard we need to reach. When local authorities, police or Gambling Commission send in real underage testers, they don't usually loiter waiting to be spotted. If they get to a machine and gamble we have failed – whether or not we ask them for ID if they come to the counter. Remember, you can disable machines from behind the counter if you need to.

Anyone who cannot produce an acceptable form of identification must be removed from the premises immediately.



Would you ID them? How old do you think they are? Have a guess and double check on page 54.

ID Verification

If approached, the individual must provide an acceptable form of photographic ID. Consider the following:

Is it an acceptable proof of ID?

(If in doubt, contact Compliance on 72 3608 or speak to your DOM)

List of acceptable forms of ID:



**UK AND INTERNATIONAL
PASSPORT BOOK**



**UK FULL AND PROVISIONAL
DRIVING LICENCES**



PASS HOLOGRAM LOGO CARDS:

- **CITIZENS CARD**
- **CONNEXIONS LOGO**
- **VALIDATE CARD**
- **YOUNG SCOTS CARD**

Does the photograph match the individual?

Does the date of birth confirm the individual is 18 or older?

Is the document valid?

It is within every team member's discretion to refuse to accept a form of ID if they are suspicious about the authenticity of the document.

CHECK ID CAREFULLY. DO NOT ACCEPT ID YOU ARE NOT 100% SATISFIED WITH!

Age Verification Reporting

Your age verification reporting figures are collated via the Daily Totals Report forms you submit. Reporting summaries are forwarded to your operations teams each period. These figures must be correct. Ensure you log every challenge in the correct category throughout the day and inform the duty manager. When a young customer can't produce ID think about whether you are reporting it correctly. Had they attempted to gamble? Was it a Cat A or a Cat B?

Complete relevant incident report forms. If you forget to complete a form and remember on a later date, backdate the IRF and contact Compliance on 72 3608. Ensure you liaise with your colleagues during handovers and discuss reporting with junior members of your shop team.

Successful Challenges

If an individual provided an acceptable form of ID which was verified and accepted it is classified as Successful Challenge. A daily summary figure of Successful Challenges needs to be marked on the Daily Totals Report form.

Age Verification - Successful Challenges		Number of Incidents								
7) No. of Customers Producing Acceptable Proof of Age When Challenged	1	<input type="text"/>	2	<input type="text"/>	3	<input type="text"/>	4	<input type="text"/>	5	<input type="text"/>
	6	<input type="text"/>	7	<input type="text"/>	8	<input type="text"/>	9	<input type="text"/>	10	<input type="text"/>
	11	<input type="text"/>	12	<input type="text"/>	13	<input type="text"/>	14	<input type="text"/>	15+	<input type="text"/>

Category B(efore attempting/ gambling)

If an individual is unable to provide an acceptable form of ID before attempting / gambling (on entry) and is asked to leave the shop it is classified as a Category B. Category B Incidents do not require an Incident Report Form. A daily total is marked on the Daily Totals Report form.

Age Verification - Category B		Number of Incidents								
6) No. of Category B Incidents	1		2		3		4		5+	

Category A (Attempt to Gamble)

If an individual is unable to provide an acceptable form of ID when challenged whilst attempting to gamble, whilst gambling, or after they already gambled it is classified as a Category A. It is marked on the Daily Totals Report and also requires a written Incident Report form which should include the following details:

- Why was the individual not spotted/approached on entry?
- How the individual attempted to gamble (OTC / machines)?
- Did they succeed in gambling? If so how?
- How long did they gamble for?
- How much did they stake/win? What action was taken regarding his stakes/winnings?
- If underage gambling was confirmed, was refund of stakes mentioned? Were their contact details requested and forwarded to the DOM? Have they been referred to Customer Relations?
- Was ID shown? If so what ID was it?
- Any other relevant details.

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) Good Neighbour – Incidents affecting Licensing Objectives
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If a youth inserted money into a gaming machine/SSBT only (and you are 100% certain they did not gamble) and they are unable to provide acceptable ID, their stakes can be refunded, e.g. A youth entered the shop and inserted a £5 note in the machine. The machine is disabled and they have no ID. £5 can be refunded.

If a youth gambled before they were approached and is now unable to provide ID, payment should be withheld until acceptable proof of ID evidencing them to be over 18 is provided.

- **If the youth claims to be over 18**, they should be asked to leave and return with ID so payment of outstanding credit/winnings can be made.
- **If the youth claims to be underage**, ask for their contact details for the DOM and provide them with the Customer Relations' number they should contact to discuss refund of stakes. Do not encourage them to return to the shop, if they claim to be under 18.

Age Verification - Category A	Number of Incidents					
5) No. of Category A Incidents (IRF)	1 <input checked="" type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5+ <input type="checkbox"/>	

Underage gambling

All instances which involve confirmed underage gambling are reported to the Gambling Commission. Once you become aware of underage gambling, or suspicions regarding underage gambling are raised, you must notify your DOM. We are legally obliged to return the stakes of anyone under the age of 18 who has gambled with us.

If a youth is able to gamble and then provides ID showing them to be under 18, their winnings MUST NOT be paid.

- If their stake is known or can be confirmed easily, contact your DOM to authorise refund of stakes.
- If their stakes cannot be determined, obtain their contact details which should be forwarded to your DOM at earliest opportunity, or, if they are unwilling to provide any, refer them to Customer Relations.

Category A / Category B Classification Table

OVER THE COUNTER	CLASSIFICATION	RATIONALE Customers must be at the point of placing a bet to be considered as attempting to gamble.
Customer enters shop.	B	No attempt to gamble.
Customer reads form/watches screens.	B	May indicate intent but has not actually attempted to bet.
Customer approaches counter and asks for a price or information about an event.	B	May indicate intent but has not actually attempted to bet.
Customer picks up a betting slip/fill in a coupon.	B	May indicate intent but has not actually attempted to bet. Customer could be writing anything on a betting slip/ coupon.
Customer approaches the counter and asks for change.	B	As they have not presented a slip or interacted with a Gaming machine, it is not classed as an attempt to gamble.
Customer approaches the counter with a betting slip/coupon.	A	By approaching the counter with a betting slip/coupon they clearly indicating an attempt to gamble. They could be defined as 'at the point of placing a bet'.
Customer places a betting slip/coupon and payment on counter/hands to cashier.	A	Clearly an attempt to gamble.
Customer approaches counter with a winning slip/ machines ticket and provides no ID/Id proving them to be underage	A	Indicates they placed a bet previously gambled.
Customer is asked for ID after having placed a bet/placed bets in the past and provides no ID/ ID proving them to be underage.	A	Customer has already gambled and is unable to confirm their age or is confirming underage gambling.

Category A / Category B Classification Table

GAMING MACHINES (GM)/SSBTs	CLASSIFICATION	RATIONALE
Customer stands near a GM/SSBT and watches other play.	B	No attempt to gamble on the machines.
Customer sits at a GM/SSBT (without inserting money)	B	No attempt to gamble on the machines. Intention might be to play, but equally to sit and watch others.
Customer accesses information on a GM/SSBT.	A	Machines/SSBTs are more difficult to monitor to identify the exact point a person attempts to gamble. Therefore the moment a customer touches or interacts with a Gm/SSBT is classified as an attempt to gamble.
Customer sits at the GM/SSBT and reaches for wallet.	A	Reaching for their wallet at a GM/SSBT is a clear indication that the customer is starting the 'interaction' and is therefore classified as an attempt to gamble.
Customer attempts to insert money into a GM/SSBT.	A	Clear attempt to gamble.
Customer inserts money into a GM/SSBT.	A	Clear attempt to gamble.
Customer spins their credit before being approached.	A	The customer gambled.
MISCELLANEOUS	CLASSIFICATION	RATIONALE
Customer uses the toilets.	B	No attempt to gamble.
Customer enters with a minor.	B	No attempt to gamble – but must be categorised as a Cat B.
Customer stands near a GM/SSBT and watches other play.	B	The child themselves have not attempted to gamble. If the incident develops, report under Q15 – Other Relevant Incidents.

IF IN DOUBT – COMPLETE AN IRF!

Think 21 case studies

EXAMPLE 01

Category A

A youth managed to enter the shop unnoticed and started playing on the gaming machine. The CSA was working on his own on during the duty manager's lunch break, and was dealing with a high volume of customers putting bets on at the counter. When noticed, the youth was asked for ID. A student card was provided and the youth was informed that it is not an acceptable proof of ID, their ticket for £23.50 was printed. The CSA wrote 'ID to be verified' on the ticket, scanned it through the till and returned to the youth who was advised to return with an acceptable form of ID or to contact Customer Relations. The youth left the shop and the CSA described the incident on a **Category A** report and processed it through the till. They informed the duty manager.

The youth returned 3 hours later with a UK driving license proofing him to be 19 years old and their ticket was paid in the shop.

Lesson

Always follow procedure and never pay any outstanding balance in the shop unless an acceptable proof of ID is shown. Make sure you do not pay this ticket when another customer hands it to you. If the youth is underage, his stakes will be returned once your DOM or Customer Relations have carried out suitable checks.

EXAMPLE 02

Category A

A youth entered the shop, approached the gaming machine and entered the menu. The duty manager approached him for ID which he was unable to produce, therefore he was asked to leave the shop. The duty manager filled in a Cat A Incident Report Form and scanned it through the till. The incident was marked as a Category A on the Daily Totals Report Form.

