

Application for a Betting (other) Premises Licence  
under the Gambling Act 2005

by

William Hill Organization Limited

at

236 Dedworth Road,

Dedworth,

Windsor

SL4 4JR

To be heard by

The Royal Borough of Windsor and Maidenhead Licensing Panel

on

Monday 2<sup>nd</sup> February 2015





**Application Premises – 236 Dedworth Road, Dedworth, Windsor**



- 5 Works of repair or maintenance of plant, machinery or equipment shall only be carried out at the site between 08:00 and 18:00 hours Mondays to Fridays, 08:00 and 13:00 on Saturdays and at no time on Sundays, or Bank Holidays or Public Holidays without the prior written consent of the Local Planning Authority. Reason:: To protect the residential amenities of the area. Relevant Policy Local Plan NAP3.

**Approved Plan Reference Number(s):**

LOCATION PLAN, version no.: n/a, received on 2 October 2014

FINAL/W/NL/771/201 A (PLANNING), version no.: n/a, received on 2 October 2014

FINAL/W/NL/771/502, version no.: n/a, received on 2 October 2014

**Informatives**

1. This decision has been made in accordance with the requirements of the National Planning Policy Framework. The Local Planning Authority has sought all reasonable measures to resolve issues and found solutions when coming to its decision. For further details please see the Officer's report and the Council's decision by following this link [R.B.W.M. | Planning - Public Access Module](#) and entering the application number, or contact the Council's Customer Service Centre on 01628 683800 and quoting the application number.
2. The attention of the applicant is drawn to the Berkshire Act 1986, Part II, Clause 9, which enables the Highway Authority to recover the costs of repairing damage to the footway or grass verge arising during building operations.
3. The attention of the applicant is drawn to Section 59 of the Highways Act 1980 which enables the Highway Authority to recover expenses due to extraordinary traffic.
4. No builders materials, plant or vehicles related to the implementation of the development should be parked/stored on the public highway so as to cause an obstruction at any time.
5. The applicant should be aware the recommended permitted hours of construction working in the Authority are as follows: Monday-Friday 08.00-18.00; Saturday 08.00-13.00. No working on Sundays or Bank Holidays. Please contact the Environmental Protection Team on 01628 683830.
6. The applicant and their contractor should take all practicable steps to minimise dust deposition, which is a major cause of nuisance to residents living near to construction and demolition sites. The applicant and their contractor should ensure that all loose materials are covered up or damped down by a suitable water device, to ensure that all cutting/breaking is appropriately damped down, to ensure that the haul route is paved or tarmac before works commence, is regularly swept and damped down, and to ensure the site is appropriately screened to prevent dust nuisance to neighbouring properties. The applicant is advised to follow guidance with respect to dust control and these are available on the internet: - London working group on Air Pollution Planning and the Environment (APPLE): London Code of Practice, Part 1: The Control of Dust from Construction; and the - Building Research Establishment: Control of dust from construction and demolition activities
7. The Royal Borough receives a large number of complaints relating to construction burning activities. The applicant should be aware that any burning that gives rise to a smoke nuisance is actionable under the Environmental Protection Act 1990. Further that any burning that gives rise to dark smoke is considered an offence under the Clean Air Act 1993. It is the Environmental Protection Team policy that there should be no fires on construction or demolition sites. All construction and demolition waste should be taken off site for disposal. The only exceptions relate to knotweed and in some cases infected timber where burning may be considered the best practicable environmental option. In these rare cases we would expect the contractor to inform the Environmental Protection Team before burning on 01628 683538 and follow good practice

## **Justifications**

- 1 The reason planning permission has been granted is that the development complies with the relevant provisions of the development plan. The relevant policies/proposals of the development plan are Local Plan DG1, NAP3, P4, T5, S7.

**This permission does not relieve the applicant from responsibility for obtaining any necessary approval which may be required under building control legislation or Section 32 Berkshire Act 1986 (access for fire appliances). For advice on building control regulations, please contact the Authority's Building Control Service on 01628 796870.**

**The applicant is advised that all works to which this permission relates must be carried out strictly in accordance with the plans, drawing and other relevant supporting material submitted as part of this application and hereby approved as such and in full compliance with all conditions set out above. The Development Control Group must be immediately advised of any proposed variation from the approved documents and the prior approval of the Council obtained before any such works are carried out on site. Failure to comply with this advice may render the person carrying out and/or authorising the works liable to enforcement proceedings, which may involve alterations and/or demolition of any unauthorised building or structures and may also lead to the possibility of prosecution.**

**The applicant's attention is also drawn to the requirements of the Party Wall Act 1996, which may affect your submitted proposals. The applicant must notify all affected neighbours if work, which you are intending to carry out, falls within the Act. This may include work on an existing wall shared with another property, building on the boundary or excavating near a neighbouring property. However, the applicant is advised that this is not a matter dealt with by this Authority and it is recommended that you seek suitable professional advice.**

Signed

Dated: 5th December 2014

*Simon Hurrell*

Simon Hurrell  
Head of Planning Services

## NOTES

1. The application number shown on the attached should be quoted in all correspondence.
2. If the applicant is aggrieved by the decision of the Local Planning Authority to refuse permission or approval for the proposed development or to grant permission subject to conditions, the applicant may appeal to the Office of the Deputy Prime Minister in accordance with Section 78 of the Town and Country Planning Act 1990 (as amended) within six months of receipt of this notice for applications for full, outline or reserved matters planning applications, listed building or conservation area consents, or within six months for all other applications. (Appeals must be made on a form which is obtainable from the Planning Inspectorate, Room 306(K), Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN. The telephone number is 0117 372 6027/6212. The Deputy Prime Minister has power to allow a longer period for the giving of a notice of appeal but he will not normally be prepared to exercise this power unless there are special circumstances which excuse the delay in giving notice of appeal. The Deputy Prime Minister is not required to entertain an appeal if it appears to him that the permission for the proposed development could not have been granted by the Local Planning Authority, or could not have been so granted otherwise than subject to the conditions imposed by them, having regard to the statutory requirements as set out in Section 78 of the Town and Country Planning Act 1990 (as amended), to the provisions of the Development Order, and to the directions given under the order. He does not in practice refuse to entertain appeals solely because the decision by the Local Planning Authority was based on a direction given by him.
3. If permission to develop land is granted subject to conditions, whether by the Local Planning Authority or by the Deputy Prime Minister, and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the Council a purchase notice requiring that Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990 (as amended).
4. In certain circumstances, a claim may be made against the Local Planning Authority for compensation, where permission is refused or granted subject to conditions by the Deputy Prime Minister on appeal or on a reference of the application to him. The circumstances in which such compensation is payable are set out in Section 199 of the Town and Country Planning Act 1990 (as amended).
5. This permission covers only consent under the Town and Country Planning Act 1990 (as amended) and does not give permission to demolish a listed building, for which separate consent is required. Amongst other things the consent of the Council of the district in which land is situated may be required under the Building Regulations and if the proposals affect land within the limits of the highway (that is between the highway fences or hedges) the separate consent of the Highway Authority may also be required. Steps to obtain the necessary further consents should be taken before proceeding with the developments.

