

**Brighton & Hove
City Council**

**LICENSING PANEL (NON LICENSING
ACT 2003 FUNCTIONS)
ADDENDUM**

10.00AM, FRIDAY, 19 DECEMBER 2014

COMMITTEE ROOM 1, BRIGHTON TOWN HALL

ADDENDUM

ITEM		Page
11	APPLICATION FOR REVIEW OF A PREMISES LICENCE- UNDER THE GAMBLING ACT 2005, METROBET BOOKMAKERS LTD, 56 BOUNDARY ROAD, HOVE	
12	APPLICATION FOR REVIEW OF PREMISES LICENCES -UNDER THE GAMBLING ACT 2005, UNITS 1 -4 REGENCY ARCADE, 63-64 WEST STREET, BRIGHTON	
A	Late Reps	1 - 96

Mark Savage-Brookes
Health and Safety and Licensing Department
Brighton and Hove City Council
Bartholomew House
Bartholomew Square
BRIGHTON
BN1 1JP

Our ref AW/AS/MET002-1-3/1934

Your ref

12 December 2014

Dear Mark

Metrobet Bookmakers – 19 December 2014

I write further to our email correspondence and enclose herewith 4 copies of a Bundle of Documents which contains information that I may refer to at the above hearing. The bundle contains training documentation and ID testing documentation as well as Challenge 25 notices. I wonder if the Bundle of Documents could be circulated accordingly.

I can also confirm that I will be representing Metrobet and George Moakes will be in attendance.

Yours sincerely



Andrew Woods
Woods Whur

METROBET BOOKMAKERS

56 BOUNDARY ROAD, HOVE

BUNDLE OF DOCUMENTS

SUMMARY

1. GAMBLING COMMISSION REFERENCE BOOK.
2. EXAMPLES OF ID TEST PURCHASING.
3. EXAMPLES OF REGULATORY RETURNS INCLUDING ID CHALLENGES.
4. ABB TRAINING GUIDE AND WORKBOOK.
5. GAMCARE AND CHALLENGE 25 SIGNS AND POSTERS.
6. SOCIAL RESPONSIBILITY TRAINING CERTIFICATE GEORGE MOAKES.
7. ROAR BETTING AWARD.

METROBET BOOKMAKERS, 56 BOUNDARY ROAD, HOVE, BN3 5TD

19 DECEMBER 2014

1. On 19 December 2014 an application for review of the Gambling Premises Licence for Metrobet 56 Boundary Road, Hove, BN3 5TD is to take place further to staff at the premises failing to prevent a young person from entering the premises and play a gambling machine on 1 May 2014 and again on the 9 October 2014.
2. Metrobet Bookmakers operate five premises throughout the United Kingdom and its two directors employed a management team to run the premises and to be responsible for compliance with the Gambling Act 2005. Further to the two failed test purchasers in Hove the management team has left the business and on 1 November 2014 a contract was signed with Roar Betting Limited for Roar Betting to manage the five shops. Roar Betting is an award winning business which currently operates three shops in London and has strict compliance and training procedures.
3. The operations manager for Roar Betting who will have overall responsibility for running the Metrobet shops and who will be attending before the Committee on the 19 December is George Moakes. George has been in the industry since 1964 and spent 37 years at Don Bruce Bookmakers in a number of positions including company secretary and general manager. In 2006 George joined Roar Betting as its operations manager and has been responsible for those premises since 2006.
4. The control and management of the Metrobet shop in Hove will now be subject to the training and operational standards of Roar Betting and the following documentation is included within the Bundle .
 - (a) Gambling Commission reference book.
 - (b) Serve Legal book ID Test Purchases carried out at Roar Betting shops.
 - (c) Examples of Roar Betting regulatory returns including confirmation of ID challenges.
 - (d) ABB training guide and workbook.

- (e) Gamcare and Challenge 25 signage.
 - (f) George Moakes Social Responsibility training certificate.
 - (g) Roar Betting Award 2013.
5. Metrobet/George Moakes have met with Mark Savage-Brookes and have proposed the following conditions to be attached to the premises licence:-
- CCTV to be installed at the premises which covers all the licensed area and images of which will be retained for 28 days and made available to a police or licensing officer upon request.
 - A maglock will be installed at the premises. The use of which will be risk assessed by the premises licence holder.
 - Challenge 25 will be operated at the premises.
 - Prominent signage and notices will be displayed showing that the premises operate "Challenge 25".
 - Prominent Gamcare documentation will be displayed at the premises.
 - All staff will be trained on the ABB training guide and workbook or similar training policy.
 - Refresher training of staff will take place and be recorded.
 - ABB approved ID test purchasing will take place at the premises with records maintained and made available to the police or licensing officer upon request.
 - An incident book will be maintained at the premises which will record all details of refusals and ID challenges.
6. Roar Betting are members of the Association of British Bookmakers and have implemented the ABB ID test purchasing systems whereby 3/4 times a year Serve Legal who are an independent test purchasing company send in young persons who are just 18 to see whether or not those young persons are challenged by the staff. The results of such test purchasing are provided in writing and attached to this document (Tab 2) is examples of the ID test purchasing results. Roar Betting also complete regulatory returns and in the regulatory returns confirm the number of

challenges made at the premises and how many people who are challenged could not verify their age (Tab 3).

7. George Moakes will ensure that the Gambling Commission reference book (tab 1) and the ABB training guide and workbook (Tab 4) are all implemented into the training systems so that staff are trained on these documents. Refresher training of staff will take place and prominent signage (Tab 5) will be displayed throughout the premises to ensure that the staff are fully aware of the obligations to challenge for ID young persons and that such challenges are recorded.
8. The Committee is asked to impose the additional conditions proposed and to accept that with the implementation of the Roar Betting management standards, additional refresher training and new training documentation that the licensing objectives will be promoted.

1. GAMBLING COMMISSION
REFERENCE BOOK

Gambling Commission

Reference Book

From September 2007 the Gambling Commission took over as the governing body for regulating the gambling industry. They established three main objectives that all betting establishments must adhere to in order to obtain licenses and continue to trade.

The **Comission Objectives** are:

- **keeping crime out of gambling**
- **Ensuring that gambling is conducted fairly and openly**
- **Protecting children and vulnerable people from being harmed or exploited by gambling**

Roar betting are fully committed to ensuring that all staff are trained, fully aware and comfortable with their responsibilities in accordance with all of the gambling commissions' expectations.

In order to fulfill this commitment all current and future employees will be breifed on day to day tasks that are required of them, inclusive of all reporting procedures, and will recieve regular updates on any and all future changes to those requirements.

Contents

MONEY LAUNDERING.....	4
AGE VERIFICATION	6
VALID FORMS OF ID	7
PROBLEM GAMBLING & SELF EXCLUSION.....	8
COMPLETING SELF EXCLUSION.....	9
REPORTING PROCEDURES.....	10
GAMBLING COMMISSION.....	13
OFFICIAL VISITS.....	13
ADDITIONAL INFORMATION	15

Money Laundering

All businesses that deal with large volumes of cash or money transfers are required by law to report suspicions of money laundering.

What is Money Laundering?

Is the process of transferring funds from illegal or dubious sources through legitimate businesses in order to conceal its true origin.

Who would you suspect of money laundering?

People who launder money tend to follow distinct patterns, in order for betting shop employees to suspect money laundering is taking place it often requires at least some knowledge of the customer. It could be that a customer has unusually high stakes or you may be suspicious that they are betting beyond their known means.

These large staking customers will usually have unusual betting pattern, involving little to no risk bets.

Such as:

- Backing non-runners
- Paying in cash, yet requesting payment in cheque or card.
- Backing several selections in one event
- Betting on odds on favourites (in particular sports events where there are only 2 participants)
- Cashing FOBT tickets with little or no play
- Using several different cards (in different names) as method of payment

If you suspect a customer of money laundering in your branch, then it is essential that you report your suspicions to the branch manager. Branch managers should report all suspicions to the on duty racing manager.

All suspicions will be looked at objectively, and a determination will be made as to whether or not the suspicions are justified, and if any further action is required.

It is important for the safety of all staff that these suspicions are kept confidential, customers are kept unaware of any reports and that no further action is taken by employees, unless specifically asked to do so.

If your not sure.....speak to the racing manager...

Age Verification

Age verification must be requested from **any** individual that you suspect is under 21 (accompanied or unaccompanied by an adult). Anyone who cannot produce a valid ID, must be asked to leave the premises immediately.

Children are not allowed on the premises at any time (including during non trading hours). Any adult who brings a child into your branch, should not be served and asked to leave the premises.

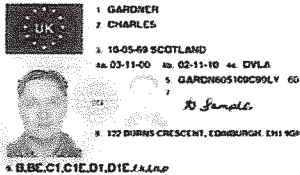
The gambling act allows for stakes to be returned to any individual who is proven to be under 18. These claims should not be paid out in your branch, in the first instance any such claim should be reported to John or George.

Any attempt by a young person or a child to enter your premise should be recorded in the GamCare EOD e-mail and your branch GamCare diary. If this individual attempts to gamble then a brief overview of events, including the time and person who dealt with the matter should be included in the GamCare EOD e-mail.

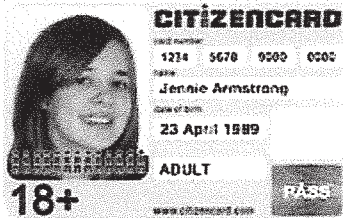
Under the gambling act there is a provision for the gambling commission to use under 18's as covert shoppers to ensure that we show due diligence in regards to age verification.

Valid forms of ID

DRIVING LICENCE



We accept full or provisional UK driving license. We do not accept any licenses or driving permits from any other country.



We accept any UK government identity card which displays "PASS" logo. These can be purchased from the www.citizencard.com



We accept any genuine passport from any country. Subject to authentication check with the Home Office. These checks may take time and it will not be possible to place a bet until the verification has been given.

If for any reason you are not happy with the ID provided, it is not unreasonable to request a secondary form of age verification.

Problem Gambling & Self Exclusion

Roar is now following guidelines set by the Association of British Bookmakers (ABB), as a result all shops will be receiving self exclusion forms from the ABB.

How to spot a problem Gambler...

In order to determine whether or not your customer has a problem with gambling, you have to know that customers normal behaviour, i.e. how their temperment is normally. Typically, a problem gambler will exhibit extreme highs and lows through out there time within the branch. They will often "chase" there money with either increased stakes, higher odds or both. They may even become aggressive and blame you for their bets losing.

Approaching a problem gambler...

If you suspect that a customer has a problem with gambling, you may want to talk to them about it. Approaching a customer regarding problem gambling is always under the condition that you are happy and comfortable to do so, and that you are fairly certain that the customer is approachable, and will not turn aggressive.

If you choose to approach the customer and they are responsive to your concerns, then you may want to make them aware of the various options and helplines that are available to them. For example you could offer them a problem with gambling leaflet which contains a helpline telephone number, and explain the implications of self exclusion and how they would proceed in excluding their selves from gambling.

It is essential that problem gambling leaflets are kept by the counter, and by FOBT's as per Gambling Commission Guidelines. It is also good practice to place some in the toilets, in order for the customer to obtain them discreetly.

Completing Self Exclusion

If a customer enters into a discussion regarding problems with gambling

Make them aware of self exclusion procedure and the implications

Key points to include:

- Will not be able to enter the premises once it is in effect- not even to say hi to Bob or Dave!
- Exclusion can be from 6 months to 5 years!
- It can only be applied to our chain
- It is non reversible after it is validated with a signature.
- Although it is not essential, it is a good idea to have a cooling off period before signing the agreement.
- At the end of the exclusion, the agreement will remain in place for up to 6 months unless the customer takes action to cancel or renew the agreement.

They do not wish to Self Exclude:

Even if the customer chooses not to self exclude you must still make a note of this in the EOD e-mail and the Branch GamCare Diary.

