

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.

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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.

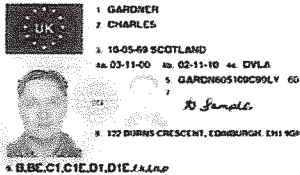
The gambling act allows for stakes to be returned to any individual who is proven to be under 18. These claims should not be paid out in your branch, in the first instance any such claim should be reported to John or George.

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.

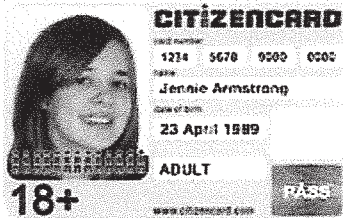
Under the gambling act there is a provision for the gambling commission to use under 18's as covert shoppers to ensure that we show due dilligence in regards to age verification.

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)
Brief over view of events:			

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 receive 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 RESPONSIBILTY TO ASK SUSPECTED U18'S TO LEAVE, IF YOU DO NT FEEL SAF TO DO THIS THEN YOU SHOULD CALL THE POLICE. REFUNDING OF STAKES -SHOULD ONLY HAPPEN AT AUTHOURISATION 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 BREIFLY 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
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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.
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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.
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How many people entered the shop could not verify their age when challenged.
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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.

0

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

2 Disputes.

1

How many customer disputes regarding a gambling transaction

3 Self Exclusions.

1

Number of self exclusions made
see note 3A.

4 Breaches of Self Exclusion.

0

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

5 Self Excluded.

0

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

6 Under Age ID Challenges.

2

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

7 Under Age Gamblers

0

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

8 Problem Gamblers.

2

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.

1

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

10 Customer Incidents.

0

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

11 Proceeds of Crime.

0

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.

██████████ 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.