

FAO Mr D. Pattenden
Licensing Team
London Borough of Barnet
Barnet House
1255 High Road
Whetstone
London
N20 0EJ

Date: 05 May 2017
Our ref: RXB/RXB/P49646-953
Doc Ref: 2145683597
Your ref:
E-mail: r.bradley@popall.co.uk
Direct line: 0115 948 7424

Special Delivery

Dear Daniel

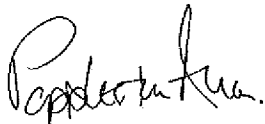
Paddy Power, Plot 299, 128 Colindale Avenue, London **New Betting Premises Licence – Hearing 4th July**

Please find enclosed a copy of the Applicant's hearing bundle.

We will also be sending you by email a supplemental statement prepared by Mr Narinder Dhanjal, Licensing and Acquisition Manager for Power Leisure Bookmakers Limited.

Thank you for your assistance with this matter.

Yours sincerely,



Poppleston Allen

Enc

THE GAMBLING ACT
2005

APPLICATION FOR A PREMISES LICENCE

Plot 299
128 Colindale Avenue
LONDON
NW9 4AX

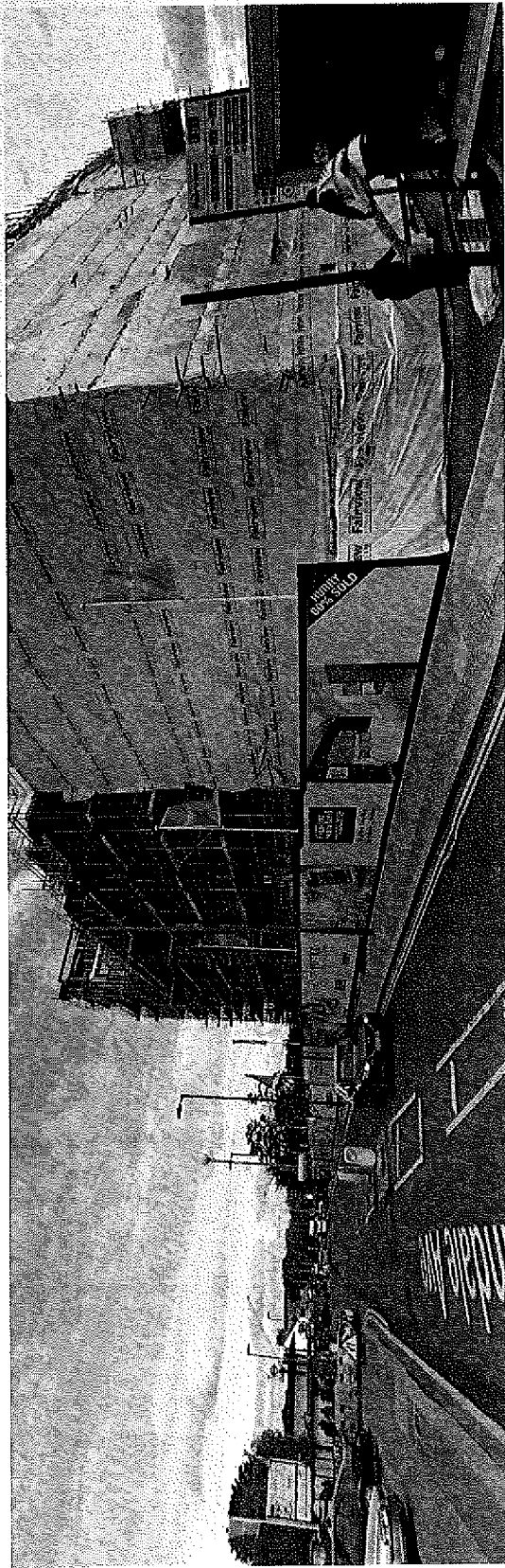
www.paddypowerplc.com

PADDYPOWER.

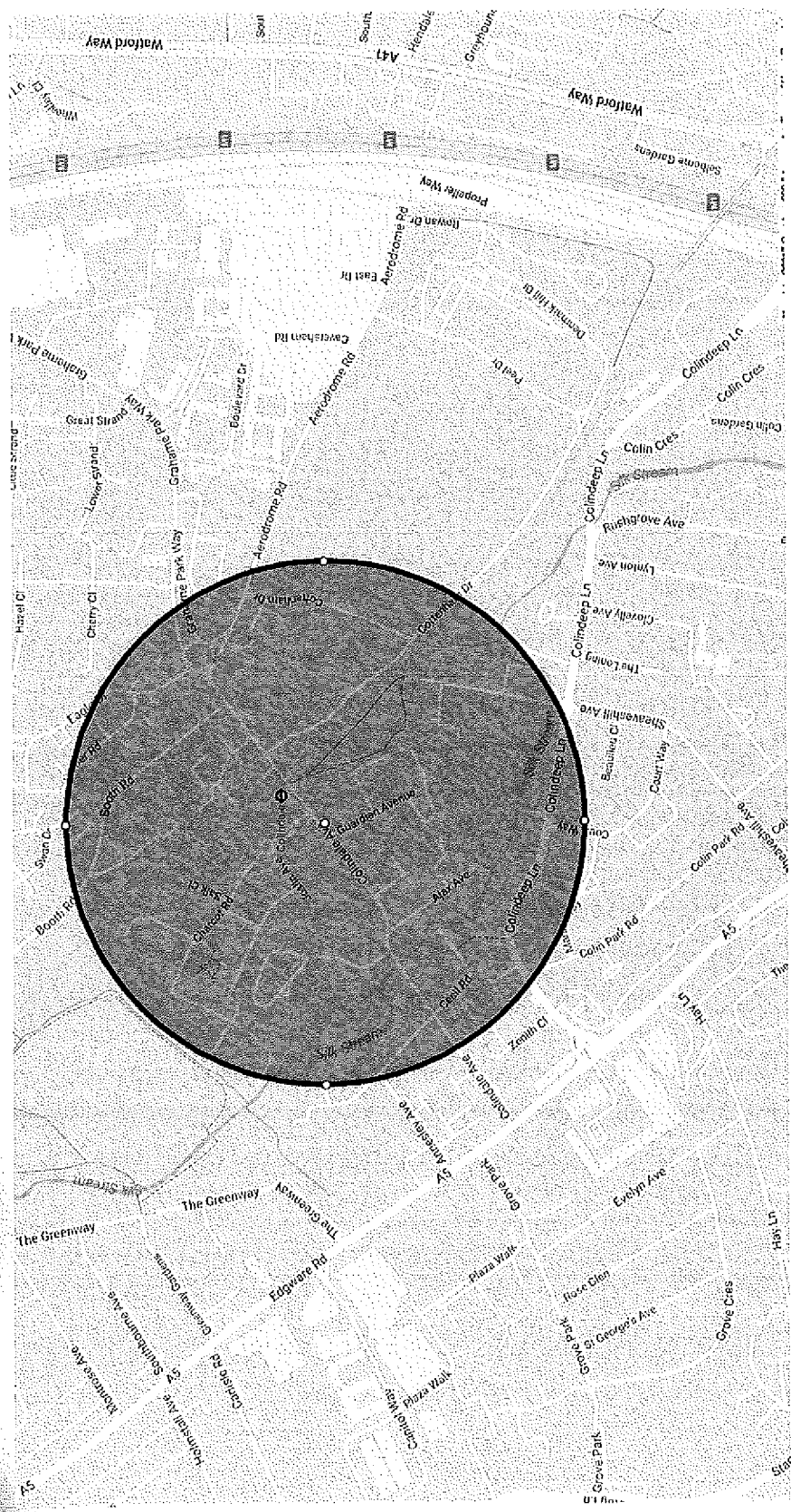
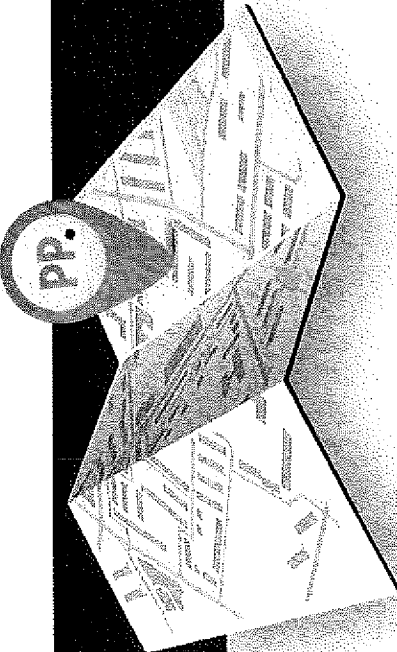
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APPLICATION SITE



QUARTER MILE RADIUS MAP



Part 5: Principles to be applied by licensing authorities

Licensing objectives

- 5.1 In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- 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 It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances. This is dealt with in more detail at Part 6.

Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

- 5.3 Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.
- 5.4 A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its statement of licensing policy
 - receiving relevant representations to an application
 - dealing with applications as a responsible authority in its own right
 - considering applications before it.
- 5.5 In the context of gambling premises licences, licensing authorities should generally consider disorder as 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.
- 5.6 Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, 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.
- 5.7 Of course, licensing 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 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

- 5.8 In relation to preventing disorder, licensing authorities have the ability under s.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 s.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 on premises licences can be found in Part 9 of this Guidance.
- 5.9 There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations⁵.
- 5.10 Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (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. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, 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.

Objective 2 : Ensuring that gambling is conducted in a fair and open way

- 5.11 Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided 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.
- 5.12 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. Further information can be found in Part 20 of this Guidance.

Objective 3 : Protecting children and other vulnerable persons from being harmed or exploited by gambling

- 5.13 In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (eg bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

⁵ For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers

- 5.14 Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.
- 5.15 If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.
- 5.16 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 s.176 of the Act. The code of practice is available as part of the Licence Conditions and Codes of Practice (LCCP) In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this Guidance.
- 5.17 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, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.
- 5.18 Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's statement of policy. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

S.153 principles

- 5.19 S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, 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 s.24 (ie the LCCP)
 - b. in accordance with any relevant guidance issued by the Commission under s.25 (ie this Guidance)
 - c. reasonably consistent with the licensing objectives (subject to a and b above), and
 - d. in accordance with the licensing authority's statement of licensing policy (subject to a to c above).
- 5.20 Whilst 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 this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.
- 5.21 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 statement of policy or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this Guidance take precedence.

- 5.22 In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:
- s.153 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
 - s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.
- 5.23 A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.
- 5.24 The requirements in s.153 are subject to the licensing authority's power under s.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 s.153.

Codes of Practice

- 5.25 The LCCP sets out the Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within Part II of the LCCP.
- 5.26 To assist licensing authorities in determining premises applications and inspecting premises, all the codes of practice are also available as a single document. The codes specify a number of requirements, many of which relate to social responsibility issues and these may be of particular interest where a licensing authority has concern about matters such as protection of the young and vulnerable. It should be noted that the codes also apply to situations in which the gambling being offered is not normally the responsibility of an operating licence holder. Examples include the code of practice for equal chance gaming and the code for gaming machines in clubs and premises with an alcohol licence.

Good practice in regulation

- 5.27 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 regulation⁶ 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 Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code⁷. 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.
- 5.28 The statutory principles of good regulation and the Regulators' Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act⁸.

⁶ Legislative and Regulatory Reform Act 2006, section 21

⁷ Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006

⁸ 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

- 5.29 Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Regulators' Code, for example in developing their Compliance and Enforcement Policy⁹, and in delivering risk-based regulation in relation to age restrictions¹⁰.

Human Rights Act 1998

- 5.30 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 Act, licensing authorities should bear in mind that they are subject to the Human Rights Act 1998 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.

Other considerations

- 5.31 Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 5.32 In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.
- 5.33 Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.
- 5.34 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. 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, and 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).

⁹ *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>

¹⁰ *Age restricted products and services framework / updated April 2014* 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 document forms the foundations of the *Age restricted products and services: a code of practice for regulatory delivery / updated April 2014*

GAMBLING ACT 2005

OBJECTIVE 1 – PREVENTING GAMBLING FROM BEING A SOURCE OF CRIME OR DISORDER, BEING ASSOCIATED WITH CRIME OR DISORDER OR BEING USED TO SUPPORT CRIME

- WE HAVE ADOPTED AND COMPLIED WITH THE GUIDELINES PRODUCED BY THE ASSOCIATION OF BRITISH BOOKMAKERS (ABB) IN RELATION TO THE PROCEEDS OF CRIME ACT 2002 (POCA) .
- ALTHOUGH A RARE OCCURRENCE; IF WE SUSPECT ANYONE OF USING OUR PREMISES FOR THE FURTHERANCE OF CRIMINAL ACTIVITY (FOR INSTANCE DRUG DEALING, USING COUNTERFEIT MONEY, SELLING SUSPECTED STOLEN PROPERTY AND CRIMINAL DAMAGE) WE WILL CONTACT THE POLICE IMMEDIATELY, REPORT TO OUR UK HEAD OF SECURITY AND RECORD THE INSTANCE IN THE SHOP LOG.
- WE EXERCISE CONSIDERABLE CAUTION WHEN APPROACHED BY A CUSTOMER UNKNOWN TO US WHO WANTS TO PLACE A SIGNIFICANT BET.
- WE AT PADDY POWER ARE ALSO AWARE OF THE NEED TO NOTIFY THE GAMBLING COMMISSION SHOULD WE SUSPECT ANYONE, INCLUDING ARE OWN STAFF, OF COMMITTING AN OFFENCE UNDER THE ACT.
- ALL OF OUR SHOPS HAVE DIGITAL CCTV INSTALLED, RECENTLY UPGRADED TO A 24 HOUR REMOTE SYSTEM WITH VIRTUALLY EVERY AREA OF THE CUSTOMER AREA SUPERVISED.
- WE HAVE A FULL TIME HEAD OF SECURITY / MONEY LAUNDERING OFFICER HEADING A SECURITY TEAM MONITORING STAFF / CUSTOMER ACTIVITY.
- WE PRE-CONSULT WITH THE POLICE WHEN MAKING NEW APPLICATIONS.

Nindi Dhanjal

From: Vicky.Johnson@met.pnn.police.uk
Sent: Thursday 25 May 2017 09:05
To: LicensingAdmin@barnet.gov.uk
Cc: Nindi Dhanjal; Michelle.Rudland@barnet.gov.uk; Daniel.Pattenden@Barnet.gov.uk; Thomas.Bolton@met.pnn.police.uk
Subject: Paddy Power Plot 299, 128 Colindale Avenue, NW9 4AX

Follow Up Flag: Follow up
Flag Status: Flagged

Licensing admin,

Please see below conditions proposed by Paddy Power.

With those applied on to any licence granted, there will be no police objections.

Nindi, Thank you for meeting with us on Friday. Thank you for being open to some new suggestions.

Tom, I think we were all in agreement that the steps taken by Paddy Power would be ideal.

Regards to all

Vicky

Licensing Officer (SX)
020 8733 4195

From: Nindi Dhanjal [mailto:Nindi.Dhanjal@paddypowerbetfair.com]
Sent: 19 May 2017 16:26
To: Wilcock Vicky T - SX ; Bolton Thomas - SX
Subject: Paddy Power

Vicky/Tom

Good to meet you earlier. As promised find below the conditions we discussed, if I have left anything out please let me know. Embarrassingly I may have forgotten John's? name but could you pass onto him as well.

1. CCTV shall be installed to Home Office Guidance standards and recordings shall be kept for 31 days and shall be made available to the police and licensing officers if requested. The CCTV system will cover the entry and exit point and the main customer area to include the machine areas and staff area of the premises. External cameras to be installed to cover the outside areas including the front door and along the boundary of the premises.
2. A maglock will be fitted to the front door of the premises and shall be controlled by staff.
3. An incident record shall be kept and made available to the Police and Responsible Authorities.

Regards

Nindi

Nindi Dhanjal

Licensing & Acquisitions – London & South

Mobile: 07508 242092

Email: nindi.dhanjal@paddypowerbetfair.com



Paddy Power Betfair | Waterfront | Hammersmith Embankment | Chancellors Road | London | W6 9HP.

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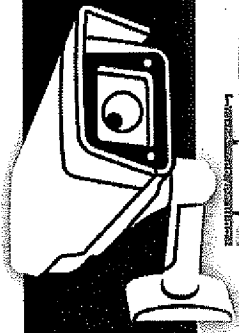
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AN EXAMPLE OF PADDY POWER CCTV



Hansard Extract

On 9 November 2004 there was a debate in the House of Commons over whether to amend the Licensing Objectives to include "the prevention of public nuisance.) Below are the relevant paragraphs from Hansard.

The amendment was withdrawn. The following are material extracts from Hansard:

Hansard 9th November 2004

Col: 12

Mr. Foster Moving amendment to include prevention of public nuisance in Licensing Objectives

Why is it important that we deal with that in the objectives? The answer is simple. As the Bill stands, the local authority is unable to take account of effects that may occur not in a new casino or on gambling premises, but further afield, outside those premises. It is crucial that local authorities have the opportunity to do so. Indeed, the Local Government Association said when it wrote to all Members about the Second Reading debate that the prevention of public nuisance should be a licensing objective:

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Hansard 9th November 2004

Col 37

Richard Caborn, Answering the amendment

[Having dealt with the liquor-licensing of Casinos...]

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the law on noise and other nuisance. There is no well established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not

believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate—I am not expressing a Government view on this—the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.

[Saturday, 24 November 2012]

GAMBLING ACT 2005

OBJECTIVE 2 – ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY.

- **A COPY OF OUR CURRENT BETTING RULES IS PROMINENTLY DISPLAYED IN EACH OF OUR OFFICES.**
- **WE ENCOURAGE SHOP TEAMS / DISTRICT MANAGERS TO USE POSITIVE DISCRETION TO RESOLVE CUSTOMER ISSUES AT A LOCAL LEVEL – WE ARE VERY PROUD OF THE FACT THAT VERY FEW ISSUES ARE ESCALATED BEYOND THIS STAGE.**
- **WHERE A CUSTOMER DISPUTE CANNOT BE RESOLVED SATISFACTORILY WE ENCOURAGE REFERENCE TO IBAS.**
- **WE WILL ALWAYS ABIDE BY ANY DECISION MADE BY IBAS.**
- **OUR SHOP STAFF RECEIVE ONGOING / REFRESHER TRAINING WHICH WE BELIEVE TO BE ESSENTIAL IN ENSURING THAT ANY POSSIBLE ISSUES ARE ADDRESSED AT BET ACCEPTANCE STAGE.**

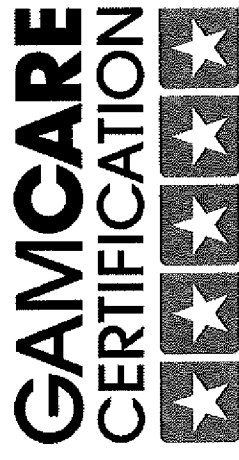
GAMBLING ACT 2005

OBJECTIVE 3 – PROTECTING CHILDREN AND OTHER VULNERABLE PERSONS FROM BEING HARMED OR EXPLOITED BY GAMBLING

- **ALL OUR STAFF RECEIVE ONGOING EXTENSIVE TRAINING ON SOCIAL RESPONSIBILITY.**
- **THE PROTECTION OF THE VULNERABLE IS AT THE HEART OF ALL NEW EMPLOYEES' INDUCTION TRAINING REGARDLESS OF WHETHER THEY ARE EXPERIENCED OR NOT**
- **UNDER 18 NOTICES ARE PROMINENTLY DISPLAYED IN EACH OF OUR OFFICES.**
- **ALL STAFF WILL REQUIRE SIGHT OF A PHOTOGRAPHIC FORM OF IDENTITY IF THEY SUSPECT A CUSTOMER TO BE UNDER AGE – ALL SUCH INSTANCES ARE RECORDED IN THE SHOP LOG.**
- **WE PROMINENTLY DISPLAY LEAFLETS AND POSTERS GIVING INFORMATION ON GAMCARE SERVICES TOGETHER WITH CONTACT DETAILS.**
- **WE OPERATE A SELF-EXCLUSION POLICY WHEREBY CUSTOMERS COMPLETE AN EXCLUSION FORM TOGETHER WITH A RECENT PHOTOGRAPH – DETAILS ARE CIRCULATED TO ALL NEARBY PADDY POWER OFFICES.**
- **WE REGULARLY DONATE TO THE RESPONSIBILITY IN GAMBLING TRUST (RIGT).**
- **OUR SHOPS ARE DESIGNED, WHEREVER POSSIBLE, TO ALLOW DIRECT SUPERVISION BY STAFF OF THE FOBT TERMINALS. FOBTS ARE MONITORED BY CCTV.**

Paddy Power Retail

Social Responsibility



Paddy Power Retail

January 2015

GamCare
7 - 11 St John's Hill
London SW11 1TR

Teresa Tunstall, Head Consultant Industry Services, GamCare

From: Better Regulation Delivery Office and Gambling Commission

First published: 21 January 2015

Part of: Regulation reform

The first Primary Authority inspection plans for gambling have received consent and are now in effect

Milton Keynes Council and Reading Borough Council have developed inspection plans for their Primary Authority partners Ladbrokes and Paddy Power. The inspection plans contain national inspection strategies which together will cover a large portion of the betting sector.

The primary authorities worked with each other, and with the Gambling Commission, to develop the inspection plans in response to business concerns about inconsistent test-purchasing.

Terry Parker from Paddy Power said: "We are delighted to partner with Reading Borough Council on our age verification policies and look forward to working closely with them to help protect underage people from gambling."

A Ladbrokes spokesperson said: "Ladbrokes take age restricted sales extremely seriously, and the Primary Authority scheme and inspection plan, together with the benefits of a consistent approach to regulation and enforcement throughout the country, will be extremely beneficial to our business ensuring a cost benefit to both regulators and ourselves."

The inspection plans are designed to be largely uniform, thereby bringing consistency to proactive test-purchasing in betting shops. Enforcing officers will have to inform the relevant primary authority before conducting a proactive test-purchase, and will have to provide feedback to the primary authority afterwards.

The results of the national inspection strategies will be used by the primary authorities to help the businesses prevent underage gambling on their premises.

A Gambling Commission spokesperson said: "The Commission welcomes the opportunity to work with local authorities and businesses to help shape these Primary Authority arrangements. Ensuring that operators take effective steps to prevent underage gambling is a priority issue for the Commission, and the inspection plans have real potential to help the businesses concerned achieve the high standards the public expect."

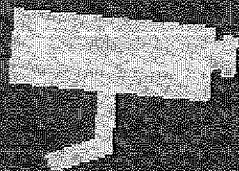
The primary authorities will have a national overview of the business's compliance and will be able to collate information from various enforcing officers to identify particular trends.

Paul Gittings, Reading Borough Council's Lead Councillor for Consumer Services, said: "These inspection plans provide consistency for local authorities and business. Reading Borough Council is pleased to work with its Primary Authority partner, Paddy Power, and the Gambling Commission to help prevent underage gambling."

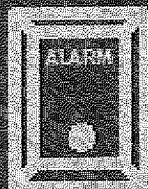
A Milton Keynes Council spokesperson said: "This new national inspection plan, developed through our Primary Authority partnership with Ladbrokes, will make a real difference to how we work together and give significantly better protection to children; an outcome we all wish to see."

ENHANCED STATUTORY NOTICES

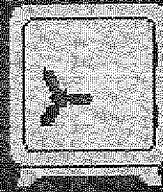
SAFETY AND SECURITY



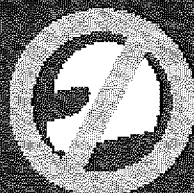
CCTV images are being recorded



Security alarms



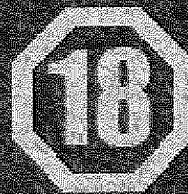
Time delay safe



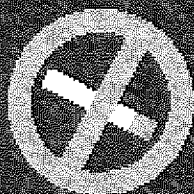
Please remove crash helmets before entering shop



No alcohol



No under 18's



No smoking

- Drugs will not be tolerated and persons found in possession will be excluded from the premises
- Those under the influence of drugs or alcohol will not be tolerated on the premises

THESE MEASURES ARE IN PLACE IN THIS SHOP FOR THE SAFETY OF CUSTOMERS AND STAFF.