Customer wishes to Self Exclude

Ensure that the form is filled out discreetly and correctly; a photograph can be supplied (although it's not an essential requirement) by the customer or taken from CCTV with the customers' permission.

Up to 4 branches can be selected on the exclusion agreement. It is important that the customer selects the 4 branches that he is most likely to visit.

As there is only 2 copies with the ABB agreement the top copy of the agreement must be kept in the shop Gambling Commission File, the second to be given to the customer, and further copies to be made and sent to Hendon Office for the attention of George and Dominic.

Details of this interaction must be noted in the EOD e-mail and the Branch GamCare Diary.

Quick Guide to Self Exclusion

Customer enters into a discussion regarding problems with gambling

Make them aware of self exclusion procedure and the implications
Key points to include:
-Will not be able to enter the premises once it is in effect- not even to say hi to Bob or Dave!
-exclusion can be from 6 months to 5 years!
-It can only be applied to our chain and can not be reversed once activated!

THEY DO NOT WISH TO SELF EXCLUDE

Even if the customer chooses not to self exclude you must still make a note of this in the End of Day e-mail and the branch Log book.

CUSTOMER WISHES TO SELF EXCLUDE

Ensure that the form is filled out correctly; a photograph can be supplied (although it's not an essential requirement) by the customer or taken from CCTV with the customers' permission.

A copy of the agreement must be given to the customer, and further copies must be kept in the shop Gambling Commission File and sent to Hendon Office for the attention of George and Dominic.

Details of this interaction must be noted in the End of Day e-mail and the Branch Log Book.

Reporting Procedures

All instances that infringe on gambling commission objectives must be reported appropriately, in the GamCare Diary and on the EOD e-mail. All information that is received through the EOD e-mail will be centrally collated and stored for inspection by the relevant authorities. Appropriate reporting will protect the company and the employees.

It is only necessary to complete the GamCare EOD e-mail if you have something to report. It should be completed separate from your EOD business e-mail, and can be completed as and when an incident occurs, although it should not be sent until the end of trading as to have some consistency and clarity in collating the figures.

There are 5 main points that should always be reported in this EOD e-mail:

- All under 18 incidents (reporting further if they attempt to gamble)
- All matters regarding responsible gambling and self exclusion (further reports should be made if the interaction is staff led or a self exclusion agreement is completed)
- Any incidents that have needed police assistance (all of which require a further reporting)
- Any instances of money laundering that have been reported to the racing manager (none of these should be elaborated upon in the EOD e-mail)
- Official Gambling Commission Visits (all of which require a further reporting)

We hope that in the near future, all information will be collected and stored via sharepoint as we have done with the marketing. This will mean that information can be updated throughout the day.

Example of EOD e-mail

To: Dominic Ford
Cc: George Moakes; dave@roarbetting.com; Rupert Procter
Subject: GC EOD-(shop name & Date here)

Type of incident	Number of Occurrences'	You need a report if...
Under 18		They attempted to gamble
Responsible gambling		Self exclusion completed Breaches of self exclusion You approached a customer
Incidents requiring Police		All require report
Money laundering		No report required
Official Visits		All require report

Date and Time:	Type of Incident:	Police reference (if Applicable): CAD _____	Name: (of person filling out report)
<p>Brief over view of events:</p>			

Gambling Commission

Official Visits.

It is expected that the Gambling commission and local authorities will make announced, unannounced and covert visits to all licensed premises. It is important that we co-operate fully with these representatives and have all necessary information readily available for them.

What security checks should be made before allowing a Gambling Commission official or local authority representative behind the counter?

Id should be requested

Staff should ask representatives for ID confirming their name and position

ID should be verified by calling the local authority

The local authority should also be able to verify that there was a visit scheduled to your premises on that day if you are still not satisfied.

What powers does the Commission have?

The Commission has the following powers:

- It may impose conditions on the licences it grants, and it will issue codes of practice.
- It can review licenses.
- Sanctions available to it include formal warnings, the amendment of license conditions, imposition of financial penalties of any amount, and license revocation.
- Its staff has powers of entry, search and seizure.
- It has enforcement powers to tackle illegal gambling and cheating and will be able to initiate criminal proceedings.

What Should you expect from an official visit?

A representative would expect to see all and any documentation associated with the gambling commission objectives, this may include:

Gambling commission Diary, to ensure that appropriate records are being kept

Any emails relating to GC incidents

Any literature that includes rules, policies, procedures or guidelines that employees use or follow.

You should also expect that staff will be asked questions relating to Gambling Commission Procedures. All members of staff need to be aware of the location of all documentation, they should also know what the three objectives are, and how they effect the running of our business.

Visits must be recorded in the gambling Commission Diary, and reported in the EOD Email.

Please inform John or George as soon as possible if you recieve a visit.

Additional Information

All shops will receive additional posters for the staff area to help retain information.

They will include the quick reference guide for self exclusion procedures (page 10), a poster that states what ID we will accept (Page 7), and a poster for behind the counter, stating the following:

"Gambling Commission Compliance

The GCC expect us to operate in adherence to three objectives

They are:

To prevent gambling being a source of, associated with or being used to support crime or disorder.

To ensure that gambling is conducted in a fair and open way

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

That means

Anyone who appears to be underage must be approached and asked for proof of age

All staff are aware of self exclusion procedures

All suspected instances of money laundering reported via Telephone

All instances of this nature are to be included in your End of Day email'

ROAR!

betting

The information in this reference book was obtained from numerous sources, including ABB, Gamcare and the official gambling commission website (www.gamblingcommission.gov.uk). If you have any enquiries please do not hesitate to contact Louise at the Edgware Rd, W2 branch.

Live! From the edge of your seat

GAMCARE –COURSE NOTES

INTRO	<p>WELCOME</p> <p>CHECK ATTENDANCE</p> <p>INTRODUCTIONS-BRIEF HISTORY/WHERE FROM ETC</p> <p>GO THROUGH HEALTH AND SAFETY ASPECTS</p> <ul style="list-style-type: none"> • FIRE EXITS • TOILETS • TEA/COFFEE <p>HAND OUT FOLDERS, (HANDOUTS TO BE PUT IN THROUGHOUT)</p>	10 MINS
AGENDA	<ul style="list-style-type: none"> • MONEY LAUNDERING • AGE VERIFICATION <p>BREAK</p> <ul style="list-style-type: none"> • PROBLEM GAMBLING AND SELF EXCLUSION • LEGAL REQUIREMENTS • REPORTING PROCEDURE <p>ALSO SPECIFY APPROX RUNNING TIME-2 HOURS</p>	5 MINS
	<p>COMMISSION OBJECTIVES</p> <p>OUTLINE OBJECTIVES AND HOW THEY CAN EFFECT THE OBTAINING OR RENWAL OF LICENSES</p> <p>POINT OUT THAT IN ROAR! HOW MUCH MORE IMPORTANT THAT IS AS WE ARE CONSTANTLY EXPANDING</p> <p>BRIEFLY DISCUSS THE ASSESSMENTS THAT WILL BE CARRIED OUT BY THE RELEVANT AUTHOURITIES (INTEGRITY AND COMPETENCE) AND MENTION EXTERNAL SHOP VISITS BY REGULATORS-TO BE DISCUSSED IN MORE DETAIL AT THE END.</p>	10 MINS
MONEY LAUNDERING	<p>IMPORTANCE OF REPORTING SUSPICIONS</p> <p>OK SO WHAT ARE THE SIGNS OF MONEY LAUNDERING AND WHO IS A LIKELY SUSPECT?? (DISCUSSION, HOPE TO COME UP WITH THE FOLLOWING)</p> <p>THROUGH WOM-WHAT DO YOUKNOW?</p> <ul style="list-style-type: none"> WORK BUSINESS WEALTHY CONVICT/CRIMINAL LIFESTYLE VS PREVIOUS ASSOCIATES <p>BETTING PATTERNS</p> <p>AGAIN DISCUSSION- WHAT BETTING PATTERNS IN CONJUNCTION WITH KNOWLEDGE OF PERSON WOULD YOU CONSIDER AS MONEY LAUNDERING?</p> <ul style="list-style-type: none"> PLACING BETS ON BEHALF OF SOMEONE ELSE LARGE STAKES- PARTICULARLY ON ODDS ON/NR'S ETC <p>SENSITIVITY OF REPORTING THIS INFORMATION, WHO IT SHOULD BE REPORTED TO, DETAILS SHOULD NOT BE PUT IN EOD EMAIL, ONLY POINT OUT THAT A PARTICULAR INSTANCE HAD BEEN DISCUSSED.</p>	25 MINS

GAMCARE –COURSE NOTES

AGE VERIFICATION	<p>IN FOLDER EXAMPLES OF ACCEPTABLE FORMS OF ID. EVERYONES RESPONSIBILITY TO ASK SUSPECTED U18'S TO LEAVE, IF YOU DO NOT FEEL SAFE TO DO THIS THEN YOU SHOULD CALL THE POLICE. REFUNDING OF STAKES -SHOULD ONLY HAPPEN AT AUTHORISATION FROM GEORGE/ RACING MANAGER</p> <p>COVERT U18'S SHOULD BE REPORTED IN EOD EMAIL AND GAMCARE DIARY</p>	10 MINS
PROBLEM GAMBLING	<ul style="list-style-type: none"> • How do you spot a problem Gambler? • Approaching a problem gambler • Different ways to interact <p>SELF EXCLUSION- HAND OUT GAMCARE FOLDERS BRIEFLY GO OVER OUR PROCEDURE.</p>	20MINS
LEGAL REQUIREMENTS	<p>DISCUSS PRICES, BET DISPUTES, PROFESSIONAL CONDUCT AND HOW FAR A CUSTOMER CAN TAKE A BET DISPUTE.</p> <p>AND WHY RULES HAVE TO ALWAYS BE ON DISPLAY.</p>	10 MINS
REPORTING PROCEDURES	<p>EOD EMAIL</p> <p>GO OVER WHEN AND HOW IT IS TO BE FILLED IN – WHERE THE INFORMATION WILL BE STORED AND WHY IT HAS TO BE ON A SEPERATE EMAIL.</p>	10 MINS
GAMCARE VISITS	<p>WHAT WE CAN EXPECT FROM GC VISITS- IMPORTANCE OF REPORTING IN SHOP DIARY IN A POLITICALLY CORRECT WAY.</p>	10 MINS



14/01/2009

Social Responsibility Training Certificate of Attendance

George Moakes

**attended and successfully completed GamCare
training on social responsibility**

Training was facilitated by Teresa Tunstall,
Head of Development, GamCare

Geoffrey Godbold, Chief Executive, GamCare



2. EXAMPLES OF ID TEST PURCHASING .

George Moakes

From: George Moakes <[REDACTED]>
Sent: 02 November 2014 12:48
To: [REDACTED]
Subject: FW: PASS - Serve Legal visit to: Roar Betting, Bath Road

From: Lauren Hilton [mailto:[REDACTED]]
Sent: 09 June 2014 09:17
To: [REDACTED]
Cc: Dominic Ford [REDACTED]
Subject: FW: PASS - Serve Legal visit to: Roar Betting, Bath Road



Hi,

The visit to **Roar Betting, Bath Road** at 4:20 pm on 6th June 2014 was a **PASS**.