Lesson

The only time when an Incident is considered a Category B on the gaming machines is when the youth is watching other customers play.

EXAMPLE

03

Lesson

Category A

A youth entered the shop and loaded £5 into the gaming machine. The machine was disabled by the duty manager. The youth had no ID. The £5 was refunded and the youth was asked to leave. A Cat A Incident Report Form was completed and scanned through the till. The incident was also marked on the Daily Totals Report.

Remember – you can disable the machine! Providing you are 100% certain no gambling took place, stakes can be refunded in the shop.

EXAMPLE

04

Lesson

Category A

A youth entered the shop, took one of the football coupons, filled it in and approached the counter with money in his hand. The CSA asked for an ID. The youth stated that he was served in the shop the day before and has shown the ID already. The CSA reinforced the procedure and informed him that he should be carrying his ID on him on all occasions when visiting for he will be challenged for ID by different members of the team working in the shop. The youth left the shop and the CSA filled in a Cat A Incident Report Form and scanned it through the till. The incident was also marked as a Category A on the Daily Totals Report.

ID must be verified by the member of the team working in the shop at the time when the customer enters. If challenged – the customer must provide ID. ID must be verified by the shop team members working at the time when the customer enters the premises.

EXAMPLE

05

Lesson

Category B

A youth entered the shop, approached the counter and asked for change. The duty manager asked for an ID. The youth was unable to produce one so he was asked to leave the shop which he did. The incident was marked as a Cat B Incident on the Daily Totals Report.

Category B is an incident where an individual did not attempt to gamble is challenged for ID and is unable to produce one.

EXAMPLE

06

Lesson

Category B

A youth was noticed crediting an SSBT. The duty manager disabled the SSBT and asked them for ID. No ID was provided. The youth was asked to leave. The credit was returned. A Cat A Incident Report Form was completed and scanned through the till. The incident was also marked on the Daily Totals Report.

Remember – you can disable the SSBT!

RESPONSIBLE GAMBLING.

The third licensing objective states that we are ‘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 fully control their actions.



Vulnerable people can be categorized as:

Underage individuals

Our Think 21 policy minimises the risk of underage gambling. You must challenge all unknown young individuals for ID. The golden standard is ‘on entry’. Once challenged, the individual has to provide acceptable ID proving them to be over 18 to be allowed to remain on the premises. (Please see Age Verification on page 26).

Clearly under the influence of drink or drugs

Do not accept bets or allow anyone to play the gaming machines if they are obviously intoxicated! Ask them to leave the premises and report it accordingly on the Daily Totals Report.

With mental health issues including dementia

If you suspect that a customer has mental health issues, be considerate of their situation whilst approaching them. Having mental health issues does not automatically disqualify individuals from gambling. We have to take care not to discriminate against an individual who is perfectly capable of making informed decisions, but the nature of his perceived disability raises concerns. At the same time, we cannot ignore customers who mention having personal problems/health problems which might impact on their ability to control their gambling or prevent them understanding what they are doing. Raise the issue. Discuss it with the duty manager; contact your DOM/ Compliance for advice.

DO NOT IGNORE THE ISSUE

With gambling issues or at risk of developing gambling issues

Consider your customers and the behaviours / betting habits they display and 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.

Those who specialise in how the minds of people with gambling issues work would identify some of the following signs in making a diagnosis:

- **The individual is preoccupied with gambling – they obsess about it**
- **They need to gamble more and more to get the “high” they want**
- **They make repeated unsuccessful attempts to control their behaviour**
- **They may be trying to use gambling to escape other aspects of their lives**
- **They are likely to chase their losses rather than accepting them**
- **They are likely to lie and may even commit criminal offences to fund their habit**
- **They jeopardise their relationships with family and friends to continue gambling**

We should accept that there is an extreme of gambling behaviour that can only be resolved by the individual when they decide to take responsibility for their actions by getting specialist counselling and self-excluding from places from which they are tempted to visit to gamble.

At the other end of the spectrum are those customers who may not have developed a severe problem like the one we have just talked about but who may in some danger of doing so. Many of our responsible gambling interactions are going to be about making sure that we are providing those “**at risk**” individuals with advice on how to gamble only with money they can afford to lose and with time they don’t need to devote elsewhere. We are prompting them to consider their gambling more carefully.

- **We are not trained counsellors – and we can’t ever be**
- **Our job is to use our experience to recognise potential signs of gambling issues and to prompt a conversation which, ideally, will inform the customer of the options available to them and signpost them to help**
- **In the vast majority of cases, we do not make decisions on behalf of the customer. Like any addiction, the decision to address an issue should come from the individual. However, we must consider the support we can provide. Your concerns relating to customers you think might have gambling issues and who ignore your interactions or refuse to listen to you at all must be raised to your line manager or the Compliance Team**
- **We absolutely do not have a legal “duty of care” to problem gamblers. Don’t use that phrase. The requirement on us is to provide information about what the customer can do. We cannot be responsible for solving their problem but we must have made genuine efforts to help them**

Interaction Prompts

Not all of these will necessarily indicate a gambling problem or a customer '**at risk**' but you need to consider them in the context of everything else you know about the customer.

- **Increasing stakes**
- **Chasing losses**
- **Repeated loading on machines**
- **Using several different payment methods**
- **Multiple deposits via debit cards and declined debit card transactions**
- **Customers who mention having gambling problems or are enquiring about self-exclusion**
- **Those who have recently returned from self-exclusion**
- **Those who have asked about help before**
- **Those who comment on adverse effects on their life e.g. spent all the rent money etc**
- **Displaying agitation or aggressive behaviour (Remember that a customer with a gambling issue will not always appear distressed. Many of them will be calm and, on the surface, appear to be in control.)**
- **Wanting to gamble on more than one machine at a time**
- **Gambling for prolonged periods without a break**
- **Strangers who enter your shop and stake unusually large amounts on machines**
- **Customers you know to be excluded elsewhere (should they wish to extend, contact Compliance on 72 3608 or complete a self-exclusion form)**
- **Customers who don't believe the machines are random yet insist on continuing to play on them**
- **Customers who are regularly there first thing in the morning and/or last thing at night playing on machines**
- **Customers who ask you for help**
- **Clearly intoxicated individuals (refuse service and ask them to leave)**
- **Customers who notice machines limits and ask you about them**
- **Customers who may reach a machines limit and show signs of frustration / anger with the enforced delay**

- **If you notice a regular customer set a voluntary limit for the first time**
- **If a customer sets limits and then either cancels them or ignores them and continues play after set limits have been reach.**
- **Customers who go to another machine to avoid set limits.**

This is not an exhaustive list. You will know your customers better than anyone else and will be able to detect changes in their behaviour. There will be instances where symptoms displayed may cause you concern but you might not be sure how to deal with the matter.

Raise your concerns with your DOM. You can also contact Compliance on 72 3608, discuss your concerns and ask for advice.

Before you approach a customer...

It can be very challenging to approach a customer regarding a potential gambling problem. We cannot be certain of the response our approach will provoke. Some customers might be receptive to a chat; some might actually have considered self-exclusion already; and some might have never considered their gambling behaviour in those terms.

Before you approach a customer who in your opinion is displaying signs of potential gambling problems firstly consider the customer's state of mind:

- The customer may **genuinely not consider that they have an issue** – they could believe that they have their gambling under control, that there is nothing wrong and may not see their own behaviour and actions as a sign that they may have an issue.
- They may **realise that their gambling is an issue but are simply not ready to deal with it** – a customer must be ready to take action - we cannot force a person they are an individual after all. We also must never assume that we know what is best for them. Consider what happens when someone else tells you they know what's best for you? How do you tend to react to people when they tell you what you should or should not do –especially when you have not asked for any advice.
- They may **know very well that they have an issue, but strongly believe that nothing will work for them in addressing the problem** – They may have tried to stop before and it did not work for them, so they may not want to listen.
- They could **realise that they have a gambling issues and be ready to take the necessary steps to deal with it** – When a customer is ready they will listen and try to find help, we must be ready to advise them on what is available.

.... and all stages in between



Remember that your task is to provide information about options and help which are available to them. You can't promise to solve their problem for them, counsel them or assume you know what is best for them.

Before interacting, consider:

- How you will communicate effectively with the customer.
- How you can do so discreetly.
- Whether it is safe for you. Do not risk your own safety or that of others in the shop.
- Whether it is the right moment to interact.

Messages that you might consider getting over:

- Are you OK? Because I'm concerned about (whatever it was that has caused you concern)
- I want to make sure you are happy with your gambling pattern (refer to their losses/time/using several cards etc.)
- Do you know about the options available to you?
- Responsible gambling leaflet - National Gambling Helpline (GamCare), Gambleaware website information
- Loss/time limits on machine
- Self-exclusion – either William Hill specific or multi operator
- You can talk to a member of the shop team at any time if you want us to go through your options with you.
- It may be best for you to stop for today and go and think about it (it is the customer's choice to make though)

Some of these conversations are straightforward and some are anything but. Remember you can ask your DOM or Compliance for advice at any time. Do not ignore a situation when you can ask for advice on how to handle it.

In the vast majority of cases, we do not make decisions on our customers' behalf. We encourage them to seek appropriate support, and advertise options available. Ultimately however, these customers need to take steps, which are going to work for them, to effectively control their gambling. If you identify interaction prompts and are concerned about a customer's lack of response to your interaction attempts, contact the Compliance Team or your DOM to seek further guidance.