THESE MEASURES ARE IN PLACE IN THIS SHOP FOR THE SAFETY OF CUSTOMERS AND STAFF. THE MEASURES ARE IN PLACE TO PROTECT THE SAFETY OF CUSTOMERS AND STAFF AND TO PREVENT THE SALE OF GOODS TO MINORS.

Paddy Power
REGULATED BY THE GAMBING COMMISSION

Appendix 1



COMPLIANCE MANUAL



PADDYPOWER.

INTRODUCTION

This is your guide to understanding the Compliance aspect of the UK Retail Business and your role in ensuring we remain compliant with all aspects of Social Responsibility.

This guide is for all UK employees working in our Retail business.

In order to operate within the UK Gambling Industry, Paddy Power must abide by legislation. In order to comply with legislation we expect all staff to fully understand and comply with our policies. This is the most important aspect of our business.

This manual is a guide to communicate our policies and procedures in dealing with all aspects of Social Responsibility.

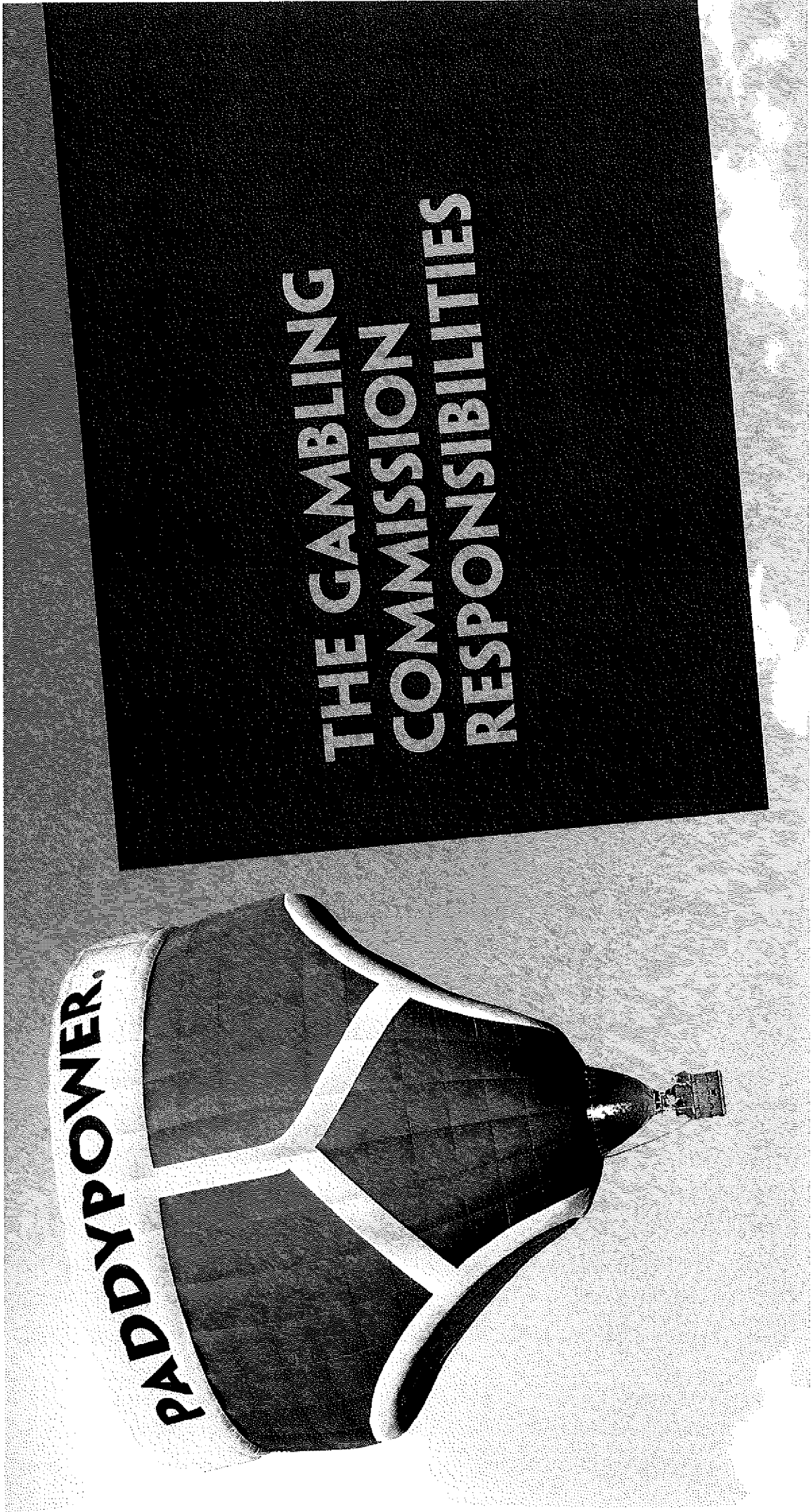
We want you to know what is expected of you, so it is important you read this guide carefully. If there is anything that is not clear then speak to your Manager or District Manager at any time.

Dan Taylor
HEAD OF UK RETAIL

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THE GAMBLING COMMISSION RESPONSIBILITIES

The Gambling Commission was set up under the Gambling Act 2005 to regulate the majority of commercial gambling in Britain.

The Gambling Commission sets out conditions and codes of practice that we must abide by. Complying with these conditions is the most important objective of the business. The Gambling Commission's requirements all flow from three licensing objectives that are set out in the 2005 Act.

LICENSING OBJECTIVES

The three licensing objectives that underpin everything required from us are:

1. To prevent gambling from being a source of crime and disorder, being associated with crime and disorder or being used to support crime
2. To ensure that gambling is conducted in a fair and open way
3. To protect children and other vulnerable persons from being harmed or exploited by gambling

These are the three areas that the Gambling Commission focuses on when they visit our shops or review our policies and procedures.

We are required to demonstrate how we meet the requirements of the Gambling Commission and consider the three licensing objectives in everything we do.

THEY CAN BE SUMMARISED AS:

- Keeping crime and disorder out
- Being fair and open
- Protecting children and the vulnerable

LICENSING OBJECTIVE 1

To Prevent Gambling from being a source of crime and disorder, being associated with crime and disorder or being used to support crime.

How the Commission will seek to prevent crime or disorder:

By licensing operating companies and their key employees the commission seeks to ensure that those offering facilities for gambling and those working in the industry are honest and competent.

THE COMMISSION AIMS TO:

- Provide guidance to operators on staff training to make them aware of their obligation with regard to crime prevention e.g. under the Proceeds of Crime Act 2002
- Identify and satisfy itself of the integrity of controllers and others relevant to the operation of gambling
- Investigate and prosecute illegal gambling
- Build and maintain good liaison and working relationships with local authorities, other regulators and law enforcement bodies

The second part of this objective relates to preventing gambling from being a source of disorder.

Licensing authorities will have the principal role in delivering this objective, but the Commission will also have a key role in this, including:

- Advising licensing authorities on their responsibilities in relation to premises licensing
- Where the Commission becomes aware that there are problems arising from disorder at gambling premises, they will consider whether the premises licence should be renewed
- Ensuring that gambling is conducted in a fair and open way e.g. displaying the rules

- Protecting children and other vulnerable persons from being harmed or exploited by gambling e.g. not allowing adults to bring children on the premises
- Licensing Authorities have the power to attach conditions to individual premises licenses where they have concerns over threats to the licensing objectives.

LICENSING OBJECTIVE 2

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

In approaching the second licensing objective, that gambling should be conducted in a fair and open way, the Commission will ensure that not only is gambling fair but the rules are transparent to players and they know what to expect.

This will be achieved by working to ensure that:

- Operating and personal licenses are issued only to those who are suitable to offer gambling facilities or work in the industry
- Operators must make easily understandable information available to players about the rules of a game, the possibility of losing or winning, and the terms and conditions of a bet
- The rules are fair
- Advertising codes are put in place that prevent consumers from being misled
- The results of events and competitions on which gambling takes place are made public
- Gaming machines equipment and software meet standards set by the Commission and operate as advertised

LICENSING OBJECTIVE 3

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

The first part of the third licensing objective relates to **protecting children from being harmed or exploited by gambling.**

With limited expectations, the intention of the Act is that children (under 16) and young people (aged 16 and 17) should not be permitted to gamble and should be prevented from entering gambling premises that are adult only environments.

In essence, **protecting children from being harmed or exploited by gambling means** preventing them from taking part in, or being in close proximity to, gambling, and for there to be restrictions on advertising so that gambling products are not aimed at, or made particularly attractive to, children

It will be a criminal offence to invite, cause or permit a child or young person to gamble.

In approaching this objective the Commission will, for example:

- Require betting shop employees to be trained to challenge children and young persons who enter the premises
- Require age verification measures to be in place to prevent under 18's gambling
- Advocate the introduction of a Think 21 Policy
- Work with the Committee of Advertising Practice to develop codes to ensure that gambling advertising is not directed at children and young persons

The second part of this objective relates to **protecting vulnerable persons from being harmed or exploited by gambling.**

The Commission does not define 'vulnerable persons', but for compliance purposes we will assume that this group includes:

- People who gamble more than they want to
- People who gamble beyond their means and / or
- People who may not be able to make informed or balanced decisions about gambling, e.g. mental health problems, learning disability, or substance misuse relating to alcohol or drugs

The Commission's role is to protect such people from harm and exploitation, but does not extend to treatment or care of those who have gambling problems. The Commission has included in its codes of practice the steps operators should take to offer assistance to people who are or who may be affected by problems related to gambling. This assistance may be general, such as supporting the work of the Responsible Gambling Trust; or it may be specific to individuals, including measures such as customer interaction and self-exclusion.

In approaching this objective the Commission will, amongst other things:

- Issue codes that include social responsibility requirements- these will set out what practical measures operators must take, including staff training
- Ensure that marketing practices (including advertising and inducements) do not exaggerate the chances of winning or encourage players to gamble more than they can afford or want to
- Liaise with the Responsible Gambling Trust and others to build and maintain knowledge about problem gambling and measures that may be taken to reduce the prevalence of problem gambling

The focus of the Commission will be on identifying best practice in protecting vulnerable people from being harmed or exploited by gambling, and where appropriate placing requirements on operators to put particular measures in place and to monitor their effectiveness.

LICENCES

There are three types of licence required to run the Retail business:

- **Operating Licence** – issued by the Gambling Commission permitting Paddy Power to trade
- **Premises Licence** – issued by the Local Authorities allowing our individual shops to trade
- **Personal Licence** – issued by the Gambling Commission to our more senior managers confirming that they are fit to run the business

There are various ways the Gambling Commission assess suitability of the above:

ASSESSMENT OF INTEGRITY

The Commission will seek to ensure that gambling does not become a source of crime by:

- Checking personal licensee's criminal records and in certain circumstances, where particular concerns exist, conduct enhanced criminal record checks
- Where appropriate, the Commission will seek information from other law enforcement agencies, gambling regulators in other jurisdictions and other bodies, which may hold information relevant to the application

ASSESSMENT OF COMPETENCE

We have to ensure that all staff involved in the provision of gambling are properly trained to carry out their functions. The Commission will consider whether the operators training programme meets the requirements that may be issued from time to time.

The Commission will consider the robustness of operator's policies and procedures for social responsibility, which, to comply with licence conditions and relevant codes of practice, must include but need not be confined to:

- Policies and procedures designed to prevent underage gambling
- Making information readily available to their customers on how to gamble responsibly
- Policies and procedures for customer interactions where there are concerns that a customer's behaviour may indicate problem gambling
- Procedure for self-exclusion
- A commitment to, and how operators will contribute to, research into the prevention and treatment of problem gambling

The industry is committed to contributing to public education on the risks of gambling, how to gamble safely, and to the identification and treatment of problem gamblers.

ASSESSMENT OF FINANCIAL OR OTHER CIRCUMSTANCES

The Commission will make enquiries about the financial position of those seeking to operate gambling. They will need to be satisfied that, where appropriate, an operator has sufficient resources to cover liabilities and to manage its business consistently with the licensing objectives

The Commission will require a standard credit check for all applicants for personal licences. Assessment of suitability of gaming machines and other gaming equipment

The Commission will consider the suitability of gaming machines and other equipment to be used in connection with the operation. In particular, the Commission will seek to ensure that gambling is fair and open by requiring all categories of machines and gambling equipment to comply with the Commission's technical standards, before they are used by the public.

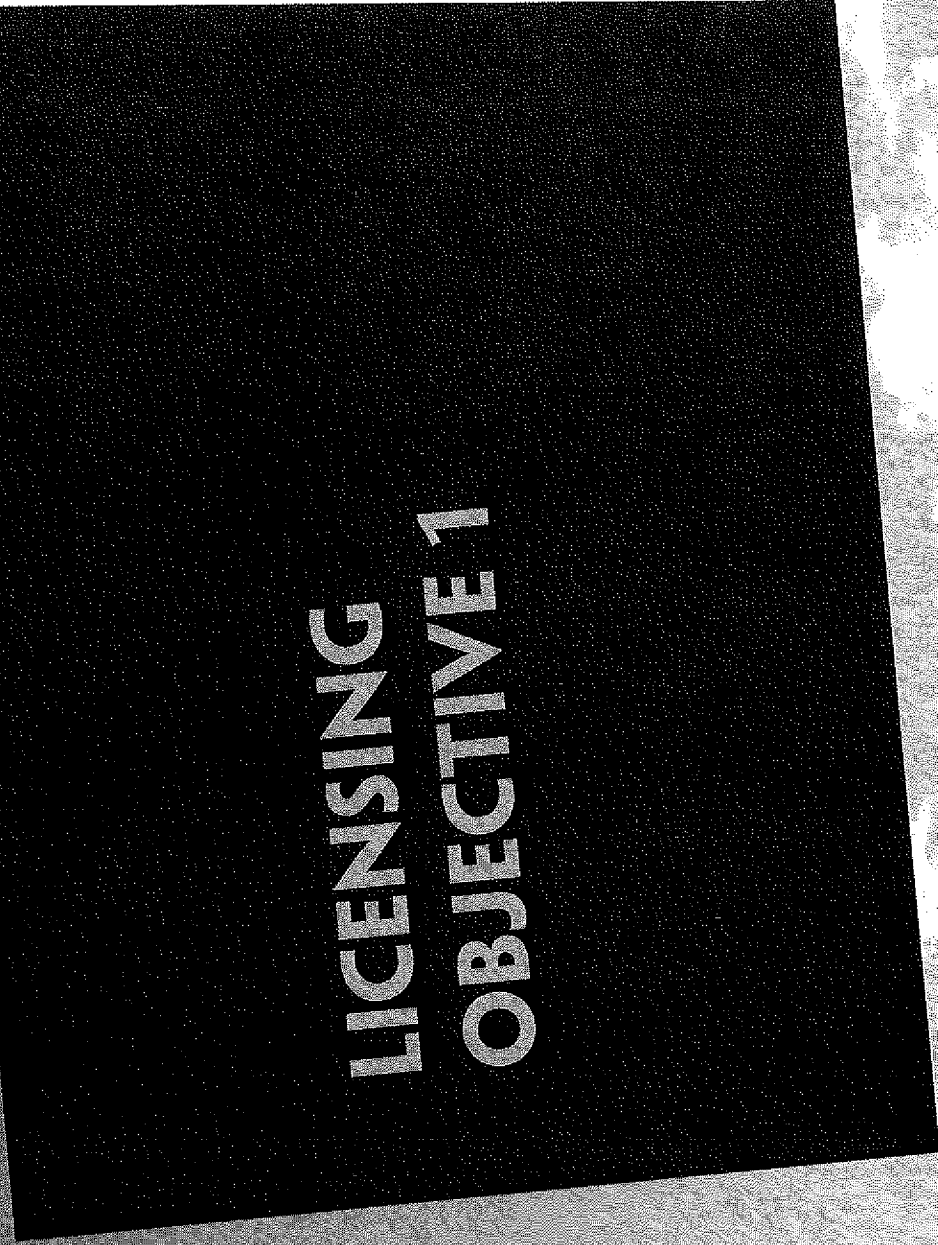
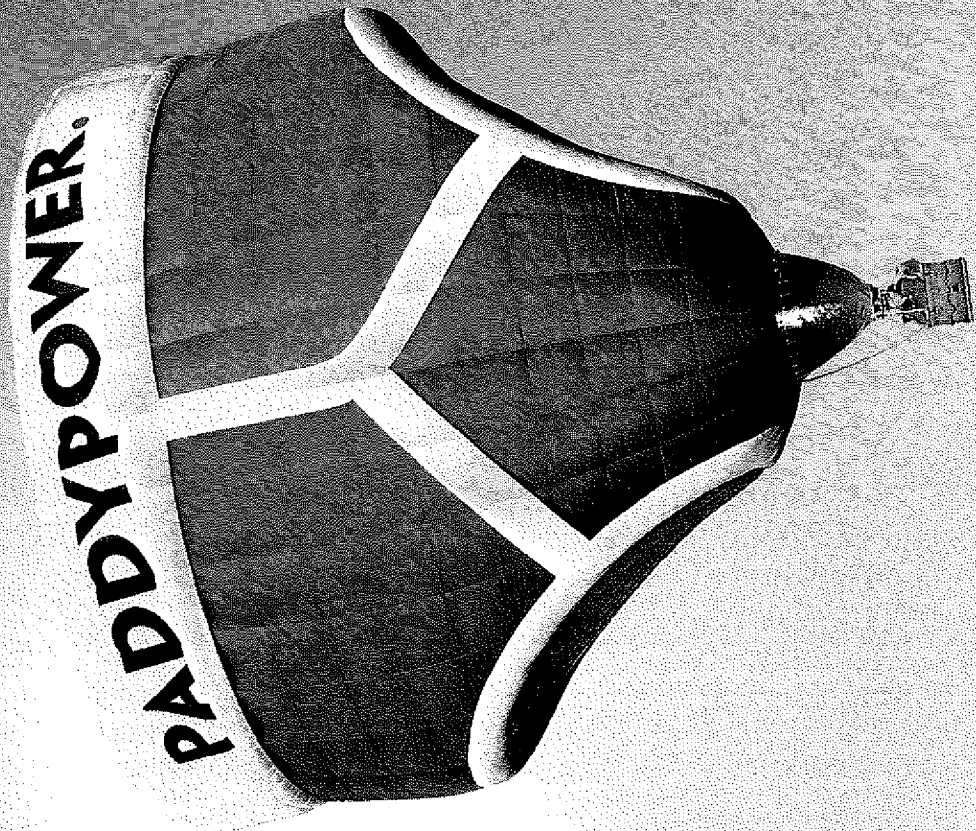
The Commission expects licensed operators to conduct their gambling operations in a way that does not put the licensing objectives at risk and has designed licence conditions and codes of practice in order to ensure this.

THE COMMISSION ALSO EXPECTS LICENCE HOLDERS TO:

- Conduct their business with integrity
- Act with due care, skill and diligence
- Take care to organise and control their affairs responsibly and effectively
- Have adequate systems and controls to protect the three licensing objectives
- Maintain adequate financial resources
- Ensure the interests of customers and treat them fairly
- Ensure that information meets the needs of the customers, and communicate with them effectively
- Ensure that information given is clear, not misleading, and allows them to make a properly informed judgement about whether to gamble
- Manage conflicts of interest fairly
- Work with the Commission in an open and cooperative way, and disclose to the Commission anything relating to the operator of which the Commission would reasonably expect to know

- Report any breach or suspected breach of the Gambling Act to the Gambling Commission and / or police

The Commission is also responsible for advising local and central government issues related to gambling. The Commission is not responsible for regulating spread betting or the National Lottery which are the responsibility of the Financial Services Authority and the National Lottery Commission, respectively.



LICENSING OBJECTIVE 1

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

Proceeds of Crime Act (POCA) & Money Laundering

POCA

Under the 2002 Proceeds of Crime Act (POCA), we are required to report gambling activities of individuals whose lifestyle is wholly supported by the proceeds of criminal activity.

What personal circumstances may suggest that a customer's gambling is being supported by the proceeds of crime?

- ✓ He/she does not work
- ✓ He/she does not own a successful, legitimate business
- ✓ He/she does not have family wealth
- ✓ Has he/she ever been in prison?
- ✓ If so, did his/her lifestyle continue as before when they were released?

If the response to **ALL** of the points is 'YES' then you must contact your Line manager (Duty Manager/District Manager) for advice.

Note: it may not apply to people who you suspect do occasional work, coupled with periods of unemployment.

Other information may also be useful in making an informed judgement. You should consider:

- Has the customer had a big win and is using that money to support him/herself or increase betting frequency and / or stakes

- Who does the customer associate with in the shop?
- What other information is known locally about the customer?

HOW WOULD I GATHER THIS INFORMATION?

- Formal enquiries are likely to arouse suspicion and possibly alert the individual concerned, so discretion is the watchword
- You will always pick up pieces of information – local gossip, overheard conversations etc.

MONEY LAUNDERING

Under the Money Laundering Regulations we have a duty to comply with the act, therefore, the following will give you a guidance as to what constitutes Money Laundering and what you should do if you suspect Money Laundering is taking place within your shop.

WHAT IS IT?

Money laundering is the processing of criminal proceeds to disguise their illegal origin (making illegal look legal). Customers may use Paddy Power to launder money through two main forms:

- The process by which criminal or 'dirty' money is legitimised or made 'clean' (traditional 'cleaning' of money)
- Bet with the proceeds of criminal activity, in the context of gambling, the use of the proceeds of crime to fund gambling as a leisure activity (otherwise known as 'lifestyle spend').

WHAT ACTIVITY MAY INDICATE MONEY LAUNDERING?

- Selecting non-runners
- Betting on odds-on favourites, particularly sports events where small odds represent more of a certainty.
- Selecting several runners in a small field, as long as one of the selections wins, they are willing to forfeit the other stakes. It is accepted that some customers bet in this way but in some instances the actions may raise suspicion because they are different from the normal betting practices.
- Gaming Machine stakes cashed in after little or no play – special care should be taken in respect of notes that have been dyed, as these obviously appear to be the proceeds of crime and must be reported to your District Manager/Duty District Manager.
- Customers frequently cashing in SSBT Value Tickets
- An individual who you do not recognise seeking to bet with a very substantial sum of money
- Irregular activity – stakes becoming unusually high or out of the ordinary from a customer who is believed to be spending beyond their known means – this does require some knowledge of the customer but nevertheless there may be circumstances that appear grossly out of order and suspicion is raised that they are using money obtained unlawfully.
- Suspicion that a customer is involved in criminality i.e. drug dealing, fraud
- Customer is known to have previous convictions i.e. money laundering, drug dealing.
- Using a Licensed Betting Shop to deposit or withdraw large amounts of cash from online account.
- Staking in cash and requesting payment by cheque. ID should be requested when issuing cheques, they must be made out to the customer collecting the winnings.

- Customers requesting receipts/copies of their tickets from the Gaming Machine payouts.

- Playing a machine/placing a bet with a substantial amount of non-territorial notes

WHAT INFORMATION DO I KNOW ABOUT THIS INDIVIDUAL FOR CERTAIN?

- Maybe you know nothing – he just appears, places bets and returns for his winnings
- You may be aware that the customer almost certainly has criminal connections
- He may be a regular customer willing to place bets on behalf of someone else

If any of the examples above occur on a regular basis, and you can answer 'Yes' to any of the questions about the customer, then you must report it to your Duty Manager.

The Duty Manager must then contact their District Manager for further advice. If the suspicion is confirmed, the District Manager will instantly contact the Money Laundering Reporting Officer (MLRO) who will assess the information and advise the District Manager on what action to take.