Site Review

Premises Details

Premises Name	Roar Betting, Bath Road
Address 1	314 Bath Road
Address 2	Hounslow
Premises City	London
Post Code	TW4 7HW

Visit Details

Actual Date of Visit	06/06/2014
Actual Time of Visit	4:20 pm
Visit Result	PASS, Challenge On Entry

Report

Question	Response
ON ENTRY / BROWSING	
As you entered the shop was eye contact made by a member of staff?	Yes
If you were acknowledged by a member of staff, please describe any eye contact or greeting you were given (e.g. brief eye contact/long enough to make an assesment of age/welcome to the branch/immediately asked for ID/another greeting):	Long enough to assess age
If you were NOT acknowledged as you entered the shop, please explain what may have prevented staff from greeting you (e.g. serving other customers, checking odds etc.):	N/A
Were you challenged for ID on entry, at the machine or after machine play? (Please indicate below at which point of your visit you were challenged):	On entry to the shop / Whilst browsing
If you were challenged at any of these points, please accurately describe the member of staff (gender, height, hair colour/length, and any distinguishing features):	Male, wearing a black bandana, tanned skin, grey shirt with red trim.
Did you see the member of staff wearing a "Think 21" / "Think 25" badge?	Yes
Please describe the manner in which you were challenged and add any other comments you feel are relevant:	Friendly
MACHINE PLAY	
Did you play on a machine before placing a bet at the counter?	Yes
If not, please state why:	N/A
Was the gaming machine you played visible from the counter?	Yes
Did you see any "Think 21" / "Think 25" stickers or posters visible from the machine area?	Yes
If you won on the gaming machine, please input the date and time from the winning machine slip:	N/A
PLACING THE BET	
Please describe what the server was doing as you approached the counter (e.g. serving a customer, talking to colleagues):	Talking to each other
Did the person who served you challenge you for ID at the counter while you placed your bet?	Yes
If so, please describe the manner in which you were challenged and add any other comments you feel are relevant:	Very friendly
Did the person who served you make eye contact with you?	Yes

Question	Response
If eye contact was made, when was it FIRST made?	Before the transaction
Please accurately describe the person who served (gender, height, hair colour/length, and any distinguishing features):	Male, wearing a black bandana, tanned skin, grey shirt with red trim.
Did you see the person who served you wearing a "Think 21" / "Think 25" badge?	No
From the counter betting slip, please record any visible codes/numbers:	00410140275475088
OVERALL VISIT EXPERIENCE	
How many staff were on duty in the shop at the time of your visit?	2
When were the staff first aware of you in the shop?	On entry
How many customers were in the shop at the time of your visit?	6
Did you see any "Think 21" / "Think 25" Posters in the shop?	Yes
Did you see any "Think 21" / "Think 25" Posters behind the counter?	Yes
Please give a report of your visit, providing a full description of your experience from entering to leaving the shop:	I went in and my ID checked almost immediately. I played on machine briefly and then placed my bet at counter, then left.
What time did you leave the shop?	4.29
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	

George Moakes

From: George Moakes <[REDACTED]>
Sent: 02 November 2014 12:49
To: [REDACTED]
Subject: FW: PASS - Serve Legal visit to: Roar Betting, 241 Edgware Road

From: Lauren Hilton [mailto:[REDACTED]]
Sent: 17 June 2014 13:54
To: George Moakes
Cc: [REDACTED]
Subject: FW: PASS - Serve Legal visit to: Roar Betting, 241 Edgware Road



Hi,

The visit to **Roar Betting, 241 Edgware Road** at 3:30 pm on 16th June 2014 was a **PASS.**

Site Review

Premises Details

Premises Name	Roar Betting, 241 Edgware Road
Address 1	241 Edgware Road
Address 2	Colindale
Premises City	Greater London
Post Code	NW9 6LU

Visit Details

Actual Date of Visit	16/06/2014
Actual Time of Visit	3:30 pm
Visit Result	PASS, Challenge On Entry

Report

Question	Response
ON ENTRY / BROWSING	
As you entered the shop was eye contact made by a member of staff?	Yes
If you were acknowledged by a member of staff, please describe any eye contact or greeting you were given (e.g. brief eye contact/long enough to make an assesment of age/welcome to the branch/immediately asked for ID/another greeting):	Long enough to make an assessment of age.
If you were NOT acknowledged as you entered the shop, please explain what may have prevented staff from greeting you (e.g. serving other customers, checking odds etc.):	N/A.
Were you challenged for ID on entry, at the machine or after machine play? (Please indicate below at which point of your visit you were challenged):	On entry to the shop / Whilst browsing
If you were challenged at any of these points, please accurately describe the member of staff (gender, height, hair colour/length, and any distinguishing features):	Female, 5 ft 5, Long blonde hair.
Did you see the member of staff wearing a "Think 21" / "Think 25" badge?	No
Please describe the manner in which you were challenged and add any other comments you feel are relevant:	Polite manner.
MACHINE PLAY	
Did you play on a machine before placing a bet at the counter?	No
If not, please state why:	Already been challenged for ID.
Was the gaming machine you played visible from the counter?	N/A
Did you see any "Think 21" / "Think 25" stickers or posters visible from the machine area?	Yes
If you won on the gaming machine, please input the date and time from the winning machine slip:	N/A.
PLACING THE BET	
Please describe what the server was doing as you approached the counter (e.g. serving a customer, talking to colleagues):	Th server was looking through some papers.
Did the person who served you challenge you for ID at the counter while you placed your bet?	No
If so, please describe the manner in which you were challenged and add any other comments you feel are relevant:	N/A.
Did the person who served you make eye contact with you?	Yes

Question	Response
If eye contact was made, when was it FIRST made?	Before the transaction
Please accurately describe the person who served (gender, height, hair colour/length, and any distinguishing features):	Female, 5 ft 5, Long blonde hair.
Did you see the person who served you wearing a "Think 21" / "Think 25" badge?	No
From the counter betting slip, please record any visible codes/numbers:	004 1012 02 31201034
OVERALL VISIT EXPERIENCE	
How many staff were on duty in the shop at the time of your visit?	1
When were the staff first aware of you in the shop?	On entry
How many customers were in the shop at the time of your visit?	2
Did you see any "Think 21" / "Think 25" Posters in the shop?	Yes
Did you see any "Think 21" / "Think 25" Posters behind the counter?	Yes
Please give a report of your visit, providing a full description of your experience from entering to leaving the shop:	I entered the store at 3 30 pm and started browsing the store. I was then asked for ID. I continued browsing and then placed my bet at the counter. I then left the store.
What time did you leave the shop?	3 34 pm
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	

George Moakes

From: George Moakes [REDACTED]
Sent: 02 November 2014 12:46
To: [REDACTED]
Subject: FW: PASS - Serve Legal visit to: Roar Betting, 328 Edgware Road

From: Lauren Hilton [mailto:[REDACTED]]
Sent: 05 September 2014 12:39
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: PASS - Serve Legal visit to: Roar Betting, 328 Edgware Road



Hi,

The visit to **Roar Betting, 328 Edgware Road** at 5:10 pm on 4th September 2014 was a **PASS**.

Site Review

Premises Details

Premises Name	Roar Betting, 328 Edgware Road
Address 1	328 Edgware Road
Address 2	Edgware
Premises City	London
Post Code	W2 1DY

Site Details

Store Code	HA8 0LT
------------	---------

Visit Details

Actual Date of Visit	04/09/2014
Actual Time of Visit	5:10 pm
Visit Result	PASS, Challenge On Entry

Report

Question	Response
ON ENTRY / BROWSING	
As you entered the shop was eye contact made by a member of staff?	Yes
If you were acknowledged by a member of staff, please describe any eye contact or greeting you were given (e.g. brief eye contact/long enough to make an assesment of age/welcome to the branch/immediately asked for ID/another greeting):	Called to the counter and asked for ID
If you were NOT acknowledged as you entered the shop, please explain what may have prevented staff from greeting you (e.g. serving other customers, checking odds etc.):	N/A
Were you challenged for ID on entry, at the machine or after machine play? (Please indicate below at which point of your visit you were challenged):	On entry to the shop / Whilst browsing
If you were challenged at any of these points, please accurately describe the member of staff (gender, height, hair colour/length, and any distinguishing features):	White male with short, grey hair
Did you see the member of staff wearing a "Think 21" / "Think 25" badge?	No
Please describe the manner in which you were challenged and add any other comments you feel are relevant:	Politely asked for ID
MACHINE PLAY	
Did you play on a machine before placing a bet at the counter?	No
If not, please state why:	ID'd on entry
Was the gaming machine you played visible from the counter?	N/A
Did you see any "Think 21" / "Think 25" stickers or posters visible from the machine area?	Yes
If you won on the gaming machine, please input the date and time from the winning machine slip:	N/A
PLACING THE BET	
Please describe what the server was doing as you approached the counter (e.g. serving a customer, talking to colleagues):	At the computer
Did the person who served you challenge you for ID at the counter while you placed your bet?	No
If so, please describe the manner in which you were challenged and add any other comments you feel are relevant:	N/A
Did the person who served you make eye contact with you?	Yes

Question	Response
If eye contact was made, when was it FIRST made?	Before the transaction
Please accurately describe the person who served (gender, height, hair colour/length, and any distinguishing features):	White male with short, grey hair
Did you see the person who served you wearing a "Think 21" / "Think 25" badge?	No
From the counter betting slip, please record any visible codes/numbers:	004 1007 01 78837262
OVERALL VISIT EXPERIENCE	
How many staff were on duty in the shop at the time of your visit?	1
When were the staff first aware of you in the shop?	On entry
How many customers were in the shop at the time of your visit?	0
Did you see any "Think 21" / "Think 25" Posters in the shop?	Yes
Did you see any "Think 21" / "Think 25" Posters behind the counter?	Yes
Please give a report of your visit, providing a full description of your experience from entering to leaving the shop:	On entry at 17:10, I was immediately called to the counter and asked for ID. I then took a completed betting slip to the counter before leaving at 17:12
What time did you leave the shop?	17:12
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	N/A

3. EXAMPLES OF REGULATORY RETURNS INCLUDING 10 CHALLENGES

Roar Betting DF Ltd**4 shop totals.****Gambling Commission.****Regulatory Return.****2013**

- 1 Complaints.**
The number of recorded complaints about the way Roar operates its licensed activities
- 2 Disputes.**
How many customer disputes regarding a gambling transaction
- 3 Self Exclusions.**
Number of self exclusions made
see note 3A.
- 4 Breaches of Self Exclusion.**
The number of known breaches. Include attempted entries and those that had entered and were stopped from gambling.
- 5 Self Excluded.**
The number of Self Excluded opting to return after a minimum of 6 months exclusion.
- 6 Under Age ID Challenges.**
How many people entered the shop could not verify their age when challenged.
- 7 Under Age Gamblers**
How many people gambling could not verify their age when challenged.
- 8 Problem Gamblers.**
On how many occasions have the staff interacted with a customer who was felt to have a problem with his gambling. Who were offered advice or given GamCare leaflets.
- 9 Customers Helped.**
The number of customers taking the advice offered by the staff.
- 10 Customer Incidents.**
The number of occasions when the police were called for assistance.
see note 10 A.
- 11 Proceeds of Crime.**
The number of occasions HO were made aware of suspected proceeds of crime being used.

0**9****7****1****0****107****7****28****13****2****0**

Roar Betting DF Ltd

Gambling Commission.

Regulatory Return.

2013

Extra Information: Both at Wexham, Slough.

3A

Why did the customer Self Exclude.

If known please note the reasons given for each Self Exclusion.

██████████ self excluded on 10th June after losing on sports betting. His wife was his mentor in making this decision.

██████████ gave no reason to exclude himself on the 15th January 2013.

10A

Why were the police summoned.

Please write a brief report for each occasion the police were called to the shop.

On 11th October 2013 an unknown person burst through the rear door and attacked the manager before making off with £300.00. No news since of an arrest.

On the 21st December an unknown man came in very drunk.

As the manager was of the opinion that he was not in a fit state to gamble he was asked to leave the premises. The person then became very abusive and threatening. The police were summoned and they removed him from the premises.

Roar Betting DF Ltd

Shop; Colindale

Name: John Lonnergai

Gambling Commission.

Regulatory Return.

2013

1 Complaints.

The number of recorded complaints about the way Roar operates its licensed activities

2 Disputes.

How many customer disputes regarding a gambling transaction

3 Self Exclusions.

Number of self exclusions made
see note 3A.