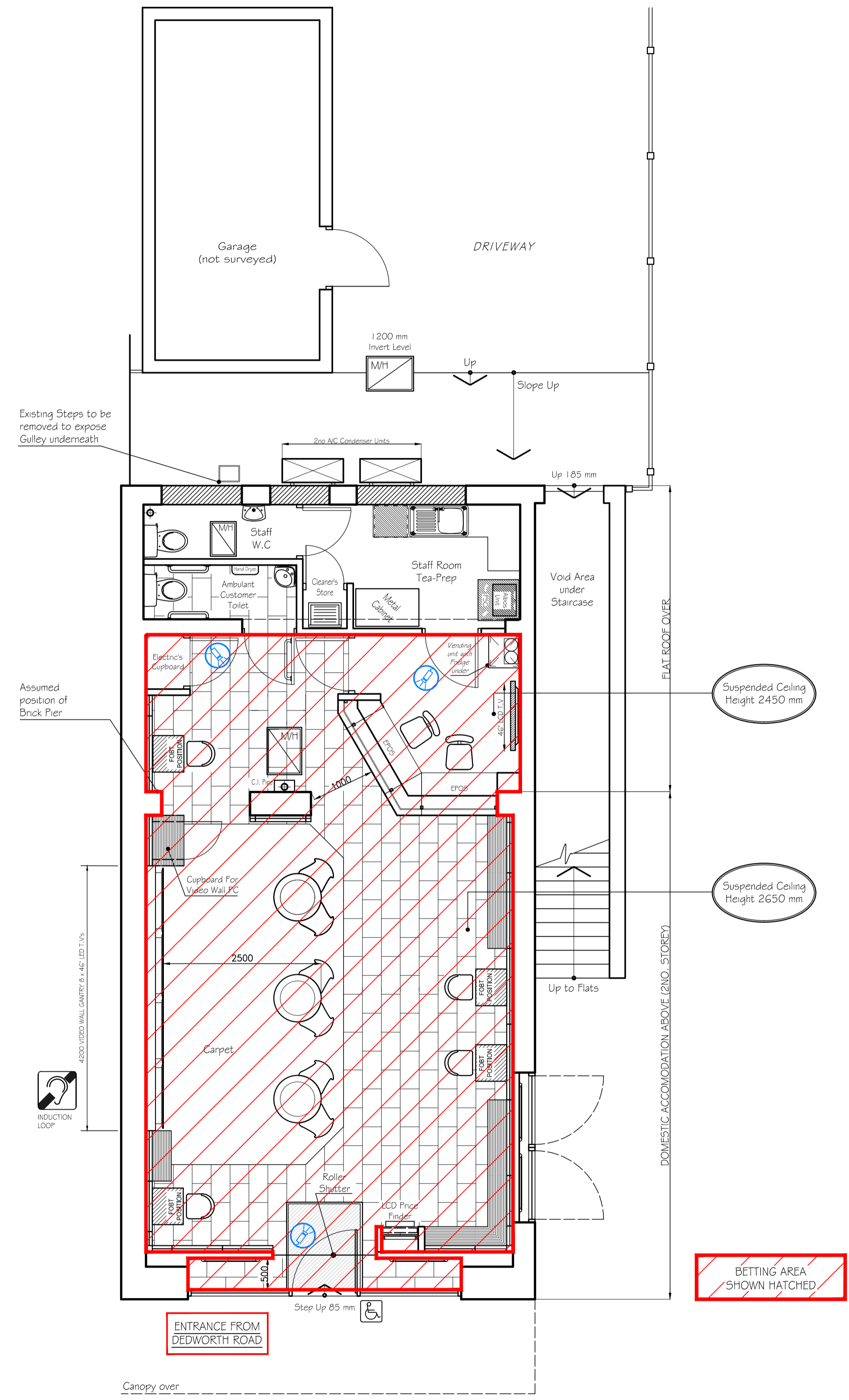
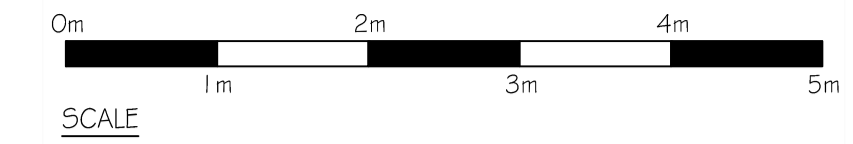
### SHOPS, OFFICES, FACTORIES, EDUCATIONAL BUILDINGS & BUILDINGS TO WHICH THE PUBLIC ARE TO BE ADMITTED; ACCESS AND PROVISION FOR THE DISABLED PERSONS.

1. The Local Planning Authority is required to bring to your attention the requirements of the Disabled Persons Act 1981, Building Regulations 1991 "Access and Facilities for Disabled People" document M and the Chronically Sick & Disabled Act 1970 (as amended 1976) (Sections 4.7.8 and 8A) requiring the provision of access facilities, car parking and toilets for the disabled and the provision of signing indicating what provision has been made for the disabled persons within the building. Your attention is also drawn to the Code of Practice BS 5819 "Design of Housing for the convenience of Disabled People", 1978 and Code of Practice, BS5810: 1979, "Access for the Disabled to Buildings" available from the British Standards Institution, 2 Park Street, London W1A 2BS. (Tel 071-629-9000) and (in so far as educational buildings are concerned), to Design Note 18 "Access for the Physically Disabled to Educational Buildings".
2. The buildings to which these requirements apply are:-
  - a) Buildings to which the public are to be admitted to which Section 4 of the Chronically Sick & Disabled Act 1970 (as amended 1976) applies; b) Offices, Shops & Railway Premises as defined in the Offices, Shops & Railway Premises Act 1963 or premises deemed to fall within the act; c) Factories as defined by Section 175 of the Factories Act 1961; d) Educational Buildings as defined by Section 29B of the Disabled Persons Act 1981.