MONEY LAUNDERING REPORTING OFFICER (MLRO)

The Company has an official Money Laundering Reporting Officer (MLRO) - Seán Whelan, Head of Compliance - who can be contacted by emailing UKMLRO@paddypower.com

We have developed a technology to help identify Money Laundering on the gaming machines. This technology highlights customers that have suspicious playing patterns via the back office focusing on Gaming Machine stakes cashed in after little or no play.

A popup screen will appear on the back office when a customer attempts to cash a suspicious ticket. If a customer's ticket is flagged as suspicious on the back office you must follow the procedure below:

DID THE CUSTOMER PAY IN CASH?

- Yes** – Pay the customer in cash
- No** – If the customer has followed the chip and pin procedure, any profit should be returned to the same card.

It is recognised that terrorist financing is harder to identify than money laundering as the customer's activity will usually be the same as any other customer, and often their funds will come from legitimate sources.

We have a duty to report anyone that we suspect or believe is in possession of money or property that is terrorist property or derived from terrorist property.

REPORTING

In every case where a payout ticket has been flagged as 'suspicious' you must do the following

- Contact UK Loss Prevention or the Duty District Manager
- Do not pay the ticket until you have been authorised to do so

WHAT SHOULD YOU DO IF YOU SUSPECT MONEY LAUNDERING OR TERRORIST FINANCING?

If you are a member of staff and have any knowledge or suspicions about activities taking place in your shop, your Duty Manager must be informed immediately.

The Duty Manager can then decide whether to consult the District Manager for further opinion.

PROCESSING TRANSACTIONS FROM DEBIT CARDS

It is Paddy Powers policy to accept debit card transactions from customers assuming the following is true:

- The customer has followed the full chip and pin procedure, and
- You have no concerns about their ownership of the debit card

If you have reason to believe that the customer is not the rightful owner of the card, you must:

- Review photo ID that demonstrates that the card is theirs (driving licence or passport)

TERRORIST FINANCING

Under the Terrorism Act 2000, we need to ensure that we are preventing Paddy Power from being used in connection with terrorist financing.

Terrorist Financing is when a person intentionally uses, possesses or receives funds which they know or suspect will be used for the purposes of terrorism.

If the suspicion is again confirmed, the District Manager will immediately contact the MLRO who will assess the information and advise the District Manager on what action to take next.

Once you have reported and discussed your suspicions with your Duty Manager, your responsibilities have been fulfilled and you should then only take any further action if instructed to do so by your Duty Manager, District Manager or MLRO.

We all have particular responsibilities to ensure when accepting a bet with Paddy Power, whether in a shop, on-course or through the internet and telephone operations, that the bet is not used for illicit purposes.

Any failure to report suspicions could result in you committing a criminal offence which is punishable by a fine, imprisonment or both.

THE IMPORTANCE OF REPORTING

Appropriate reporting will provide legal protection for both employees and the company. It will act as a safeguard to identify any proceeds of crime being legitimised or channelled

through our operations. This reporting process will also protect our licenses and standards of integrity.

There are five basic principles within our anti-money laundering and terrorist financing initiative that covers all of our operations.

1. We will act on 'knowledge and suspicion'
2. MLRO will retain relevant disclosure records for six years
3. Rigorously apply the company's policies and procedures.
4. The appointment of a Money Laundering Reporting Officer (MLRO)
5. Ensure that all employees are aware of relevant legislation

Upon receiving a report of suspected Money Laundering or Terrorist Financing, the MLRO will then determine whether the facts justify a formal disclosure to the appropriate agency. The MLRO will keep a private and confidential record of any report for six years.

The MLRO is responsible for ensuring compliance by the company and its employees, through monitoring, auditing and analysing patterns and levels, throughout all aspects of our operations. The MLRO liaises and maintains mutually beneficial working relationships with the National Crime Agency.

PREJUDICING AN INVESTIGATION

Under no circumstances should a customer be made aware, by an employee, that they are the subject of a report in relation to Money Laundering or Terrorist Financing. It is an offence and it can also put the safety and security of other members of staff at risk.

MONEY LENDING

Licenses should seek to prevent organised money lending between customers on the premises.

If you are working as a member of staff, you should report any instances of substantial money lending to your Duty Manager who, if they confirm your suspicion, will then contact the District Manager.

Remember to adopt a common sense approach as you do not need to report someone lending money to one of their friends.

SPORTING INTEGRITY

We have a responsibility to maintain a high level of integrity in our business and within sport on general. We need to look out for any evidence that someone is cheating at a sport in order to make money betting on it.

Should an individual attempt to place a bet on an event which you know or suspect that they are directly involved in, you should notify your District Manager at the earliest opportunity – either before the bet is taken or as soon as you become aware of the situation, so for example: if a well-known sports star enters your shop to place a bet on a game they are involved in, alarm bells should start ringing.

CRIME PREVENTION

ADVICE & GUIDANCE

The following has been prepared in consultation with the Association of British Bookmakers. It also acknowledges the Safe Bet Alliance initiative, which is supported by a number of external agencies.

The following has been produced as a reference guide for all shop teams, fortunately, the overwhelming majority of shops will never be subjected to a robbery and by following this advice you will further reduce the risk of robbery and ensure the safety of yourself, colleagues and customers.

The contents are not designed to meet all circumstances but should assist you in taking an appropriate course of action.

All Paddy Power shops are equipped with safes, intruder alarms, CCTV and in some instances a full or partial Counter Screens. All employees should know what equipment is in place and how and when to operate it.

In addition the CCTV in your shop will be monitored remotely to ensure that all systems and advice intended to reduce the risk of robbery are being adhered to.

It may be necessary for all employees to work alone from time to time. The shop and the member of staff will have been subject of a Risk Assessment and a copy of the assessment will be contained within the H&S manual.

Any member of staff who is scheduled to single schedule must be familiar with Safe Working Practice. Ref: H&S manual

PREVENTATIVE MEASURES

OPENING PREPARATIONS FOR TRADING

You should be on time and alert to your surroundings as you approach the shop. If you are suspicious of anyone hanging around near the shop do not go to the door; walk away and call your District Manager or the Duty DM.

You should know the full address of the shop you are about to enter, preferably with a local landmark should you need to call the Police.

On approaching your shop you should take note of your external alarm box/panel. If the alarm strobe light is flashing this may indicate that the alarm has been activated, in which case advice must be sought from Duty DM / DM before entering the shop.

Once inside the shop, lock the door immediately. Prepare the shop for trading with the door fully locked at all times. Ensure that the tills have only the proper float levels and all other cash is dispersed properly in the safe and the time delay insert.

Do not open the door to anyone unknown prior to opening unless you are fully satisfied with their identification. Criminals may attempt to gain entry posing as staff, contractors etc. If in doubt, return behind the counter and contact UK Loss Prevention or your District Manager for advice.

CLOSING PROCEDURES

Do not set the insert before 9.45pm. The insert should only be opened once the shop has closed and the premises are secure. Before locking the front door you must check the toilets to ensure that nobody in there.

Push-in robberies can occur at closing times as well as at opening, the robber(s) will spot signs that staff are getting ready to open/leave the shop, by observing them putting coats on etc. For them to see this, they must be close to the shop, so check the immediate

vicinity (bus stops, parked cars) before unlocking the door to go out.

if two or more staff members leave together, it may be that the Manager will ask his/her colleague to move a short distance away to observe the Manager locking up. This may give them opportunity to raise the alarm in an emergency. When leaving, staff should do so by the main door, which must be locked immediately. Once the front door is locked do not continue to loiter by the shop entrance.

GAMING MACHINE - PROCEDURE

Gaming Machines should only be emptied when it is operationally necessary and is safe to do so. No one should attempt to empty the Gaming Machines during trading times without first contacting the Duty District Manager.

DURING TRADING

Current trends are that robbery offences most commonly occur in the evening, whilst staff should be vigilant at all times, it is particularly required during these times.

Most robbers are strangers, and will sometimes come in or send an accomplice in to check out the premises before any offence.

Employees should not be afraid to ask a stranger if they need help. If you make eye contact, a potential robber may be put off and leave for an easier target. Be aware of distraction tactics, designed to get you out of your safe area to look at a gaming machine or another problem. If in doubt, contact your District Manager and UK Loss Prevention.

The counter door must be kept secure at all times, do not allow anyone such as delivery persons, contractors etc. behind the counter unless you have seen their ID and are fully satisfied as to their identity and the reason for them being in the shop, contact your District

Manager and Loss Prevention if you are in any doubt.

Cash at the counter (regardless of the number of tills) should not exceed be kept within the company guidelines

- Open > 12.00pm = £500
- 12.00pm > 6.00pm = £1000
- 6.00pm > Close = £500
- Keep safe level to £1000 or less (including coins)

It is important that you do not count large amounts of cash in open view of customers. All excess cash should be kept in the time delay inserts which must remain locked at all times when not in use. Cash should be kept out of reach from the customer area, and staff must be discreet when paying out or discussing large payouts with customers or colleagues. Always keep till drawers closed when not in use.

Be aware of strangers loitering in or around the shop, should you have concerns then contact your District Manager and UK Loss prevention. Do not allow any unauthorised people back into the shop after closing time for any reason.

BANKING

Not all robberies occur in shop – a small number occur when staff are taking the cash to the bank/post office or between shops for operational reasons. The same advice applies to both circumstances:

- Always try to operate your shop at all times with a minimum holding cash, reduce cash minimum by banking down to your authorised float level and as often as possible during the day dependant on your locality.
- Should you expect to have a closing balance of £25k or more then contact your District Manager and Loss Prevention by 8pm.

- When preparing banking, do so out of sight of customers in a private secure area
- A lone member of staff should take no more than £5,000 in any one visit to the Bank or Post Office, if large amounts need to be banked, then the District Manager should be consulted.
- The cash should be carried discreetly, and all corporate clothing should be either removed or covered and ensure that the money is dispensed throughout and not in just one location e.g. handbag or within one pocket.
- The time and route should be varied
- Know your local Bank/Post Office opening and closing times, use the full range of opening times to bank, speak to them about special arrangements – for example a privilege service to avoid waiting in queues. Always consider banking both am and pm. Go direct to the bank/post office; do not carry out any other tasks until the banking is done.

PANIC ALARM

All shops have panic alarms, you should be aware of where they are located, both in the counter areas and other parts of the shop, such as staff areas.

The type of panic alarm buttons that we use are dual press, the operation requires both buttons to be pushed in for a few seconds to activate the alarm. Remember that all alarms require to be reset using the appropriate key.

YOU SHOULD ONLY USE PANIC ALARM BUTTONS IF:

- You believe you are about to be robbed or a robbery is in progress and it is safe to do so

- You require urgent, immediate assistance and you are in real imminent risk of danger. Do not use the panic alarm buttons after a serious incident, it is far more effective to dial 999 direct and give quality descriptions, methods used, directions of escape and vehicle registration etc.

Even if you have pressed the Panic Button and when it is safe to do so follow this up with a call to 999

INTRUDER ALARM

All Duty managers are responsible for ensuring that the Intruder Alarm is fully operational and activated before leaving for the night. If you have any problems with setting the shop alarm you must contact the intruder alarm company, the emergency number for the intruder alarm company is kept within the shop.

FOG CANNON

A small number of shops have a fog cannon. This device is operated by pressing your panic button. In the event of a robbery a fog cannon will fill the shop with non-harmful smoke that will distract the robber and may give you an opportunity to retreat to a safe area, or somewhere out of view

SAFEGUARD DEVICE

A number of shops have a Safeguard device. This device should be kept on you in line with guidelines which can be found on your PC desktop. This device is a two-way communicator which allows to speak with a representative in our CCTV Control Centre.

DURING A ROBBERY

IF A ROBBERY TAKES PLACE:

- If you get the opportunity, get out of sight in the staff kitchen or other area that can be secured. Most robberies take less than one minute. If possible remain out of sight until you are satisfied that the robber(s) have left.
- Do not take risks, it is best just to keep still and do as you are told, avoid making any sudden movements.
- Do not confront or attempt to apprehend the offender(s), remain calm and comply with meaningful instructions from the offender(s)
- If you are not directly involved keep away, if you are out of sight, stay there. Obey instructions and do exactly what you are told, your safety is paramount.
- Press the panic alarm buttons, but only if it is safe to do so before or during an incident.
- Following a robbery, if the panic alarms have not been pressed then dial 999.
- Remember, if a robbery occurs, try to make a mental note of the suspect's descriptions. Even if the raider is masked remember what you can about their clothing labels, accents, height, age, peculiar mannerisms and the type of weapon they may be carrying. Try to recall the exact words that they used. Look out for scars and tattoos. If possible and if it is safe to do so, watch their getaway route and note any car registration number, make and model. Write down what you remember as soon as you can and keep your notes. Ask any customers to remain so that they can assist police as witnesses, if they cannot wait take down their name and details as the police may want to contact them.

IMMEDIATELY AFTER A ROBBERY

After a robbery you should complete the following tasks systematically and quickly, speed is vital because it can lead to the early arrest of a criminal:

- Telephone 999 and ask for the police, tell the operator there has been a robbery, give them the name and address of the shop and tell them if anyone is injured. Give as much quality information as possible, such as number of suspects, any weapons you may have seen, descriptions of suspects and their clothing, direction and escape and vehicles.
- **Stop trading immediately** and ensure the premises are secure; this gives the Police and Scenes of Crime Officer the best possible chance of finding any forensic evidence. **Do not touch anything** as you could destroy traces of evidence left by the criminals such as DNA, fingerprints, palm prints and shoe marks.
- Notify Loss Prevention and your District Manager/Duty District Manager immediately
- Write down the descriptions you remember
- Await the arrival of the Police
- Lock the shop

WHAT HAPPENS NEXT?

- The Police will respond immediately and will thoroughly investigate all allegations of robbery, they will ask searching questions so the facts can be checked and all relevant evidence can be gathered. This is necessary as part of the investigation.
- Be prepared to make a full Police Witness Statement, which may take some time.
- If you do complete a Police Witness Statement, please ask for a copy and hand to your District Manager so that a complete picture of the events can be recorded by the company.

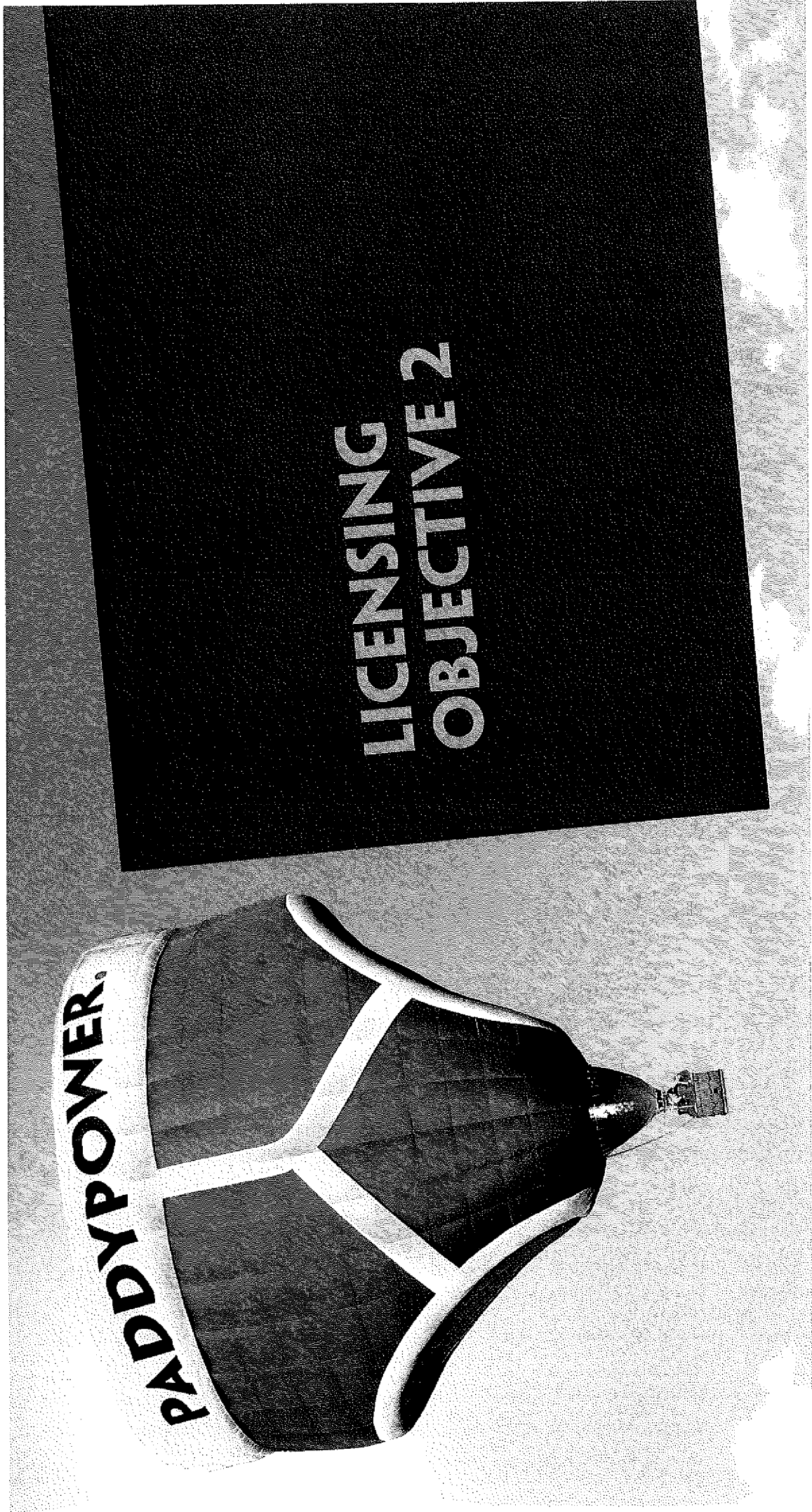
- Obtain contact details of the Police Officer attending the scene, and ask for a Crime Reference Number.

A senior member of staff will visit the shop as soon as possible following a robbery incident to support you (this may be the following day). A member of the Loss Prevention team will contact you regarding the incident and will also liaise with the Police.

You will be kept informed of any developments relating to this incident, sometimes the Police Officer in charge of the case may contact you direct, if this happens, make sure you tell your District Manager and Loss Prevention Department.

SUPPORT AFTER A ROBBERY

The company provides an independent counselling service offering Paddy Power employees a free confidential helpline, which provides access to advice, information and face-to-face counselling where appropriate.



LICENSING OBJECTIVE 2

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

LEGALLY ENFORCEABLE

Prior to 2007, a gambling transaction was seen as a gentleman's agreement, this meant that any disputes between Paddy Power and the customer could not be challenged and resolved through the courts.

From the 1st September 2007, the law changed in respect of gambling contracts, and therefore, any debts owing under these contracts are now legally enforceable. This means:

A customer can issue proceedings in the courts to recover a bet if we refuse to pay out or there is a dispute over it.

We will continue to settle bets by our rules. Our rules are reviewed to ensure that they reflect applicable content and consumer law. Where appropriate, we will continue to refer customers to the Independent Betting Adjudication Service (IBAS).

In dealing with a customer complaint, please ensure that you do not pass any judgement which could be in complete disagreement with what the Duty Manager or the Customer Service team has decided to do, for example, if your Duty Manager has decided not to pay out on a bet do not say to the customer, "if that had been me, I would have paid you" – employees represent the company and should not offer personal views which could have an impact on the decision made. If members of staff feel the situation has been dealt with incorrectly, please refer to your Duty Manager; do not mention anything in front of the customer.

DISPUTE RESOLUTION

The Independent Betting Adjudication Service (IBAS) acts as an impartial adjudicator on disputes that arise between gambling operators and their customers.

In all Paddy Power shops there are leaflets headed 'How did we do today, we value your comments'. If a customer is not happy with the way a complaint has been handled in the shop, give them one of these leaflets.

The leaflet explains the procedure for customers and gives details of how to contact our Customer Relations Team and explains that the customer has the option of going to IBAS if the complaint is regarding a betting dispute. The Gambling Commission will refer to this as the Dispute Resolution process.

We would always hope that complaints/disputes could be resolved by the shop team. At Paddy Power we strive to make every experience a great one for the customer so bear this in mind when complaints/disputes arise.

The procedure for dealing with complaints/disputes is noted below, which is what is contained within our 'How did we do today, we value your comments' leaflets.

STAGE 1

If you have a complaint or dispute, you should return to the shop in which you placed the bet and raise it with a member of staff. In most cases this will be the Duty Manager or Assistant Manager. The vast majority of disputes are resolved at this stage.

STAGE 2

If the staff in the shop are unable to resolve your complaint and you still remain dissatisfied, you can contact our Retail Helpdesk on 0800 169 0404. One of our staff will take the details of your issue along with your name and contact details. You should expect our Retail Helpdesk to contact you back within 24 hours hopefully resolving your issue.

One of our Customer Service Team members will take all your details and oversees the management of your complaint. They will look into your complaint in detail and liaise with the shop staff and the local Management Team; we will deal with your complaint as quickly as possible.

STAGE 3

if a complaint regarding a bet is not resolved to your satisfaction, you may refer the matter to IBAS (Independent Betting Adjudication Service) who provide a free, independent, impartial and confidential dispute resolution service. IBAS will investigate the matter further and inform you of the correct settlement of your bet. In doing this they will ask us to provide any relevant information, such as betting slips. Paddy Power will always comply with any ruling made by IBAS. The details for IBAS are noted below:

If you have received exceptional service from any member of our shop team or have been impressed with the way in which your query has been handled please feel free to let us know.

Please email us at ukretailfeedback@paddypower.com or write to us at Paddy Power One Euston Square, 40 Melton Street, London, NW1 2FD

IBAS PO BOX 62639 London EC3P 3AS

TEL: 020 7347 5883

Email: adjudication@ibas-uk.co.uk

Web: www.ibas-uk.com

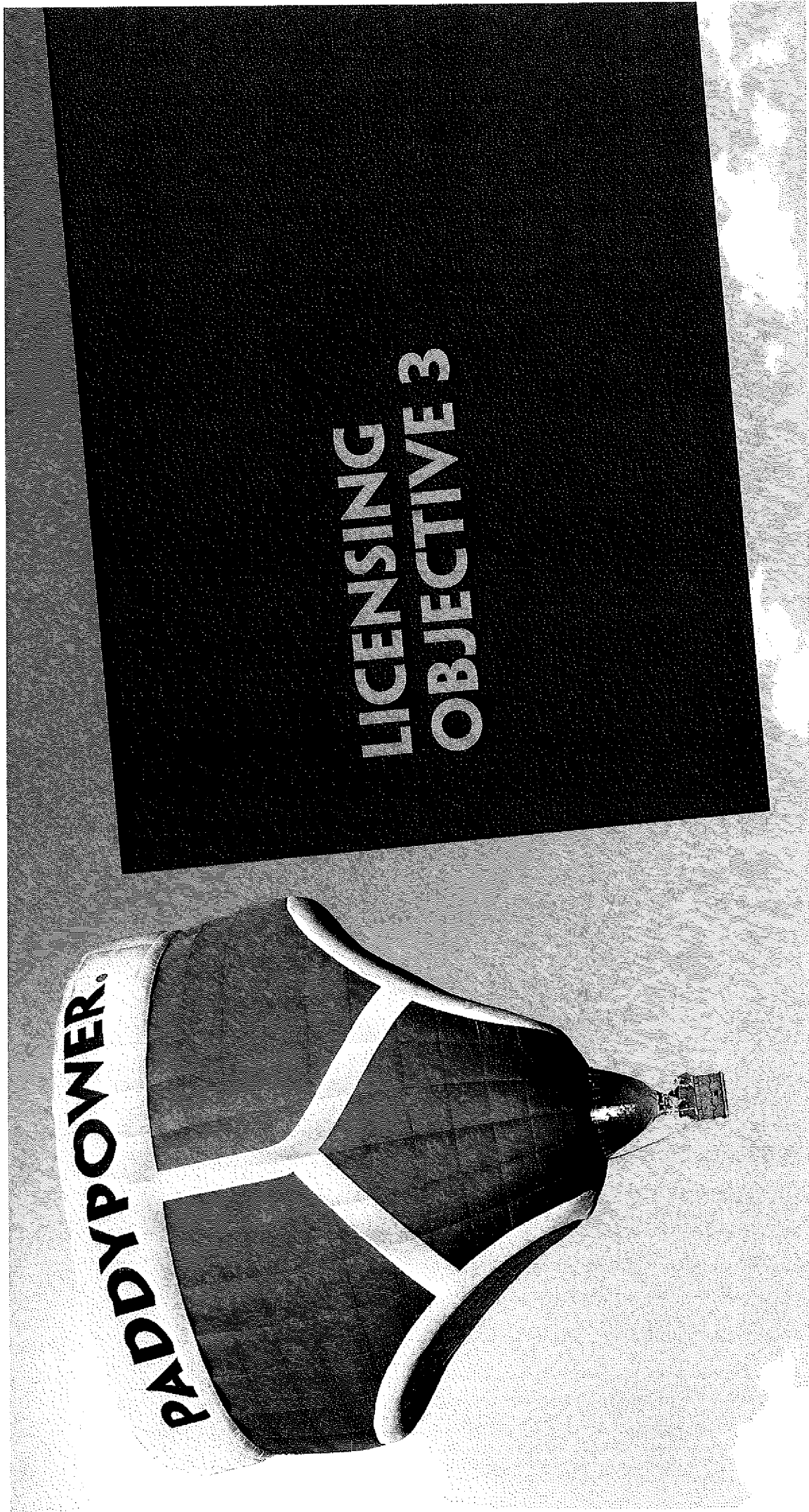
RULES DISPLAY

Our rules outline the terms under which bets are accepted in our Licensed Betting Offices (LBOs).