4 Breaches of Self Exclusion.

The number of known breaches. Include attempted entries and those that had entered and were stopped from gambling.

5 Self Excluded.

The number of Self Excluded opting to return after a minimum of 6 months exclusion.

6 Under Age ID Challenges.

How many people entered the shop could not verify their age when challenged.

7 Under Age Gamblers

How many people gambling could not verify their age when challenged.

8 Problem Gamblers.

On how many occasions have the staff interacted with a customer who was felt to have a problem with his gambling. Who were offered advice or given GamCare leaflets.

9 Customers Helped.

The number of customers taking the advice offered by the staff.

10 Customer Incidents.

The number of occasions when the police were called for assistance.
see note 10 A.

11 Proceeds of Crime.

The number of occasions HO were made aware of suspected proceeds of crime being used.

Roar Betting DF Ltd

Gambling Commission.

Regulatory Return.

2013

Extra Information:

3A

Why did the customer Self Exclude.

If known please note the reasons given for each Self Exclusion.

1. family pressure
2. went to seek gambling advice

10A

Why were the police summoned.

Please write a brief report for each occasion the police were called to the shop.

On the evening of Thursday 10th October 2013 a Fobt player lost £300.00. The Romanian client then threatened to smash the terminal he was playing. The manager tried to calm the customer. The customer then hit the terminal with force. The manager requested that the customer stopped playing and "call it a day". The customer said he would smash the shops equipment. The manager said that the customer should leave the premises or he would have to summon the police. The Romanian said he would not leave. The manager closed the Fobts and phoned the police. The customer stayed in the shop being abusive and threatening for an hour before leaving. The police arrived shortly after the customer had left. The police were not happy and told the manager he had wasted their time.

Roar Betting DF Ltd

Shop; edgware rd w2

Name: e.goodwin

Gambling Commission.

Regulatory Return. 2013

- 1 Complaints.**
The number of recorded complaints about the way Roar operates its licensed activities
- 2 Disputes.**
How many customer disputes regarding a gambling transaction
- 3 Self Exclusions.**
Number of self exclusions made *see note 3A.*
- 4 Breaches of Self Exclusion.**
The number of known breaches. Include attempted entries and those that had entered and were stopped from gambling.
- 5 Self Excluded.**
The number of Self Excluded opting to return after a minimum of 6 months exclusion.
- 6 Under Age ID Challenges.**
How many people entered the shop could not verify their age when challenged.
- 7 Under Age Gamblers**
How many people gambling could not verify their age when challenged.
- 8 Problem Gamblers.**
On how many occasions have the staff interacted with a customer who was felt to have a problem with his gambling. Who were offered advice or given GamCare leaflets.
- 9 Customers Helped.**
The number of customers taking the advice offered by the staff.
- 10 Customer Incidents.**
The number of occasions when the police were called for assistance. *see note 10 A.*
- 11 Proceeds of Crime.**
The number of occasions HO were made aware of suspected proceeds of crime being used.

Roar Betting DF Ltd

Gambling Commission.

Regulatory Return.

2013

Extra Information:

3A

Why did the customer Self Exclude.

If known please note the reasons given for each Self Exclusion.

The 2 Self Exclusions were both for the same reason; they felt they were gambling too much and wished to stop.

10A

Why were the police summoned.

Please write a brief report for each occasion the police were called to the shop.

Roar Betting DF Ltd

Shop; Hendon

Name: T. Comer

Gambling Commission.

Regulatory Return. 2013

1 Complaints.

The number of recorded complaints about the way Roar operates its licensed activities

2 Disputes.

How many customer disputes regarding a gambling transaction

3 Self Exclusions.

Number of self exclusions made
see note 3A.

4 Breaches of Self Exclusion.

The number of known breaches. Include attempted entries and those that had entered and were stopped from gambling.

5 Self Excluded.

The number of Self Excluded opting to return after a minimum of 6 months exclusion.

6 Under Age ID Challenges.

How many people entered the shop could not verify their age when challenged.

7 Under Age Gamblers

How many people gambling could not verify their age when challenged.

8 Problem Gamblers.

On how many occasions have the staff interacted with a customer who was felt to have a problem with his gambling. Who were offered advice or given GamCare leaflets.

9 Customers Helped.

The number of customers taking the advice offered by the staff.

10 Customer Incidents.

The number of occasions when the police were called for assistance.
see note 10 A.

11 Proceeds of Crime.

The number of occasions HO were made aware of suspected proceeds of crime being used.

Roar Betting DF Ltd

Gambling Commission.

Regulatory Return.

2013

Extra Information:

3A

Why did the customer Self Exclude.

If known please note the reasons given for each Self Exclusion.

no reason given

10A

Why were the police summoned.

Please write a brief report for each occasion the police were called to the shop.

Roar Betting DF Ltd

Shop; Wexham

Name: Glenn Sturton

Gambling Commission.

Regulatory Return. 2013

1 Complaints.

The number of recorded complaints about the way Roar operates its licensed activities

2 Disputes.

How many customer disputes regarding a gambling transaction

3 Self Exclusions.

Number of self exclusions made
see note 3A.

4 Breaches of Self Exclusion.

The number of known breaches. Include attempted entries and those that had entered and were stopped from gambling.

A [REDACTED] had excluded himself on the 5th November 2012. In October 2013 without withdrawing the self exclusion he tried to resume betting under hand. When noticed he was challenged by the staff and he left the shop.

5 Self Excluded.

The number of Self Excluded opting to return after a minimum of 6 months exclusion.

6 Under Age ID Challenges.

How many people entered the shop could not verify their age when challenged.

7 Under Age Gamblers

How many people gambling could not verify their age when challenged.

8 Problem Gamblers.

On how many occasions have the staff interacted with a customer who was felt to have a problem with his gambling. Who were offered advice or given GamCare leaflets.

9 Customers Helped.

The number of customers taking the advice offered by the staff.

10 Customer Incidents.

The number of occasions when the police were called for assistance.
see note 10 A.

11 Proceeds of Crime.

The number of occasions HO were made aware of suspected proceeds of crime being used.

Roar Betting DF Ltd

Gambling Commission.

Regulatory Return.

2013

Extra Information:

3A

Why did the customer Self Exclude.

If known please note the reasons given for each Self Exclusion.

[REDACTED] self excluded on 10th June after losing on sports betting. His wife was his mentor in making this decision.

[REDACTED] gave no reason to exclude himself on the 15th January 2013.

[REDACTED]

10A

Why were the police summoned.

Please write a brief report for each occasion the police were called to the shop.

On 11th October 2013 an unknown person burst through the rear door and attacked the manager before making off with £300.00. No news since of an arrest.

On the 21st December an unknown man came in very drunk.

As the manager was of the opinion that he was not in a fit state to gamble he was asked to leave the premises. The person then became very abusive and threatening. The police were summoned and they removed him from the premises.

4. ABB TRAINING GUIDE AND WORKBOOK



TRAINING GUIDE AND WORKBOOK

NAME

SHOP

Contents

Introduction	3
Your workbook	5
Increasing customer interaction	6
Promoting responsible gambling and responding to problem gambling	10
Machine messaging (as of March 1st 2014)	18
Conflict management	20
Test your learning	27

CUSTOMER INTERACTION WITH A FOCUS ON RESPONSIBLE GAMBLING: AN INTRODUCTION

This training manual and work book has been created by the Association of British Bookmakers (ABB) based on training information supplied by the larger betting operators in their application of the Code for Responsible Gambling and Player Protection, as well as information from problem gambling experts. This manual has been designed for the benefit of our independent members with the consent of those supplying the training detail.

Whilst the manual contains comprehensive information on the areas staff need to know about in order to comply with the social responsibility aspects of the Code, it is required to be used in conjunction with a comprehensive ongoing staff training programme run by operators themselves, which remains the responsibility of the individual operator.

There should be a compulsory element to shop teams spending time in the customer area.

The ABB recently, in October 2013, launched their new Code for Responsible Gambling and Player Protection.

- The ABB is the leading trade association for licensed betting offices in Great Britain
- The ABB help create and sustain conditions in which socially responsible betting shops can compete
- The members of the ABB account for 80% of the betting shop market (major companies and independents)

As a result of this new Code, there is now a compulsory element to betting shop staff being in the customer area and maintaining a focus on betting operators' social responsibilities.

The Code builds on current best practices by implementing new measures designed to further protect vulnerable people from being harmed by gambling. Its success depends upon your ability to have meaningful interactions.

The Code requires that all staff can meet the below requirements -

- **All staff should be able to offer customers clear and accessible information on responsible gambling and the help available**
 - Staff should have the information to hand as well as it being on display in the shop.
- **All shop staff will be actively encouraged to 'walk the shop floor' and implement the Think 21 policy**
 - Especially amongst machine players and use of the remote counter facility to prevent play prior to the completion of appropriate age verification procedures should be encouraged.
- **All shop colleagues should be able to complete self-exclusion agreements with a customer.**
 - Until now it has often been a duty manager who has been nominated to be responsible for this. Moving forward all staff will have to be trained to be able to carry out the self-exclusion process.
- **When self-excluding, customers should be encouraged to enter into self-exclusion with other bookmakers, arcades, bingo halls and casinos in the local area. The ABB has produced a leaflet with bookmakers' contact details. A copy of the leaflet will be provided. Shop staff can add details of other gambling operators in the immediate area if available.**

- Staff will need to be aware of this information and provide it to the customer as part of the self-exclusion process.
- **All staff should be able to recognise a wider range of problem gambling indicators and spend time in the customer area to initiate interaction in response to such indicators.**
 - Feedback from the Gambling Commission and from the ABB suggest that the gambling industry needs to be more aware of the changes in betting patterns as an indicator, as well as other more noticeable behaviours. Money loading on machines is another indicator that staff need to consider.
- **Gaming machines**
 - The Code also details new measures around Gaming Machines, which will be implemented on March 1st 2014 and which staff will need to understand and be able to explain to customers.
 - Alerts will also go off behind the counter providing opportunities for customer interaction.

On completion of this handbook staff will also be in a position to:

- Interact with customers in order to drive up customer service standards
- Make Think 21 challenges at an earlier stage and so reduce the likelihood of an underage person gambling
- Recognise and interact with customers that may be displaying indicators of problem gambling
- Spot unacceptable and/or anti-social behaviour in the shop and feel more confident to deal with such behaviour at the early stages
- Encourage an environment in the shop where customers are aware that unacceptable and/or anti-social behaviour will not be tolerated

YOUR WORKBOOK

To ensure that you are able to carry out your role effectively and remain compliant with the ABB Code, you must read through this workbook and complete the activities. A manager should look through your completed activities and carry out some role-play activities with you. This will help your manager to check your learning whilst giving you an opportunity to practice interaction.

Once you've completed your training, you should be able to:

- List the new measures introduced by the ABB's Code for Responsible Gambling and the shop teams' role in delivering these measures
- Recognise a wider range of problem gambling indicators and early warning signs of potentially aggressive situations and identify when it's appropriate to intervene
- Describe how increased interaction with your customers will help to encourage an environment in your shop where customers are aware that unacceptable and/or anti-social behaviour will not be tolerated

INCREASING CUSTOMER INTERACTION

Before you start your learning, think about these two scenarios:

Scenario 1:

A customer in your shop is becoming agitated about something – it may or may not be caused by a gambling related problem.

Is that customer less likely to become aggressive with you if you use each other's names when you welcome them into the shop and often have a chat with them about their betting or favourite sport?

Scenario 2:

A customer in your shop recognises that he or she may have lost control of their gambling. *Is that customer more likely to talk about this with you if you have a good relationship with the customer and they are used to having a chat with you from time to time?*

We believe the answer to the two questions raised in these scenarios is 'YES'.