In situations where the customer mentions self-harm or even suicide, phone the police, contact your DOM and prevent the customer from gambling further.

Remember to discuss your interactions with other team members and make them aware of any follow up actions which are required. Not all customers will be receptive to your first approach. Document interactions using Incident Report Forms.

What to say and how to say it

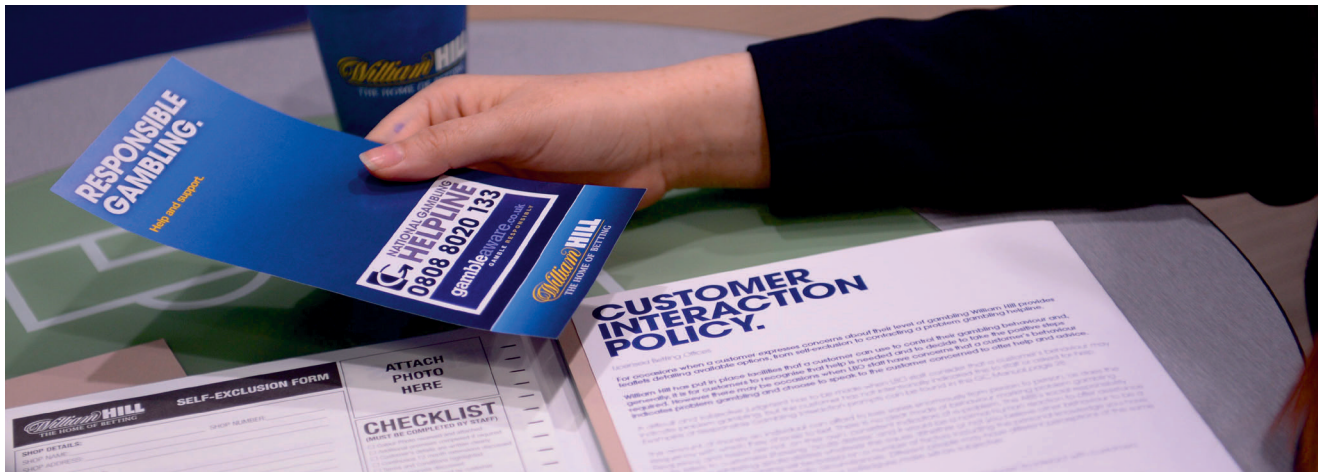
It is impossible to provide you with a step-by-step guide which would provide you with precise directions on how to interact with every one of your customers. Every customer is unique, and their response will depend on many factors. You know your customers better than anyone else, and you will have an idea on how to approach them to get the best response. Some customers may be receptive to a direct approach, particularly customers who admit they have a problem. Remember however that there will be individuals who will not be ready to accept that they might have a gambling problem or they might indeed not have a problem at all. They might not respond during the first interaction and who you might need to follow-up with.

An interaction must be as specific to a customer as it can be. If a customer knows that lots of people in a shop get asked if they are OK with their gambling, and he is asked the same question, it is easy to brush off as not being relevant to him. However, if the interaction specifies reasons particular to the customer (I've seen you go and get more money from the cashpoint/your card was refused on your 4th deposit/you did talk about saving for your holiday before you staked £1000 – or whatever) they are much more likely to take no board what is being said.

You will need to build a rapport with the customer and use techniques and behaviours that will encourage the customer to give you the information you may need to determine what action to take and what to offer. The details you get to discuss and options you will offer are going to depend on how receptive the customer is, or is not, to your approach. You may be able to be more direct and forceful about the options available with customers who admit they have a problem. But, try not to hammer away at those who are just not ready to hear it! A series of gentle nudges, perhaps over several days, is more likely to get them thinking and realising they need to take action.

REPORTING.

Responsible Gambling Interaction



Details required on the Incident Report Form:

- Who the customer is – name if known/regular?/stranger?/logged?
- Any relevant history with the customer?
- What it was that triggered you to interact?
- What you said and what the customer's reaction was. (Remember, the sort of conversation you can have is going to be affected by whether or not the customer thinks they have an issue and whether they are ready to deal with it).
- Whether there is follow up action required (e.g. speaking to the customer again when they are calmer etc).

Discuss with your shop team, process the Incident Report Form as soon as possible after the event and inform the DOM regarding any concerns. Mark the Daily Totals Report form.

EXAMPLE

01

Lesson

INCIDENT REPORT FORM

Responsible Gambling Interactions

Regular customer Joe Bloggs came in again today, loaded £150.00 on machine via card then tried to load £50.00 more but the transaction was declined.

He immediately left the shop, but returned with £200.00 in cash which he loaded. He used to be self-excluded.

We've tried speaking with him several times over the last few weeks. I approached him again and said I was concerned he was spending much more than usual. He said he needed a big win as he was almost out of money. I suggested he Set Limits or self-excluded again. He said it didn't work for him and neither would the National Gambling Helpline.

Consider interaction prompts. In this scenario, a previously self-excluded customer's card declined and he proceeded to continue to use cash. If you are concerned about the customer not paying attention to your attempts to interact with them, get advice from your DOM or the Compliance Team.

EXAMPLE

02

Lesson

INCIDENT REPORT FORM

Responsible Gambling Interactions

A customer I know as John came in and played a machine. He set a spend limit of £100.00 but then went on to load and play a further £200 in cash. I was on my own in the shop and would have liked to talk to him when he played through his limit. When my colleague returned I went out and spoke to John saying I was worried that he set a limit and then played through it. He laughed and said it didn't matter and didn't want to talk. I'll speak to the rest of the shop team because next time it would be better to speak to him earlier.

Remember that customers who set voluntary limits indicate attempts to control their gambling.

Interact with customers who play through their limits.

EXAMPLE

03

Lesson

INCIDENT REPORT FORM

Responsible Gambling Interactions

A stranger loaded £3000.00 using a debit card. I saw the name on the card and checked it. It didn't match any of our self-excludees. He was Mr S Smith. He seemed calm and in control but most customers don't load 4 lots of £750.00. So I asked him if he was happy spending that amount and if he knew about machine limits or the National Gambling Helpline.

He said he appreciated my concern and accepted a Responsible Gambling leaflet.

Large spending strangers should not be ignored.

Interact with them and consider discussing them with your DOM or Area Machines Managers.

SELF-EXCLUSION.

It is a requirement for all betting operations to have and enforce a customer self-exclusion policy. Self-exclusion is a tool we offer to help people control their gambling. It is not a guarantee that we can control it for them but we have to do all we reasonably can to make sure we prevent our excluded customers from gambling.

We must:

- explain how exclusion works to customers
- know how to complete an exclusion form
- understand the importance of provision of a photo
- check the yellow box at the start of every shift to know who our excludees are
- understand that self-exclusion forms include sensitive personal data about our customer and keep them safe and secure
- look at the names on debit cards in case they match one of you self-excludees – particularly if they are depositing relatively large amounts.

William HILL
THE HOME OF BETTING

SELF-EXCLUSION FORM

ATTACH PHOTO HERE

CHECKLIST
(MUST BE COMPLETED BY STAFF)

- ☐ Colour Photo received and attached
- ☐ Additional premises completed if required
- ☐ Customer's details are written clearly
- ☐ Continuous 12 month exclusions discussed
- ☐ Terms and Conditions highlighted
- ☐ Review process discussed
- ☐ Form has been signed by customer
- ☐ LINKED account queried

SHOP DETAILS:
SHOP NAME: _____ SHOP NUMBER: _____
SHOP ADDRESS: _____

CUSTOMER DETAILS:
FULL NAME (Mr/Ms/Miss/Ms): _____
ADDRESS: _____
POSTCODE: _____

OPTIONAL:
TEL NUMBER(S): _____ D.O.B: _____
EMAIL ADDRESS: _____

I wish to be excluded from the above Licensed Betting Office and **have/have not** (delete as appropriate) requested to be excluded from further shops as detailed on the Additional Premises Form.
Enter the number of additional premises requested here: _____

If you want to self-exclude from your William Hill Online or Telephone Betting account give us details here:
Account Number(s): _____ User Name(s): _____
Email Address: _____
LINKED Card Number: _____
Mobile/Email used to activate LINKED account: _____

I wish to be excluded from the Licensed Betting Office named on this form, others detailed on the Additional Premises Form and from any William Hill Online or Telephone Betting accounts I have given details for.

End date: DD/MM/YY _____

I confirm that I have read and understand the Terms & Conditions as detailed on the back of this form, that I cannot revoke, rescind or withdraw this self-exclusion prior to the expiry date above and that I hereby release all William Hill Group Companies and employees from any liability or claims for losses I should suffer.