It is your responsibility to ensure that you are familiar with these rules and that these are correctly displayed.

By placing a bet the customer accepts our rules applying to the particular sporting event they have chosen.

Amendments and updates to our rules can be made at any time so please ensure that you make yourself aware of any changes.



LICENSING OBJECTIVE 3

To protect children and other vulnerable people from being harmed or exploited by gambling

THINK 21

The Law has always stated that to **enter a Betting Shop** you must be at least 18 years of age. Think 21 was introduced in 2002 to encourage licensed betting operators to challenge anybody under 21 for proof of age.

This means that anyone under 18 is not allowed to enter our shops, place a bet or play the gaming machines.

If you allow a person under 18 to enter your shop, and you do not challenge them for proof of ID, you will have committed a criminal offence.

It is also a criminal offence to allow a person to remain on the premises who could not provide evidence of their age; this is also the case for serving a person who is accompanied by a child.

To assist our staff in dealing with this requirement, we have adopted a Think 21 procedure that requires staff to check any customer who appears to be under the age of 21. Those who prove satisfactory that they are 18 are permitted to remain in the shop and gamble.

If you are **uncertain** of a customer's age and they appear to be under 21, **you must** ask them for ID that confirms they are at least 18 years old.

Think 21 is a nationally recognised age verification initiative that has been implemented by many retailers nationwide, it requires staff to seek proof of age prior to serving any customer, and in our case those who are on the premises, who appear to be under the age of 21.

MEASURES IN PLACE

We have measures in place to prevent occurrences of underage gambling that include:

- Clear signage at the front door(s) and within the shop stating the minimum age of entry
- Think 21: the requirement for anyone who appears to be under the age of 21 to provide proof of age before they are permitted to gamble.
- Think 21: signage at each gaming machine zone and at the counter area
- Clear staff instructions and training with regards to our policy and procedures in relation to the prevention of underage gambling.
- Internal audits to measure our level of compliance
- Disciplinary action against members of staff who fail to apply our underage policies.
- We ensure that our external marketing is appropriate and not attractive to persons under the age of 18.
- Third party age verification testing.

WE ACCEPT THE FOLLOWING FORMS OF IDENTIFICATION WITH REGARDS TO PROOF OF AGE:

- i. A driving licence, including a provisional licence, with a photo
- ii. ValidateUK Card
- iii. A passport/National Identity Card
- iv. Any form of identification that carries a PASS hologram
- v. Military ID



The PASS hologram is a card scheme approved by the national Proof of Age Standards Scheme (PASS), any card carrying this hologram is a genuine and reputable form of ID for young people.

There are many schemes that carry the PASS hologram, Citizen Card, Validate Card etc.

ALL ACCEPTED ID MUST:

- Have a clear photograph of the individual
- Have the customers date of birth
- Be valid
- Be clear to read and have no visible signs of tampering

PASS CARD RECOGNITION GUIDE – 5 STEP CHECKING PROCESS

- 1. Check the Pass hologram**
 - Look for the 3D effect in the background of the hologram
 - Make sure it has the characteristics tick on the "A" in the PASS lettering
 - The hologram must be flush with the plastic card – NOT stuck on top of the plastic
- 2. Check the photograph**
 - Ensure that the photograph is of the person presenting the card
 - The photograph must be printed directly onto the plastic card – **NOT** stuck on top of the plastic.

3. Check the date of birth

- Calculate the age of the person from the date of birth
- The date of birth must be printed onto the plastic – NOT handwritten or stuck on top of the plastic

4. Check the card

- Ensure the card has not been tampered with or altered
- The card should be completely smooth

5. Check the person

- If you are still unsure about a person's age, your legal responsibility is to refuse to serve them

MILITARY IDENTIFICATION CARDS

Until recently, armed forces personnel were not permitted to use their military identification cards as proof of age.

In March 2011, the Government announced that military identification cards could be used as proof of age.

Examples of British Army, Royal Navy and Royal Air Force identification cards are detailed below, however there is key information that you will need to familiarise yourself with.

KEY INFORMATION

VALIDITY:

Held by all serving members of the Royal Navy, Royal Marines, Army and Royal Air Force (who may be aged 16 or 17) and by members of the Reserve Forces. The expiry date of the card appears at the bottom right.

SIZE:

Approximately 85 x 53 mm (credit card size)

PERSONAL DETAILS:

The holders rank, date of birth, height and name appear on the left hand side of the card. The holder's Service Number is reproduced at the top centre.

HOLDER'S PHOTOGRAPH:

A crown is superimposed over the bottom left of the holder's photograph.

HOLDER'S SIGNATURE:

There is no requirement for a Military Identification Card to be signed.

HOLOGRAPHIC FEATURE:

The holographic feature at the top left is the MOD Badge, made up of the fouled anchor of the Royal Navy, the crossed swords of the Army and the eagle of the Royal Air Force, contained within a circle of laurel leaves and surmounted by the royal crown



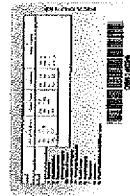
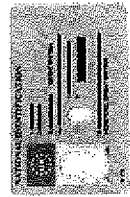
If a customer is unable to present any acceptable documents you should then explain that we require proof of age prior to allowing them to bet or remain on the premises, you must ask them to leave if they cannot produce documents.

If a customer refuses to provide proof of age you must reiterate to the customer that we require them to verify their age for them to remain in the shop. If they continue to refuse then we must ask them to leave and only return when they have the required documents.

The company will consider any breaches of policy to be misconduct, which may result in disciplinary action being taken against you.

COMMONLY USED FAKE ID

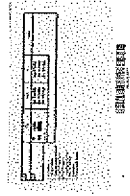
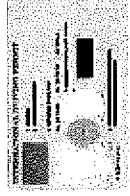
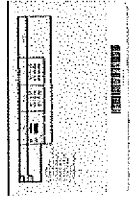
NATIONAL IDENTIFICATION CARD



- Made to look like a driving licence
- The flag in the top left differs to that in a driving licence as it contains GB or nothing in the middle rather than UK.
- Some versions of the National Identification have alphabetised and numbered lines as used on a driving licence
- "National Identification" appears at the top left instead of "Driving Licence" at the top centre
- The top portion of a driving licence has the words "driving licence" written in different languages. The National identification card has the same patterned surface all round
- Some come with a small Union Jack under EU flag which does not feature on the driving licence
- Some will have the photographs in the wrong place and not include signatures on the front

FAKE ID

INTERNATIONAL/EUROPEAN DRIVING PERMIT



- Made to look like a driving licence
- International and European Driving Permits do not exist
- The European Driving Permit looks almost identical to a driving licence. The only noticeable difference being the writing at the top and the symbol on the back. The steering wheel symbol on a driving licence is replaced with "EDP" surrounded by stars in the European Driving Permit. You can use the security features detailed above to identify fakes.

THE INTERNATIONAL DRIVING PERMIT HAS MORE NOTICEABLE DIFFERENCES DETAILED BELOW:

- The international Driving Permit features 2 photographs rather than one
- International Driving Permit is written at the top left rather than top centre
- The top portion of the driving licence has "driving licence" written in different languages. The International Driving Permit card has the same patterned surface all round
- The hologram on the front of the International Driving Permit is "IDP" written in a circle rather than a steering wheel
- The International Driving Permit is missing the golden steering wheel on the back

FAKE ID

- United Kingdom Entitlement Card
- United Kingdom Identity Card
- International Age card
- National Registry Card
- European Union Travel card
- ID Check Card

PROVISIONAL MOTORCYCLE PERMIT



Made to look like a provisional driving licence. The Provisional Motorcycle permit does not exist, these appear almost identical to the International Driving Permit listed below, differences include the red L on the top left, the colour of the card and the letters in the hologram say MDP.

CUSTOMERS ACCOMPANIED WITH A CHILD

If a customer enters the shop accompanied with a child, the member of staff must ask the person to leave as soon as they are noticed; under no circumstances must the person be allowed to place a bet.

OTHER CARDS OFFERED BY FALSE ID WEBSITES:

- International Student Card
- University Library Card
- Age Card
- British Students Union Card
- European Identity Card
- European Works Permit Card
- Freelance Reporter Licence
- Proof of Age Card
- Student Offers Card
- Student Union Card

WHAT IF A PERSON HAS ALREADY GAMBLLED?

If a person has already placed a bet or played a machine, prior to being noticed, this requires the following procedure to be adopted:

A CUSTOMER WHO APPEARS TO BE UNDER THE AGE OF 21, BUT DOES NOT HAVE ACCEPTABLE PROOF OF AGE THAT THEY ARE 18 SHOULD:

- Be paid any outstanding machine balance or bet returns and asked to leave
- They should also be informed that they should only return to the shop when they can provide suitable proof of age ID.
- This must be reported to your District Manager and the details recorded in the SR reporting to under incident type "Think 21 – Person attempting to place a bet, or playing on the gaming machines challenged for ID, No ID provided and asked to leave".

A CUSTOMER WHO IS EITHER KNOWN TO BE UNDER 18, OR PRODUCES ACCEPTABLE ID WHICH PROVES THEY ARE UNDER 18 MUST BE DEALT WITH AS FOLLOWS:

- Under no circumstances can any winnings be paid, only stake money returned
- Stakes should also be returned on any bets not yet finished
- Return all money placed in the gaming machines not yet played
- Obtain contact details regarding any claim for previously lost stakes
- They should be asked to leave the shop and not return until they are at the legal age
- Contact your District Manager and Loss Prevention
- The details must be recorded in the SR reporting log under incident type "Think 21 – Person attempting to place a bet, or playing on the gaming machines challenged for ID, No ID provided and asked to leave".
- Any claim for additional payment regarding previous lost stakes must be referred to your District Manager.
- Do not attempt to reclaim any winnings already paid

HOW TO CHALLENGE

GENERIC CHALLENGES

- Please can I see some proof of age identification?
- Do you have any proof of your age on you?
- You have probably come across 'Think 21' before, so you will know why I have to ask you for some form of ID

- I am sorry, but it is company policy to ask for proof of age from anyone who appears to be under 21.

CHALLENGING FROM BEHIND THE COUNTER

- Excuse me, before you can play on the gaming machines, can you show me some proof of your age?
- If you are unable to show me any ID, I will have to disable the machine
- Excuse me, without suitable ID, you are not allowed inside and I will have to ask you to leave.

CHALLENGING FOR ID ON THE GAMING MACHINES

- I'm afraid if you are unable to show me any identification, I will have to disable the machine.
- Without suitable ID, I will have to ask you to stop playing on the machine and leave the premises
- As the posters show, our company operates a 'Think 21' policy and as such, I'm afraid I cannot let you play on the machines without appropriate ID. You need to leave the shop immediately.

CHALLENGING A PARENT WITH AN UNDERAGE CHILD

- I am sorry, I am unable to serve you as your child is clearly under 18 and is not allowed in the premises.
- Can I remind you that it is illegal to bring a child under the age of 18 in to a betting shop so I will have to ask you to leave the shop as I am unable to serve you when accompanied with a child

DEALING WITH CUSTOMERS REFUSING TO LEAVE THE SHOP

- Remain calm
- Do not be confrontational
- Tell them that you are unable to serve them
- Stress that 'Think 21' is a company policy
- If you are on the shop floor, return behind the counter if the customer starts to become aggressive or uncooperative.

CHECKING ID

ONCE SOMEONE PRODUCES ID YOU HAVE TO EXAMINE IT TO CHECK THAT THE

- Photograph looks like the person in front of you.
- Date of Birth confirms the person is over 18
- Is Valid and has no signs of tampering

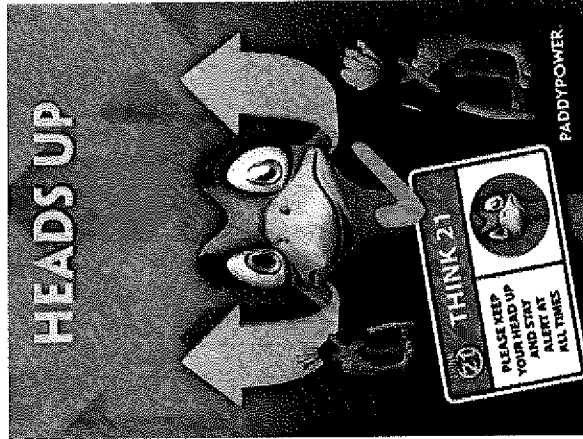
PERSISTENT OFFENDERS

Any youth persistently unable to provide ID when challenged or any adult accompanied by a child on more than one occasion should be considered for permanent barring.

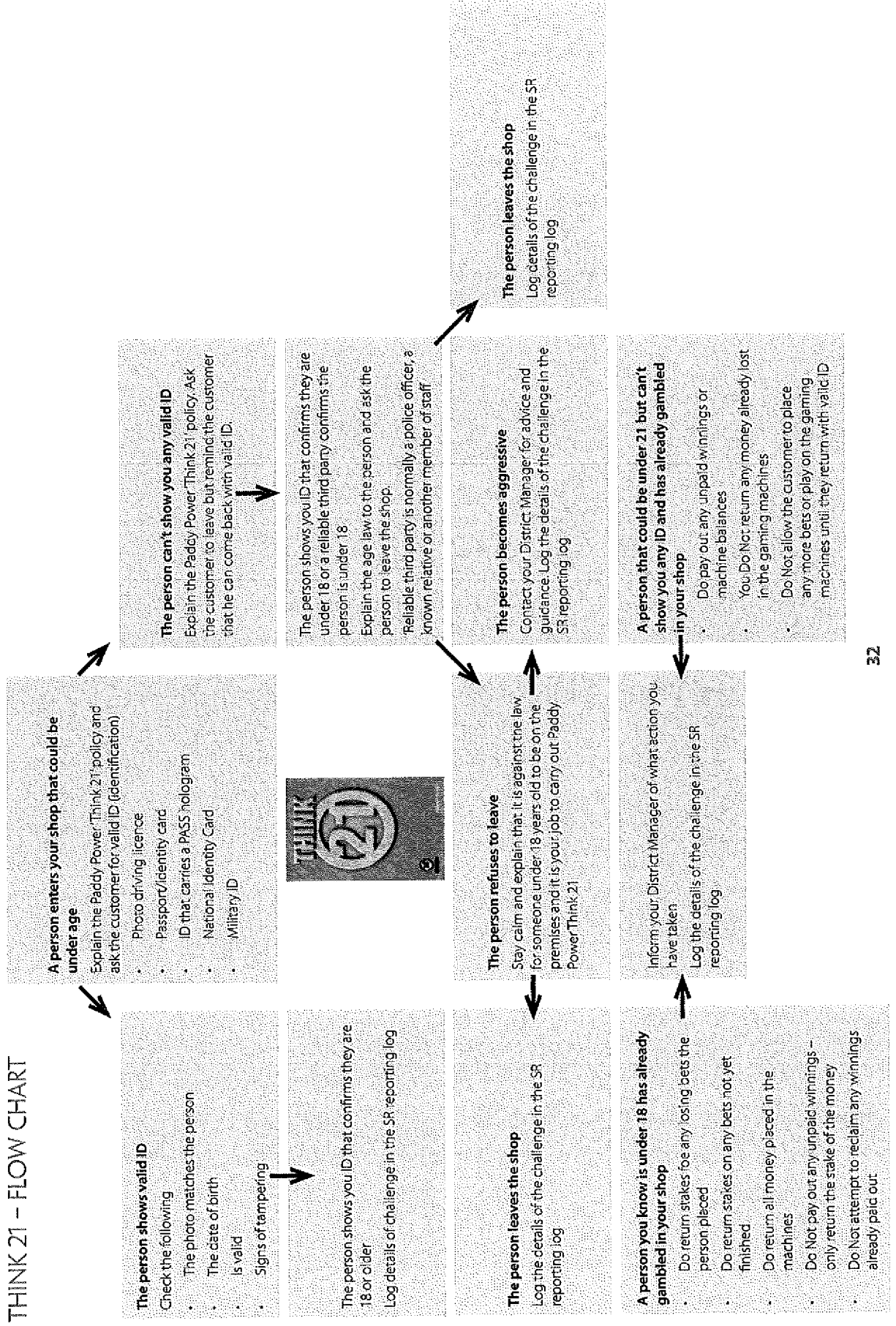
Staff must bring such incidents to the attention of their Duty Manager who can then discuss with the District Manager and UK Loss Prevention.

REPORTING

Irrespective of if the customer has ID or not, the challenge **MUST** be recorded in the SR log under the relevant category (see page 56)



THINK 21 – FLOW CHART



RESPONSIBLE GAMBLING

DUTY OF CARE

Gambling is an exciting form of entertainment offered by our shops. Whilst most customers enjoy gambling, a very small number have problems and gambling ceases to be fun.

Paddy Power has a responsibility of exercising a Duty of Care towards our customers. Where a customer indicates that they have lost control of their gambling, or when we are provided with reliable information of that fact, Paddy Power will offer help and advice.

Irrespective if a HVC customer is displaying signs of being a problem gambler, you will need to interact as you would with any other customer. Further guidance on how and when to interact with a customer please refer to 34.

Paddy Power will consider permanent exclusion from a premises for any customer accompanied by a child or young person on more than one occasion.

In the event where a child or young person repeatedly attempts to gamble please report this as a matter of urgency to your District Manager and UK Loss Prevention.

INFORMATION

Whilst the responsibility for an individual's gambling is their own, we do remind our customers of the need to gamble responsibly, particularly through our Staying in Control material, which:

- Is available in the form of leaflets in the customer area
- Can be obtained without approaching a member of staff
- Includes additional signage and leaflets in close proximity to our Gaming Machine zone and in discreet locations where possible
- Includes our commitment to the promotion of responsible gambling
- Indicates a source of help, GamCare that they can access
- Is clear and legible

MAINTAINING INTEGRITY

Our Policy outlines our commitment to support customers who appears not to be in control of their gambling or where a relative or third party informs us that this is the case. The integrity of the Policy relies on our staff exercising their responsibility and, in the case of self-exclusion, supporting the wishes of the customer to be excluded.

Situations may arise where the customer asks staff to collude with them by giving false information to a relative, or during the exclusion period asks staff to 'turn a blind eye' to the exclusion. All employees are expected to comply with this Policy and the 'Customer Self-Exclusion Procedure. Any failure to do so may result in disciplinary action. If you are asked by a customer to do anything that contravenes either the Policy or Procedure you should report the matter to your Shop Manager/District Manager and make a record of this interaction.

INTERACTION GUIDANCE

The Gambling Commission's Licence Conditions and Codes of Practice require us to put into effect policies and procedures for customer interactions where we have concerns that a customer's behaviours may indicate problem gambling. This includes recording instances where a customer displays indicators of problem gambling. Where someone other than the Shop Manager makes an entry, it must be brought to the Shop Managers attention as early as possible.

PLAYER PROTECTION

The ABGs Code for Responsible Gambling and Player Protection in Licensed Betting Offices in Great Britain.

THE CODE

To help us incorporate Responsible Gambling into every working day, we will be using the acronym 'CODE'

C **Customer Behaviour** - know the indicators of potential problem gambling

O **Observe** – identify vulnerable individuals

D **Demonstrate** – interact and record Responsible Gambling interactions

E **Ensure you interact correctly** – consider health and safety and the comfort of the individual

gambling that you should look out for:

INDICATORS OF PROBLEM GAMBLING

- Significantly increased stakes
- Complains about losing money, mentioning being addicted or having issues at home caused by gambling
- Displaying signs of distress
- Gambling for an extended period of time without having a break, playing more than 1 machine at the same time
- Creates arguments over losses, has frequent mood swings and their normal behaviour changes over a period of time
- Known to be excluded from other shops
- Self-excluded in the past and resumed gambling
- Individuals who approached the shop team to discuss responsible gambling; enquire about self-exclusion, or potential gambling problem
- Paranoid belief gambling losses are due to betting being fixed
- Obsessive belief in lucky routines
- Uncaring about personal hygiene
- Sees gambling as a way of making money
- Obvious money difficulties
- Waiting for the shop to open
- Concerned about people looking for him/her
- Tends to chase losses
- Shows aggression

HOW WILL I RECOGNISE IF A CUSTOMER HAS A PROBLEM?

CUSTOMER BEHAVIOUR

Sometimes it may be necessary to interact with a customer who has a gambling problem. Normally the customer will recognise the problem themselves and make a direct approach to you. Alternatively the approach may come from a member of the customer's family or from a third party.

If the customer makes the approach directly then they should be given the information on GamCare and have the self-exclusion process explained to them. If the approach has come from a member of their family or a third party, then you should explain to them what help is available and encourage them to return with the customer to discuss the options available to them in more detail. You must not discuss the betting habits of an individual with anyone other than the customers themselves.

If a customer or a representative does approach you, then this should be recorded in the SR reporting logs under:

Responsible Gambling Interaction Incident – (Details MUST include what advice or help was given to the customer e.g. setting time and spend limits, self-exclusion)

However, it will not always be as simple as the customer coming to you and indicating that they believe they have a problem as sometimes it may be behaviours that you observe from the customer that will flag that there is a potential issue. Sometimes a gambling dependency can be hard to spot and the customer themselves may not believe they have a problem or may wish to hide it. If this is the case there are some indicators of problem:

- Attempting to borrow from customers and staff
- Asking for credit
- Lies about extent of gambling
- Fellow customer, relative or friend expresses concern
- Regular customer shows signs of stress

As a shop team you should be aware of customers who begin to exhibit some of these behaviours. If you believe that a customer may have developed a problem with gambling then in the first instance you should discuss these with your Duty Manager/ District Manager.

The Duty Manager and/or District Manager should then assess the information and decide whether to discuss this with the customer. If this discussion takes place then the Manager should ensure that it happens in a quiet location where they will not be disturbed. The Manager should make the customer aware that they have seen changes in their behaviour and make known to them the options that are available i.e. GamCare, self-exclusion etc.

All conversations and outcomes should be recorded in the SR Reporting Log under:

Responsible Gambling Interaction with an Individual – (Details MUST include MCR name or first and surname, what advice or help was given to the customer e.g. setting time and spend limits, self-exclusion) and if done by the Duty Manager, the District Manager should be informed.

OBSERVE YOUR CUSTOMERS

It is your knowledge of your customers and their behaviour which will lead you to consider whether a responsible gambling interaction is required. It is very important not to ignore any signs of vulnerability. If unsure raise the matter with your District Manager.