Being in the customer area gives shop staff valuable time to interact with the customers.

Before you read more about how to increase customer interaction, answer the two questions below:

Q) On average, how much time per day do you spend in the customer area?

Q) What 3 tasks do you spend most of your time doing when you're out on the customer area?

- a)
- b)
- c)

When shop teams use their time wisely in the customer area, they can drive service standards in the shop and make an impact on business.

Focusing on customer interaction and building better relationships with customers can also help teams to be more pro-active and more compliant with the licensing objectives, especially:

- Protecting the young and vulnerable from gambling related harm, e.g.
 - Spotting young people quicker and being in a better position to challenge sooner
 - Recognising self-excluded customers
 - Appearing more approachable to customers that may wish to discuss a problem with their gambling
 - Spotting behaviour that may indicate someone has a problem with their gambling
- Keeping crime out of gambling, e.g.
 - Customers drinking, smoking or using drugs on the premises

Putting the Responsible Gambling Code into Action

- Other incidents of anti-social behaviour that are less visible from behind the counter (such as spitting, swearing, kicking or banging machines, etc)

On the shop floor: What can you do?

Below are some examples of the kind of things you can do when in the customer area. Discuss with your manager other ideas and make a note of them in the boxes underneath.

Driving service standards:

- Greet every customer on entry
- Get to know every customer's name
- Introduce yourself to new customers and find out what they like to bet on
- Complete the a shop walk ensuring the shop is clean and tidy and the marketing material is up to date
- Ask young people for proof of age ID as soon as they enter and before they begin to gamble
- Ask customers for feedback on a particular aspect of service or a product
- Check what races or sporting fixtures are on that night
- Watch a race / event with the customer and cheer on their selection
- Strike up conversations with customers about their favourite sport / team / player
- Look out for floating customers and ask why they use competitors instead of your shop
- Welcome the machines players/offer a hot drink

Add your own ideas here:

Promoting the Business

- Talk to customers about new products or services
- Talk up sporting events and challenge them to think what the result will be
- Talk to new customers about some of the things that make yours a good betting shop
- Offer to show customers how to download the mobile app on their mobile
- Run demo sessions on the machines
- Talk to customers about any options for digital betting
- Show customers popular machine games
- Show machine players new machine games

Add your own ideas here:

What does positive customer interaction mean for you and your shop team?

- Finding a way to spend as much time as possible on the shop floor (even when working alone)
- Getting to know your customers and developing your relationship with them
- Focusing on customers and recognising where someone could be under 21 and challenging for proof of age ID
- Looking out for early signs of anger / anti-social behaviour and intervening when it is safe to do so
- Recognising that unacceptable behaviour may be an indicator of a problem with gambling and initiating conversation in which a customer may want to seek help and advice

Positive interaction does not mean:

- Intervening in difficult situations that would put you, your colleagues or customers in danger
- Pressuring customers who show signs of unacceptable and anti-social behaviour into admitting they have a problem with their gambling

Make a note of anything you think will prevent you from introducing a positive interaction attitude in your shop. Be ready to discuss this with your manager and then agree what you can do to overcome those barriers, to make a note of next to your initial thoughts:

Best practices for positive interaction when working alone

Remember, when working alone you're still required to spend every available opportunity in the customer area. However, you should consider the following things before leaving the counter:

- **Does the level of business allow you to leave the counter?**

When in the customer area keep an eye out for which events are about to start. If customers are betting on the next race you'll need to make sure you can get back to your till quickly to accept these bets.

- **Is the money secure when you leave the counter?**

You must ensure that the cash held in your till is minimal and that the till drawer is locked before you leave the counter. Even if only leaving the counter briefly, you must always lock the counter door or hatch, ensuring that you can re-gain access when needed.

- **Are the customers in the shop known to you?**

If the answer is yes, it's an easy decision to make. Even if you don't know everyone you can still go into the customer area – how else will you ensure that your new customers get a warm welcome? However, if you feel your safety may be compromised in any way, remain behind the counter.

If you're unable to get into the customer area and you spot someone displaying signs of problem gambling, you must still record the incident in the log.

PROMOTING RESPONSIBLE GAMBLING AND RESPONDING TO PROBLEM GAMBLING

All staff have a part to play in promoting responsible gambling:

- Recognise behaviours that indicate a customer may have a problem with gambling
- Recognise and respond to a request for help and advice in relation to problem gambling (be that from a customer, a relative of the customer or from a third party)
- Deal appropriately with customer self-exclusion
- Deal appropriately with customers who wish to re-commence gambling following a period of self-exclusion
- Record details of the above in a log to share with other team members and to aid reporting of regulatory returns to the Gambling Commission

Make a note below of at least 10 behaviours that may indicate someone has a problem with their gambling.

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.

TASK: Read the following statement:

When deciding if a particular behaviour is an indicator that someone may have a problem with their gambling, you should be on the lookout for behaviour that appears unusual to the customer or shows clear signs of distress.

Do you think this is easier to do if you know all of your customers well and have built better relationships with them?

Answer:

.....

Self-exclusion

As part of the ABB Code for Responsible Gambling, all staff will be responsible for carrying out the processes of self-exclusion and recommencing gambling.

- All staff must complete the Self-Exclusion and Recommencing Gambling training in this workbook.
- By getting to know all of your customers by name and through building great relationships with them, you will be in a much better position to:

- Appear more approachable to customers to ask you directly for help and advice once they begin to feel they may have lost control of their gambling
- Approach customers who display non-aggressive indicators of problem gambling to open up a conversation and check on the customer's welfare
- Intervene in situations where a customer may be showing early signs of anger that might be an indicator of problem gambling

Most importantly, where customers have built great relationships with the team and where they have become familiar with the team members being on the shop floor there is evidence to suggest that customers are:

- Less likely to display aggressive/violent behaviour
- More likely to leave the shop and take their anger and any potential aggression or violent outburst with them.

Self-exclusion: sequence of events

1. The following is the sequence of responses to a request for help from a person who believes that they might have a problem with gambling:

Give the customer a suitable responsible gambling leaflet and discuss the details. All discussions must take place as privately as possible.

Encourage them to phone the National Gambling Helpline on 0808 8020 133

2. Log the customer enquiry as an interaction in the 'Customer Interaction' log, whether they take the leaflet and advice only or also go on to self-exclude. If they enquire more than once, log each discussion as a separate interaction.
 - Discuss the option of self-exclusion.
 - If the customer wishes to self-exclude they can do so immediately, or alternatively, having obtained the necessary information, they may wish to take some time to consider this option and possibly discuss with another person.
3. If they do not wish to self-exclude immediately offer a copy of the form to take with them and bring back, or post back if they do not wish to enter the shop again.
4. Give the customer a copy of the self-exclusion leaflet, explain the procedure in full and remind them that a self-exclusion scheme can be initiated immediately.
5. When the customer indicates they do wish to self-exclude, complete the form in conjunction with them ensuring that all the details are correct.
6. Ask the customer to supply two photographs and explain that without a photograph the likelihood of a member of staff recognising them is greatly reduced, particularly where more than one shop is included.

7. Explain to the customer that the self-exclusion period must be for a minimum of 6 months and can be for a period of up to 5 years.
8. Confirm the self-exclusion dates requested with the customer before entering on the form (must be for a minimum of six months).
9. If applicable, inform the customer that all forms of account betting will be automatically included in their self-exclusion.
10. Ask the customer if they wish to self-exclude from any other shop within the organisation.
11. You should state to the customer that they may wish to consider self-excluding from other gambling premises in the locality. Details of bookmakers are on the leaflet provided by the ABB. You can add details of other gambling operators in the immediate area if available. Add that it is still their responsibility to telephone or visit to complete this.
12. Review the details of the self-exclusion scheme with the customer prior to obtaining their signature. Ensure you witness the form by signing the relevant box.
13. Inform the customer that they have now self-excluded from the premises included in their scheme and any betting accounts they also have in place.
14. Give the customer their copy and confirm that they are now self-excluded.
15. Explain to the customer that at the end of the chosen period the exclusion will remain in force until such time that the customer completes a Declaration to Recommence Gambling.
16. Inform the customer that at the end of the period of self-exclusion, should they wish to recommence gambling, they will be required to:
 - a. Complete and sign a 'Declaration to Recommence Gambling' form
 - b. Not enter the premises, or any other shop/facility included in the scheme, for the purpose of gambling following their submission of this form until a further twenty-four hours have passed; to allow them time to consider their decision.
17. Inform your manager and shop colleagues that the customer is now excluded.

Age verification and Think21

Another advantage of getting to know your customers is that you and your team will be in a much better position to spot new customers as they enter and, if they appear under 21, ask for proof of age ID.

Remember all Think 21 challenges must be recorded – whatever the outcome.

It is important challenges are made on entry, but they can also be made at the counter.

Machines should be sighted within view of the counter to help avoid gambling by young people and use should be made of under the counter facilities to disable to machine if there is any doubt as to their age and before they are asked to provide ID.

Indicators of problem gambling

The vast majority of people will be able to enjoy gambling for what it is – an enjoyable form of entertainment. However, there will always be those for whom it becomes something different, and they can develop into problem gamblers.

It is important to remember that problem gambling is not always easily recognized; many problem gamblers successfully hide their addiction from friends and family. As a betting shop employee however you will be best placed to notice the change in behaviours which may indicate a problem with a customer's control of their gambling developing.

You can also provide them with the information about where to get help and how to self-exclude from your betting shop and other premises should they wish.

Some indicators of problem gambling which will cause little to no offence to others around them are for example:

- Always talking about their losses
- Spending all of their money and then coming back later with more money
- Admission of debts
- Sweating, red-faced due to fear or distress
- Throwing betting slips / pens on the floor
- Paranoid belief in rituals or lucky routines
- An admission that the amount they are spending is causing them distress
- A view that gambling is a means of making money
- Changes to betting patterns (See below for examples)
- Continually loading money into a machine over a short period of time or repeatedly using cash or a debit card to purchase machine credit over the counter – this may suggest the customer is chasing their losses (a classic problem gambling behavioural indicator)

Changes in betting patterns may also indicate a problem with gambling and are no less important than other, more noticeable, behaviours.

Changes to look out for involve:

- Customers increasing their stakes, e.g. the customer has always staked an average of £2 per slip and suddenly starts to bet at £20 and above.
- Customers who dramatically change their betting patterns and frequency of visits, e.g. a customer who normally comes in once a day and places a multiple bet is suddenly betting

race by race every day. He/she may now be placing singles and may even change product type, for example changing over to greyhound betting because of the speed of the races.

- Customers who normally stay in for their lunch hour or come in for a little while after work suddenly extends their break or stay in all day/all evening
- A customer is clearly betting down to the very last of the money they have on them – this may lead to the customer asking to borrow money
- A machines player has been playing his own money then stops and instead crowds around another customer using the machine, telling them what to bet and expecting a reward if the person playing wins
- An unwillingness to admit they have lost money in the belief this is only temporary and they can win the money back
- Claiming they have lost because the outcome of the event or game was “fixed” against them

Customers who display changes to their betting patterns do not necessarily have a problem with gambling but from a due diligence perspective we should be aware of the change in betting pattern, frequency of visits, etc. As with any approach to interact with a customer displaying potential signs of problem gambling, the interaction is aimed at creating a general conversation that could just be a reality check for the customer.

As the behaviours above cause little to no offence to others they may be less noticeable. However, you and your team must not overlook such behaviours.

- By being in the customer area, you will be more likely to spot these behaviours.
- By knowing your customers well, you will be more likely to spot that these behaviours are out of the norm for the customer.

Having built great relationships with your customers, you will feel more comfortable to simply start a conversation or sit and watch a race with them. This may encourage them to talk to you about any problems they may be having with their gambling.

Customers generally fall into four categories of gambler and it helps to be aware of the potential escalation to problem gambler.