Customer Signature: _____ Date: _____
Duty Manager Signature: _____ Date: _____

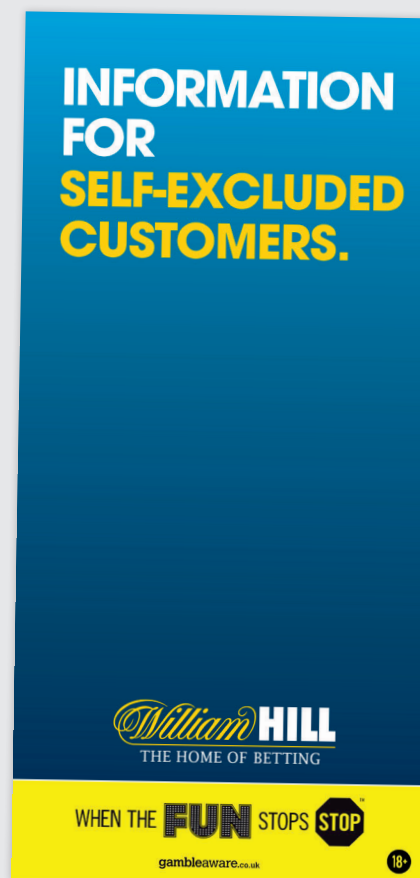
WHITE COPY - SHOP YELLOW COPY - COMPLAINTS DEPT. OPERATIONS HOUSE BLUE COPY - DISTRICT OPERATIONS MANAGER YELLOW COPY - CUSTOMER

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 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 ☐
DATE: _____

CUSTOMER SIGNATURE: _____

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 the National Gambling Helpline on 0800 9020 133



Self-Exclusion Request from William Hill

All team members must be able to explain the self-exclusion process to our customers and assist in completing it.

- A customer should be given the opportunity to discuss self-exclusion in private
- The duty manager should follow the step-by-step checklist at the top right corner of the self-exclusion form and tick all relevant boxes
- The exclusion period is 12 months
- A photograph is compulsory therefore team members are required to know their nearest photo service provider
- You have to get your AOMs permission before you accept an exclusion without a photo or add more than 6 additional premises
- Check that all relevant information has been entered, before signing the form and processing it through the till
- Remember to ask the customer to include online accounts and LINKED card details should they wish to
- Remember to scan new exclusions and additional premises forms through your till and send the right copies to you DOM and to Compliance
- Self-excluders should be given a copy of the yellow 'information for Self-Excluded Customers' leaflet
- The Self-Exclusion forms need to be photocopied in colour for the additional premises of choice and distributed immediately. The shops should be contacted to notify them about the form and confirmation should be sought regarding the forms reaching their destinations
- All team members must be made aware of the new self-exclusion, it should be kept in your self-exclusion file and reviewed at the beginning of every shift

Self-Exclusion Review

- A 6 month review period follows the 12 month self-exclusion. During these 6 months, a customer remains self-excluded until a review is completed.
- A customer can opt to resume gambling (following a 24h cooling off period) or to renew their self-exclusion for a further 12 months.
- Self-exclusions which remain un-reviewed expire after these 6 months and should be forwarded to your DOM for safe disposal.
- During the review period, all instances of gambling whilst the form remains un-reviewed are considered as self-exclusion breaches and should be reported on Incident Report Forms.

If the customer excluded on 01/01/16, their exclusion period will be up to and including 01/01/17. They now 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.

Resume gambling

The customer ticks the tickbox on the bottom of the self-exclusion form they are reviewing and signs the form. They must then leave the shop for a 24h cooling-off period before they are allowed to gamble. After the 24h cooling off period, the signed 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.

You should ensure that all shops covered by the form are aware of the review and forward their copies to their DOM for safe disposal.

Extend self-exclusion for another 12 months

The customer ticks the tickbox 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 be marked on the Daily Totals Report.

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 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:** _____

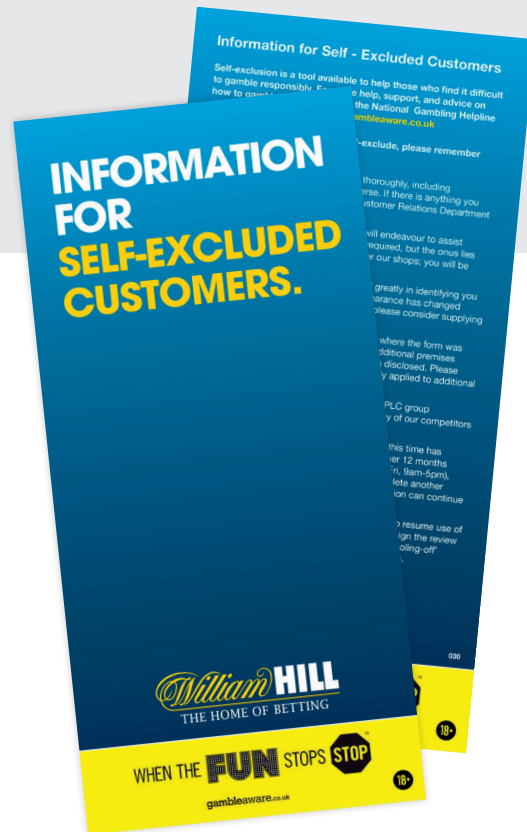
.....

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 the National Gambling Helpline on **0800 8020 133**

034308

Reviewing the form via the SE Helpline 0800 169 3352

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 they do not wish to enter a 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 your DOM.

Expired Forms

If the customer excluded on 01/01/12, their exclusion period will be up to and including 01/01/13. He remains excluded and should review his exclusion up to and including 01/07/13. His exclusion expires on 02/07/13. He can now enter the shop and gamble. Remember to consider interacting with customers who have returned after being self-excluded.

Self-Exclusion Breach

Customers exclude for a period of 12 months. Attempts to enter the premises or to gamble during their exclusion will be classified as breaches. Should a self-excludee attempt to gamble during the 6 month review period and should they wish to complete a review or should they gamble before the 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. Stakes of losing bets are not to be refunded but their winnings paid in full.

Sometimes you will approach individuals you suspect of being excluded but because of a potential change in their appearance you cannot be certain and when approached, they deny their identity. Ask them for ID. Unless their identity can be verified and you are sure they are not self-excluded, ask them to leave.

Remember to also approach individuals you suspect are placing bets on a self-excludee's behalf. If they admit placing bets on behalf of self-excludees, refuse any future transactions. If they say that the bets are their personal bets, accept them and stress the importance of support for self-excludees.

If you are in doubt contact your DOM or the Compliance Team for advice.

Reporting Self-Exclusion Breaches

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

- **The customer NAME.**
- **Why they were not identified first? Has their appearance changed?**
- **Did they manage to gamble before they were identified?**
- **How long they were able to gamble for? How often did they visit the shop before being identified?**
- **Did they bet OTC/GM or both? If OTC, how many bets placed? If GM, what terminal (in case of CCTV)?**
- **How much did they gamble? How much did they collect?**
- **Did they use cash/card or both? If card, how many occasions did they approach the counter?**
- **Were the other shops covered by the self-exclusion agreement informed?**

The image shows two forms from the Retail Compliance Manual. The left form is the 'INCIDENT REPORT FORM' and the right form is the 'DAILY TOTALS REPORT'.

INCIDENT REPORT FORM
One Incident Report Form should be completed for each Incident

Branch Name: _____ Date of Incident: _____
Branch Number: _____ Time of Incident: _____
Employee Name: _____ Employee Number: _____

TYPE OF INCIDENT

1) H&S Record - Response Not Initiated	2) H&S Incident - Abuse/Violence - Police Not Called	3) H&S Incident - Accident	4) Age Verification - Category A	5) Responsible Gambling Interaction	6) Self-Exclusion Breach	7) Police Called	8) Official Visit	9) Good Neighbour - Incidents affecting Licensing Objectives
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Line Manager Informed? Yes ☐ No ☐
SIGN: _____ DATE: _____

DAILY TOTALS REPORT
Questions that require an Incident Report Form: 2 (if No), 3, 4, 5, 6, 10, 12, 14, and 15

Branch Name: _____ Date: _____
Employee Name: _____ Employee Number: _____

Health and Safety

1) Hazard Identified? (If Yes Complete Q2) Yes ☐ No ☐
2) Helpdesk Informed? Yes ☐ No ☐
3) No. of Verbal Abuse/Violence Incidents - Police Not Called (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
4) Section 5 H&S Manual No. of Incidents/Accidents Occurred (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐

Age Verification - Category A
5) No. of Category A Incidents (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
Age Verification - Category B
6) No. of Category B Incidents 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
Age Verification - Successful Challenges
7) No. of Customers Producing Acceptable Proof of Age When Challenged 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐ 11 ☐ 12 ☐ 13 ☐ 14 ☐ 15+ ☐

Responsible Gambling
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+ ☐

Police Incidents
12) No. of Incidents - Police Called (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
POCA/Money Laundering Incidents
13) No. of Notifications to AOM 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐

Official Visits
14) No. of official visits (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
Good Neighbour
15) No. of Incidents affecting Licensing Objectives (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
16) No. of alcohol challenges 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
17) No. of instances of drug abuse or dealing 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
18) Card Requested 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐

Multi Operator Self-Exclusion

The Multi Operator Self-Exclusion Scheme allows customers to exclude from more than one operator by making just one telephone call to the Central Self-Exclusion Team on 0800 294 2060 who facilitate the entire completion process, including helping the customer to include relevant shops and tailoring their self-exclusion to their specific needs.

The scheme is an additional option for our customers, not a replacement of the existing William Hill self-exclusion scheme.

- The completion process is managed by the Central Self-Exclusion Team and any specific customer enquiries relating to completion should be forwarded to them.
- The multi operator self-exclusion process matches our existing William Hill self-exclusion process – the self-exclusion period is 12 months and remains in place for a further 6 months. All bets stand. The forms should be kept in yellow folder and reviewed daily.
- Please note, that neither the initial completion nor the review process can be completed in the shop. Customers, who wish to resume gambling, or to renew for another 12 months must contact the Central Self-Exclusion Team to complete the process.