You are encouraged to spend as much time as possible with your customers. This is a crucial part in helping us to comply with the licensing objectives, the CODE and to deliver an outstanding service to our customers. It is also an opportunity for you to observe your

customers behaviour and if any signs of potential problem gambling are displayed you will then be able to decide if it is the right time to begin with a Responsible Gambling Interaction (RGI). It may be that more than one interaction is needed; just because you have spoken to a customer once regarding their gambling does not mean the job is done.

You must ensure you evidence your adherence to protecting children and other vulnerable persons. Think 21 remains a high focus in order to protect children and more time spent in the customer area should lead us to challenge more young looking people on entry before any attempt is made to gamble either at the counter or on the Gaming Machines.

- You know your customers
- Time in the customer area is vital
- Further interaction is needed
- Think 21 – Challenge on entry

DEMONSTRATE – INTERACT AND RECORD

In the first instance you should discuss with your Line Manager (Manager/District Manager) if you believe that a customer may have developed a problem with gambling.

We must ensure that we make progress, interact at appropriate times, and record them all. Record any conversations and interactions concerning responsible gambling and the actions that you take on a daily basis.

In some instances you may wish to ban a customer due to their problem gambling, before doing so, you should always consult with your District Manager in the first instance. However, it is your responsibility to interact and make them aware of the options available to them. It is vital that any customers displaying signs of distress about their gambling know that help is available. With more time spent in the customer area you should be able to spot these signs quickly. Ensure your 'Staying in Control' leaflet dispensers are fully stocked and accessible.

- Encourage all team members to interact

- Record all responsible Gambling Interactions (RGI)
- Never ignore the indicators
- Ask for help if you need it

Check your understanding of GamCare – who they are and how they can be reached

The National Gambling Helpline is operated by GamCare

ENSURE YOU INTERACT CORRECTLY

BEFORE ANY INTERACTION YOU MUST ASK YOURSELF CERTAIN QUESTIONS:

- Can you communicate effectively with the customer?
- Can you deal with the situation discreetly?
- Are you safe in doing so? Consider the Health & Safety of everyone in the shop
- Is it the right time for the customer?

Consider if the timing is right – can you have a conversation without anyone overhearing, and is the customer comfortable? Be prepared to discuss GamCare and self-exclusion in detail. Know your processes. Assess the situation regarding Health & Safety – if someone is agitated or showing signs of aggression – don't ignore them, offer them a break or a drink

- Interact at the right time, in the right way
- Can you communicate effectively?
- Can you speak with them discreetly?
- Can all team members explain self-exclusion?
- Record and report your interaction

Recording – it is important that we all record correctly

RESPONSIBLE GAMBLING ESCALATION PROCESS

There may be times that you deem a customer a such great risk of harm from gambling that you believe that an immediate response is required.
Examples of this may be:

- A customer mentions that he has become homeless due to his gambling,
- A customer informs you that he is not living with his family due to his problem gambling
- A customer tells you that they are suicidal

These are just a few of the most extreme circumstances, however if a customer does approach you, or you are approached by a third party, or you witness such extreme behaviours, please contact your District Manager/Duty District Manager straight away.

SOCIAL RESPONSIBILITY LOG

1. **Responsible Gambling Interaction Incident – (Details MUST include what advice or help was given to the customer e.g. setting time limits, spend limits, self-exclusion)**
2. **Responsible Gambling Interaction with an Individual – (Details MUST include MCR or first and surname, what advice or help was given to the customer e.g. setting time limits, spend limits, self-exclusion)**
3. **Problem Gambling – No need to have a responsible Interaction with any customer**

THE CODE – GAMING MACHINES

INTRODUCTION

New Harm Minimisation Strategies for Machine Players

The gaming machine industry currently operates 238,000 gaming machines of different categories in Great Britain. There are around 33,000 in licensed Betting Offices, the majority of those being category B2 (casino games) and B3 (slot machines). B2 gaming machines, originally known as Fixed Odds Betting Terminals (FOBTs), were introduced to betting shops in 2002.

The industry accepts that there is some public and political concern about this product and this is why Paddy Power, along with the Association of British Bookmakers, have created a step change in our responsible gambling thinking.

This is the first code of its kind to be published in Europe, implementing new consumer protection measures that will increase public confidence in the industry and more importantly make a difference to those machine players most at risk of developing a problem with their gambling.

Paddy Power is committed to implementing these measures as minimum standards of harm minimisation.

Paddy Power have introduced machine controls to further expand on the CODE

Mandatory money based reminders – a mandatory reminder will inform all customers automatically when they insert £250 or more (and every £250 thereafter). The popup is displayed at the earliest opportunity pausing the current activity on the terminal. The automatic reminders can be dismissed by pressing the 'Continue' button, or they will be automatically dismissed after 20 seconds. Upon dismissal, the terminal returns to normal. The alert will also appear behind the counter on the back office which could offer opportunities for customer interaction.

AUTOMATIC MONETARY REMINDER

The monetary reminder is based on session spend. Session spend is defined as **any credit entered or loaded to the terminal**

Mandatory time-based reminders – a mandatory reminder will inform all customers automatically that they have been playing for 30 minutes (and every 30 minutes thereafter). The popup is displayed at the earliest opportunity pausing the current activity on the terminal. The automatic reminders can be dismissed by pressing the 'Continue' button, or they will be automatically dismissed after 20 seconds. Upon dismissal, the terminal returns to normal. The alert will also appear behind the counter on the back office which could offer opportunities for customer interactions. For further guidance on how and when to interact with a customer please refer to 34

AUTOMATIC TIME REMINDER

The time reminder is based on the length of the session.

Voluntary monetary limits – Customers will be able to set limits on the maximum amount of money spent during a single session of play. When the player's personal limit is reached an alert will inform the customer that this money has been spent and the customer will be asked to make a decision as to whether or not to continue to gamble. Activation of the alert will also appear behind the counter on the back office which may offer opportunities for customer interaction.

Voluntary time limits – customers will have an option to set limits on the maximum amount of time spent during a single session of play. This enables customers to plan and pre-set their gambling behaviour. When the player's personal limit is reached an alert will inform the customer that the time allocated has been reached and the customer will have to decide whether to continue to gamble or not. Activation of the alert will also appear behind the counter on the back office which may offer opportunities for customer interaction.

SET YOUR LIMITS

The player can set voluntary limits on the terminal by pressing the 'Set Your Limits' button in the bottom right hand corner of the screen.

Each player session begins with no limits set. This is reflected in the 'Set Your Limits' menu button.



NO LIMITS SET ON THE TERMINAL

LIMITS SET ON THE TERMINAL

SETTING LIMITS

When setting voluntary limits the player is choosing how much time or money they wish to spend in the current session. The player can choose to set either time or money limits or to set both.

The time limit can be set in increments of 5 minutes up to 30 minutes. After this, the limit can be increased or decreased in 10 minute increments.

Press the Clear button to return the time limit to 'No Limit'.

Use the keypad to set a voluntary monetary limit in whole pounds (£). Press the backspace button to delete the last digit.

Press the Clear button to return the monetary limit to 'No Limit'.

CLEARING VOLUNTARY LIMITS

Press the Set Limits button on the menu to open the Set Limits Interface. The limits set will be displayed on screen. **Limits cannot be edited – the player must clear the limits before they can be reset.**

Press the 'Clear Limits' button to clear the voluntary limits displayed. Press 'Cancel' to exit the limits interface without any changes. Limits will remain in place.

Clearing voluntary limits results in a 30 second pause

When the window is automatically dismissed after 30 seconds, all limits are cleared. These can be reset using the Set Limits Interface

BREACHING SPEND LIMIT

The voluntary spend limit is breached when the session spend (credit inserted), from the point at which the limit was set, exceeds the limit e.g. if a customer has £10 credit on the machine and then sets the spend limit to £20, the £10 credit on the machine will not be included in the £20 spend limit setting.

The popup is displayed at the earliest available opportunity from the point the credit which exceeds the limit was inserted. The popup pauses activity on the terminal. The player can choose to stick to the limit set by pressing the Collect Excess button. This will print a ticket for the credit above the spend limit set.

If this button is pressed, all limits will persist when the popup is closed. Otherwise, the popup will automatically be cleared after 30 seconds. If this happens, all limits will be cleared.

BREACHING TIME LIMIT

The voluntary time limit is breached when the session duration, from the point at which the limit was set, equals or exceeds the limit.

The popup is displayed at the earliest available opportunity, pausing activity on the terminal.

The player can choose to keep to their time limit and leave the terminal.

Pressing the Collect button will print a ticket for the collectable credit on the terminal. All limits will be cleared and the session is ended. Otherwise, the popup will automatically be

cleared after 30 seconds. If this happens, all limits will be cleared and the terminal returns to normal.

Should a customer persistently breach their limits, consideration should be given to conducting a responsible gambling interaction. Further guidance on how and when to interact with a customer please refer to 34.

BREACHING BOTH LIMITS

In the event that both voluntary limits are breached at the same time, the voluntary breach popup will reflect this.

The popup is displayed at the earliest available opportunity, pausing activity on the terminal.

The player can choose to keep to their limits and leave the terminal.

Pressing the collect button will print a ticket for the collectable credit on the terminal. All limits will be cleared and the session is ended. Otherwise, the popup will automatically be cleared after 30 seconds. If this happens, all limits will be cleared and the terminal returns to normal.

RESPONSIBLE GAMBLING SCREENS

The Responsible Gambling screens contain new information for the player, as specified by the ABB. The screens can be accessed by pressing the Responsible Gambling Information button on the bottom right hand corner of the screen.

NOTIFICATIONS ON THE BACK OFFICE

A popup will be displayed on the back office in the following events:

- Player sets a voluntary time limit
- Player sets a voluntary monetary limit
- Player sets both voluntary limits

- Player breaches a voluntary limit
- Voluntary limits are cleared
- A mandatory reminder is displayed

VIEWING LOGS

Code of Conduct related events on the terminal are logged. The logs from today can be viewed by staff on the back office.

1. Press the staff functions button
2. Press the View Recent Events Button
3. Select 'Code of Conduct' from the list of logs

RECORDING

It is important that we all record correctly

Social Responsibility Log – Customer Interaction other than self-exclusion & anti-social behaviour.

This is where you record instances when you have interacted with customers as a result of what you believe is problem gambling.

- Responsible Gambling Interaction Incident – (Details MUST include what advice or help was given to the customer e.g. setting time limits, spend limits, self-exclusion)
- Responsible Gambling Interaction with an Individual – (Details MUST include MCR or first and surname, what advice or help was given to the customer e.g. setting time limits, spend limits, self-exclusion)

Problem Gambling – No need to have a Responsible Gambling Interaction with any customer

£50+ GAMING MACHINE LAW

THE LAW HAS BEEN PUT IN PLACE TO:

1. Promote responsible gambling
2. Drive more customer interactions
3. Help identify customers at risk of problem gambling.

To do a spin at above £50 on the Gaming Machine a customer will have two options:

OPTION 1: ACCOUNT (BIG REWARDS)

- Play with a registered account which has verified contact details & has been authorised by a team member for £50+ play



OPTION 2: CASH

- First cash load to be authorised by a team member at the counter to have the machine unlocked for £50+ play
- Each further session/cash load to be authorised again

Both these options means an opportunity to interact with customers more and make an assessment whether they are fit to play.

All employees should focus on delivering the best £50+ options for BOTH CASH AND CARD CUSTOMERS

OPTION 1: ACCOUNT (BIG REWARDS)

Changes to BIG Rewards sign-up



The law states that the registered players need both a

- ✓ Verified contact detail and;
- ✓ An interaction with shop teams to approve the Big Rewards Card for above £50 spins

MACHINE SIGN-UP

There are two options for the customer to request to have their account unlocked for £50+ play

Option 1:  Customer goes to the counter

Option 2:  Shop team member goes to machine

This process ensures that the customer has first verified and then had a staff interaction.

Buttons displayed on the machine for the customer to request which option they prefer



COUNTER AUTHORISATION

REMOVE CARD & AUTHORISE MY ACCOUNT AT COUNTER

The player is logged out and takes the card to the counter to be authorised for £50+ play

WHAT YOU NEED TO DO

- ✓ Customer goes to the counter
- ✓ Press 'Register' on your back-office
- ✓ Press 'Authorise Card' button
- ✓ Scan/input card number to authorise

MACHINE AUTHORISATION

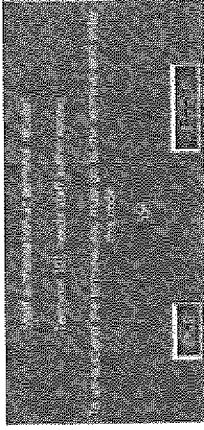
CALL A MEMBER OF STAFF OVER TO AUTHORISE MY ACCOUNT

The machine is paused, the staff member is notified on the back-office to go to the machine to authorise £50+ play

For machine authorisation, the back-office machine line will flash in green



- ✓ Press the 'Authorisation' tab
- ✓ A message will pop up for a staff member to go to the machine and enter the 3 digit authorisation code
- ✓ This only needs to be done once for the account to allow above £50 every time the customers logs in



Under no circumstances should Paddy Power employees shout out or write the 3 digit authorisation code on paper for the customer.

Employees should always go to the machine and enter the code themselves if the customer is fit to play.

BACK OFFICE SIGN-UP FOR £50+ PLAY

There are new options to start registration at the back-office

- The staff interaction that is required can take place first at the counter using the back-office ensuring that the customer is 100% authorised with their account.
- Staff can enter card and contact details using the back-office but the customer will be sent a verification code that needs to be entered in to the machine

BACK OFFICE REGISTRATION TABS

REGISTER A USERNAME ACCOUNT

Register a Username Account

Customer wants to register for Big Rewards at the counter but does not want a card

BACK-OFFICE ACTION

1. Press **grey button** (above)
2. Enter customer mobile number and/or email address
3. Username is mobile # if provided – Otherwise email address
4. Press green 'Register' button
5. SMS or email is sent with verification code
6. Tell customer to complete at machine

MACHINE ACTION

1. Customer logs in with username for the first time
2. Selects PIN
3. Enters verification code
4. **Customer is 100% Authorised for £50+**

REGISTER A CARD

Register a Card

Customer wants to register for Big Rewards at the counter

BACK-OFFICE ACTION

1. Press **grey button** (above)
2. Scan a new card or enter card number
3. Enter customer mobile number and/or email address
4. Press green 'Register' button
5. SMS or email is sent with verification code
6. Tell customer to complete at machine

MACHINE ACTION

1. Customer logs in with card for the first time
2. Selects PIN
3. Enters verification code
4. **Customer is 100% Authorised for £50+**

REGISTER A CARD (NO DETAILS)

Register a Card (No Details)

Customer wants to register for Big Rewards at the counter but does not want to give you his/her details

BACK-OFFICE ACTION

1. Press grey button (above)
2. Scan a new card or enter the card number
3. Press green 'Register' button
4. Tell customer to complete at machine

MACHINE ACTION

1. Customer logs in with card for the first time
2. Selects PIN
3. Enters mobile number and/or email address
4. SMS or email is sent with verification code
5. Enters verification code
6. **Customer is 100% Authorised for £50+**

AUTHORISE A CARD

Customer has registered and verified on the machine but needs £50+ authorisation

BACK-OFFICE ACTION

1. Press **grey 'Authorise Card'** button
2. Scan the card or enter card number
3. Choose to **Accept/Reject**
4. Tell customer to go back and log in at machine

MACHINE ACTION

1. Customer then logs in with card at the machine
2. Once accepted customer is **100% Authorised for £50+**

RESET PIN

Existing customer wants to reset the PIN on their account (not successful when trying Text 'PIN' to 60002)

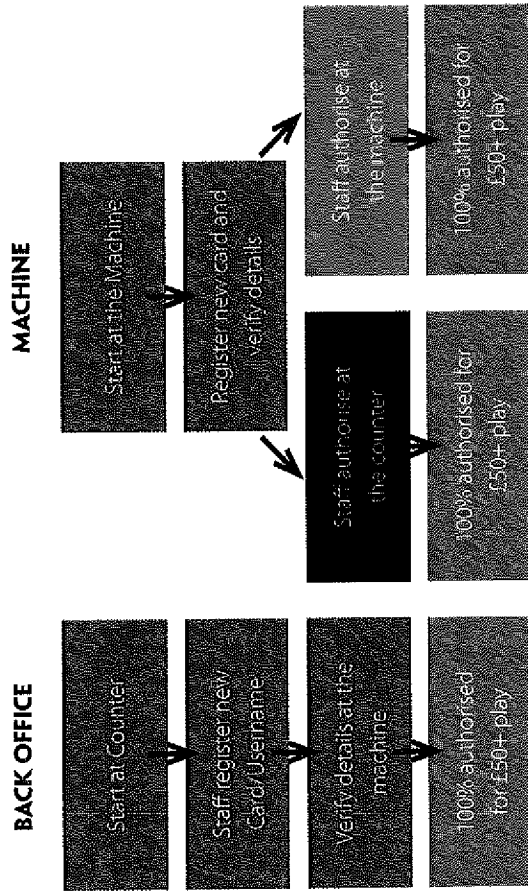
BACK-OFFICE ACTION

1. Customer should first always try to Text 'PIN' to 60002
2. If that doesn't work, press grey '**Reset PIN**' Button
3. Enter customer's existing mobile number and/or email
4. Click green '**Reset PIN**' button

MACHINE ACTION

1. Use new PIN when needed at machine e.g. to log-in or access personal details

BIG SIGN-UP OPTION OVERVIEW



OPTION 2: THE PROCESS FOR AUTHORISING CASH PLAYERS TO SPIN ABOVE £50



CASH CUSTOMER AUTHORIZATION

- **First cash load** to be **authorised** by a **staff member at the counter** to have the machine unlocked for £50+ play
 - Each further **session/cash** load to be **authorised** again
- The first time a customer who is not logged in with Big Rewards account tries to spin above £50 in any session, there will be a popup message with 3 options.



OPTION 1: INSERT CARD

Customer inserts card or logs in with username that is fully authorised to play £50+

OPTION 2: REDUCE BET

Customer chooses to lower to £50 or below and continues playing

OPTION 3: LOCK SCREEN & AUTHORISE AT COUNTER

Customer chooses to authorise £50+ play at the counter.

The screen locks for 2 minutes and prints out a Zero Value Ticket for the customer to take to the counter to be authorised

- If fit to play and the ticket is authorised the customer returns to the machine with the authorised value ticket, inserts the ticket into the machine and can play £50+
- If not fit to play, ticket will not be authorised and when the customer inserts it back into the machine they can either cash out or continue to play spins of £50 and below

WHAT YOU NEED TO DO TO AUTHORISE AT THE COUNTER

- On the back-office the machine will flash blue
- Press the 'Authorisations' tab
- Scan the Zero Value Ticket
- If the scanner does not work, enter the 4 digit code from the ticket

NEW £50+ AUTHORISATION IS REQUIRED WHEN

NEW SESSION TRIGGERS

1. Cash Out and Resume play later

If a customer cashes out his/her ticket and resumes play later, the customer would start a new session if attempting to stake over £50 and will hence get a pop-up with the previously seen options again.

2. Down to zero credit with 2 min inactivity

The customer would start a new session altogether if attempting to stake over £50 and will hence get a pop-up with the previously seen options again.

3. Any cash load in authorised session (even 1 Opilly)

Any new cash inserted needs new authorisation, even cash inserted in an already authorised session.

EXAMPLE:

If a player runs downs to £80 credit and wants to top up with £20 to do a £100 spin, the loading of the £20 would trigger new authorisation.

When cash is loaded in an already authorised session, there is a 4th option for the customer to call a shop team member over to the machine for authorisation of that cash.



BACK-OFFICE CASH LOAD

Add Cash and authorise over £50 play

There is a new button on the back-office to make sure that any cash loaded directly at the counter can be authorised without having to first go to the machine and then come back to the counter again.

This option should always be used unless there is a reason to believe the customer is having issues with problem gambling, therefore, the customer would not be fit to play.

You should not ask the customer about playing over £50 as it can be very intimidating for them, just load using this button so the customer can choose to play £50+ once at the machine.

CASH AUTHORISATION: BACK-OFFICE OVERVIEW

Flashing Green
Go to the machine

Flashing Blue
They will come to you

CASH AUTHORISATION KEY POINTS

- ✓ First authorisation always at the counter
- ✓ Any cash loaded in £50+ session requires new authorisation at the counter or the machine
- ✓ Cash out or inactivity also requires new authorisation
- ✓ Cash loaded from the back-office should be authorised directly as appropriate

RESPONSIBLE GAMBLING

The new law is an opportunity to interact more with customers and identify possible problem gamblers

WHY REJECT £50+ PLAY

Sometimes a customer may become frustrated with their gambling. If the customer persistently demonstrates behaviours like this then you should consider rejecting the customer's next £50+ request

Knowing your customer's normal behaviour will help you identify changes in behaviour over time.