1. Social gambler
2. Regular gambler
3. Problem gambler
4. Pathological gambler

Common triggers for escalation to problem gambler and beyond include:

- Loneliness
- Isolation
- Work problems
- A life crisis such as bereavement etc.
- Low self esteem

Interaction log - important

An Interaction Log must be completed when you've observed any behaviour that could be an indication a customer is not in control of their gambling – whether or not you have intervened.

The Interaction Log will be a great communication tool in keeping the shop team up to date with anti-social behaviour on a daily basis.

Other incidents that should be logged include:

- Age verification challenges (successful and unsuccessful)
- Incidents involving customers not in relation to problem gambling such as verbal abuse or violence
- Self-exclusions or attempts to breach a self-exclusion

TASK: Consider the behaviours described above; make a note below of the different approaches you could take to open up a conversation and/or check on the customer's welfare.

We've given you some ideas to get you started:

A customer is always talking about losses or admits to debts...

- You could ask if it would help to have someone to talk to. If they say yes, mention the National Gambling Helpline: 0808 8020 133

A customer throws pens/slips on the floor...

- You could say 'that's not like you Jim, is everything ok?'

Essential interaction skills

- Don't judge, listen....try to understand
- Be specific about your concerns and what help you can offer
- Be conscious of your voice level and tone: A calm assured voice models respect and helps ease these moments
- Don't dominate the conversation or try to get the last word in
- If they feel the need to finish try to keep the door open for future talks
- Avoid describing the customer as "having a problem (with their gambling)" – as most problem gamblers will be in denial
- Try to approach them using phrases such as: "Do you feel gambling's become an issue for you?" and listen out for key phrases such as 'chasing loses', denial of the problem, or indications that gambling has caused serious financial difficulties and/or is affecting their home life
- They may try and blame you as the gambling operator, and you may have to accept that you cannot help them any further at this stage

If appropriate you can remind customers about some of the ways to help stay in control of their gambling. The following responsible gambling messages will also be on the machines and leaflets.

1. Don't think of gambling as a way to make money

2. Only gamble with money you can afford to lose
3. Decide how much you want to spend – set a money limit on the machine
4. Decide how long you want to play – set a time limit on the machine
5. Think about how much time and money you have spent today
6. Never chase your losses
7. Don't gamble when you're depressed or upset
8. Balance gambling with other activities
9. Take frequent breaks
10. If you need more help call the National Gambling Helpline or visit gambleaware.co.uk

Remember: The aim of this type of interaction is for you to give the customer the opportunity to talk to you about a possible problem with gambling if they indeed believe they have one.

Your objective is NOT to get the customer to admit to a gambling related problem.

Indicator of problem gambling' or just 'anti-social behaviour'?

TASK: Think about the following scenarios.

- If a customer shouts and swears at you or at one of your colleagues, is he or she showing signs of distress with their gambling or are they displaying anti-social behaviour?

What do you think?.....

- When a customer kicks a machine or even tries to smash it, is this because the customer is anti-social or is this indicative of the customer not being in control of their gambling?

What do you think?.....

- If a customer is smoking, drinking or using drugs on the premises, is this down to anti-social behaviour or a gambling related problem?

What do you think?.....

There may be times, like in the examples above, when something that could be an indicator of problem gambling will also be an example of unacceptable and even anti-social behaviour.

For example:

- Attempting to borrow money from customers or shop colleagues (may be seen as begging)
- Creating arguments or using rude language or behaviour when losing
- Hitting or kicking the machines
- Banging the buttons or the screen of the machines
- Smoking, drinking alcohol or even taking drugs (to relieve the stress caused by their gambling)
- Spitting (at something)
- A machines player has been playing his own money then stops and instead crowds around another customer using the machine, telling them what to bet and expecting a reward if the person playing wins

Looking at the list above, none of these behaviours are acceptable and all of them would fit into the definition of 'anti-social' behaviour.

*Would you ban someone for banging the buttons on a gaming machine? Ask them to leave? It's unlikely. Though you would want them to stop. What about someone who throws pens at the TVs – certainly it is unacceptable and could even escalate if it isn't managed – but we would not ban the customer or phone the police. However, we would want them to stop such behaviour.

So...problem gambling? Or just anti-social?

Actually the answer to that question doesn't matter at the time it happens. In both scenarios, the behaviour is not acceptable to:

- Shop team colleagues working at the time
- Other customers present in the shop
- Gambling Commission (where no action is taken to interact)
- Other interested parties (local authorities, police, media) again if we're seen to take no action

As some of these indicators are clear examples of anti-social behaviour, they can fall into the licensing objective to keep crime out of gambling. It is in this area where we can demonstrate an improvement in the way we seek to:

- Manage unacceptable/anti-social behaviour
- Offer support to customers that may have a problem with gambling

Some examples of anti-social behaviour are so serious that they result in:

- Harm to another staff member or another customer (intimidation, harassment, assault, including spitting)
- Criminal damage to property (machines, security screens, glass etc.)
- Robbery

These are acts that even if they are caused by a problem with gambling, it is beyond your level of responsibility to help and advise the person involved.

These behaviours should be reported to your central security and, in some cases, to the police.

MACHINE MESSAGING (as of March 1st 2014)

New mandatory alerts and voluntary limits on time and money spent will be in place on all machines from March 1st 2014.

Staff should be fully aware of these and how they will work so they can talk to customers about them and answer any questions.

The exact specifications should be checked with your machine supplier.

Session

The machine needs to have a defined session in order for the limits to work. A session will start as soon as credit is added to the machine, and it will end either when the player cashes out, or when the balance falls below £0.20 and there is no activity for 60 seconds.

Important: If a player runs out of credit but 60 seconds does not pass before the next player starts playing then that will not be recognized as a new session by the machine.

If credit remains on the machine but there is no activity for 4 minutes, this also causes the session to end.

Voluntary limits

Players can set time or spend limits for themselves, or both. The minimum time limit is five minutes and the maximum is 3 hours. Monetary limits will be set at £1 increments.

Important: The spend limits refer to credit inserted and not turnover on the machine.

Limits are set via the “Set your Limits” button in the bottom right of the screen. When the button is green it means no limits have yet been set; once limits have been set it will appear blue.

Limits should be set before credit is loaded onto the machine. If a player wants to set a limit after a session has already started, this is possible, but the limits are being set for the *rest* of the session, e.g. a limit of £0 would allow play to continue, but would not allow any further credit to be inserted.

Once the limits have been reached play will be suspended for 30 seconds. The pop up messages that will appear on screen will display some responsible gambling information. The pause is designed to allow the customer time to think about whether they want to continue playing. An alert will also go off behind the counter providing an opportunity for customer interaction if needed.

Mandatory reminders

The players will have no control over the mandatory reminders – they will apply even if voluntary limits are set.

The mandatory spend reminders are triggered at £250 and every £250 thereafter. The player will be required to go over this amount before the pop up is triggered. The reminders are triggered on the total amount inserted during the session, not on machine turnover.

The mandatory time reminders are triggered at 30 minutes and every 30 minutes thereafter. Once 30 minutes is reached a pop up will appear.

Once the limits have been reached play will be suspended for 20 seconds and an alert will go off behind the counter providing an opportunity for customer interaction if needed.

Session Data

Some operators will allow loyalty card users to request their session data, which includes money won or lost and time spent on gaming machines.

All customers will be able to access a time and spend summary for their current session on the gaming machines. This is available on the “Set Limits” screen.

CONFLICT MANAGEMENT

To help you deal with the indicators of problem gambling that mentioned earlier, it's useful to refresh your understanding of dealing with anger.

The common thread between experiencing a problem with gambling and becoming angry about something is an increase in the level of emotion being experienced by the individual.

Before reading further, make a note below of 10 early warning signs that someone is becoming angry

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.

Now look back at your list of indicators of problem gambling and tick any that you've repeated here as examples of anger.

Before you read further, on a scale of 1-10 (where 1 = completely disagree and 10 = completely agree) would you agree that it is perfectly acceptable for someone to become angry about something or someone?

Anger is a human emotion that everyone experiences from time to time. We all have a right to feel what we feel so it is acceptable for someone to feel angry about something or someone.

- Anger can range from simple frustration to downright fury
- It is the behaviour that springs from that anger that may become unacceptable
- Being angry about someone or something is acceptable; becoming aggressive towards someone or something is not acceptable

Consider this scenario:

A customer runs up at the off of a race but it is too late for your colleague to place his bet. The customer is normally mild mannered and not known for creating arguments or using rude language or behaviour. You're in the customer area and he approaches you whilst he watches the race. His selection wins. He shouts and swears at you and throws his pen at the TV.

So...

Is this customer just anti-social? Does he have a problem with his gambling? Or is he showing warning/danger signs of being angry?

What do you think?

What would you do in this situation?

Whether the customer has a problem with gambling or is just plain angry, you will need to be confident that you can:

- Recognise the signs of anger
- Identify when it's safe to intervene
- Manage your own response to anger
- Take steps to defuse anger

Causes of anger and aggressive behaviour

The 'equation of aggressive behaviour' tells us what causes aggressive behaviour. It is a combination of factors.

THE PERSON'S PRE-CONDITION

What does a person consider to be acceptable behaviour?

A TRIGGER

Something that happens to make the person feel angry, frustrated, etc.

+ /or

A PRE-PLANNED EVENT

Where someone has already decided upon a course of action

The equation tells us that aggressive behaviour is caused by a combination of two factors - the person's pre-condition and added to that is either a trigger or a pre-planned event

A person's pre-condition

People get angry for many reasons and some get angry quicker than others. Their pre-condition may determine:

- How quickly they become angry
- How angry they become
- Whether or not they will use aggressive behaviour or even become violent

The factors that can create the pre-condition include:

- Their beliefs, norms etc, e.g.
 - some people naturally talk louder than others
 - what some people see as bad behaviour (spitting, swearing, etc) others see as acceptable and normal behaviour
 - some may think it acceptable to shout and threaten others to get what they want
 - some people come from a background of violence and see it as normal
- What is the state of mind of the person at the time? Do they suffer from mental illness?
- Is the person under the influence of drink or drugs?
- Do they have a problem with their gambling?

In some cases, anti-social behaviour is often a symptom of a person's pre-condition. There doesn't have to be a specific trigger nor a pre-planned event for the person to behave in an aggressive manner.

A pre-planned event

Based on someone's pre-condition, it may be they decide in advance to use aggression and/or violence, such as in the cases of robbery or smashing up the machines.

In these cases, staff should never attempt to intervene; you should always follow policy for dealing with such cases.

Trigger

A trigger is something that happens to make someone feel angry or frustrated. In your shop that could be:

- Not being able to get a bet on
- Not being given a back price
- There's an unexpected R4
- The customer is losing money across the counter or on the machines
- There's no money in the shop to allow them to be paid winnings

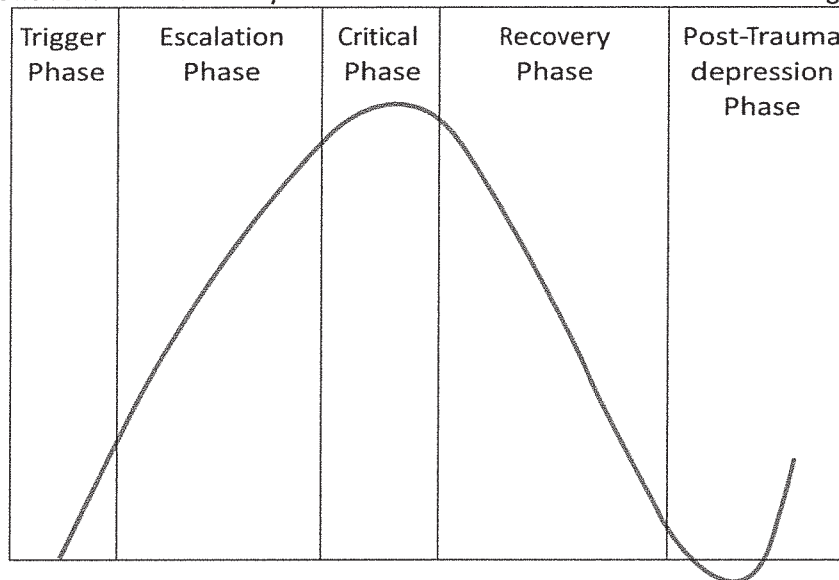
TASK: What other things could make a customer feel angry or frustrated? Make a note here of things you may have seen people get angry about in your shop:

So, now you know what causes aggression and also what may trigger the anger in the first place.