### BERKSHIRE ACT 1986 ACCESS FOR THE FIRE BRIGADE

#### S.32

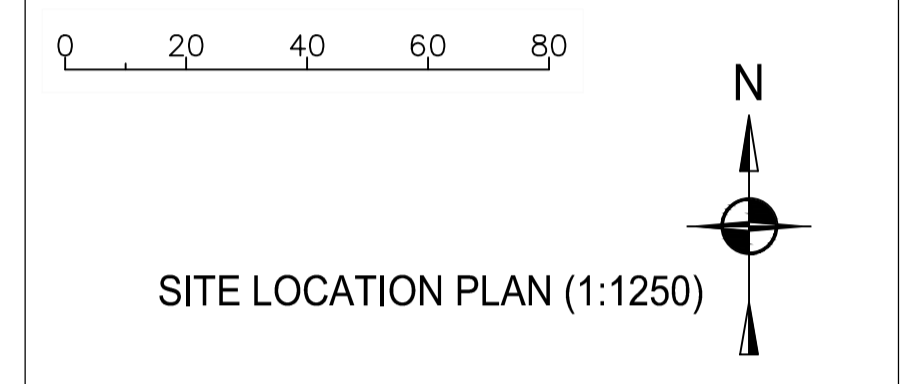
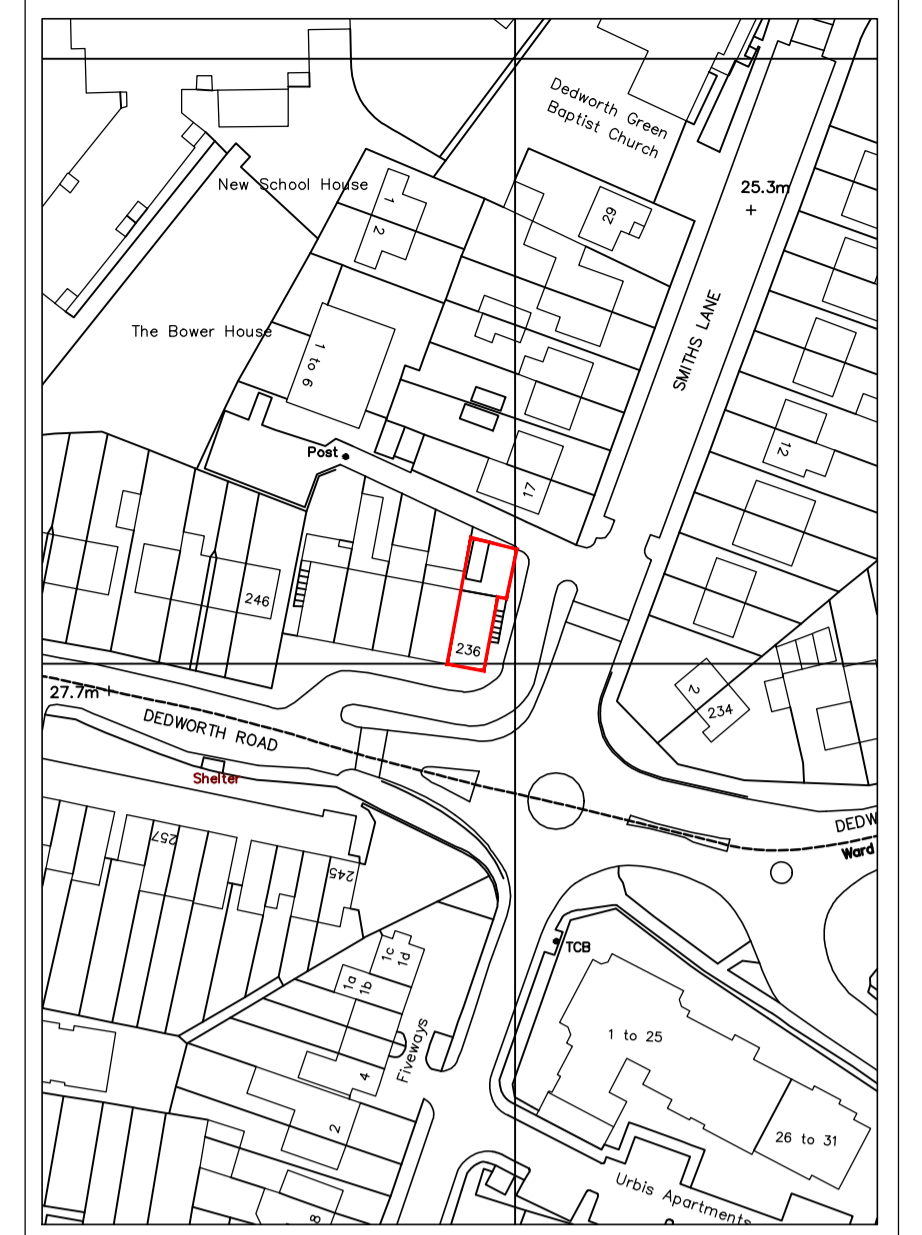
- (1) Except as provided in subsection (2) below, where the plans for the erection or extension of a building are deposited with a district council in accordance with building regulations, the district council shall reject the plans unless, after consultation with the fire authority, they are satisfied that the plans show:
  - (a) that there will be adequate means of access for the fire brigade to the building or as the case may be, to the building as extended; and
  - (b) that the building, or as the case may be, the extension of the building will not render inadequate existing means of access for the fire brigade to a neighbouring building.
- (2) No requirement concerning means of access to a building or to a neighbouring building shall be made under this section in the case of a building to be erected or extended in pursuance of a planning permission granted upon an application made under the Act of 1990, unless notice of provisions of this section is endorsed on or accompanies the planning permission.
- (3) Section 16 (7) and (8) and section 36 (2) to (6) of the Building Act 1984 (notice of rejection or passing of plans and enforcement of requirements) shall apply as if this section were a section of the said Act of 1984.
- (4) Any person aggrieved by the action of the district council in rejecting plans under this section may appeal to a magistrates' court.
- (5) In this section references to the adequacy or inadequacy of means of access for the fire brigade shall be construed as reference to a means of access adequate or, as the case may be, inadequate for use of fire fighting purposes by members of one or more fire brigades and their appliances.



Proposed Ground Floor Plan

**SECURITY PROVISIONS**  
 CCTV camera numbers and locations are illustrative only and subject to modification, following a full on-site security assessment. The CCTV recording equipment will operate with at least a 21 day recording cycle.  
 A polycarbonate security screen will be installed on the counter.  
 A safe with a time delay insert will also be installed.

Anything shown on this plan which is not required by Regulations 4(2) and 4(8) of the Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007, is for illustrative purposes only and does not form part of the premises licence.



Revisions

DESCRIPTION	DATE	TECH

PROPOSED

GROSS UNIT AREA	778 sqft
GROSS CUSTOMER AREA	524 sqft
NET CUSTOMER AREA	421 sqft
NEWSPAPER DISPLAY AREA	30 L.ft

DO NOT SCALE OFF THIS DRAWING



Site: 236 DEDWORTH ROAD  
 DEDWORTH, WINDSOR  
 SL4 4JR

Description:  
 LICENSING PLAN

Date: 05/12/2014 Scale: 1:50@A1 1:100@A3

Drawn: CRISTINA DI NOIA PM: PAUL JERMY

Drawing Number:  
 FINAL/W/NL/771/601

# **Schedule of Proposed Facilities**

**Net customer area 421 sq ft**

**Air-conditioning**

**Customer toilet**

**2 EPOS till positions**

**8 screen video-wall television system**

**Tables and chairs on carpeted viewing area**

**Touch-screen Pricefinder**

**Newspaper display area (30 ft)**

**4 Gaming machines**

**Digital colour CCTV recording system, including both overt and covert cameras**

**Staff-safe system**

**Think 21 policy**

**Notices regarding no alcohol, no smoking, no persons under 18 years**



## Gambling Commission Shop Team Training Approach Summary

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

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

understanding of GC principles and responsibilities.

- ✓ DTC reports back any issues, which the Area Training Officer will deal with at a local level. This could be in the form of additional training, or escalation of issue to Senior Management.



# Vulnerability and Interaction



# Vulnerability

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

Vulnerable people may be:

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

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



- **With mental health issues**

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



- **With gambling issues**

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





# Responsible Gambling Interactions

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

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



## Examples of Responsible Gambling Interaction prompts:

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

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

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



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

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

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

## Reporting

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

Responsible Gambling	Number of Incidents				
8) No. of Self-Exclusions Completed	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5+ <input type="checkbox"/>
9) No. of Responsible Gambling Interactions (IRF)	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5+ <input type="checkbox"/>
10) No. of Self-Exclusion Breaches (IRF)	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5+ <input type="checkbox"/>
11) No. of Self-Exclusion Reviews Completed	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5+ <input type="checkbox"/>



# Responsible Gambling Interaction

## EXAMPLE 1

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

## LESSON

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





**EXAMPLE 2**

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

**LESSON**

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



# Self-Exclusion

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



# Self-Exclusion

Self-exclusion is a tool available to customers who wish to control their gambling.