SOME SIGNS COULD BE:

- Aggression
- Displaying signs of distress
- Creating arguments over losses
- Asking for credit
- Complaining about lost money or mentioning gambling addiction

For further guidance on how and when to interact with a customer please refer to 34

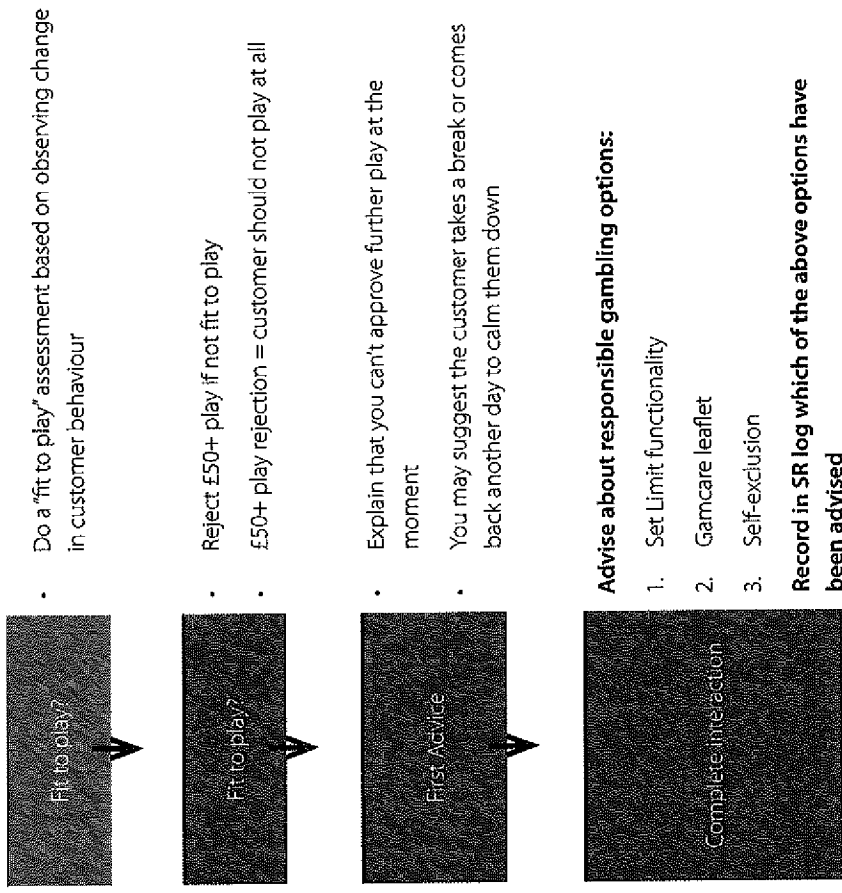
HOW TO INTERACT WITH CUSTOMERS RESPONSIBLY

When you interact with players for £50+ approval you should always do a fit to play assessment based on observing changes in behaviour

If there is a reason to reject £50+ play due to the player not being fit to play, you should not allow this player to play at all

If the customer is upset you may suggest they take a break or come back at a different time to calm them down

Find a moment to advise the customer about responsible gambling options and record in the SR log which of the options have been advised to the customer



THINK 'CODE'

CUSTOMER

- Know the indicators of problem gambling

OBSERVE

- Keep an eye out for any behavioural changes

DEMONSTRATE

Interact with customers & record in SR log:

- ✓ Stay calm - do not raise your voice even if they do.
- ✓ Recognise the emotion and apologise in a neutral way
- ✓ Allow them to vent and don't interrupt them
- ✓ Separate the problem - be clear that this is the law and that you don't have a choice

- ✗ Use emotive language
- ✗ Make it seem that this is something that you personally are doing to them
- ✗ Use bad language, make threats/ become aggressive.
- ✗ Put your personal safety at risk

ENSURE TO INTERACT CORRECTLY

- Be consistent and don't risk your safety

SEQUENCE OF EVENTS / PROCEDURE FOR SELF EXCLUSION

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

1. Give the customer a Staying in Control leaflet and discuss the details.
2. Encourage them to phone GamCare helpline free on 0808 8020 133.
3. Discuss the option of self-exclusion, if the customer wishes to self-exclude they can do so immediately, or alternatively, having obtained the necessary information, they may wish to take some time to consider this option and possibly discuss with another person. If the customer does **NOT** wish to self-exclude immediately provide them with the GamCare leaflet and a copy of the self-exclusion agreement so they understand the process in full.
4. Should the customer elect to self-exclude at that time or later, complete the form with them ensuring that all details are correct.
5. 'NO PHOTO NO SELF EXCLUSION'
The customer should provide a photograph to aid the exclusion. We must emphasise to the customer the importance of a photo to help staff identify individuals
6. Explain to the customer that the period for self-exclusion is a standard 12 months – no less than 6 months, however, customers can self-exclude for more if they ask..
7. Confirm the self-excluded dates requested with the customer before entering on the form.
8. Inform the customer that Paddy Power online account betting can be included in their self-exclusion, these will be closed and they will not be able to re-open these accounts. Request their account details and enter them in the box provided. Once Head Office receives the copy of the self-exclusion form they will make contact with Online Operations to close these accounts; this may take up to 7 working days.
9. Inform the customer that you will need their BIG Rewards Card and write the number

- of the card on the self-exclusion form. Keep the card in the safe, this will need to be destroyed at a later date.
10. Explore the suitability to self-exclude from any other Paddy Power shop. Inform them that the maximum number of shops that can be agreed at this point is five (your shop plus 4 others) and that the exclusion will take effect immediately in all five shops. Consider where the customer lives, works and frequents on a regular basis when agreeing additional shops.
 11. If the customer wishes to be excluded from more than 5 shops inform them that they need to discuss their request with the District Manager and should indicate on the form in the box provided and note a contact number to allow them to do so.
 12. The District Manager will contact the customer within 7 working days to discuss the additional shops they wish to exclude from and will confirm in writing within 7 further working days of that discussion. This may include a reduction in the number of additional shops requested or a refusal to include any additional shops at all.
 13. Review the details of the self-exclusion scheme with the customer prior to obtaining their signature.
 14. Explain to the customer that at the end of the period the exclusion will remain in force until such time that the customer makes a positive declaration to re-commence gambling.
 15. Explain to the customer that once the self-exclusion period has finished they will have to complete a re-commencement form and have another 24 hours cooling off period before being able to gamble again.
 16. When discussing self-exclusion you will also need to inform the customer of the following, if after a period of 6 months after the last date of the self-exclusion period the customer has not re-commenced to gambling their self-exclusion will end. It is important that the customer understands this point.
 17. Explain that this scheme does not apply to other operators and that they might wish to contact them to extend their self-exclusion.
 18. Give the customer their copy of the form, shop copy – place in the SR folder and the team informed. The head office copy–scan and email to ukselfexclusions@paddypower.com. Do not post the head office copy of the form keep this with the original shop copy.
 19. Once the customer has Self-Excluded you must offer the customer the purple ABB leaflet to enable the customer to consider self-excluding from other operators.

SELF-EXCLUSION

A CUSTOMER REQUESTS TO BE SELF-EXCLUDED

Give the customer a self-exclusion leaflet. Explain the implications of self-exclusion

- Self-exclusion period
- Required to complete the self-exclusion form
- The importance of providing a photograph
- Includes Paddy Power betting account facilities and BIG Rewards

The customer wishes to self-exclude

All members of staff are responsible for completing a self-exclusion with the customer, however if the Duty Manager is present they should complete the self-exclusion. Each section to be discussed and then completed

- Personal details & the end date of the self-exclusion period
- Ask the customer for their betting account details and Big Rewards card
- Maximum of 5 shops to be agreed

NO PHOTO NO SELF-EXCLUSION

The customer must provide a photograph to aid the exclusion. We must emphasise to the customer the importance of a photo to help staff identify individuals

The customer decides not to self-exclude

Allow the customer to continue gambling and inform them to consider contacting Gamcare. Log the details in the SR reporting log

The customer wishes to self-exclude from more than 5 shops

Explain the process of applying for self-exclusion from more than 5 shops (e.g. your District Manager will call them)
Continue and complete the form
Once the customer has Self-Excluded offer the customer the purple ABB leaflet to enable the customer to consider self-excluding from other operators

The form is completed and signed by both the customer and the member of staff. Form to be split into 2 parts

Customer Copy - Give the customer their copy of the form

Shop Copy - Put the shop copy in your SR Folder and inform the team

Head Office - Scan and email to ukselfexclusion@paddypower.com and store in your SR Folder

Inform all employees working in the shop

Self-exclusion in the shop where the form was signed is with immediate effect. The Duty Manager informs other employees and the Shop Manager. The Shop Manager is then responsible to ensure all employees who work in the shop are informed.

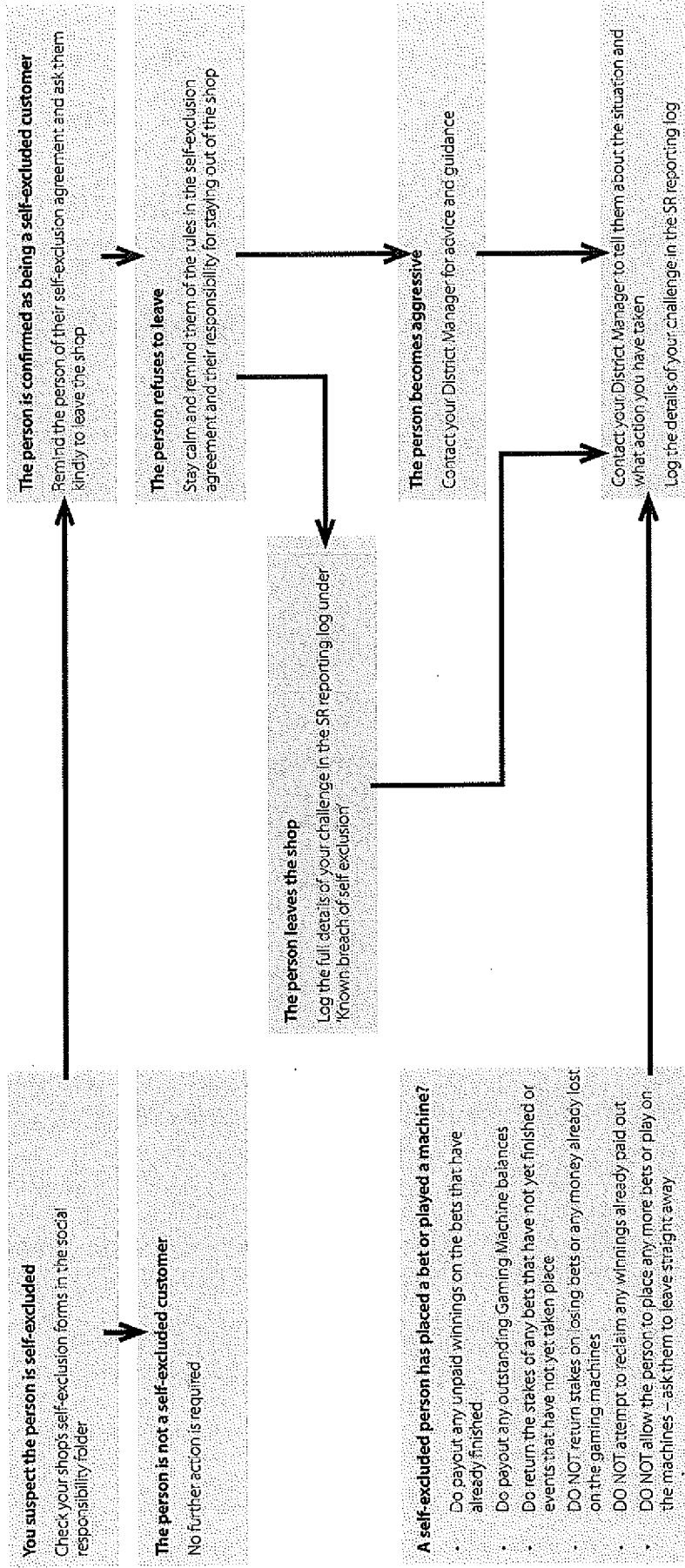
All employees have a personal responsibility to check the self-exclusion folder on a daily basis to refresh themselves of customers who have self-excluded

Other shops listed for self-exclusion

Head Office will make sure that all additional shops included in the self-exclusion are informed

BREACH OF SELF-EXCLUSION

A CUSTOMER THAT YOU KNOW (OR SUSPECT) IS SELF-EXCLUDED ENTERS YOUR SHOP



RE-COMMENCEMENT TO GAMBLING

A CUSTOMER REQUESTS TO RETURN TO GAMBLING AFTER SELF-EXCLUSION PERIOD IS OVER

The customer enquires about Re-commencement to gambling

Explain to the customer the process for Re-Commencement

- Required to complete the form
- Required to wait for a period of 24 hours 'cooling off' period
- Cannot enter any shops currently self-excluded from

The customer confirms that they wish to complete a positive re-commencement to gambling

The Duty Manager completes the 3 part Re-commencement form with the customer. Each section to be discussed and then completed:

- Personal details
- Entry time and date for re-commencement to gambling

Remind the customer that they can change or withdraw the details of this request and at any time enter into a new self-exclusion

The form is completed and signed by both the customer and the member of staff

Form to be split into 3 parts

Customer Copy - Give this to the customer

Shop Copy - Put the shop copy in the SR folder

Inform all employees working in the shop

- The Duty Manager informs other employees and the Shop Manager
- The Shop Manager is then responsible to ensure all employees who work in the shop and any new employees are made aware

The customer decides not to Re-commence

Refer to the self-exclusion policy and complete the process of self-exclusion

Head Office Copy - Scan and email to ukselfexclusion@paddypower.com and send the copy to Head Office

Other shops listed for re-commencement

Head office will make sure that all additional shops included in the re-commencement are informed

DEALING WITH OTHER VULNERABLE GROUPS AND CONFLICT RESOLUTION

Another vulnerable group of people that you may need to deal with are those who are clearly under the influence of drink or drugs or customers with mental health issues.

Do not accept a bet or allow anyone to play on the Gaming Machines if they are very obviously under the influence of drink or drugs.

Care should be taken when challenging these people and employees should not put themselves or others in danger.

Phrase your language in terms of 'I' instead of 'You'. For example 'I cannot serve you,' 'I am concerned about your behaviour'. Avoid more confrontational phrasing such as 'You are drunk'.

Avoid getting into confrontation with the person. Treat the customer with courtesy, most will know why they are being asked to leave and will do so with little or no confrontation.

If a confrontation becomes unavoidable, here are some ideas about minimising the disturbance:

1. If the customer hasn't been violent, try to allow them a little time to collect themselves. The customer is more likely to react peacefully if they have their dignity intact.
2. If all else fails, the Police will assist you.

Similarly if you believe someone may have mental health problems or a learning disability your best course of action is to refer this to your Duty Manager/District Manager.

The Duty Manager may wish to speak to UK Loss Prevention who will be happy to give advice in this very difficult and delicate area.

Whilst we don't want people to bet if they do not know what they are doing, we have to be careful not to discriminate against individuals who, whilst they may have a disability, are perfectly capable of making sensible decisions about their gambling behaviour.

On the following pages you will find examples of our reporting document and instructions on how to complete, remember these are to be completed as and when incidents/activities arise and the Duty Manager must ensure these are accurate and completed on a daily basis.

THE HOMELESS

In some areas where we trade, people who are homeless may come in. Whilst it may not be immediately obvious that people entering the premises are homeless or residing in hostels and shelters, it is important that the behavioural indicators as described on pages 34 & 35 are observed and acted upon.

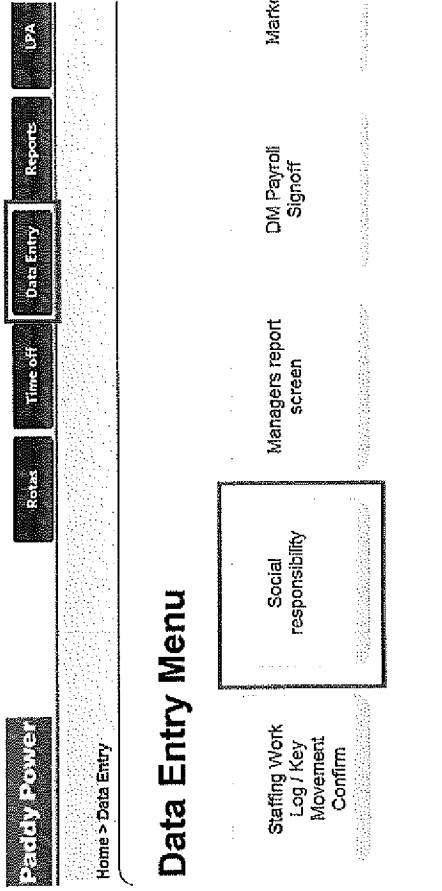


SOCIAL RESPONSIBILITY REPORTING – LOGS

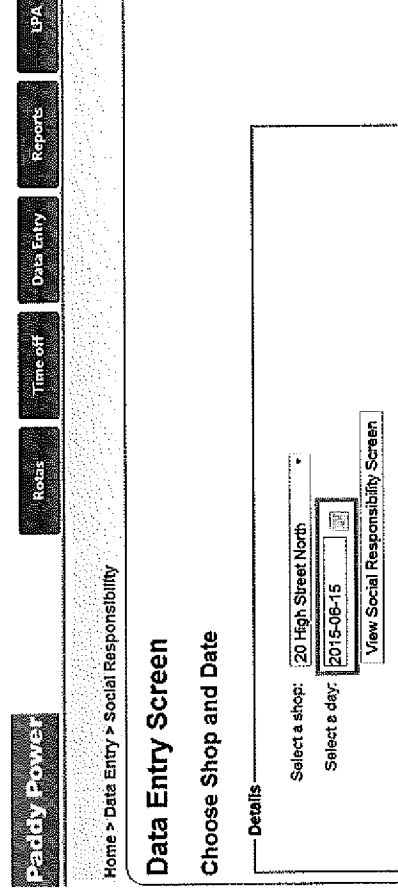
SOCIAL RESPONSIBILITY REPORTING – LOGS

Follow the instructions to complete throughout the Trading Day and approve at the end of each Trading Day

- Log on to Shopworks using your Password, then choose the Data Entry Tab
- Select Social Responsibility



The date will default to the current date, select the 'View Social Responsibility Screen' button.



You need to complete the form with as much relevant information as possible. Enter your full name, then select the type of incident (using the arrow to get the drop down list).

This example is reporting a suspected underage person entering the premises but having ID when challenged. When you have completed your entry select the confirmation check box and then press 'Save Now'.

Please note: you will be unable to edit or remove this entry once you have saved it.

If you have had no incidents to report by the end of the day you MUST still select make an entry as below to confirm that no challenges were required.

This selection must only be used at the end of the day

An entry under Think 21 must be made without fail in to the log every night (the same as confirming your staff hours). Remember this is a **legal requirement**

You MUST record incidents throughout the day as and when they occur as you would do when we used hard copy logs. You must ensure that all entries are logged separately and not together, therefore if during a trading day you have two incidents of Age verification then these are recorded separately and not together under one incident. This data will be used to compile the quarterly returns for Paddy Power automatically and the functionality will pick each section up as one incident.

You must still record if no challenges are made

THE CATEGORIES ARE AS FOLLOWS:

THINK 21

- Think 21 – No challenges needed to be made
- Think 21 – Person attempting to place a bet, or play on the gaming machines, challenged for ID, ID provided and age verified as ok
- Think 21 – Person attempting to place a bet, or play on the gaming machines, challenged for ID, no ID provided and asked to leave
- Think 21 – Person entering premises and challenged for ID, no ID provided and asked to leave
- Think 21 – Person entering the premises, challenged for ID, ID provided and age verified as ok
- Think 21 – Provided ID and is under 18

POLICE/EMERGENCY SERVICES RELATED ISSUES

- Incident involving call to Police on 999
- Incident involving call to Police on 101
- Incident involving call to Police on local Safer Neighbourhood Team telephone number
- Incident relating to Anti-Social Behaviour & not involving a call to the Police
- Incident involving call to Ambulance Service or Fire Brigade

SUSPICIOUS BEHAVIOUR/MONEY LAUNDERING

- The discovery of/or use of illegal drugs on the premises
- The possession of/or consumption of alcohol in the premises
- Suspected proceeds of crime e.g. money laundering

SELF-EXCLUSION

- Self-exclusion
- Known breach of self-exclusion
- Self-excluded individuals opting to return to gambling

RESPONSIBLE GAMBLING

- Responsible Gambling Interaction Incident - (Details MUST include what advice or help was given to the customer e.g. setting time limits, spend limits, self-exclusion)
- Responsible Gambling Interaction with an Individual – (Details MUST include MCR name or first name and surname, what advice or help was given to the customer e.g. setting time limits, spend limits, self-exclusion)
- Problem Gambling – No need to have a Responsible Gambling Interaction with any customer

CUSTOMER COMPLAINTS

- Customer Complaint
- If you have any queries please contact your District Manager or Loss Prevention for clarification

VISITORS

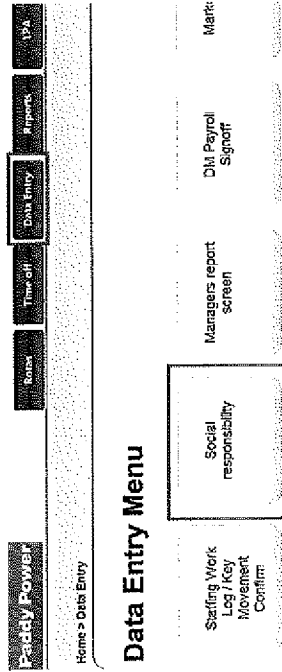
- Visit from official authority (not including head office employees)
- Visit From Head Office employee/DM

ACCIDENT

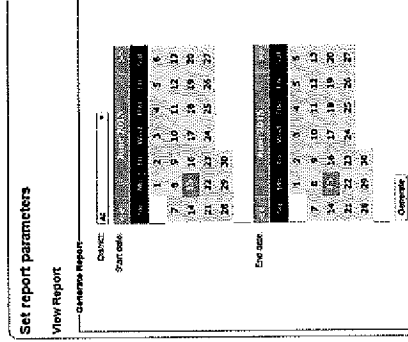
- Accident Report - Please include name, address of person(s) injured, date, time and location of accident, how it occurred and details of any injuries sustained.

Follow the instructions to retrieve details of log entries for your shop

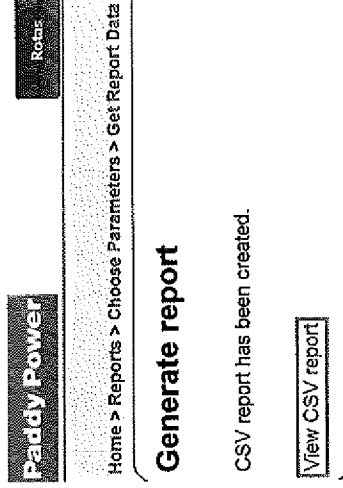
Log on to Shopworks using your Passwords then choose the 'Reports' tab and select 'Social responsibility log'.



The date will default to the current date; select the date range that you want to review then click on the 'Generate' tab button

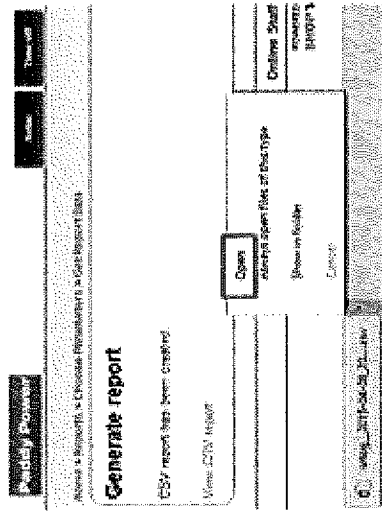


Then click on the 'View CSV report' button



CSV report has been created.

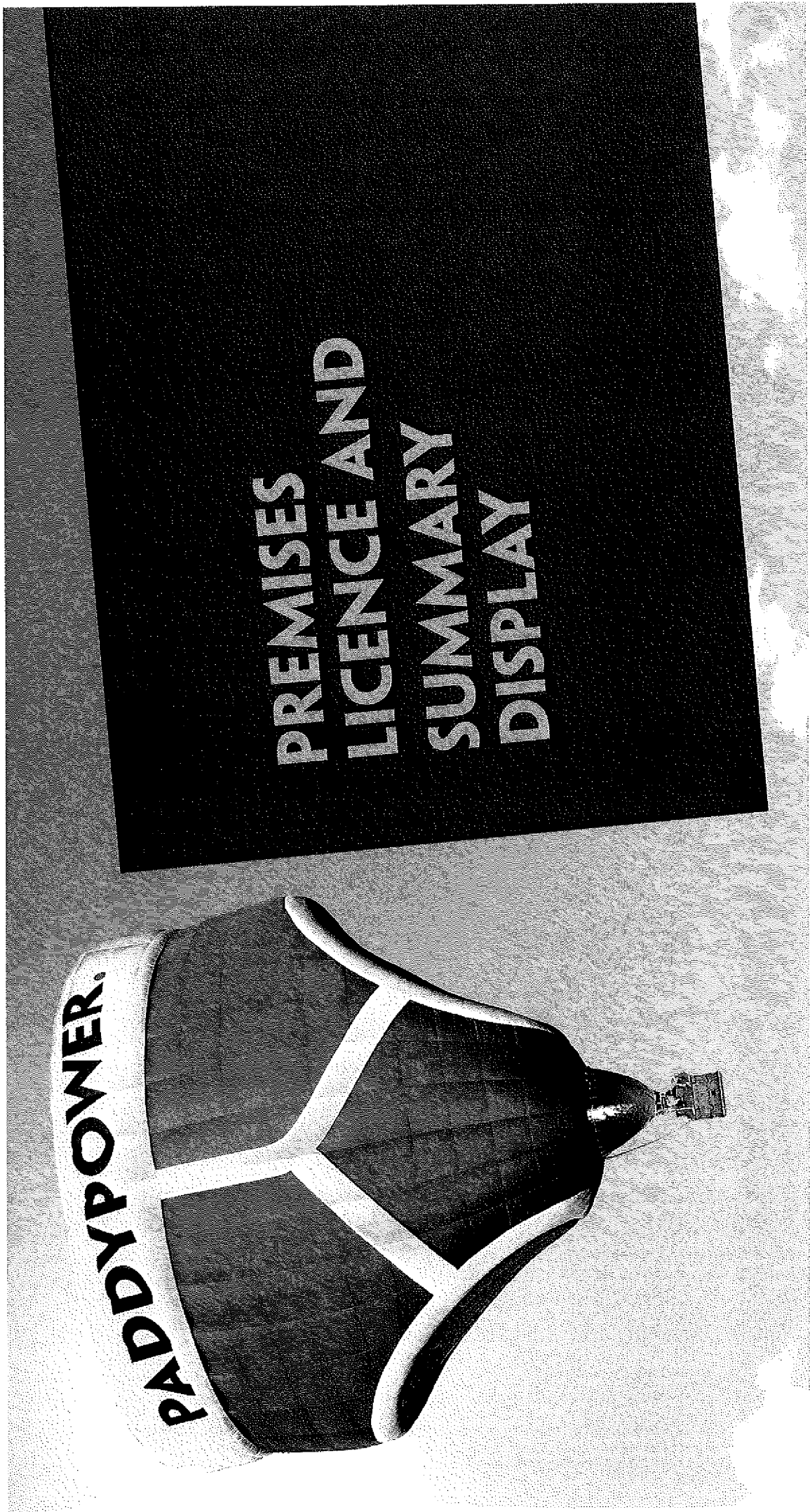
A dialog box appears as below, click on 'Open'.