THE MULTI OPERATOR SELF-EXCLUSION PROCESS	
The Customer calls the Central Self-Exclusion Team on 0800 294 2060 and completes the self-exclusion process.	▼
The Central Self-Exclusion Team will forward the completed self-exclusion to our Compliance Team.	▼
Our Compliance Team will circulate the self-exclusion to your shop.	▼
You contact your DOM/designated shop to confirm the form has been received.	▼
Manage the form as per our self-exclusion procedures i.e. Yellow folder reviewed daily.	▼
The Customer calls the Central Self-Exclusion Team to review their agreement. Our compliance team will communicate with you once a review has been completed and will advise you of further action required.	▼

The Multi Operator Self-Exclusion scheme

Remember that customers who want to exclude immediately from William Hill can still do just that. Our own self-exclusion process remains the same. Inform the customer of the multi-operator scheme too. It is then the customer's choice how to proceed.

Don't say:	You can exclude from all betting shops in the UK.
Instead say:	You can self-exclude from more than one betting operator – relevant shops will be discussed during your call with the central self-exclusion team.
Don't say:	Call the number to exclude and it will be easier than excluding now in William Hill.
Instead say:	You can call the number to complete a multi operator exclusion but, if you wish to, you can exclude in just William Hill today.
Don't say:	Call the number and exclude nationwide as it would be easier for you.
Instead say:	You can call the number to discuss one self-exclusion from the shops you are likely to visit across different betting operators. You will need to provide them with a photo and proof of ID and they will tailor an exclusion to suit your needs.

Correct Reporting

Ensure the number of incidents reported on the Daily Totals Report is correct. These figures are collated, reviewed and should be a realistic picture of compliance actions in your shop. Your reporting history is your personal compliance log which evidences your social responsibility and adherence to the three licensing objectives. Please be aware that inaccurate reporting could lead to disciplinary action being taken against you.

Communicate the number of incidents you dealt with to the duty manager taking over your shift.

Be aware of any ongoing issues or recent incidents which occurred in shops you work in.

Be able to deal with compliance reporting related enquiries. If you have a GC Officer asking questions about your reporting ensure you can talk them through it. Every duty manager should be able to discuss the shops compliance reporting and every team member should be able to explain the reporting processes.

The image shows two overlapping forms from the Gambling Commission's Retail Compliance Manual. The top form is the 'RETAIL COMPLIANCE INCIDENT REPORT FORM' and the bottom form is the 'RETAIL COMPLIANCE DAILY TOTALS REPORT'.

RETAIL COMPLIANCE INCIDENT REPORT FORM
One Incident Report Form should be completed for each Incident

Branch Name: _____ Date of Incident: _____
Branch Number: _____ Time of Incident: _____
Employee Name: _____ Employee Number: _____

TYPE OF INCIDENT

1) H&S Incident - Helpdesk Not Informed	2) H&S Incident - Abuse/Violence - Police Not Called	3) H&S Incident - Accident	4) Age Verification - Category A	5) Responsible Gambling Interaction	6) Self-Exclusion Breach	7) Police Called	8) Official Visit	9) Good Neighbour - Incidents affecting Licensing Objectives
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Line Manager Informed? Yes ☐ No ☐
SIGN: _____ DATE: _____

RETAIL COMPLIANCE DAILY TOTALS REPORT
Question 1 must ALWAYS be completed
Questions that require an Incident Report Form: 2 (if No), 3, 4, 5, 6, 10, 12, 14, and 15

Branch Name: _____ Date: _____
Employee Name: _____ Employee Number: _____

Health and Safety

1) Hazard Identified? (If Yes Complete Q2) Yes ☐ No ☐
2) Helpdesk Informed? Yes ☐ No ☐
3) No. of Verbal Abuse/Violence Incidents - Police Not Called (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
4) No. of Incidents/Accidents Occurred (IRF) + Section 5 H&S Manual 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐

Age Verification - Category A

5) No. of Category A Incidents (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
Age Verification - Category B

6) No. of Category B Incidents 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
Age Verification - Successful Challenges

7) No. of Customers Producing Acceptable Proof of Age When Challenged 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐ 11 ☐ 12 ☐ 13 ☐ 14 ☐ 15+ ☐

Responsible Gambling

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+ ☐

Police Incidents

12) No. of Incidents - Police Called (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
POCA/Money Laundering Incidents

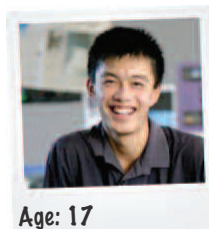
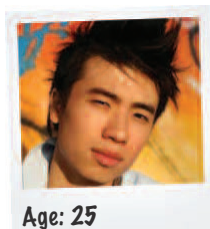
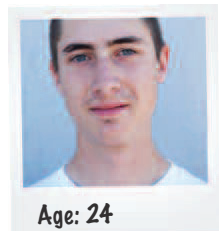
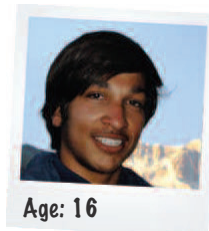
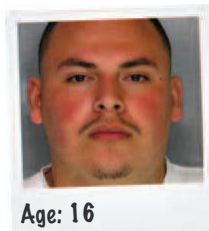
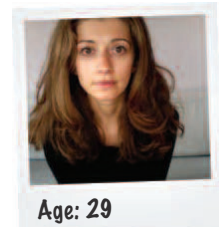
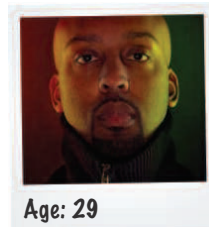
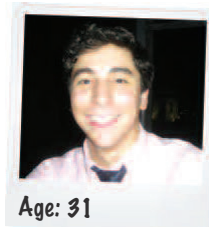
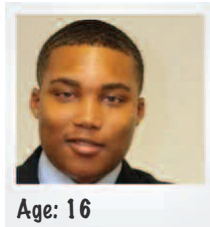
13) No. of Notifications to ADM 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
Official Visits

14) No. of official visits (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
Good Neighbour

15) No. of Incidents affecting Licensing Objectives (IRF) 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
16) No. of alcohol challenges 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
17) No. of instances of drug abuse or dealing 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐
18) Card Requested 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐

Think 21

Did you guess the ages correctly?



IF IN DOUBT, ASK FOR ID

RESPONSIBLE GAMBLING

3.1

THINK 21

Under the conditions of our operating licence, no customers under the age of 18 are allowed on our premises under any circumstances.

To fulfil this obligation, Ladbrokes Coral operate a Think 21 policy. This requires any customer who is believed to be or who is known to be under the age of 21 to be challenged for identification. If in doubt, we use the principle of a “young stranger” – if the customer looks young and is a stranger, they should always be asked for proof of age. For full details refer to the Think 21 policy in the Compliance Directory and Huddle space which also covers Think 21 FAQs and examples of acceptable forms of ID.

The challenge for identification must happen as soon as possible after the customer has entered the shop.

If it's possible, approach the customer on the shop floor and ask for sufficient identification. If it's not possible to do this, you should politely ask the customer to approach the counter (blocking the gaming machine / Betstation if required).

Should an adult enter the premises with young children, then they must be asked to leave the shop and this needs to be logged like a standard Think 21 challenge.

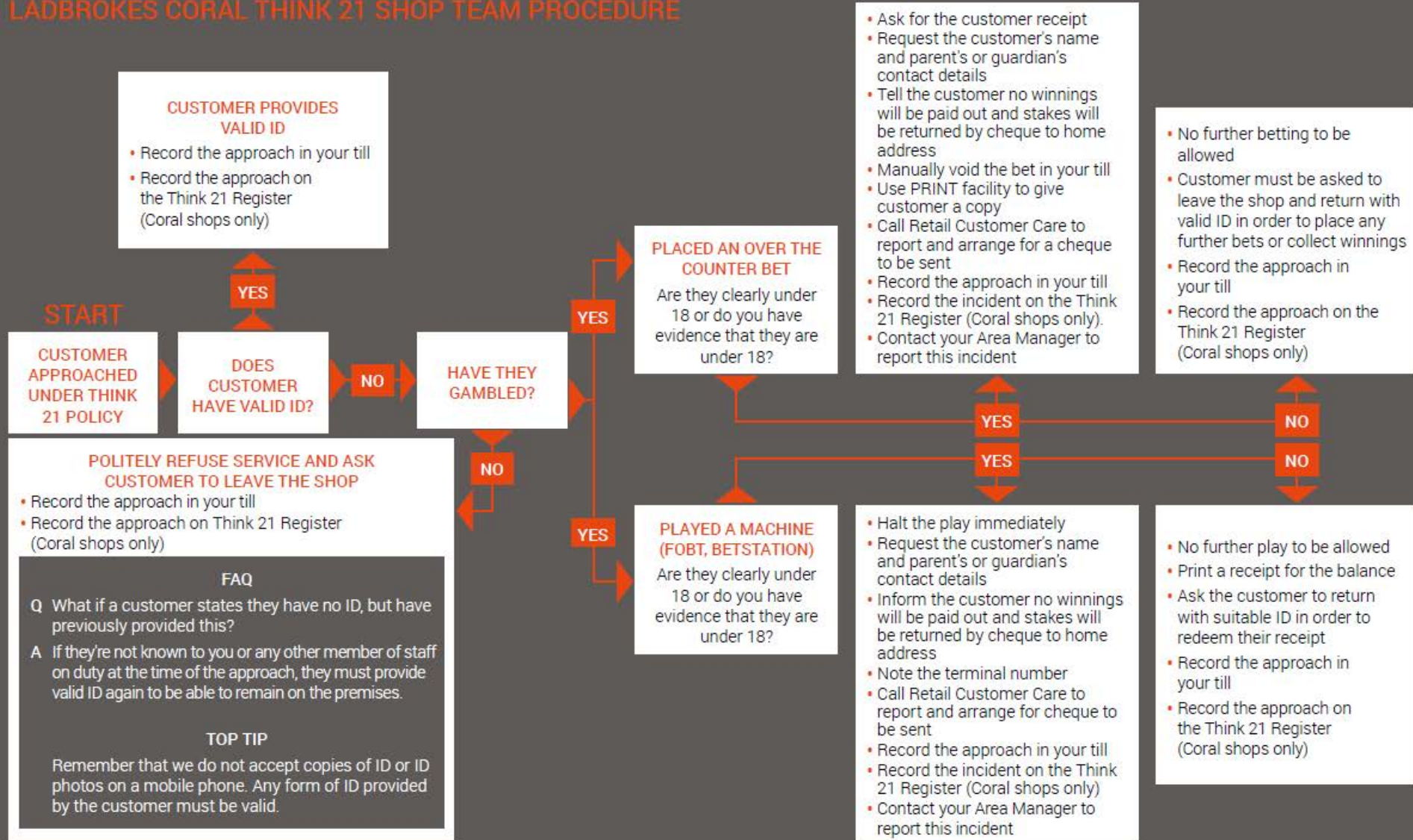
Please refer to the flowchart overleaf for the process which should be followed in a shop.