The next model shows us the 'cycle' an angry person goes through – it is the 'Violent Behaviour Cycle'.

Violent behaviour cycle

Recognising the early warning signals of anti-social behaviour and of a potentially aggressive situation allows us to intervene early and reduce the chance of the situation escalating into violence.



The trigger phase is the point at which the individual first indicates a move away from how they usually behave (i.e. their baseline behaviour). Such changes may be seen or heard in verbal or non-verbal behaviour, e.g. an unwillingness to sit down, doesn't wait for you to finish your sentences, no eye contact, tapping fingers (tapping harder on the buttons on the machines), finger wagging, fidgeting, pacing, increased tone, pitch and speed of speech.

The less familiar you are with a particular individual, the more easily you can miss these early warning signs of the possibility of attack or violent outburst. So the better you know someone, the more likely you will pick up on a change in behaviour.

At each phase, the person's behaviour can be said to be a method of communicating. In the Trigger phase, the person is more than likely feeling very agitated and is trying to communicate that they are hurt, concerned or worried about something.

The escalation phase

At the escalation phase, the person is becoming more aggressive and this can lead directly to violent behaviour. If there is no intervention, the person will become less open to diversion and their behaviour may become destructive.

As the levels of emotions increase, the person will be less likely to respond to any form of rational intervention. During this phase, your actions are likely to be over-interpreted as aggressive. Even approaching a customer may be seen as a threat as you invade his or her personal space. It is, therefore, very important to intervene as early as possible in the escalation phase.

The behaviour in the escalation phase is now more like a danger sign than an early warning signal.

What behaviour might indicate that someone has moved into the escalation phase?

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.

The critical phase

As the person experiences increasing levels of emotion, they will become less able to control aggressive impulses. Actual violence becomes more likely. Any attempt at verbal 'argument' or any confrontation from you at this stage is likely to increase the agitation of the aggressor.

TASK: Think about a time when you've been angry about something. You've initially 'calmed down' only for something to trigger you off again into anger.

What was it that triggered you? Was it something someone said or did?

Or was it just that you mulled things over and that triggered the return of your anger?

The recovery phase

The person's level of emotion can remain high for a period of one and a half hours after the incident. Attempts to intervene during this period can result in a renewal of the violent outburst.

It is during this recovery phase that many intervention errors occur. A person may appear to have calmed down but they are particularly sensitive to trigger factors.

Post-trauma depression phase

In this phase, the person is likely to show signs of mental and physical exhaustion. Anyone who has experienced an adrenalin rush will have some idea of what this feels like.

The individual may become tearful, remorseful, guilty or ashamed. At this point, the individual may be receptive once again to intervention.

Important! You are unlikely to see the customer go through all of the phases. For example:

Where a customer has erupted into a violent outburst, it is likely that he or she will leave before entering the 'recovery' and/or 'post-trauma depression' phase.

A trigger may have occurred before they enter the shop (at home, in another bookmakers, even another driver who has just cut them up as they drove to your shop!).

Answers from above:

Behaviours suggesting someone has entered the escalation phase:

1. Fists clenching / unclenching
2. Lips tightening over teeth
3. Face goes white as blood rushes from the brain to the arms and legs (ready for fight or flight)
4. Head dropping forward to protect the throat
5. Eyebrows dropping to protect the eyes
6. Hands rising above the waist
7. Shoulders tensing
8. Changing to a side-on or fighting stance
9. Glancing at intended target areas
10. Lowering of entire body before launching an attack

Managing your own response to anger

When a person is faced with an aggressive encounter, he or she is also likely to experience a similar set of behavioural responses. As the level of emotion increases, they may also find themselves caught up in the violent behaviour cycle.

This means that at exactly the moment when it is important to behave in a rational and controlled manner, the heightened emotional state is likely to hamper the person's ability to manage the system in a controlled and effective way.

The exact time that any given incident 'begins' is often difficult to determine. The earlier you can recognise signs of anger, the greater the opportunity to intervene earlier and avoid escalation.

There are three factors to consider in order to ensure safe and successful management of difficult situations.

1. Maintain a constant awareness of the person's behaviour
 - Get to know your customers, observe how they normally behave
 - Take note when they start to show unusual behaviour
 - We already know that there is a greater risk of violence where someone's pre-condition dictates that violence is acceptable
 - Where someone shows signs of escalating anger, or a pre-condition such as being under the influence of alcohol or drugs, it is almost always too late to intervene

LOOK: Is the person showing signs of anger

LISTEN: Exactly what are you hearing? Listen for volume, speech patterns, rate of speech

TEST OUT: Testing determines the readiness, willingness and ability to co-operate with a request e.g. does the person react to your presence by looking up? Can you make contact verbally? Does the person respond when you call him or her by name? Will they speak to you?

2. Be aware of the environment

- Who else is in the shop? Are they at risk of harm?
 - How close to the customer are you? As agitation rises, 'personal space' increases. Take a step back to reduce tension rather than a step forward, which may be seen as threatening
 - Where are you – are you close enough to the office door or the shop exit if you need to remove yourself from the situation?
 - Never allow a customer to box you into a corner of the shop
3. Assess yourself; your feelings, your strengths, your weaknesses
- It is very important that you manage your own response to unacceptable behaviour
 - If the behaviour makes you angry, you'll need to manage that before approaching the customer otherwise you may be the cause of escalation
 - If the person's behaviour causes feelings of anger or fear you will naturally begin to display physical signs of anger or fear

Our own thoughts and feelings, which are often determined by our own pre-conditioning, will impact on our actions:

Thoughts	Feelings	Action
I'm scared	Fear	Freeze
I can't cope	Fear	Panic
Who does he think he is?	Anger	Aggression
How could she say that?	Hurt	Non-assertion
I'd better go along with this or he will get out of control	Fear	Non-assertion

Diffusing anger

- First and foremost, stay calm
- Look, listen and test
- Assess yourself: if your thoughts and feelings are affecting your behaviour you are not in the right frame of mind to deal effectively with an angry person
- Be assertive
- Try a diversion tactic; for example, someone is beginning to bang on the gaming machines. It may be enough to divert the customer from their mounting anger simply by gaining eye contact with them, asking if there is a problem with the machine. If they respond positively, offer them a drink
- If a customer has a complaint or dispute, be ready to show the customer that you are willing to help resolve the issue
- Maintain an awareness of your non-verbal behaviour – is it matching your words?
- If you or a member of the team has made a mistake, admit it openly
 - Say 'sorry' once and mean it
 - Don't over apologise
 - Don't counter attack

TEST YOUR LEARNING

Discuss the following questions with your manager in a 1-1 session. Make a note of your agreed answers.

1. Tick all that apply. The best time to intervene is when:

- a. A customer has pre-planned a violent activity and has just entered the shop
- b. During the 'trigger' phase
- c. A customer has just calmed down after a violent outburst
- d. As early as possible during the escalation phase

2. True or False? Once I've been trained, I will be expected to intervene in every incident of unacceptable / anti-social behaviour in my shop.

Explain why it's true or false:

3. Where a customer is demonstrating the early warning signs of anger, and I feel confident to intervene, I can help to defuse the anger in the following ways:

4. The following people / teams are available as support if I feel unsafe or uncertain about how to intervene with someone displaying unacceptable / anti-social behaviour:

5. If I go out onto the shop floor when I'm working alone, I must:

Role-play scenarios

Your Line Manager will ask you to show how you'd deal with the following situations. He or she can then give you feedback on how you did, including giving feedback on your non-verbal communication.

Your Line Manager may improvise in these scenarios so be ready to respond accordingly.

Scenario 1:

You are tidying up in the customer area. Jamie is a regular machines player and has been known to bang the buttons out of frustration when he loses. He has been on the machine for about 20 minutes and you hear him bang the buttons and swear at the machine. He shakes his hand as if he has hurt it when he hit the machine.

What will you do? Think about what you'll say and how you'll say it (consider your non-verbal communication as well).

Be prepared to discuss with your Manager what you would be looking and listening for as you intervene.

Notes:

Scenario 2:

You're in the customer area. A customer is sat at a table watching the racing on the TV screens. He is starting to shout at the screen and throws a pen at the screen. Most of his bets have been losers today and other customers are looking at him uncomfortably. You get on well with this customer and have been known to sit and watch the racing with him before.

Show your Manager how you would respond in this situation.

Notes:

Scenario 2:

You can see a group of young people hanging around outside the shop - they have been there for some time. A customer you think you have seen in this group enters the shop, you don't recognize him, and he begins to walk over to the machines. What do you do?

Notes:

Scenario 3:

You suddenly have a rush to place bets at the counter. Whilst you are busy serving at the counter a new customer enters and sits down at a machine. You can't see their face. What do you do?

Notes:

Scenario 4:

You're in the customer area talking to a customer when someone rushes into the shop and immediately starts to shout and swear at nobody in particular. He looks extremely angry and is talking so quickly, you find it hard to listen to what he is saying. He kicks over a stool and walks towards the gaming machines. Another customer playing on the machines backs away. The angry person punches the screen on the gaming machine but the screen doesn't smash. Looking around, the person sees you in the shop and begins to walk towards you.

What will you do?

Be ready to talk your Manager through what you're thinking and feeling at the moment the aggressor comes in and again when he begins to walk towards you.

Notes:

Scenario 5:

Following your intervention earlier, Jamie from scenario 1 has calmed down on the machines. He comes to the counter a little while later and apologises for his outburst. He says 'sorry about earlier, I got a bit carried away. I can't seem to control myself when I'm losing money'.

How will you respond?

Notes:

Scenario 6:

Tom is a regular customer that is well-known to you. He places bets OTC and has never been known to play on the machines. Tom has only ever come in twice a week during the evening. You've now seen Tom in your shop for the fourth time this week. He has continued to bet OTC but you've noticed a small rise in the amounts he places. He has also started to play on the machines and although there are no obvious signs of agitation with the machines, you've noticed him putting quite a lot of notes into the machine. He normally places bets of around £5 over the counter.

In what way will you respond?

Notes:

Role-play: feedback from my manager

What I did well?

How I could improve?

Self-exclusion training task

We recommend that all customers be asked to sign a declaration to recommence gambling upon their self-exclusion period running out.

12 months is generally the time set for self-exclusion agreements, but it can be up to five years and as little as six months under Gambling Commission rules.

If you do not have your own forms we can supply you with versions you can replicate.

Ask your Manager to give you a copy of the Self-Exclusion Agreement form and the Declaration to Recommence Gambling.

- Prepare to show your manager that you can complete the self-exclusion and recommencing gambling processes with a customer and fill in each form fully and accurately. To help, think about what you need to ask / tell the customer and what information needs to be written on each form.

Following proper procedures, complete:

- A Self-Exclusion Agreement form with your manager acting as the customer. Remember that you can and should use the Sequence of Events, even when dealing with a genuine customer.
- A Declaration to Recommence Gambling.

Your manager will give feedback on what you do well and where you need to improve. Only when you've completed this task fully and accurately should you both sign below to sign-off your training.

Your name and signature –

Your manager's name and signature –

Gaming Machine Limits Exercise

Fill in the grid below with the correct information based on what you have learnt about how the mandatory and voluntary machine limits will work.