You have generated a report for all Social Responsibility Log entries for the date range you requested, the report is shown below and has the following headers: Date, Shop, Staff, Type and Comment. This is the report to generate to check your shop is compliant with logging Social Responsibility entries, all Managers have a responsibility to ensure they check this on a regular basis and take remedial action as necessary.

This is also the report to generate when a Gambling Commission Compliance Officer requests to view your logs.

Date	Shop	Staff	Type	Comment
18/04/2015	Longbridge	Samuel	Problem gambler and responsible needed	
18/04/2015	Longbridge	Samuel	Thank 23 - No other challenges made.	
18/04/2015	Longbridge	Martin 20	Visit From House	Responsible completed.
18/04/2015	Longbridge	Samuel	Local Check Com	Spelt checked at 11:05 PM. All OK
18/04/2015	Longbridge	Samuel	Thank 23 - Person ID type	Person ID type: 1-501 PM
18/04/2015	Longbridge	Samuel	Thank 23 - Person ID type	Person ID type: Driving License. Time: 1



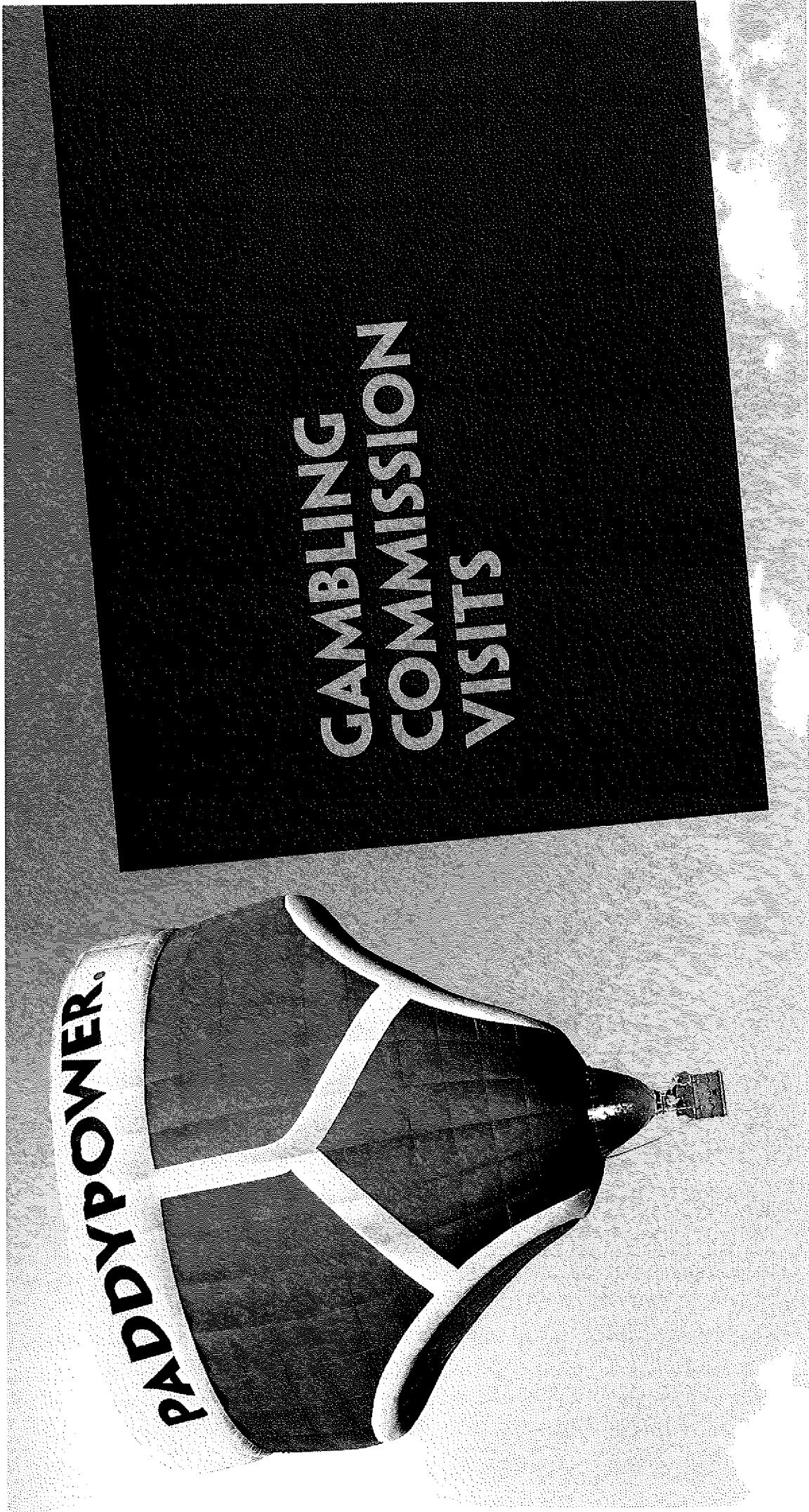
PREMISES LICENCE AND SUMMARY DISPLAY

issued by the Local Authorities this documentation is required to allow our individual LBOs to trade. It is a condition of the Premises Licence that the original documentation be kept on the premises and be made available on request to a constable, enforcement officer or local authority officer. The holder of the licence commits an offence if she/he fails to comply with this condition.

The licence comes in two parts, the Premises Licence and the Premises Licence Summary.

The Premises Licence Summary should be prominently displayed in every shop; clip frames are usually supplied for this purpose. It is advised that the Premises Licence be stored behind the Summary for safe keeping.

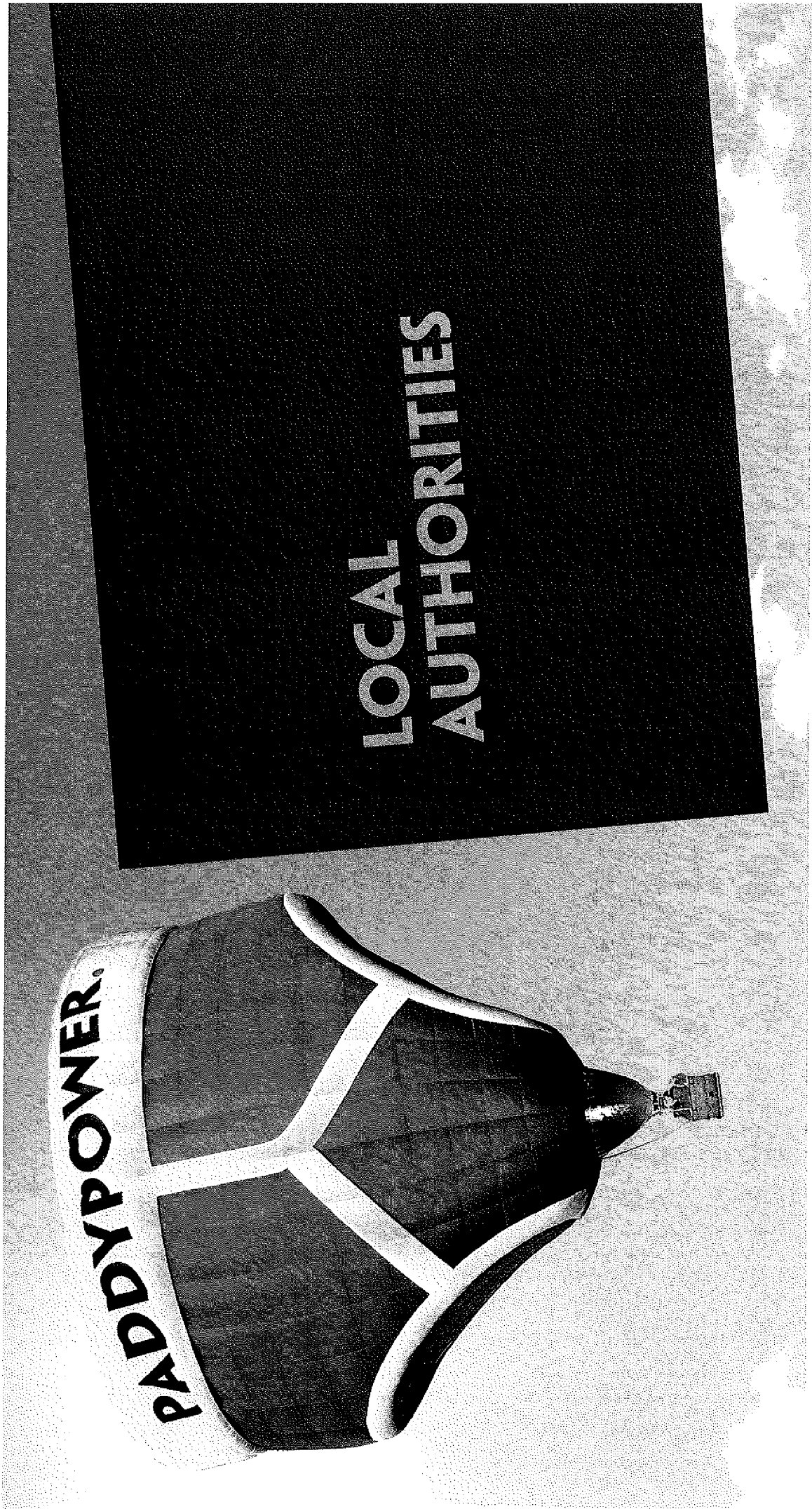
Some of our newer shops are subject to licensing conditions; these are detailed on the Premises Licence documents. It is very important that all members of staff acquaint themselves with these conditions upon commencement of work within branches where these apply – your District Manager will be able to advise accordingly.



GAMBLING COMMISSION VISITS

Gambling Commission Officers have the right to conduct announced, unannounced and covert inspections of all premises licensed under the Gambling Act 2005.

The Gambling Commission, Police and Local Authority are allowed to, and do, send individuals under the age of 18 into betting shops to test age verification procedures.

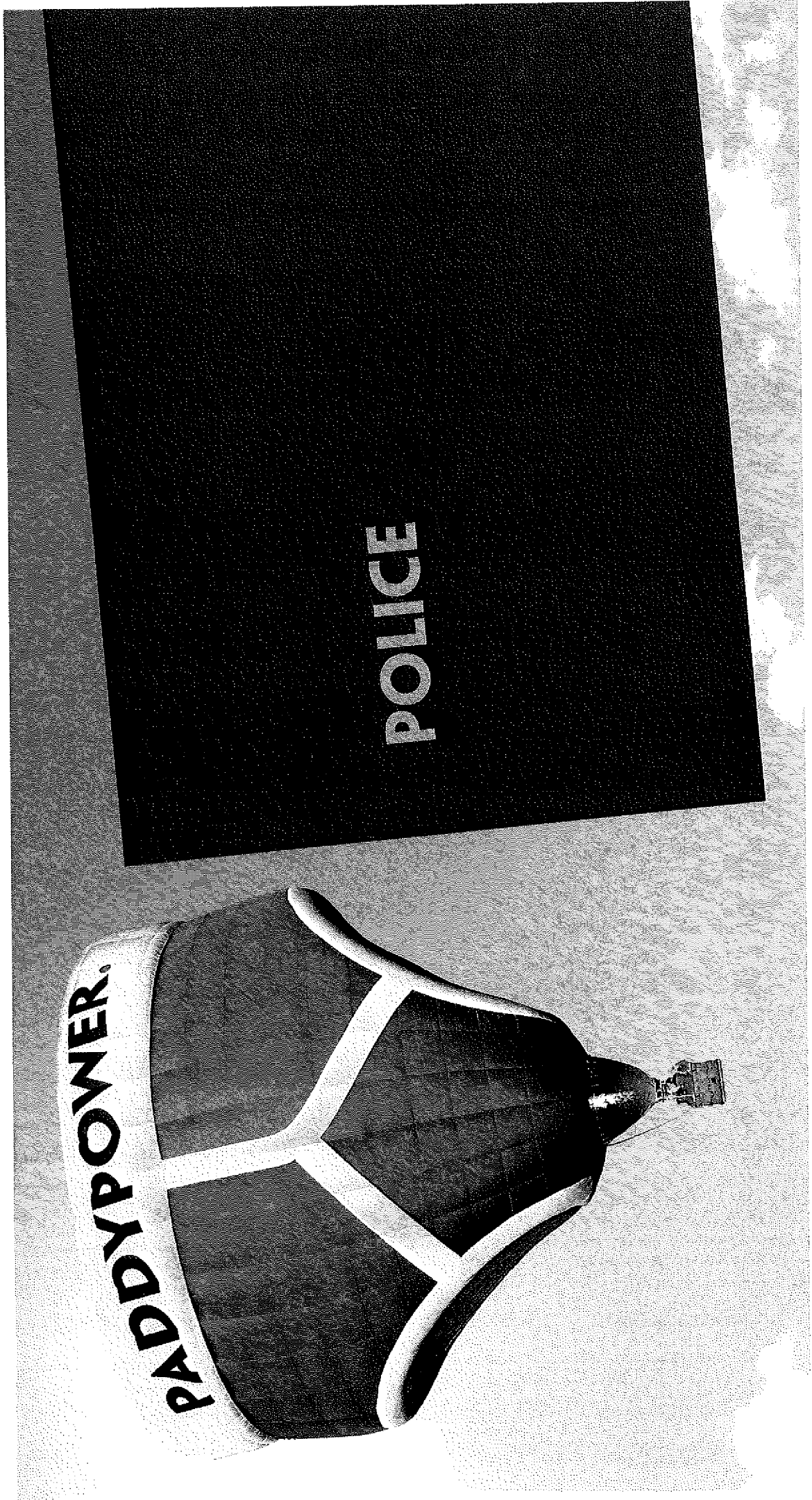


LOCAL AUTHORITIES

The Local Authorities also carry out ad-hoc visits to our shops to check that we are adhering to the Commissions regulations and procedures. They will also check that we are adhering to any locally imposed conditions. The Local Authorities also send in their own underage mystery shoppers and have also bought along Trading Standards Officers on these visits to investigate incidents of non-compliance.

PADDYPOWER.

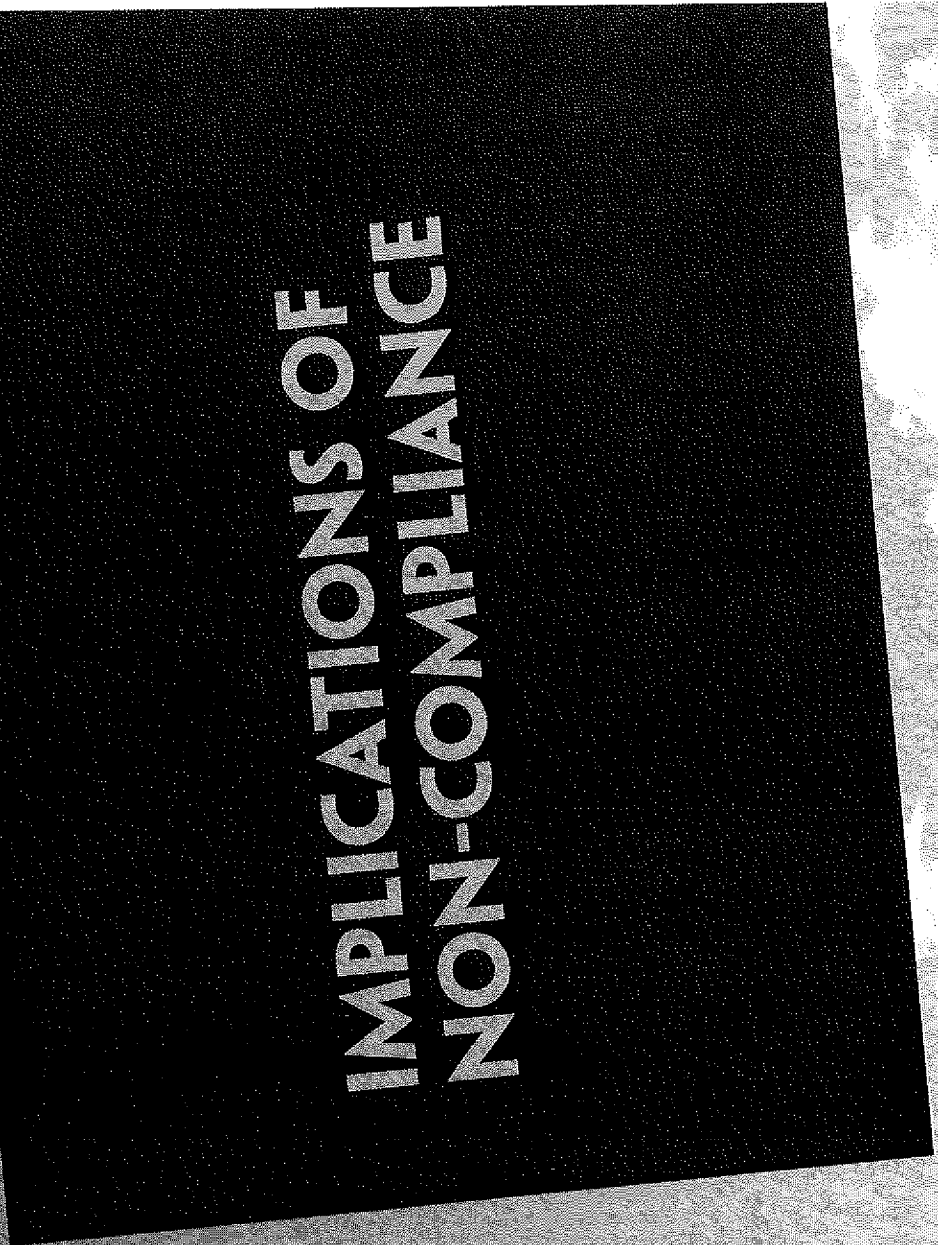
COMPLIANCE MANUAL



POLICE

The Police have the power to visit our shops to investigate allegations of any under-age gambling and other compliance issues. By serving anyone who is under the age of 18 or assisting people to profit from criminal activities you are breaking the law.

REMEMBER IF YOU ARE VISITED BY ANY OF THE ABOVE ALWAYS ASK FOR ID AND ALWAYS LOG THIS WITHIN SHOPWORKS UNDER 'visit from official authority (not including head office employees)'



IMPLICATIONS OF NON-COMPLIANCE

What can happen if shop staff do not comply with the Gambling Commissions procedures?

- You could be suspended and following a full investigation may end up facing a disciplinary or even dismissal.
- You could also become part of a criminal investigation if it is perceived that you have helped someone profit from any illegal activity or you have allowed someone under the age of 18 to gamble. This potentially could result in a criminal record and a fine

The Gambling Commission itself has a range of power that they may exercise if a licence holder fails to comply with conditions and codes of practice, they can:

Issue a warning

- Attach an additional condition to the licence
- Suspend a licence
- Revoke a licence (either the Company Licence or a Personal Licence of a senior individual)
- Fine the company

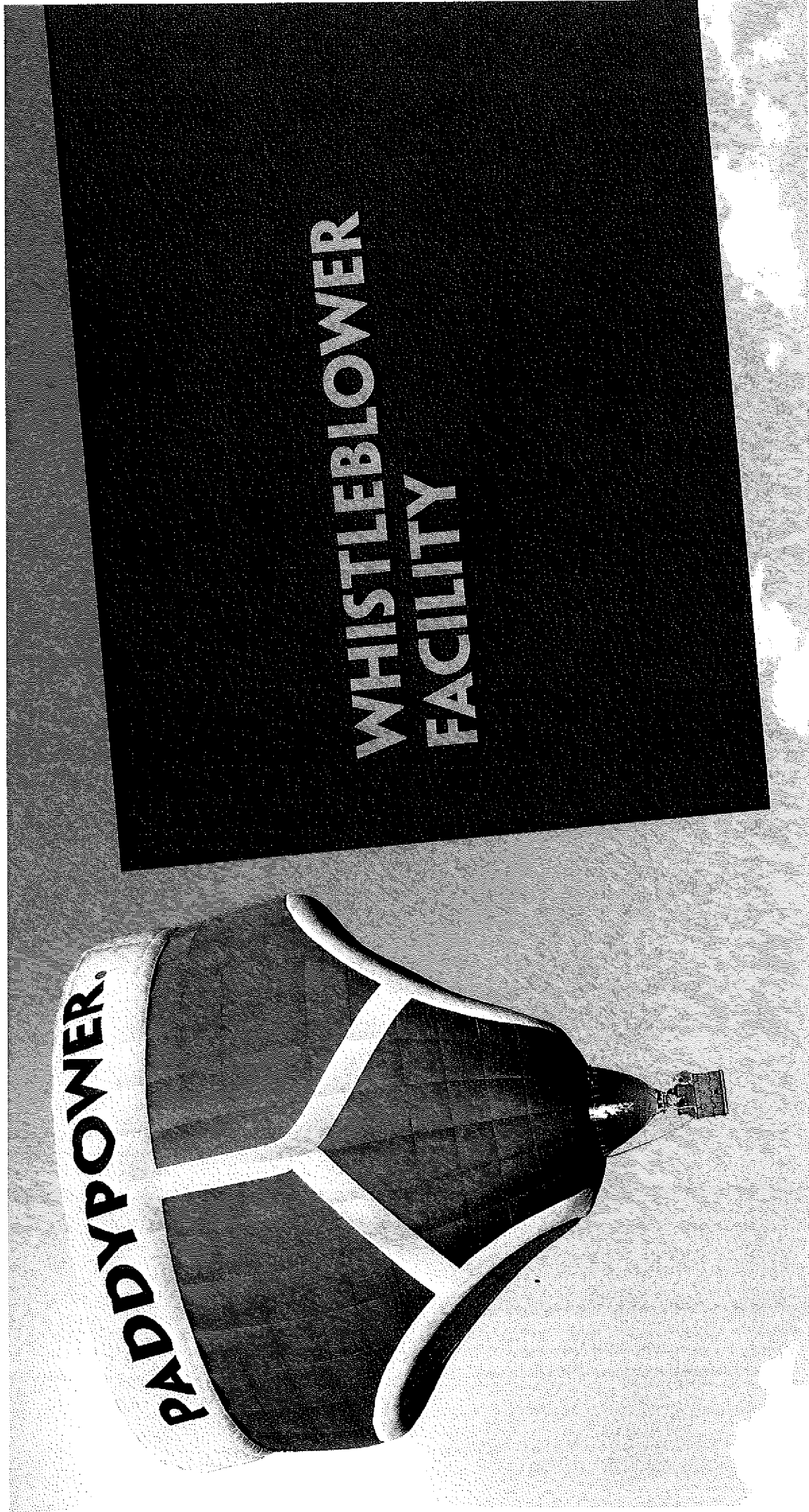
The worst possible outcome is that we may be forced to stop trading at a particular LBO or across the estate.

SHOP EXTERIOR

Whilst we have no jurisdiction beyond the boundaries of the shop demise we at Paddy Power have a duty of care to our neighbours and community to ensure that any activity outside our shops that creates a negative impact/ perception is minimised

STAFF ARE ASKED TO:

- Ensure that the area in front of the shop is kept litter free
- Cigarette bins are emptied frequently
- Drinking of alcohol by customers is discouraged
- Loitering is discouraged



WHISTLEBLOWER FACILITY

Paddy Power seeks to conduct itself honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. On this basis colleagues are encouraged to raise genuine concerns about malpractice in the workplace without fear of reprisals or victimisation.