CITIZENCARD APPLICATION FORM



**Complete Think 21 2018 e-learning module on
Ladbrokes Coral Academy.**

LADBROKES CORAL THINK 21 SHOP TEAM PROCEDURE



3.2

**SELF-EXCLUSION
RETAIL**

As part of our obligations under our licencing conditions, Ladbrokes Coral has a Self-Exclusion policy to help protect vulnerable customers.

When a customer feels they can no longer gamble safely and their only option is to stop completely, we have the facility to allow them to stop themselves gambling, referred to as a self-exclusion. The process is instigated by the customer.

Customers currently have two options:

- 1. Multi-Operator Self-Exclusion (MOSES)** – a customer can exclude themselves from multiple operators with one process
- 2. Ladbrokes Coral Self-Exclusion** – a customer can exclude themselves from selected Ladbrokes and Coral shops simultaneously - see overleaf.

Both schemes allow customers to self-exclude for a period of 12 months. Customers can also choose to extend their retail self-exclusion to any Group accounts by specifying these on the form.

Self-Exclusion checks:

It is crucial that you check your self-exclusion register regularly (at least once a week) to help customers uphold their agreements. Special attention should be given to customers who have recently self-excluded or breached their agreements. Weekly checks must be recorded in the shop diary.

Northern Ireland:

MOSES is not available in Northern Ireland. Please refer to original Self-Exclusion Scheme.

**MULTI-OPERATOR SELF-EXCLUSION
(MOSES)**

If a customer wants to exclude themselves from Ladbrokes Coral brands and other operators, they can enter into a Multi-Operator Self-Exclusion (MOSES) agreement.

There is a simple, three step process to follow:

1.

Customer contacts a Central Self-Exclusion Team on 0800 294 2060 and agrees which shops and operators they want to be excluded from

2.

The Central Self-Exclusion Team will then contact the operator's Head Office advising of the customer's request

3.

Our Head Office team will contact the shops covered in the agreement with full details of the Self-Exclusion

In line with the new GDPR legislation, all self-exclusion forms (internal and MOSES) should be stored in the Compliance Directory.

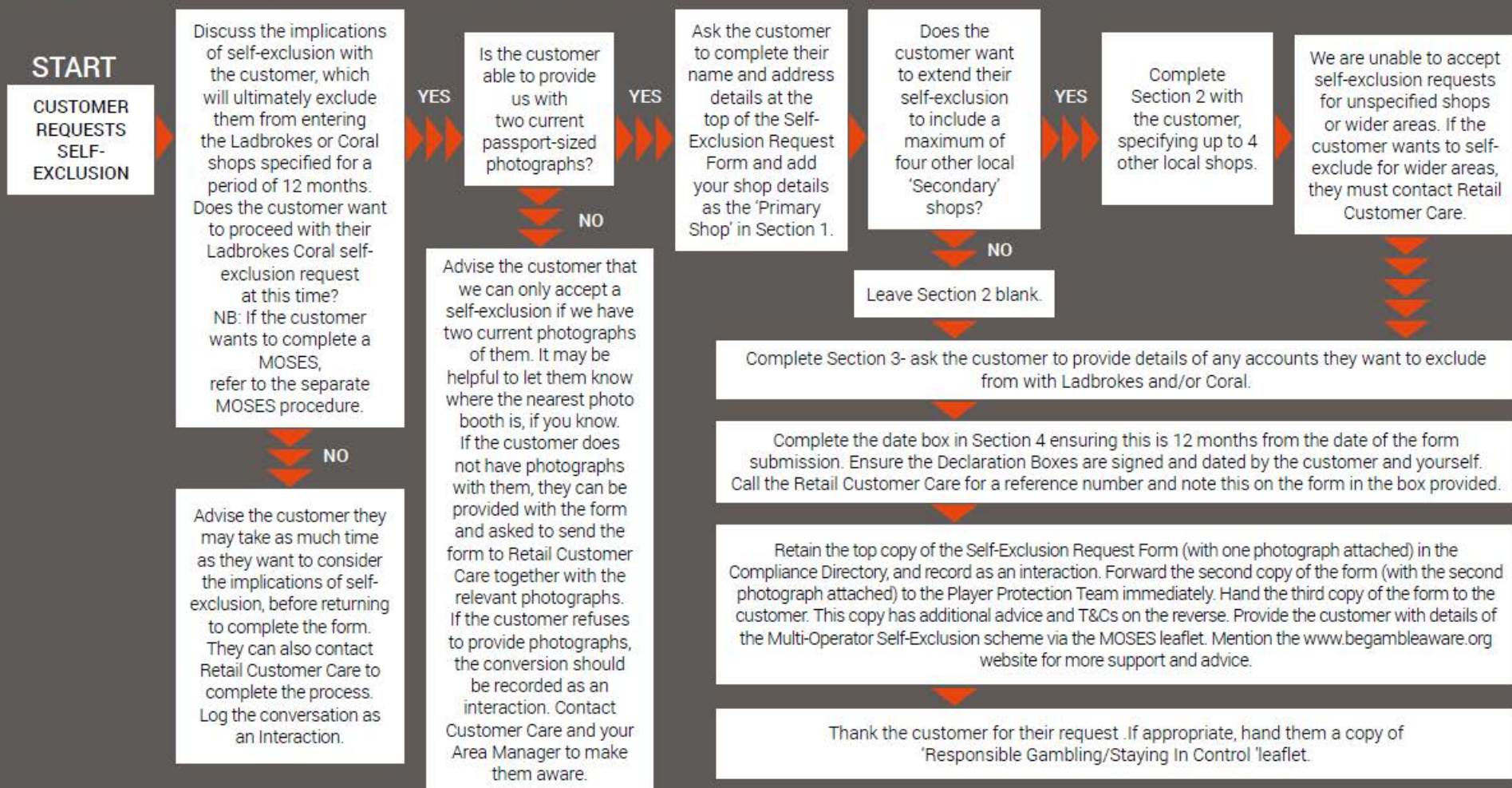
DIGITAL

Digital customers have currently two options to control their gambling:

- Ladbrokes and Coral digital self-exclusion scheme which allows them to self-exclude from online accounts with each brand
- Gamstop – a new, online cross operator scheme (like MOSES for retail shops) which allows customers to self-exclude from online accounts across the industry



LADBROKES CORAL RETAIL SELF-EXCLUSION PROCESS



KEY POINT: Six months after the point of expiry or once a reinstatement form has been completed, the self-exclusion forms should be securely destroyed in shop using a shredder.

BREACH OF SELF-EXCLUSION

If a self-excluded customer enters the shop in breach of their self-exclusion agreement, follow the below steps:

- If the customer has approached a machine, block the machine
- If it's safe to leave the counter, approach the customer and inform them they are in breach of their self-exclusion agreement
- Wear your StaffGuard fob, activating it if you feel unsafe
- If it's not safe to leave the counter, ask the customer to approach the counter and tell them they are in breach of their self-exclusion agreement
- Advise them we are unable to serve them and ask them to leave the shop immediately
- If customer has credit in the machine, withdraw it and return it to the customer
- Call Retail Customer Care and your Area Manager to log the breach, then record it in the Interaction Log. **If you are aware that the customer is excluded from other shops but not your shop, you should still contact Customer Care, your Area Manager and record it in the Interaction Log**

- If a customer is attempting to use a self-excluded Grid or Connect card in shop (i.e. due to a Ladbrokes Coral or a GAMSTOP exclusion) a recorded interaction needs to take place with the customer to ask if they also wish to self-exclude from shop. If they do, provide the customer with details of Ladbrokes Coral and MOSES scheme and assist as required. If they do not, record an Interaction and allow the customer to continue betting in the shops

SELF-EXCLUSION REINSTATEMENT

Following completion of a period of self-exclusion and within a further six months of the expiry date, a customer may ask to re-enter our shops by completing a Self-Exclusion Return to Gambling Request Form. However, if the customer does not wish to reinstate or they wish to extend their self-exclusion for a further period, the self-exclusion can be renewed for a period of 12 months. A new form needs to be completed in the original shop (new photographs are only required if there has been a significant change to customer's image). A customer can also contact Retail Customer Care instead of coming in to the shop.