Any customer may choose to control their gambling and behaviour by self-excluding from particular William Hill shops, Internet and Telephone Operations.

Every team member has a responsibility to familiarise themselves with the identities of the customers who have self-excluded from the shops they are working in.

Details of self-excludees can be found in the yellow Customer Self-Exclusion and Interaction File.

**Every team member, including relief, must check the yellow file at the beginning of every shift.**

**SELF-EXCLUSION FORM**  
THE HOME OF BETTING

**ATTACH  
PHOTO  
HERE**

**SHOP DETAILS:**  
 SHOP NAME: \_\_\_\_\_ SHOP NUMBER: \_\_\_\_\_  
 SHOP ADDRESS: \_\_\_\_\_

**CUSTOMER DETAILS:**  
 FULL NAME: (Mr/Mrs/Miss/Ms) \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_  
 POSTCODE: \_\_\_\_\_

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

By giving details of your William Hill Online or Telephone Betting accounts below you will be excluded from them:  
 Account Number(s): \_\_\_\_\_ User Name(s): \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

I wish to be excluded from the Licensed Betting Office named on this form, others detailed on the back of this form, others detailed on the Additional Premises Form and from any William Hill Online or Telephone Betting accounts I have given details for:  
**The exclusion period is 12 months up to include:**  DD/MM/YY

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

Customer Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
 Duty Manager Signature: \_\_\_\_\_ Date: \_\_\_\_\_

www.williamhill.com | 0845 6000 133 | 18000-0000 | 0800-0000 | 0800-0000 | 0800-0000 | 0800-0000 | 0800-0000

**YOU DON'T NEED TO RETURN TO THE SHOP TO RENEW YOUR EXCLUSION ONCE IT HAS EXPIRED. SELF-EXCLUSION CAN BE EXTENDED FOR A FURTHER 12 MONTHS BY PHONING 0800 133 3332**

**REVIEW SECTION:** (To be completed after the expiry date shown above)  
 I wish to extend my exclusion period for a further 12 months and have completed a new Self-Exclusion Form   
 I wish to re-use my William Hill PLC Group Company betting facilities following a 24 hour cooling off period

**CUSTOMER SIGNATURE:** \_\_\_\_\_

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

**INFORMATION  
FOR  
SELF-EXCLUDED  
CUSTOMERS.**

**GamCare Helpline:  
0845 6000 133**

Working with GamCare, the national centre for information, advice and practical help regarding the social impact of gambling.

**MORE INFORMATION AT:  
WWW.GAMCARE.ORG.UK**

The yellow Customer Self-Exclusion and Interaction File must be kept and placed in all premises which have been re-sited.



# Self-Exclusion Request

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

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



# Self-Exclusion Review

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

## Reviewing the form in the shop

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

**THERE ARE TWO OPTIONS AVAILABLE.**

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

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

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

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

**CUSTOMER SIGNATURE:** \_\_\_\_\_ **DATE:** \_\_\_\_\_

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

### - RESUME GAMBLING

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



**- EXTEND SELF-EXCLUSION FOR ANOTHER 12 MONTHS**

The customer ticks the tick box on the bottom of their self-exclusion form and signs it. A new form should be completed and a new photograph obtained (unless the one on the old form is a good likeness and is sufficient to identify the individual) Both forms (the reviewed one and the newly completed one) should be processed through the till. Other shops covered on the old and on the new agreement must be made aware of the actions taken.

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

11) No. of Self-Exclusion Reviews Completed	1	2	3	4	5+
---	---	---	---	---	----

**Reviewing the form via the SE Helpline**

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

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

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

**Expired forms**

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

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



# Self-Exclusion Breach

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

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

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

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

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

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

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

	10) No. of Self-Exclusion Breaches (IRF)	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5+ <input type="checkbox"/>	
--	--	----------------------------	----------------------------	----------------------------	----------------------------	-----------------------------	--



TYPE OF INCIDENT									
2) H&S Hazard- Helpdesk Not Informed	3) H&S Verbal Abuse/Violence – Police Not Called	4) H&S Incident/Accident	5) Age Verification – Category A	9) Responsible Gambling Interaction	10) Self-Exclusion Breach	12) Police Called	14) Official Visit	15) Other Relevant Incident	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

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





# Self-Exclusion Case Studies

## EXAMPLE 1

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

### LESSON

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

## EXAMPLE 2

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

### LESSON

Remember to follow correct Self-exclusion review procedures.



# Think 21

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



# Think 21 Policy

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

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

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

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

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



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



# ID Verification

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

- **Is it an acceptable form of ID?**

Information regarding acceptable proof of ID can be found on ALBOS.

If in doubt - call the Compliance team on 72 3608

- **UK or International Passport Book**



- **Full or provisional UK only Driving Licence**



- **Pass Hologram Logo Cards:**

- **Citizens Card**

- **Connexions Logo**

- **Validate Card**



- **Does the photograph match the individual?**

A number of breaches occur because an individual is using another person's ID.

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

The date can be found on ALBOS on a daily basis. Press F3 and double RED

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

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



# Successful Challenges

- If an individual provides a form of ID which proves them to be over 18 it is classified as a Successful Challenge.
- All Successful ID Challenges need to be marked on the Daily Totals Report; a correct figure must be entered.

Age Verification - Successful Challenges		Number of Incidents								
7) No. of Customers Producing Acceptable Proof of Age When Challenged	1	<input type="checkbox"/>	2	<input type="checkbox"/>	3	<input type="checkbox"/>	4	<input type="checkbox"/>	5	<input type="checkbox"/>
	6	<input type="checkbox"/>	7	<input type="checkbox"/>	8	<input type="checkbox"/>	9	<input type="checkbox"/>	10	<input type="checkbox"/>
	11	<input type="checkbox"/>	12	<input type="checkbox"/>	13	<input type="checkbox"/>	14	<input type="checkbox"/>	15	<input type="checkbox"/>
	16	<input type="checkbox"/>	17	<input type="checkbox"/>	18	<input type="checkbox"/>	19	<input type="checkbox"/>	20+	<input type="checkbox"/>

# Category B(efore Attempting to Gamble)

- If an individual is unable to provide an acceptable form of ID when approached before they are able to gamble it is classified as an Underage Gambling Category B Incident.
- An Underage Gambling Category B Incident does not require an Incident Report Form. It is marked on the Daily Totals Report only.

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



# Category A (Attempt to Gamble/Gambling)

If an individual is unable to provide an acceptable form of ID when challenged after they attempted to gamble, or after they have succeeded in gambling, it is classified as an Underage Gambling Category A Incident.

**It requires an Incident Report Form with the following information:**

- Why haven't they been noticed before gambling?
- How the individual attempted to gamble (OTC/machines)?
- Did they succeed in gambling? If so how? How long did they gamble for?
- How much did they stake/win?
- What action was taken regarding their stakes/winnings?
- Have they been referred to Customer Relations? Were their contact details requested/obtained?
- Was ID shown? If so what ID was it?
- Anything else that may be relevant.

TYPE OF INCIDENT									
2) H&S Hazard-Helpdesk Not Informed	3) H&S Verbal Abuse/Violence – Police Not Called	4) H&S Incident/Accident	5) Age Verification – Category A	9) Responsible Gambling Interaction	10) Self-Exclusion Breach	12) Police Called	14) Official Visit	15) Other Relevant Incident	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- The Incident needs to be marked on the Daily Totals Report.