Scenario	Pop-up?		Limits?			Mandatory or Voluntary?	
	Yes	No	Time	Spend	Session	M	V
A customer walks away from a gaming machine after playing for 27 minutes, his total loaded spend was £50.00. No winning ticket was printed. Another customer immediately puts £20.00 into the same machine and plays for 10 minutes.							
A regular customer sets a spend limit of £500.00 and then inserts a winning gaming machine ticket from yesterday for £450.00.							
A customer sets a spend limit of £200.00 and puts £200.00 into the gaming machine. After 10 minutes the customer's credit has gone up to £300.00 as he has won £100.00. He then spends another 10 minutes playing his credit down to 0 and walks away.							
A customer loads £150.00 onto a gaming machine. He plays for 10 minutes and walks away when his credit hits 0. Another customer immediately puts £100 into the same gaming machine.							

Putting the Responsible Gambling Code into Action

A customer sets a time limit of 25 minutes and loads £200.00 onto the machine. After 20 minutes he logs out, prints his ticket and walks away. Another customer immediately puts £50.00 into the same machine.							
A customer sets a spend limit of £100.00 and loads £100.00 onto the machine at the counter using a debit card. Once the customer has spent £80.00 of the original credit and has been playing for 25 minutes, they then put another £100.00 into the gaming machine.							
A customer sets a time limit of 25 minutes and hen loads £100.00 onto the gaming machine. The customer plays for 25 minutes, prints his ticket and walks away.							
A customer sets a spend limit of £100.00 and inserts £100.00. After 10 minutes of playing the customer receives a telephone call, so prints the ticket after spending only £60.00 of the £100.00. Another customer immediately puts £50.00 into the same machine.							
A customer sets a time limit of 20 minutes and a spend limit of £50.00. Once the customer has played for 15 minutes, he realizes he has nearly spent his £50.00, so clears all limits. He then inserts another £50.00 and continues to play the gaming machine for another 20 minutes.							
A customer sets a spend limit of £100 and loads a ticket from yesterday for £110.00.							



Responsible Gambling and Player Protection Code Training 2014

Name:.....

Company:.....

I confirm that all staff at the above company have been trained in the requirements of the ABB Responsible Gambling and Player Protection Code and can:

- Offer customers clearer and more accessible information on responsible gambling and help available.
- Recognise a wider range of problem gambling indicators and be aware of the most vulnerable groups.
- 'Walk the shop floor' and initiate interaction with customers.
- Initiate interaction in response to problem gambling indicators.
- Explain to customers about the new mandatory and voluntary time and money based reminders on machines, provide customers with session data, and respond to the behind the counter alerts.
- Complete self-exclusion agreements with a customer and encourage customers to enter into self-exclusion with other bookmakers, arcades, bingo halls and casinos in the immediate area.
- Implement the Think 21 policy at an earlier stage on entry and amongst machine players, and use the remote counter facility to prevent play on machines prior to the completion of appropriate age verification procedures.

Name:.....

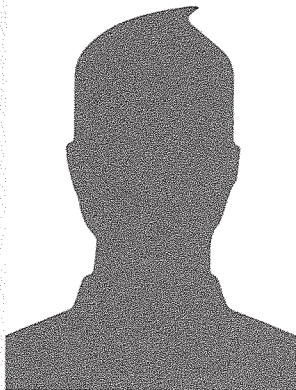
Signature:.....

Date:.....

5. GAMCARE & CHALLENGE 25
SIGNS & POSTERS


UNDER 25?

IF YOU ARE LUCKY ENOUGH
TO LOOK UNDER 25, YOU WILL
BE ASKED FOR ID




ACCEPTABLE PROOF OF AGE

- CARDS BEARING THE PASS HOLOGRAM
- PHOTOCARD DRIVING LICENCE
- PASSPORT



This is a Category B Machine



KNOW YOUR LIMIT.....
IF GAMBLING IS CAUSING YOU A PROBLEM,
CALL GAMCARE ON:
0845 6000 133
FOR CONFIDENTIAL ADVICE AND SUPPORT

**NO UNDER
18s
TO PLAY**

Percentage payout for each game can be seen in the relevant help pages.
Machine malfunction voids game.
No prize greater than £500 can be won from this machine in any one game.

abb



UNDER 21?

IF YOU ARE LUCKY ENOUGH
TO LOOK UNDER 21, YOU WILL
BE ASKED FOR ID



NATIONAL GAMBLING HELPLINE
0800 5297 529

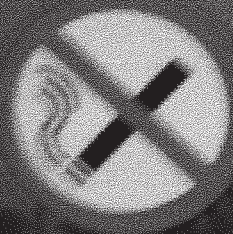
gambleaware.co.uk

ROARR!

betting

You must be 18 years or older.
If you are fortunate enough
to look 21 or younger, we need
proof of age.

ROARR! betting believe in
responsible gambling



NO SMOKING

IT'S AGAINST THE LAW TO
SMOKE ON THESE PREMISES



NO ALCOHOL

IT'S AGAINST THE LAW TO CONSUME
ALCOHOL ON THESE PREMISES



NO UNDER 18's

IT'S AGAINST THE LAW FOR UNDER
18's TO BE ALLOWED ON
THESE PREMISES



— *Journal of the American Medical Association*

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
DATE 08-11-2010 BY 60322 UCBAW/BJS

Signature of Student: _____
 Date: _____

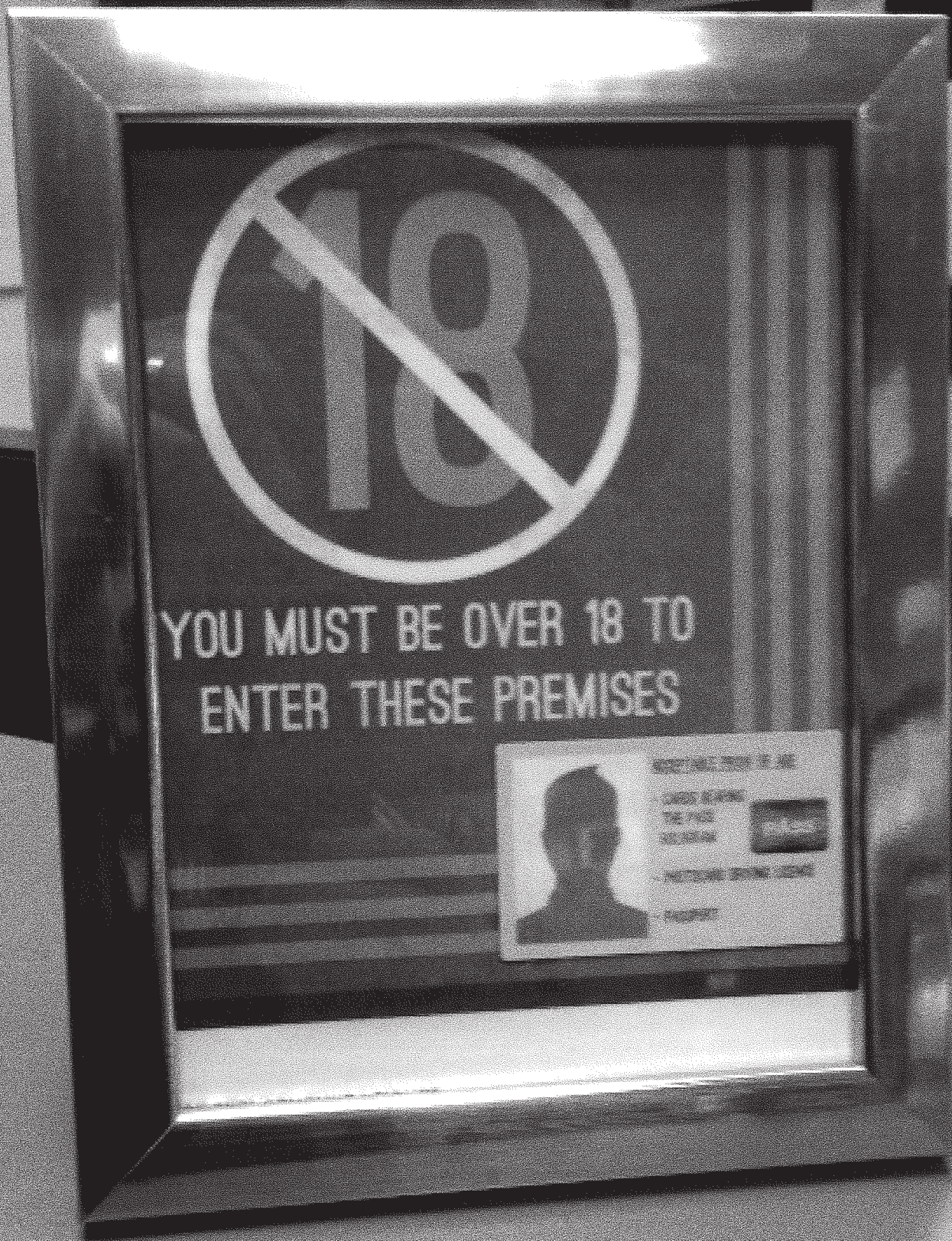
[illegible]

[illegible]

- 1. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.
- 2. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.
- 3. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.
- 4. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.
- 5. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.
- 6. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.
- 7. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.
- 8. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.
- 9. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.
- 10. In a particular case, the defendant's claim for the proceeds of the crime was not affected by the defendant's death.

1990

It is an offense under section 101 of the Insurance Act, 1938, to make, maintain or cause to be made or maintained any arrangement for a person connected with the insurance business to have an interest in the business.



Self-exclusion from all gambling operators

Offering self-exclusion is a requirement for all gambling operators in your immediate area. Some operators have systems in place that will exclude you from all of their premises or a number of their premises in an area.

You should make sure you exclude yourself from all the places where you may be tempted to gamble.

Here are the details for betting shop operators.

BETFRED 0800 032 0878

CHISHOLM Bookmakers 01670 841106

CORAL 0800 169 0299

corbettssports.com 0845 029 1366

JENNINGSbet 0800 089 8887

Ladbrokes 0800 731 6191

PADDYPOWER 0800 056 5275

William HILL 0800 169 3352

For independent operators, ABB: 020 7434 2111

LET'S KEEP IT FUN!

Helping you stay in
control of your gambling.

Helpline:
0845 6000 133
www.gamcare.org.uk



6. SOCIAL RESPONSIBILITY
TRAINING CERTIFICATE
GEORGE MOANES



14/01/2009

Social Responsibility Training Certificate of Attendance

George Moakes

**attended and successfully completed GamCare
training on social responsibility**

Training was facilitated by Teresa Tunstall,
Head of Development, GamCare

Geoffrey Godbold, Chief Executive, GamCare



7 . ROAR BETTING
AWARD.

Team of the Year Choicebet, Gillingham

Sponsored by



Sally Abel and the Choicebet, Gillingham team pick up their Award

Our Betview mystery visitor was blown away by the warm and friendly atmosphere he experienced at the Choicebet shop in Gillingham, one of five LBOs in the company's estate. Overall, the judges felt this was a shop where the team truly work together and pool their assets in order to offer customers one of the best leisure experiences on the High Street.

"Thank you to the Betview Awards for appreciating what we do as a team. We take a lot of pride in our job and we love what we do"

Sally Abel, Manager, Choicebet, Gillingham

Independent Outlet of the Year Roar! betting

Sponsored by



Roar! betting leaves nothing to chance in the way that it does business across its five-shop estate in north west London. The judges were particularly impressed at the ability, breadth of knowledge and friendly attitude of all the staff they encountered at Roar!, the empowerment the staff are given by their management and the expert way they interact with their customers.



Roar! betting owner Dominic Ford and team receive their Award from Michael Conlon, Sales Director, Turf TV

"It's a tough time out there, but you can still make a successful business if you work hard, and that is what our staff show"

Dominic Ford, Owner, Roar! betting