Upon reinstatement you must have a Responsible Gambling (RG) Interaction with the customer ensuring they are aware of all the RG tools available to them.

Reinstatement may only occur at the request of the customer, in person at the shop where the original self-exclusion Request Form was submitted. They can

also contact Retail Customer Care if the self-exclusion was originally processed by them. Reinstatement for MOSES self-exclusions needs to be done via MOSES helpline.

You should assist the customer with the completion of the Self-Exclusion Return to Gambling Request Form. Raise any queries with completing the form with Retail Customer Care.

After the reinstatement process, a 24-hour cooling off period applies before the customer can enter our shops.

Reinstatements need to be reported to Retail Customer Care and the form sent to the Player Protection Team.

Complete the Introduction to Responsible Gambling 2018 e-learning module on Ladbrokes Coral Academy.

3.3

RESPONSIBLE GAMBLING INTERACTIONS

The Gambling Commission's Licence Conditions and Codes of Practice requires us to put into effect policies and procedures for customer interaction, where we have concerns that a customer's behaviour may indicate problem gambling.

RESPONSIBLE GAMBLING TRIGGERS

There are three types of Responsible Gambling triggers to be aware of:

BEHAVIOURAL TRIGGERS

Behavioural triggers are things customers do that suggest they may not be in control of their gambling. Examples include:

- Chasing their losses
- Mood swings, irritability, agitation, restlessness
- Becoming aggressive towards the machines
- Playing multiple machines at the same time
- Increased normal spend
- Increased dwell time vs normal time spent in shop
- If a customer asks to stop playing £50+ stakes
- Obvious money difficulties and debts (e.g. use of high-interest pay day loans)
- Trying to borrow money from colleagues or customers
- Frequently spending all the money they have brought with them

PHYSICAL TRIGGERS

These are defined, hard measures such as reaching a cash or debit card limit. Each time a physical trigger is reached, it requires a mandatory customer interaction with the customer which should be recorded in the till system.

1. Customer exceeds set voluntary (time or spend) limit on a Gaming Machine
2. Every Manager Loaded Cash transaction of £500 or more
3. All declined debit card transactions

You must familiarise yourself with the physical triggers and ensure that every time a customer reaches one or more of them, an interaction takes place and is recorded as required.

ANALYTICAL TRIGGERS

As part of our Responsible Gambling obligations, we monitor customer activity via loyalty cards and customer logs and may communicate Responsible Gambling messages to them.

From time to time you may be contacted by the Player Protection Team for additional information. Please comply with their requests and refer any customer queries to Retail Customer Care.

Complete Responsible Gambling Tools and Responsible Gambling Interactions e-learning modules on Ladbrokes Coral Academy.

INITIATING A CUSTOMER INTERACTION WHAT IS THE AIM OF THE INTERACTION?

- To introduce Responsible Gambling tools that are available to customers such as setting time and spend limits or self-exclusions
- To try and find out if the amount they spend is consistent with the job they have. From talking to them do you think they can afford to spend this much?
- To create a conversation that could help the customer to indicate if they have a problem with gambling

The aim is NOT to get the customer to admit that they have a problem with gambling. However, if they indicate they do have a problem, contact your Area Manager who will liaise with the Player Protection Team, as we will need to withdraw our services to the customer in their own best interests.

Some suggestions to initiating an interaction:

- Approach the customer at a quiet time and be discreet
- Present a relaxed image
- Initiate the conversation by asking the customer how they are; use their name if known
- Talk quietly to maintain privacy
- If you think it might help during the conversation, offer the customer a hot drink to allow them to take a break from play

- Refer to previous conversations or indicators that have been logged
- To any request for financial help, respond with 'I can't help in that way, but would it help if you could talk to someone confidentially'
- Listen to their responses and stop the conversation if the customer clearly does not want to talk to you

Colleague and customer safety is of utmost importance. Do not start any customer interaction if you feel your own safety or that of other colleagues or customers could be put at risk. Instead record an observation and follow up with an interaction the next time the customer enters the shop.

See the below space on Compliance Huddle for more information on physical triggers and interactions:

- *Handy Hints & Tips for Interaction*

RECORDING INTERACTIONS, OBSERVATIONS AND REVIEWS

Following an Interaction, Observation or Review you must record details of it in the Interaction Log.

If you can't make an interaction because it may not be safe, you must log an Observation.

Customers who are unresponsive to interactions or display multiple triggers should be referred for review to your Area Manager.

Please refer to the Interaction Policy in the Compliance Directory for details of your responsibilities and the

step-by-step guide on Huddle for details of how to log an Interaction, Observation or Review.

If you have further concerns after the review, these should be escalated to Player Protection Team via the SMC before taking any other action or implementing any refusal of customer service.

RG / AML HOSPITALITY CONCERNS

For any customer invited to a hospitality event, you must immediately flag to the SMC if you:

- Are aware of any RG concerns and/or
- Have money laundering concerns, knowledge or suspicion



Gamble Aware does not cover our shops in Northern Ireland and colleagues in NI should refer customers to Dunlewey Addiction Services on 08000 886 725. Separate RG leaflet is available for NI.

ANTI MONEY LAUNDERING (AML)

3.4

PROCEEDS OF CRIME AND MONEY LAUNDERING

We have a responsibility to be alert to customer attempts to use the proceeds of crime. This includes both the act of using criminal proceeds to fund gambling, or attempting to obtain 'legitimate' or 'clean' money in return.

There are different types of activity or customer behaviours which could lead to cause for concern, knowledge, or suspicion that an individual may be using criminal funds.

You need to be alert to the following product, customer, and payment factors which might indicate potential risk:

Product:

- Large stakes on short price selections
- Placing bets on all selections of an event
- Picking non-runners or putting on late bets to 'guarantee' getting stakes back
- Loading Gaming Machines / BetStations with money and then printing tickets for payment after minimal or no play

Customer:

- You believe a customer is betting on behalf of another barred or suspended customer or using someone else's Grid or Connect card

- You have heard that a customer has been barred or asked to provide further information to a competitor. This can show that other companies have concerns
- You have seen a customer attempting to sell their bets or lend money to other customers
- You believe that a customer may be involved in crime. This could be knowledge or rumour of drug dealing, theft, a prison sentence or Police investigation. Think about anything you may have seen in the local news
- A customer is betting with funds which you don't think match their means or lifestyle. This could be a customer thought to be unemployed or whose job, employment status, age, appearance or living arrangements do not tally with the time and money they spend (or lose) in your shop
- A customer who starts betting in large stakes straight away or who has had a sudden increase in stake with no clear indication of where the money has come from
- Customer requests for multiple receipts or repeat request for receipts for winnings paid from bets and game play
- You notice irregularities in the information provided by customers when signing up for an account

Payments:

- A customer is paying with large amounts of non-local bank notes, such as Scottish or Northern Irish bank notes in England
- A customer has large amounts of cash in a bag or bundles of high value or damaged notes
- A customer asks to change lots of notes. This must always be declined
- Customers attempt to use stolen Debit Cards or 'stained' notes
- Customers attempt to 'swap' payment methods using one method to fund activity and asking for funds back to a different method

If any of your customers show these triggers or you have suspicion or knowledge of money laundering you must advise the Duty Manager and contact the Safety Management Centre.

These SOPs must be read alongside the Group AML Policy, AML training modules and other AML materials that may be issued from time to time which provide further information about money laundering and the law.

Complete the Proceeds of Crime & Money laundering 2018 and Fraud Prevention e-learning modules on Ladbrokes Coral Academy.

3.5

REPORTING CONCERNS, KNOWLEDGE OR SUSPICION TO THE SMC

Where you have concerns, knowledge or suspicion of potential money laundering, you must inform the Safety Management Centre (SMC) immediately with as much information as possible about the customer and your concerns.

Failure to report knowledge or suspicion of money laundering may be a serious criminal offence.

- When contacting the SMC, be discreet so not to make the individual or other customers aware of your concerns
- Inform the SMC whether the customer is known to bet in other shops or if they have a Connect or Grid account
- If you have concerns before a bet is placed or before winnings or returns are collected, make the call to the SMC before proceeding where possible
- Do not tell the customer that a report has been made about them or that they are being investigated by Police or other authorities. Severe penalties could be applied against both yourself and the Company

Reporting confidential matters:

If you have concerns about reporting confidential matters to SMC or your Line Manager, you can report your concerns directly to the AML Team or to the Group Money Laundering Reporting Officer

3.6

SOURCE OF FUNDS

All operators must ensure that gambling is fair and open, not linked to crime and does not lead to harm. Like banks, we must collect customer information for age, identity and funds verification.

This means we sometimes need to ask customers to confirm their identity or show they have sufficient funds to support their gambling activity. We may need the information before further bets can be accepted or paid out.

We do this by giving the customer a letter and leaflet explaining what is required.