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



# Dealing with Cat As

- **Money inserted in machine/SSBT**  
- no gambling - no ID

**Stakes can only be refunded in shops if the individual had not yet succeeded in gambling when they were approached for ID, e.g. if they only loaded £5 on the machine and definitely have NOT GAMBLED you can refund the £5.**

- **Money inserted in machine/SSBT**  
- no gambling - ID confirming u18

If no gambling took place, refund the stake and ask the youth to leave the shop immediately.

- **Gambled - no ID**

If the youth gambled before they were approached for ID and now are unable to provide any, **payment of winnings/outstanding credit should be withheld until the individual who gambled is able to provide ID proving them to be over 18.**

If they claim to be u18, obtain their contact details (for the DOM to contact them to arrange refund of stakes) or, if they are not willing to provide any, refer them to Customer Relations. They should not be asked to return to the shop to prove they are u18!

- **Gambled - ID confirming u18**

If the youth gambled before they were approached for ID and now provides ID proving them to be u18 their winnings **MUST NOT BE PAID!**

**If their stake is known, contact the DOM to authorise REFUND OF STAKES. You cannot pay without authorisation.**

**If stakes are not known, obtain their details for the DOM or if they are not willing to provide any, refer them to Customer Relations.**

**Contact your DOM and Compliance to notify them if a confirmed underage individual gambled in the shop.**



# Category A/B

Scenario - OTC Point of approach made	Classification	Rationale
Customer enters the shop	<b>B</b>	No attempt to gamble
Customer reads form / watches screens	<b>B</b>	No attempt to place a bet (may indicate intent but has not actually attempted to bet)
Customer approaches counter and asks for a price or information about an event	<b>B</b>	No attempt to place a bet (may indicate intent but has not actually attempted to bet)
Customer picks up a betting slip/ coupon	<b>B</b>	No attempt to place a bet (may indicate intent but has not actually attempted to bet)
Customer starts to write on a slip/ fill in a coupon	<b>B</b>	No attempt to place a bet (may indicate intent but has not actually attempted to bet) Customer could be writing anything on a bet slip / coupon.
Customer approaches the counter with a betting slip / coupon	<b>A</b>	By approaching the counter with a betting slip/ coupon they are beginning an interaction with a member of the staff that would be classed as an attempt to gamble. They could be defined as at the point of placing a bet.
Customer places betting slip / coupon and payment on counter/ hands to cashier	<b>A</b>	Clearly an attempt to gamble

Scenario - Gaming Machines Approach made	Classification	Rationale
Customer stands near SST / Gaming machine watching others play	<b>B</b>	No attempt to play / gamble on the machines.
Customer sits at a SST / Gaming machine	<b>B</b>	No attempt to play / gamble on the machines. Again intention might be to play - but could equally be to sit and watch others.
Customer accesses information on a SST (without inserting money)	<b>A</b>	Machines / SST's are more difficult to monitor to identify the exact point that a person attempts to gamble. Therefore the moment a customer touches or interacts with a machine in any way we would class this as an attempt to gamble.
Customer approaches counter and asks for change	<b>B</b>	As they have not at this stage interacted with a machine, and do not have a betting slip in their hand that they are presenting to the staff this is not classed as an attempt to gamble.
Customer sits at SST/ Gaming Machine and reaches for wallet	<b>A</b>	By reaching for their wallet at a gaming machine there is a clear indication that the customer is starting the "interaction" and is therefore considered as an attempt to gamble. It is similar to approaching the counter OTC scenario.
Customer attempts to insert money into a SST/ Gaming machine	<b>A</b>	Clearly an attempt to gamble.

Scenario - Misc Approach made	Classification	Rationale
Customer uses toilets in betting shop	<b>B</b>	No attempt to gamble.
Customer enters with a minor (adult/child)	<b>B</b>	No attempt to gamble - but must be categorised as a category B.
Customer enters with minor and adult attempts to place a bet (even if suspect it is for child)	<b>B</b>	As the child has not attempted to gamble this is a category B - if the child was attempting to place a bet themselves then this would be considered category A. If you have a conversation with the customer and challenge them - Report it as a Responsible Gambling interaction.





# Think 21 Case Studies:

## EXAMPLE 1 - Category A

- The CSA was working on his own during the duty manager's lunch break.
- Due to a high volume of customers putting bets on at the counter a youth managed to enter the shop unnoticed and start playing one of the gaming machines.
- The CSA noticed him after 1 minute and immediately challenged him for ID as he looked under 21.
- The youth only had a Student Card on him and was informed that it is not an acceptable proof of ID therefore he can not stay on the premises.
- The receipt totalled £23.50. The CSA marked the receipt with 'ID to be verified', scanned it through the till and referred the youth to the Customer Relations Department for payment. He also asked for a contact number.
- The youth left the shop and the CSA completed and scanned an Incident Report Form through the till and noted the incident in the shop diary.
- The youth returned 3 hours later with a UK driving license proving him to be 19 years old and got paid in the shop.

### LESSON

Always follow procedure and never pay any outstanding balance in the shop unless an acceptable proof of ID is shown. Make sure you do not pay this ticket when another customer hands it to you. If the youth is underage his stakes will be returned by Customer Relations once they have seen proof of age.



**EXAMPLE 2 - Category A**

- A youth entered the shop, took a football coupon, filled it in and came to the counter with money in his hand.
- The CSA asked for ID.
- The youth stated that he was served in the shop the day before and has shown ID already.
- The CSA reinforced the procedure and informed him that he should be carrying his ID on him on all occasions when visiting as he will be challenged for ID by different members of the team working in the shop.

**LESSON**

The ID must be verified by the member of the team working in the shop at the time when the customer enters whether or not the customer claims to have shown it already.

**EXAMPLE 3 - Category B**

- A youth entered the shop started to browse football coupons.
- He was approached and was unable to produce ID when asked.
- He was asked to leave the shop.

**LESSON**

This is a Category B. It all depends on when you approached the youth. If the youth was approached at the counter attempting to gamble it would be considered a Cat A.



**EXAMPLE 4 - Category B**

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

**LESSON**

Category B is an incident where an individual who has not attempted to gamble is challenged for ID and is unable to produce any.

**EXAMPLE 5 - Category A**

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

**LESSON**

As soon as a youth touches a gaming machine screen or starts to insert money it is a Category A. The only time when an incident is considered a Category B on the gaming machines is when the youth is watching other customers play.



**EXAMPLE 6 - Category B**

- A regular customer entered the shop with a small child and approached the counter with a football slip.
- The CSA apologised and asked the customer to leave the shop.
- The customer left the child outside of the shop and re-entered.
- The CSA again apologised explaining that they did not feel comfortable accepting any bets whilst the child is outside unattended and that unfortunately the customer will be asked to leave.
- The customer left the shop

**LESSON**

You should not condone customers leaving children outside of the shop.  
Report it as a Responsible Gambling Interaction



# Correct reporting

**Ensure the number of incidents reported on the Daily Totals Report is correct.**

These figures are collated, reviewed and should be a realistic picture of compliance actions in your shop. Your reporting history is your personal compliance log which is evidencing your social responsibility and adherence to the three licensing objectives.