We have, therefore, introduced a Whistleblower facility - called Integrity Line - which enables you to raise concerns anonymously.

If you believe that the actions of anyone (or a group of people) working for Paddy Power do or could constitute malpractice you should raise the matter with your line manager. Where this is not appropriate because the line manager is involved in the alleged malpractice, or you fear retribution for raising the issue, you should use the Integrity Line facility.

The term 'malpractice' includes, but is not exhaustive of:

- Theft, fraud and any attempted theft or fraud
- Collusion with any other party in a fraudulent or non-compliant activity
- Serious operational non-compliance or breach of company procedures
- Physical violence or bullying
- Harassment of colleagues/customers
- Unlawful discrimination
- Bringing the organisation into serious disrepute
- The concealment of any of the above

If an individual raises a genuine concern and is acting in good faith, even if it is later discovered that they are mistaken, under this policy they will not be at risk of losing their job or suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way with the malpractice.

The Integrity Line can be contacted on 0800 012 1000, or via an online reporting form, www.theintegrityline.co.uk. It is available 24 hours a day, 7 days a week, and is operated by the registered national charity, Crimestoppers.

USEFUL CONTACT DETAILS

Paddy Power Bookmaker

One Euston Square
40 Melton Street
London
NW1 2FD

London HQ Switchboard: 0207 874 9100
Racing Bet Clearance: 0800 169 0404
Sports Bet Clearance: 0800 169 0404
Retail Support Desk (RSD): 0800 169 0404
Technical Support Desk (TSD): 0800 169 0404

Web: www.paddypowerplc.com

Loss Prevention: uklossprevention@paddypower.com

Appendix 2



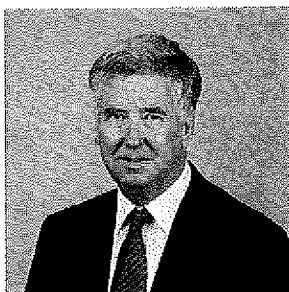
Department
for Business
Innovation & Skills

Better
Regulation
Delivery Office

Regulators' Code

April 2014

Foreword



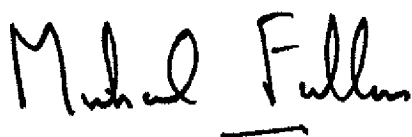
In the Autumn Statement 2012 Government announced that it would introduce a package of measures to improve the way regulation is delivered at the frontline such as the Focus on Enforcement review of appeals, the proposed Growth Duty for non-economic regulators and the Accountability for Regulator Impact measure.

This Government is committed to reducing regulatory burdens and supporting compliant business growth through the development of an open and constructive relationship between regulators and those they regulate. The Regulators' Code provides a flexible, principles based framework for regulatory delivery that supports and enables regulators to design their service and enforcement policies in a manner that best suits the needs of businesses and other regulated entities.

Our expectation is that by clarifying the provisions contained in the previous Regulators' Compliance Code, in a shorter and accessible format, regulators and those they regulate will have a clear understanding of the services that can be expected and will feel able to challenge if these are not being fulfilled.

Regulators within scope of the Regulators' Code are diverse but they share a common primary purpose – to regulate for the protection of the vulnerable, the environment, social or other objective. This Code does not detract from these core purposes but seeks to promote proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate.

I believe the Regulators' Code will support a positive shift in how regulation is delivered by setting clear expectations and promising open dialogue. Ultimately this will give businesses greater confidence to invest and grow.

A handwritten signature in black ink that reads "Michael Fallon". The signature is written in a cursive style with a horizontal line underneath the name.

Michael Fallon
Minister of State for Business and Enterprise
Department for Business, Innovation and Skills

- 2.2 In responding to non-compliance that they identify, regulators should clearly explain what the non-compliant item or activity is, the advice being given, actions required or decisions taken, and the reasons for these. Regulators should provide an opportunity for dialogue in relation to the advice, requirements or decisions, with a view to ensuring that they are acting in a way that is proportionate and consistent.

This paragraph does not apply where the regulator can demonstrate that immediate enforcement action is required to prevent or respond to a serious breach or where providing such an opportunity would be likely to defeat the purpose of the proposed enforcement action.

- 2.3 Regulators should provide an impartial and clearly explained route to appeal against a regulatory decision or a failure to act in accordance with this Code. Individual officers of the regulator who took the decision or action against which the appeal is being made should not be involved in considering the appeal. This route to appeal should be publicised to those who are regulated.
- 2.4 Regulators should provide a timely explanation in writing of any right to representation or right to appeal. This explanation should be in plain language and include practical information on the process involved.
- 2.5 Regulators should make available to those they regulate, clearly explained complaints procedures, allowing them to easily make a complaint about the conduct of the regulator.
- 2.6 Regulators should have a range of mechanisms to enable and regularly invite, receive and take on board customer feedback, including, for example, through customer satisfaction surveys of those they regulate⁴.

3. Regulators should base their regulatory activities on risk

3.1 Regulators should take an evidence based approach to determining the priority risks in their area of responsibility, and should allocate resources where they would be most effective in addressing those priority risks.

- 3.2 Regulators should consider risk at every stage of their decision-making processes, including choosing the most appropriate type of intervention or way of working with those regulated; targeting checks on compliance; and when taking enforcement action.
- 3.3 Regulators designing a risk assessment framework⁵, for their own use or for use by others, should have mechanisms in place to consult on the design with those affected, and to review it regularly.
- 3.4 Regulators, in making their assessment of risk, should recognise the compliance record of those they regulate, including using earned recognition approaches and should consider all available and relevant data on compliance, including evidence of relevant external verification.
- 3.5 Regulators should review the effectiveness of their chosen regulatory activities in delivering the desired outcomes and make any necessary adjustments accordingly.

⁴ The Government will discuss with national regulators a common approach to surveys to support benchmarking of their performance.

⁵ The term 'risk assessment framework' encompasses any model, scheme, methodology or risk rating approach that is used to inform risk-based targeting of regulatory activities in relation to individual businesses or other regulated entities.

4. Regulators should share information about compliance and risk

- 4.1 Regulators should collectively follow the principle of “collect once, use many times” when requesting information from those they regulate.
- 4.2 When the law allows, regulators should agree secure mechanisms to share information with each other about businesses and other bodies they regulate, to help target resources and activities and minimise duplication.

5. Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply

- 5.1 Regulators should provide advice and guidance that is focused on assisting those they regulate to understand and meet their responsibilities. When providing advice and guidance, legal requirements should be distinguished from suggested good practice and the impact of the advice or guidance should be considered so that it does not impose unnecessary burdens in itself.
- 5.2 Regulators should publish guidance, and information in a clear, accessible, concise format, using media appropriate to the target audience and written in plain language for the audience.
- 5.3 Regulators should have mechanisms in place to consult those they regulate in relation to the guidance they produce to ensure that it meets their needs.
- 5.4 Regulators should seek to create an environment in which those they regulate have confidence in the advice they receive and feel able to seek advice without fear of triggering enforcement action.
- 5.5 In responding to requests for advice, a regulator's primary concerns should be to provide the advice necessary to support compliance, and to ensure that the advice can be relied on.
- 5.6 Regulators should have mechanisms to work collaboratively to assist those regulated by more than one regulator. Regulators should consider advice provided by other regulators and, where there is disagreement about the advice provided, this should be discussed with the other regulator to reach agreement.

6. Regulators should ensure that their approach to their regulatory activities is transparent

- 6.1 Regulators should publish a set of clear service standards, setting out what those they regulate should expect from them.
- 6.2 Regulators' published service standards should include clear information on:
 - a) how they communicate with those they regulate and how they can be contacted;
 - b) their approach to providing information, guidance and advice;
 - c) their approach to checks on compliance⁶, including details of the risk assessment framework used to target those checks as well as protocols for their conduct, clearly setting out what those they regulate should expect;

⁶ Including inspections, audit, monitoring and sampling visits, and test purchases.

Regulators' Code

This Code was laid before Parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006 ("the Act"). Regulators whose functions are specified by order under section 24(2) of the Act **must** have regard to the Code when developing policies and operational procedures that guide their regulatory activities. Regulators must equally have regard to the Code when setting standards or giving guidance which will guide the regulatory activities of other regulators. If a regulator concludes, on the basis of material evidence, that a specific provision of the Code is either not applicable or is outweighed by another relevant consideration, the regulator is not bound to follow that provision, but should record that decision and the reasons for it.

1. Regulators should carry out their activities in a way that supports those they regulate to comply and grow

1.1 Regulators should avoid imposing unnecessary regulatory burdens through their regulatory activities¹ and should assess whether similar social, environmental and economic outcomes could be achieved by less burdensome means. Regulators should choose proportionate approaches to those they regulate, based on relevant factors including, for example, business size and capacity.

1.2 When designing and reviewing policies, operational procedures and practices, regulators should consider how they might support or enable economic growth for compliant businesses and other regulated entities², for example, by considering how they can best:

- understand and minimise negative economic impacts of their regulatory activities;
- minimising the costs of compliance for those they regulate;
- improve confidence in compliance for those they regulate, by providing greater certainty; and
- encourage and promote compliance.

1.3 Regulators should ensure that their officers have the necessary knowledge and skills to support those they regulate, including having an understanding of those they regulate that enables them to choose proportionate and effective approaches.

1.4 Regulators should ensure that their officers understand the statutory principles of good regulation³ and of this Code, and how the regulator delivers its activities in accordance with them.

2. Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views

2.1 Regulators should have mechanisms in place to engage those they regulate, citizens and others to offer views and contribute to the development of their policies and service standards. Before changing policies, practices or service standards, regulators should consider the impact on business and engage with business representatives.

¹ The term 'regulatory activities' refers to the whole range of regulatory options and interventions available to regulators.

² The terms 'business or businesses' is used throughout this document to refer to businesses and other regulated entities.

³ The statutory principles of good regulation can be viewed in Part 2 (21) on page 12: http://www.legislation.gov.uk/ukpga/2006/51/pdfs/ukpga_20060051_en.pdf.

Regulators' Code

- d) their enforcement policy, explaining how they respond to non-compliance;
 - e) their fees and charges, if any. This information should clearly explain the basis on which these are calculated, and should include an explanation of whether compliance will affect fees and charges; and
 - f) how to comment or complain about the service provided and routes to appeal.
- 6.3 Information published to meet the provisions of this Code should be easily accessible, including being available at a single point⁷ on the regulator's website that is clearly signposted, and it should be kept up to date.
- 6.4 Regulators should have mechanisms in place to ensure that their officers act in accordance with their published service standards, including their enforcement policy.
- 6.5 Regulators should publish, on a regular basis, details of their performance against their service standards, including feedback received from those they regulate, such as customer satisfaction surveys, and data relating to complaints about them and appeals against their decisions.

⁷ This requirement may be satisfied by providing a single web page that includes links to information published elsewhere.

Monitoring the effectiveness of the Regulators' Code

The Government is committed to making sure the Regulators' Code is effective. To make sure that the Code is being used effectively, we want businesses, regulated bodies and citizens to challenge regulators who they believe are not acting in accordance with their published policies and standards. It is in the wider public interest that regulators are transparent and proportionate in their approaches to regulation.

The Government will monitor published policies and standards of regulators subject to the Regulators' Code, and will challenge regulators where there is evidence that policies and standards are not in line with the Code or are not followed.

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This publication is also available on our website at:
<https://www.gov.uk/government/publications/regulators-code>

Any enquiries regarding this publication should be sent to:

Better Regulation Delivery Office
Department for Business, Innovation and Skills
Lower Ground Floor
Victoria Square House
Victoria Square
Birmingham B2 4AJ

Tel: 0121 345 1200

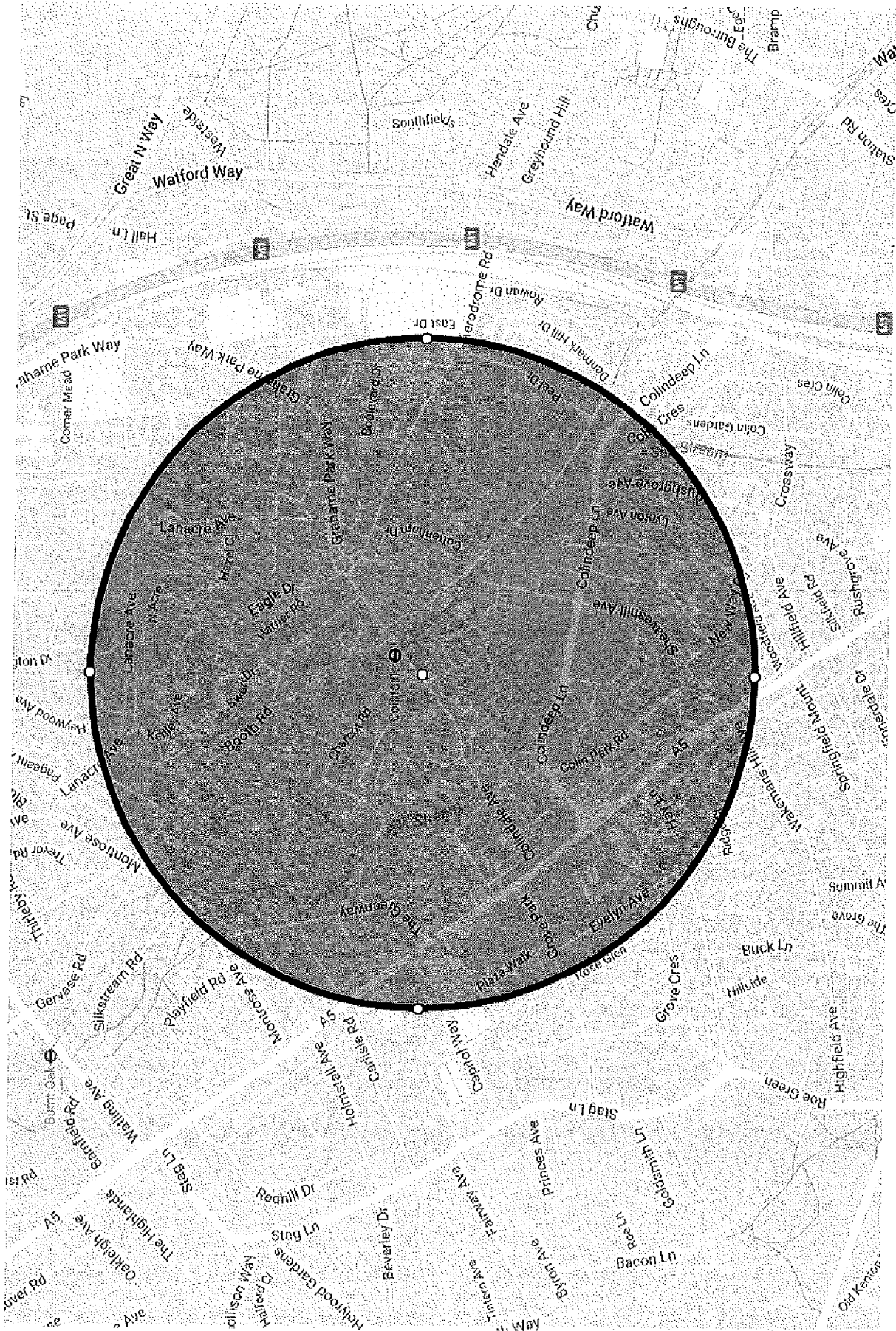
If you require this publication in an alternative format, email brdo.enquiries@bis.gsi.gov.uk or call 0121 345 1200.

URN: BRDO/14/705

Appendix 3

LOCAL AREA
RISK ASSESSMENT

LOCAL AREA RISK ASSESSMENT RADIUS MAP



Localised Risk Assessment

Shop	Colindale Avenue	Assessment Conducted By	N Dhanjal
Post code	NW9 6HF	Assessment Date	27.01.16
Shop Code	TBC	Morning Shifts Scheduling Shop	Yes
Licensing Authority	Barnet	Evening Shifts Scheduling Shop	No
Risk Type	Risk Event	Risk Category	Local Sites
Protecting the young Risk of underage persons being able to access an LBO and place a bet/play a machine		Risk of an underage customer getting undetected in a shop	<p>Schools</p> <ul style="list-style-type: none"> - Barnet & Southgate College - Orlon Primary School - Blessed Dominic RC Primary School - St. James Catholic High School - North London Grammar - Colindale Primary School - Oak Yarrow Primary School - Joel Nursery School - Twiley Tails Nursery - Hilda University - Beaufort Park, Early Care & Education Centre <p>Transport Links</p> <ul style="list-style-type: none"> - Colindale Station - Local Bus Routes <p>Other</p>
		Risk of an underage customer being able to place a bet 'Over the Counter' (OTC)	<p>As above</p>
		Risk of an underage customer being able to play a machine POF753PT	<p>As above</p>
			<p>Entry Counter</p> <ul style="list-style-type: none"> - All shop employees receive Social Responsibility training at induction and are also refreshed every quarter. Guidance as to identifying underage customers, and how to log and interact provided in the Retail Compliance Manual available in the shop. - There is a requirement for the Store Duty Manager to record if no Think 21 challenge was required. - Continuous independent risk based testing by a third party to assess if and how we interact with customer who appear to be under 21. - Estate-wide volume of Think 21 challenge monitored in weekly LP report. - No 'under 21's' signage on the front door. - Think 21 signage located at the entrance, machine zone and behind the counter. - The shop design has been assessed and has sufficient means to identify customers as they enter the shop. - The shop design has been assessed and has sufficient means to identify customers who are playing a FOBT machine.
			<ul style="list-style-type: none"> - All bets played over the counter, or any bet being paid to a customer requires an interaction with a member of staff. An assessment at this time is taken and if the customer appears to be under 21, a challenge for ID is made. - Guidance as to identifying underage customers, and how to log and interact provided in the Retail Compliance Manual. - SR Log available for all staff to record and monitor Think 21 challenges conducted, or when no Think 21 challenge was required. - All shop employees receive Social Responsibility training at induction and are also refreshed every quarter. - DMs receive all shop logged ROI data, to their respective Districts, on a weekly basis. In order that they can review. - Continuous independent risk based testing by a third party to assess if and how we interact with customer who appear to be under 21. - Estate-wide volume of Think 21 challenges and no Think 21 challenges required monitored in weekly LP report. - No 'under 21's' signage on the front door. - Think 21 signage located at the entrance, machine zone and behind the counter. - The shop has been assessed and has sufficient means to identify customers as they enter the shop.
			<ul style="list-style-type: none"> - All tickets being redeemed for cash requires an interaction with a member of staff. An assessment at this time is taken and if the customer appears to be demonstrating signs of harm an interaction is undertaken. - Guidance as to identifying problem gamblers, and how to log and interact provided in the Retail Compliance Manual. - SR Log available for all staff to record and monitor Responsible Gambling interactions conducted. - All shop employees receive Social Responsibility training at induction and are also refreshed every quarter. - DMs receive all shop logged ROI data, for their respective Districts, on a weekly basis. In order that they can review. - The shop has been assessed and has sufficient means to identify customers who are playing a FOBT machine.

<p>Protecting the vulnerable</p>	<p>Risk of a vulnerable person playing a machine</p>	<p>Risk of problem gamblers going undetected in a shop</p>	<p>Treatment Centres</p> <ul style="list-style-type: none"> - Cotnam Medical Centre <p>Sales of Alcohol</p> <ul style="list-style-type: none"> - Glendale Local Public Gro/Off Licence - The Wood Off Licence - The Park Off Licence - Home Store Food & Wine - Asda - Morrisons - Sainsbury's Local - Tesco Express - The Boatyard PH - Quakers Arms PH - The Boatyard PH - City's Clerk Bar 	<ul style="list-style-type: none"> - All shop employees receive RG training at induction and are also refreshed every quarter - Guidance as to identifying behavioural RG, and how to log and intercept provided in the Retail Compliance Manual - SR Log available for all staff to record and monitor RGs - Daily PRL reports (from shops to DMs) include a section for RG issues to be escalated to DMs - DMs receive all shop flagged RG data, further communication to HMs & DMs for follow-up in shops where no RGs recorded / machine updated to include review of quality of RGs recorded, and where none recorded, what would be recorded by the shop team if they were required to - Estate-wide volume of RGs mentioned in weekly IP report, but only reviewed by IP - Data fed "OIG" customer contact strategy underway
<p>Protecting the vulnerable</p>	<p>Risk of a vulnerable person playing a machine</p>	<p>Risk of a problem gambler being able to place a bet 'Over the Counter' (OTC) as above</p>	<p>As above</p>	<ul style="list-style-type: none"> - All shop employees receive RG training at induction and are also refreshed every quarter - Guidance as to identifying behavioural RG, and how to log and intercept provided in the Retail Compliance Manual - SR Log available for all staff to record and monitor RGs - Daily PRL reports (from shops to DMs) include a section for RG issues to be escalated to DMs - DMs receive all shop flagged RG data, for their respective Districts, on a weekly basis, in order that they can review, monitor / high risk data flagged to shop - Monthly review of RGs undertaken for follow-up in shops where no RGs recorded / correlation with machine recorded by the shop team if they were required to
<p>Protecting the vulnerable</p>	<p>Risk of a vulnerable person playing a machine</p>	<p>Risk of a problem gambler being able to place a bet 'Over the Counter' (OCR & SM)</p>	<p>As above</p>	<ul style="list-style-type: none"> - All shop employees receive RG training at induction and are also refreshed every quarter - Guidance as to identifying behavioural RG, and how to log and intercept provided in the Retail Compliance Manual - SR Log available for all staff to record and monitor RGs - Daily PRL reports (from shops to DMs) include a section for RG issues to be escalated to DMs - DMs receive all shop flagged RG data, for their respective Districts, on a weekly basis, in order that they can review, monitor / correlation with machine updates / high risk RGs flagged to DMs - Shop benchmarking updated to include review of quality of RGs recorded, and where none recorded, what would be recorded by the shop team if they were required to - Estate-wide volume of RGs monitored in weekly IP report, but only reviewed by IP
<p>Protecting the vulnerable</p>	<p>Risk of problem gamblers going undetected in a shop</p>	<p>Risk that employees are sufficiently trained in order to reasonably identify problem gambler behaviour</p>	<p>As above</p>	<ul style="list-style-type: none"> - Guidance as to identifying behavioural RG, and how to log and intercept provided in the Retail Compliance Manual - All shop employees receive RG training at induction and are also refreshed every quarter - Shop benchmarking updated to include review of quality of RGs recorded, and where none recorded, what would be recorded by the shop team if they were required to

<p>Preventing the best form being a source of crime and disorder</p>	<p>Risk that the shop is a source of crime and disorder</p>	<p>Risk of an crime and/or disorder going undetected in the shop</p>	<p>Crime</p> <ul style="list-style-type: none"> - The Collindale ward has an average crime rate according to the Met Police Statistics. - We remain in active discussion with the local police to ensure that company policies and procedures address any potential risks that are identified 	<ul style="list-style-type: none"> - All shop employees receive Social Responsibility training at induction and are also refreshed every quarter - Guidance as to identifying crime and disorder, and how to log and interact provided in the Retail Compliance Manual available in the shop - Social Responsibility log available to all staff which allows incidents to be reported
<p>Preventing the best form being a source of crime and disorder</p>	<p>Tools available inside the shop which will mitigate the risk of crime and disorder</p>	<p>As above</p>	<ul style="list-style-type: none"> - The shop is equipped with CCTV which is monitored 24 hours a day - The shop has a Safeguard device which allows the shop member to raise a silent alarm - this device is kept on the premises at the register - The shop has 2 panic alarms located within the shop, 2 under the counter and one in the pitch board - Staff have an alarm button which allows staff to retreat into a secure incident occur - Counter area which can be secured preventing access from a customer - Ability to remotely disable a machine should the requirement be needed - Escalation process to either the District Manager/Duty District Manager or UK Loss Prevention to raise concerns - Fog Cannon which can be activated via the panic button, or when the Intruder alarm is in confirmed Intruder mode - Intruder alarm which is monitored 24 hours a day - Crime prevention advice available in the Retail Compliance Manual 	