The AML or Player Protection Team will brief your Area Manager beforehand, as well as the colleague chosen to handover the leaflet or letter, to explain what is required from the customer, within what timeframe, and by what method. When the letter or leaflet arrives in shop from the AML or Player Protection team, the advice opposite should help with the handover process:



When information is requested from a customer, please follow this process:

- When the customer enters your shop discreetly hand them the letter and leaflet and let them read through the content
- If the customer asks why they have been handed the letter, explain: "I've been contacted by Head Office who has asked me to hand this to you to ask for some further information. All operators may ask for this information from time to time."
- Explain to the customer what they are required to provide. This could be:
 - » Proof of identity
 - » Proof of address
 - » Proof that they have sufficient funds to support their gambling activity.
- If the customer is required to provide proof of identity, explain that we'll need to see photographic ID, such as a passport or driving licence
- Where proof of address is required, please explain that we'll need to see confirmation, such as a recent utility bill
- If the customer is required to show that they have sufficient funds to support their gambling, explain that we need to see confirmation of the actual source of those funds. This could be evidence of the customer's salary or a payment made to them

- The leaflet and letter will advise customers:
 - » How to return information to us
 - » What will happen if information is not provided
 - it's likely we'll be unable to accept any further business from the customer until they do
 - » Who to contact if they have queries – this could be Retail Customer Care or the contact details provided in the letter

Please report the date and time the leaflet was handed to the customer, along with details of the customer's response to the AML or Player Protection Teams using the email address provided.

You should hand the customer the Ladbrokes / Coral leaflet as well as the purple ABB "Getting to know You" leaflet. This helps show that the source of funds process is an industry wide initiative.

3.7

STAINED NOTES

If you come across ink stained notes, it could indicate that they have been obtained illegally from a cash-in-transit robbery.

Where ink stained notes are offered, you must refuse to take the money and ask the customer to leave the shop immediately. Report the incident to the Safety Management Centre, including as much information about the incident as possible.



If you identify ink stained notes in your gaming machines or BetStations or have accepted them over the counter in error, follow the steps below:

- Secure the notes in a plastic wallet or envelope and store in the safe to limit unnecessary handling of them
- Contact the police to report the incident and obtain a Crime Reference Number:
 - » London shops – no action required, as the Metropolitan Police Flying Squad will deal with this matter
 - » Non-London shops contact local police via the non-urgent 101 system
- The police will usually deploy an officer to attend the shop and collect the notes
- Contact the SMC to report the incident, including as much information as possible – i.e. amount, note denominations, crime reference information, date/time, the terminal, and suspect description
- The SMC will refer the matter to the AML Team for further investigation

Where ink stained notes have been accepted in error or found in your Gaming Machines / BetStation), you must report it as a cash shortage in your till.

REGULATORY COMPLIANCE

3.8

SHOP LICENCE CONDITIONS

To meet the conditions of your Premises Licence, you must:

- Ensure the 'Think 21' policy and procedures are adhered to
- Ensure that no bets are accepted over the counter, via FOBTs or BetStations before 7 am or after 10 pm
- Politely ask customers to either refrain from the following or leave the premises immediately:
 - » Smoking (includes Vaping and eCigarettes)
 - » Using or dealing in illegal substances
 - » Drinking Alcohol (includes bringing unopened alcohol into the shop)
- Any incident involving the above should be reported to the SMC
- Maintain your shop in accordance with 'Gold Standards', ensuring that the correct licences, regulatory signage and rules are displayed at all times
- Display your Premises Licence and the Certificate of Employers' Liability Insurance

Please also refer to Section 4 of your Premises Local Area Risk Assessment (PLARA) for any additional local conditions which apply to your specific shop.

3.11

COMPLAINTS AND DISPUTES

We want our customers to have the best experience possible and enjoy their visit. However, there may be instances when some customers may want to complain.

COMPLAINTS PROCEDURE

The complaints procedure involves a three stage process:

1. The customer should talk to a member of the shop team to try and resolve their complaint
2. If the issue can't be resolved, the customer should escalate their complaint to Retail Customer Care for investigation

Under no circumstances should you ring Retail Customer Care on a customer's behalf or allow them to use the shop telephone. The customer must make contact directly. The number is a freephone freephone number..

3. If the customer remains dissatisfied following the internal complaints process and their complaint relates to the settlement of a betting or gaming transaction, Retail Customer Care will refer them to our Alternative Dispute Resolution (ADR) provider, which is the Independent Betting Adjudication Service (IBAS). They will conduct an independent review. Ladbrokes Coral are registered with IBAS and agree to be bound by their decision in all matters of betting adjudication

VOID BETS

Sometimes after a dispute, a bet may need to be voided. Full details of the various circumstances are outlined in the shop rules poster. If you're unsure if a bet should be voided, you should contact the SMC.

In exceptional circumstances, Area Manager / Regional Directors may agree settlement of a bet contrary to the shop rules, based on the individual circumstances surrounding the original bet acceptance.

If you are authorised to void a bet, you should:

- Void the bet in your till and return the money to the customer
- Scan a note through your till explaining the reason the bet was voided and who authorised it
- The betting slip should be kept with the day's bets for auditing purposes

Always hand the 'How did we do? leaflet to any customers who want to log a complaint. Retail Customer Care details can be found there and customers can check what process they should follow if they wish to complain.

INCIDENT REPORTING

2.18

REPORTING OVERVIEW

An incident report should be completed after any accident, incident, near miss or enforcement visit to ensure we maintain accurate records and have adequate control measures to protect our colleagues and customers.

WHAT NEEDS TO BE REPORTED TO RETAIL CUSTOMER CARE?

The following incidents should be reported to Retail Customer Care:

- New self-exclusions
- Self-exclusion reinstatements
- Self-exclusion breaches
- Think 21 challenges where the customer has managed to play before challenge and then does not provide ID or is in fact underage
- If a parent or guardian visits and claims that their child had been betting in the shop and is underage



WHAT NEEDS TO BE REPORTED TO SAFETY MANAGEMENT CENTRE?

Examples of things you should report to SMC include:

- A robbery or an assault on a colleague or customer
- Customers becoming threatening or violent with a colleague, another customer or a machine
- Actual customer fraud or criminal activity or grounds to suspect someone
- Any slips, trips or falls, including any 'near misses' which did not result in an injury
- Money Laundering and any Responsible Gambling concerns, including stained notes
- Police, Local Authority and Gambling Commission visits including any Regulatory Underage Tests
- Any other Security or Health & Safety related incidents
- FOBT ticket alerts and BetStation Value tickets of concern, prior to payment

HOW IS AN INCIDENT REPORT RECORDED?

When logging an incident report:

- Contact the Safety Management Centre (SMC) as soon as possible
- A report should be made by a colleague present at the time of the incident wherever possible

- All standard incident report details should be available when making the call:
 - » Location
 - » Date and time of incident
 - » Description of incident
 - » Persons involved including witnesses
 - » Any action already taken
- The SMC may ask you additional questions to classify the incident and complete the report
- A notification will be sent to all relevant parties via email summarising the incident
- In the event of a serious incident, the SMC will contact the relevant parties to escalate the response

If you're unsure about whether an incident should be logged, please contact the SMC anyway.

Complete the following e-learning modules on the Ladbrokes Coral academy:

- **Managing Antisocial behaviour**
- **Crime Prevention for All**
- **Crime Prevention for Managers (CSM grade and above)**

GENERAL SECURITY PROCEDURES

1.12

OVERVIEW

As well as following specific SOPs, there are general security procedures which must be observed at all times.



CONTACTING HEAD OFFICE DEPARTMENTS

This rule applies to contacting all Head Office departments including Trading, Customer Care etc

- Do not put the phone on loudspeaker - other customers can hear you which means that we may be disclosing personal data to third parties. With GDPR legislation in place as of 25th May, it is vital that all phone calls regarding customers' data are made in a private environment
- Have customer details at hand prior to making the phone call

- Do not pass the phone over to the customer – the only departments that customers should be contacting are Customer Care and Customer Services and they should do so using their own device

PROTECTIVE EQUIPMENT

- Wear your StaffGuard fob at work **at all times**. Do not leave them lying around in a drawer – they will be of no use in an emergency
- Regularly check all equipment is working and record this in the shop diary
- All colleagues must ensure they remain up-to-date on all safety and security procedures and policies

WORKING ON THE SHOP FLOOR

- Be aware of your surroundings and remain vigilant. Situations that seem minor can escalate quickly if not handled effectively
- Before leaving the counter area to go onto the shop floor, you must always:
 - » Check that it's safe to leave the counter
 - » Secure all cash in a till drawer or in the safe
 - » Carry your StaffGuard fob
 - » Secure the counter door behind you
 - » If a situation develops, activate your StaffGuard fob and return behind the counter immediately, if safe to do so

- Under no circumstances should you ever put yourself in harm's way

COLLEAGUE AREAS

- Only authorised personnel are permitted to access colleague areas, including behind the counter and back of house
- Authorised personnel include Ladbrokes Coral employees and authorised contractors with appropriate identification
- The following items are not allowed in shops: grills, sandwich presses, hobs or any other electrical cooking items inc. rice cookers

CASH HANDLING

- Cash limits must be adhered to at all times and money positioned discretely to avoid the risk of opportunistic theft
- Excess cash must be transferred into the safe or insert throughout the day
- Ensure that all excess cash is placed in the time lock insert before the last hour of trading, in line with cash control procedures
- At 6pm, where business permits, you should cash down to one till if possible, to remove excess cash from the counter
- All other excess cash, including cash removed from machines, must be placed in the time lock insert via the cash posting slot, immediately after it has been counted