**Please be aware that inaccurate reporting could lead to disciplinary action being taken against you.**

Communicate the number of incidents you dealt with to the Duty Manager taking over your shift.

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

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

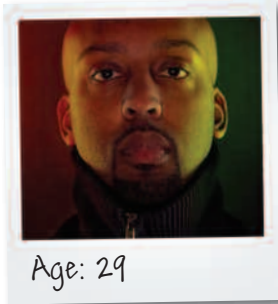
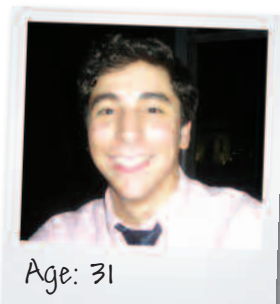
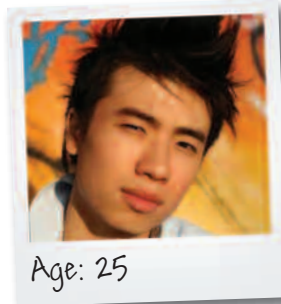
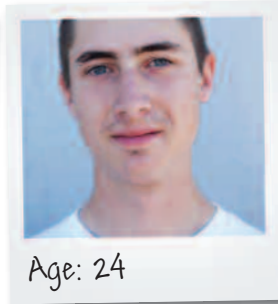
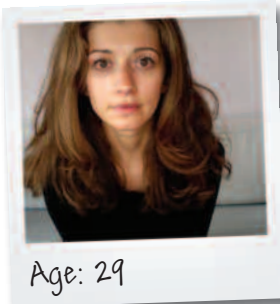
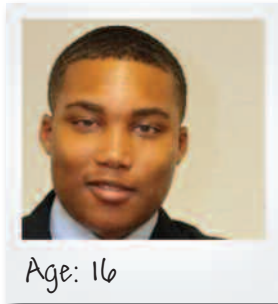
RETAIL COMPLIANCE DAILY TOTALS REPORT <small>Current Form 03/2019 24/01/2019</small>						
Branch Name		Date		Employee Number		
<b>Health and Safety</b>						
1) Hazard Identified? (If Yes Complete Q2)						
Yes		No (JRF)				
2) Helpdesk Informed?						
Yes		No (JRF)				
3) No. of Verbal Abuse/Violence Incidents – Police Not Called (JRF)						
1	2	3	4	5+		
4) No. of Incidents/Accidents Occurred (JRF)						
1	2	3	4	5+		
<b>Age Verification - Category A</b>						
5) No. of Category A Incidents (JRF)						
1	2	3	4	5+		
<b>Age Verification - Category B</b>						
6) No. of Category B Incidents						
1	2	3	4	5+		
<b>Age Verification - Successful Challenges</b>						
7) No. of Customers Producing Acceptable Proof of Age When Challenged						
1	2	3	4	5		
6	7	8	9	10		
11	12	13	14	15		
16	17	18	19	20+		
<b>Responsible Gambling</b>						
8) No. of Self-Exclusions Completed						
1	2	3	4	5+		
9) No. of Responsible Gambling Interactions (JRF)						
1	2	3	4	5+		
10) No. of Self-Exclusion Breaches (JRF)						
1	2	3	4	5+		
11) No. of Self-Exclusion Reviews Completed						
1	2	3	4	5+		
<b>Police Incidents</b>						
12) No. of Incidents – Police Called (JRF)						
1	2	3	4	5+		
<b>POCA/Money Laundering Incidents</b>						
13) No. of Notifications to ACDM						
1	2	3	4	5+		
<b>Official Visits</b>						
14) No. of Official Visits (JRF)						
1	2	3	4	5+		
<b>Any Other Incidents</b>						
15) No. of Incidents affecting Licensing Objectives (JRF)						
1	2	3	4	5+		

RETAIL COMPLIANCE INCIDENT REPORT FORM <small>One Incident Report Form should be completed for each incident</small>									
Branch Name		Date of Incident		Employee Number					
Branch Number		Time of Incident		Employee Name					
<b>TYPE OF INCIDENT</b>									
1) Not Issue - Misused Self-Exclusion	2) Not Issue - Responsible Gambling	3) Not Issue - Police Called	4) Not Issue - Category A	5) Responsible Gambling Interaction	6) Self-Exclusion Breach	7) Police Called	8) Official Visit	9) Other Incident	10) Other Incident
Line Manager Informed? Yes <input type="checkbox"/> No <input type="checkbox"/>									
SIGN				DATE					



# Think 21

Did you guess the ages correctly?



## If in doubt - ASK FOR ID

# WELCOME.

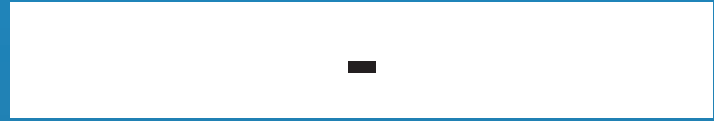
**THINK 21**  
Look under 21? You will need ID to come in

## OPENING TIMES.

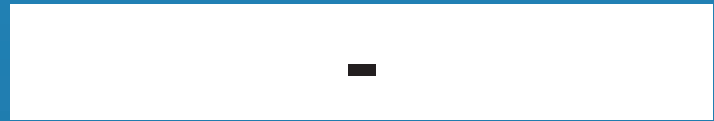
**Mon - Fri\***



**Saturday**



**Sunday**



All major Debit cards accepted in this shop

\*Excludes Bank Holidays

**08705 18 17 15**

**Customer Helpline**  
General/Shop Enquiries



No smoking. It is against the law to smoke in these premises



No one under the age of 18 is permitted in these premises

## SECURITY NOTICE.

William Hill will actively support the prosecution of any person committing offences at these premises. The following security measures are in place at this shop:



Please remove all face coverings before entering these premises



Alcohol is not permitted in these premises



For the protection of our customers, our employees and our business, and for the purposes of crime prevention and detection, CCTV images are recorded and monitored



This shop is fitted with a security alarm system



All cash is protected by an anti hold-up device. Staff cannot override or affect its operation

In an emergency out of hours please contact:

**0113 291 2000**

*William* **HILL**  
THE HOME OF BETTING

**0800 44 40 40**

**williamhill.com**

NATIONAL GAMBLING HELPLINE  
 **0808 8020 133**  **gambleaware.co.uk™**  
GAMBLE RESPONSIBLY

# SECURITY NOTICE.

William Hill will actively support the prosecution of any person committing offences on these premises.  
The following security measures are in place at this shop:



## NO SMOKING

It is against the law to smoke on these premises



## NO UNDER 18s

No one under the age of 18 is permitted on these premises including children



## NO ALCOHOL

Alcohol is not permitted on these premises



## NO HELMETS

Please remove all face coverings before entering these premises



## SECURITY ALARM

This shop is fitted with a security alarm system



## TIME LOCKED SAFE

All cash is protected by an anti hold-up device Staff cannot override or affect its operation



## CCTV

For the protection of our customers, our employees and our business, and for the purposes of crime prevention and detection, CCTV images are recorded and monitored.

*William* **HILL**

THE HOME OF BETTING





17.10.2005

*Certificate of  
Social Responsibility  
Awarded to*

**William Hill Organisation**

This is to certify that following an audit the above company  
has been awarded GamCare certification for establishing  
high standards of social responsibility

**Signed:**

Jill Davidson, Chief Executive, GamCare



Serial Number: 004

Not Transferable

NEWS

# Bookmakers to implement FOBT code of practice

By Bill Barber

BRITAIN'S bookmakers are set to implement measures described by one academic as "potentially world-leading" in an attempt to prevent harm from gambling – including from gaming machines (FOBTs).

Innovations include machine players being able to set their own time and monetary limits, as well as mandatory warnings being displayed on screen when certain limits are breached.

The measures are part of the Association of British Bookmakers' new Code for Responsible Gambling and Player Protection, launched today.

The code also includes plans to strengthen the Safe Bet Alliance, which the ABB claims has helped reduce robberies of betting shops in London by 60 per cent over the last two years, tackling money-laundering, reviewing advertising and promotions, introducing new measures on age-verification and developing a new industry standard for staff training.

However, it is the new code governing gaming machines that is likely to provoke most discussion.

When players reach their monetary and time limits, play will be suspended for 30 seconds and a message will ask them if they want to stop playing. The machine will also display responsible gambling messages.

In addition, all customers will receive mandatory reminders on screen when they have been playing for 30 minutes or have lost £250, giving the player the opportunity to decide whether they want to continue. In both instances betting shop staff will also be alerted.

The intention is for the new technology to be installed in all member shops before March next year.

A new Responsible Gambling Committee will also be set up with an independent chairman, supported by organisations including the Responsible



New measures to be introduced will include FOBT players being issued with a reminder after 30 minutes of play or when they have lost £250

Gambling Trust, Gamcare and Gordon Moody Association.

ABB chairman Neil Goulden said: "We are saying don't demonise a single product because there is no evidence of a direct link between any single product and gambling-related harm. All the evidence says reducing stakes and prizes is not effective for harm prevention. Here are some things we think might be more effective."

"We are hoping the regulator and the government will welcome it. I would be very surprised if they didn't, but because it's all very new and unproven I would be very surprised if they said, 'Yes, that's perfect'."

Asked how he thought opponents of machines would react to the new code, Goulden said: "The plea to the anti-lobby is let's stop this warfare. If you are really committed to harm prevention put someone on our committee and work

with us. Don't just keep standing up and being abolitionists."

Betfred are not a member of the ABB but have adopted the code, meaning 95 per cent of the industry will be covered.

"We are hoping that other independents who are not part of the ABB will sign up as well," Goulden added.

The code has been endorsed by leading gambling expert Dr Mark Griffiths, professor of gambling studies at Nottingham Trent University's International Gaming Research Unit.

He said: "The player protection and harm-minimisation measures proposed go further than anything else emanating from the UK gambling sector in the past."

"Some of the measures proposed are innovative and potentially world-leading and I'm delighted the ABB has taken such a proactive stance in its efforts to promote responsible gambling and minimise problem gambling."

## Code for responsible gambling Key points

- » New player protection strategies for machine players, including voluntary monetary and time limits, as well as mandatory time and monetary reminders on machines
- » All shop staff to be trained to recognise a wider range of problem gambling indicators and aim to identify customers at risk of developing a gambling problem
- » All ABB members to maintain a central self-exclusion register and monitor the number of self-exclusions in each of their shops. Internal arrangements to be made for exclusion from the operator's other channels and removal from marketing databases
- » Strengthening age verification measures, including all shop staff being actively encouraged to walk the shop floor and implement "Think 21" policy among machine players. Staff to be trained to prevent under-age access to machines. ABB to fund a new programme of compliance testing undertaken for independent ABB members
- » Creation of new Responsible Gambling Committee to monitor and review compliance with the code and the detail of the code itself. Committee to have an independent (non-bookmaking) chairman and independent adviser
- » Evolve and improve national standards in terms of the Safe Bet Alliance, which covers shop safety and security

**NEWS**

By Bill Barber

BOOKMAKER representatives have dismissed accusations that betting shops are a hotbed for money laundering as “laughable” following newspaper reports of criminality involving fixed odds betting terminals.

The Guardian has run a number of articles on the industry, publishing claims from self-professed drugs dealers in an unnamed east coast town that they used FOBTs to launder their profits.

The newspaper has also published accusations from a former Ladbrokes employee that the bookmaking giants had sought to conceal money laundering and under-age gambling in their shops.

The news comes just a few weeks after Coral were rebuked by the Gambling Commission for not having sufficient anti-money laundering controls in place following a police investigation into an individual whose activities resulted in a financial benefit to the bookmaker estimated to be £90,000.

Dirk Vennix, chief executive of the Association of British Bookmakers, said: “Money laundering is a major criminal problem for countries worldwide. Our industry takes it very seriously. But the idea that high street bookmakers are at the centre of money laundering is frankly laughable.

“According to Soca [Serious Organised Crime Agency] the number of suspicious incidents involving our shops was just 89 compared to some 218,021 recorded in the UK banking industry in 2012.

“We’re not complacent and we co-operate fully with the authorities and will always try to do more. But it’s hard for any fair-minded person looking at this evidence to come to the conclusion that bookmakers are a hot-bed of money laundering activity.”

# Claims that bookies rife with money laundering ‘laughable’

Paul Pearce, a former member of Ladbrokes’s security team, claimed in The Guardian that a director of security at the firm had asked for certain terms not to be used in reports in order to make it “harder to assess the scale of money laundering or children illegally betting”.

In response the bookmaker said it had clear anti-money laundering and under-age gambling policies and said that more than 10,000 customers were being turned away every month on suspicion of being under 21, and having no ID.

Ladbrokes corporate director Ciaran O’Brien added: “Ladbrokes records all incidents and works closely with both the police and regulator on all issues.

“This employee raised no concerns during his employment and we reject any suggestion that the company does not take under-age betting or crime seriously. We continually seek to be at the forefront of tackling crime and will continue to develop and improve our approach in conjunction with the regulator and police.”

**Extract from Gambling Act 2005**

***Licensing authorities' functions***

**153 Principles to be applied**

- (1) In exercising their functions under this Part a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it—
- (a) in accordance with any relevant code of practice under section 24,
  - (b) in accordance with any relevant guidance issued by the Commission under section 25,
  - (c) reasonably consistent with the licensing objectives (subject to paragraphs (a) and (b)), and
  - (d) in accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c)).
- (2) In determining whether to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide.
- (3) This section is subject to section 166.

## Part 5: Principles to be applied by licensing authorities

### Principles to be applied

- 5.1** In exercising most of their functions under the 2005 Act, licensing authorities must have regard to the licensing objectives set out in section 1 of the Act. In particular, licensing authorities must have regard to the licensing objectives when exercising their functions in relation to premises licences, temporary use notices and some permits. Those objectives are:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
  - ensuring that gambling is conducted in a fair and open way
  - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 5.2** In considering applications, licensing authorities in England and Wales should take particular care to bear in mind that these objectives are not the same as those in the Licensing Act 2003. In particular, they do not include considerations in relation to public safety or prevention of public nuisance. The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling.
- 5.3** Similarly in Scotland the licensing objectives for the Licensing (Scotland) Act 2005 are different. In particular the Gambling Act does not include the objectives of preventing public nuisance and protecting and improving public health.
- 5.4** Section 153 of the Act provides that in exercising its functions under Part 8 of the Act (premises licensing and provisional statements), a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:
- (a) in accordance with any relevant code of practice under section 24 (i.e. such as that found within the Commission's *Licence Conditions and Codes of Practice* (LCCP))
  - (b) in accordance with any relevant guidance issued by the Commission under section 25 (ie this document)
  - (c) reasonably consistent with the licensing objectives (subject to (a) and (b) above), and
  - (d) in accordance with the Licensing Authority Statement of Policy (subject to (a) and (c) above). (See part 6 of this Guidance.)
- 5.5** Section 153 applies not only to a licensing authority's relevant functions under Part 8 of the Act (ie applications for the grant, transfer, reinstatement or review of premises licences and provisional statements) but also when it is deciding whether to give a counter notice on receipt of a temporary use notice. Its effect is that, whilst in such circumstances there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with the guidance contained in this document, any relevant Commission code of practice and its own statement of licensing policy as well as reasonably consistent with the licensing objectives. In reaching a view that the grant of a licence, or the giving of the temporary use notice, is in accordance with such guidance, code of practice or policy statement, a licensing authority is, in common with all such public authority decision makers, under a duty to act fairly and rationally. In cases where an authority is concerned whether a grant would be in accordance with, for example, the guidance in this document, this can be resolved by the imposition of appropriate licence conditions. In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this Guidance and its own policy statement or view as to the application of the licensing objectives the structure of section 153 makes it plain that the Commission's codes and Guidance take precedence.

- 5.6** Section 153 also makes it clear that in deciding whether or not to grant a licence a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application.
- 5.7** The requirements in section 153 are subject to the licensing authority's power (under section 166) to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in section 153.
- 5.8** It should be noted that, unlike the Licensing Act, the Gambling Act does not include as a specific licensing objective the prevention of public nuisance. Any nuisance associated with gambling premises should be tackled under other relevant legislation.

## More about the licensing objectives

### Objective 1

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

- 5.9** The Commission play a leading role in preventing gambling from being a source of crime. It will maintain rigorous licensing procedures that aim to prevent criminals from providing facilities for gambling, or being associated with providing such facilities. The Act provides the Commission with powers to investigate the suitability of applicants for operating and personal licences, and others relevant to the application. This will provide the Commission with the power to make enquiries about and investigate those who are involved in the control of a company or the provision of gambling. In considering applications for operating and personal licences the Commission will, in particular, take a serious view of any offences involving dishonesty committed by applicants or persons relevant to the application.
- 5.10** As applicants for premises licences (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued, licensing authorities will not need to investigate the suitability of an applicant. If during the course of considering a premises licence application, or at any other time, the licensing authority receives information that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.
- 5.11** Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. If an application for a licence or permit is received in relation to premises that are in an area noted for particular problems with organised crime, for example, licensing authorities should think about what (if any) controls might be appropriate to prevent those premises becoming a source of crime. These might include conditions being put on the licence, such as a requirement for door supervisors.
- 5.12** A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its Licensing Authority Statement of Policy
  - receiving relevant representations to an application
  - dealing with applications as a responsible authority in its own right
  - considering applications before it.
- 5.13** Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. (Although if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.)

- 5.14** Local authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003, in which context they have wider powers to also take into account measures to prevent nuisance.
- 5.15** In relation to preventing disorder, licensing authorities have the ability under section 169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in section 178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions can be found in part 9 of this Guidance.
- 5.16** Local authorities should note that in the case of gambling premises licences, disorder is intended to mean activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.

## **Objective 2**

### **Ensuring that gambling is conducted in a fair and open way**

- 5.17** The Commission is concerned to ensure that not only is gambling fair in the way it is played, but also that the rules are transparent to players and they know what to expect. It achieves this by working to ensure that:
- operating and personal licences are issued only to those who are suitable to offer gambling facilities or work in the industry
  - easily understandable information is made available by operators to players about, for example: the rules of the game, the probability of losing or winning, and the terms and conditions on which business is conducted
  - the rules are fair
  - advertising is not misleading
  - the results of events and competitions on which commercial gambling takes place are made public
  - machines, equipment and software used to produce the outcome of games meet standards set by the Commission and operate as advertised.
- 5.18** Generally the Commission would not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be a matter for either the management of the gambling business, and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. (However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.)
- 5.19** In relation to the licensing of tracks the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Please see part 20 of this Guidance for more information.

## Objective 3

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

- 5.20** With limited exceptions, the intention of the Gambling Act is that children and young persons should not be permitted to gamble and should be prevented from entering those gambling premises which are adult-only environments. The objective refers to protecting children from being 'harmed or exploited by gambling'. That means preventing them from taking part in gambling and for there to be restrictions on advertising so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children, excepting Category D gaming machines.
- 5.21** In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by section 176 of the Act. The code of practice is available as part of the *Licence Conditions and Codes of Practice (LCCP)* on the Commission website<sup>1</sup>. In accordance with that section, adherence to the code will be a condition of the premises licence. (Please see part 9 of this Guidance for more information.)
- 5.22** The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons', but it does for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to mental health needs, learning disability or substance misuse relating to alcohol or drugs.
- 5.23** Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

### Good practice in regulation

- 5.24** Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation<sup>2</sup> in the exercise of the function. These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Gambling Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Compliance Code<sup>3</sup> ("the Code"). The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.
- 5.25** The statutory principles of good regulation and the Code also apply to local authorities when they are fulfilling regulatory functions under the Gambling Act 2005<sup>4</sup> and the Gambling Commission reminds licensing authorities that they are under a statutory duty to have regard to these principles and the Code.

---

<sup>1</sup> LCCP available from [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

<sup>2</sup> Legislative and Regulatory Reform Act 2006, section 21

<sup>3</sup> Regulators' Compliance Code, Department for Business, Innovation and Skills (formerly the Department for Business, Enterprise and Regulatory Reform), 2007, issued under section 22 of the Legislative and Regulatory Reform Act 2006

<sup>4</sup> The Legislative and Regulatory Reform (Regulatory Functions) Order 2007, was amended by the Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2009, which, amongst other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the Gambling Act 2005 - see Parts 3 and 7.



- 5.26** Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Code, for example in developing their Compliance and Enforcement Policy<sup>5</sup>, and in delivering risk-based regulation in relation to age restrictions<sup>6</sup>.

## Human Rights Act 1998

- 5.27** The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action, under the Gambling Act licensing authorities should bear in mind that they are subject to the Human Rights Act and in particular:
- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
  - Article 6 – right to a fair hearing
  - Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person’s private life
  - Article 10 – right to freedom of expression.

Licensing authorities are reminded of their duty when applying their Licensing Authority Statement of Policy to consider whether, in the light of relevant representations made to them, exceptions to those policies should be made in any particular case.

- 5.28** In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met. Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. This is because such objections do not relate to the licensing objectives. An authority’s decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

---

<sup>5</sup> *Template: Compliance and Enforcement Policy*, Better Regulation Delivery Office. This template policy was developed by the Local Better Regulation Office, with local authorities, to assist local authorities in developing a policy that is in line with the requirements of the Regulators’ Compliance Code, or to review their existing policy. It is available on the BRDO website at <http://www.bis.gov.uk/brdo/resources/risk-based-regulation/compliance-policy>

<sup>6</sup> The Age Restricted Products and Services Framework published in 2011 sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The principles for regulators and enforcers will be underpinned by a Code of Practice for Regulatory Delivery, which is due to be launched for consultation in June 2012.