



CORAL RACING LIMITED

APPLICATION FOR A PREMISES LICENCE – GAMBLING ACT 2005

142 CROCKHAMWELL ROAD,

WOODLEY,

READING

APPLICANTS BUNDLE OF DOCUMENTS

Operational Information

1. GamCare Certificate
2. Proposed Layout
3. Photographs of similar Coral Shop
4. Photograph showing proximity of Coral Shop to Earley secondary school
5. SafeBet Alliance
6. Think 21 Policy
7. Think 21 test result
8. Self-Exclusion Policy
9. Interaction Policy
10. Responsible Gambling Briefer
11. Coral Commitment to Social Responsibility
12. ABB Code for Responsible Gambling – September 2013
13. SENET Announcement
14. Shop Signage

Regulatory Information

15. Gambling Act 2005 – s. 153
16. LCCP in respect of Betting Office Premises
17. Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007
18. Wokingham Borough Council – Gambling Act 2005 Policy

**GAMCARE
CERTIFIED**



Certificate of Social Responsibility

Awarded to

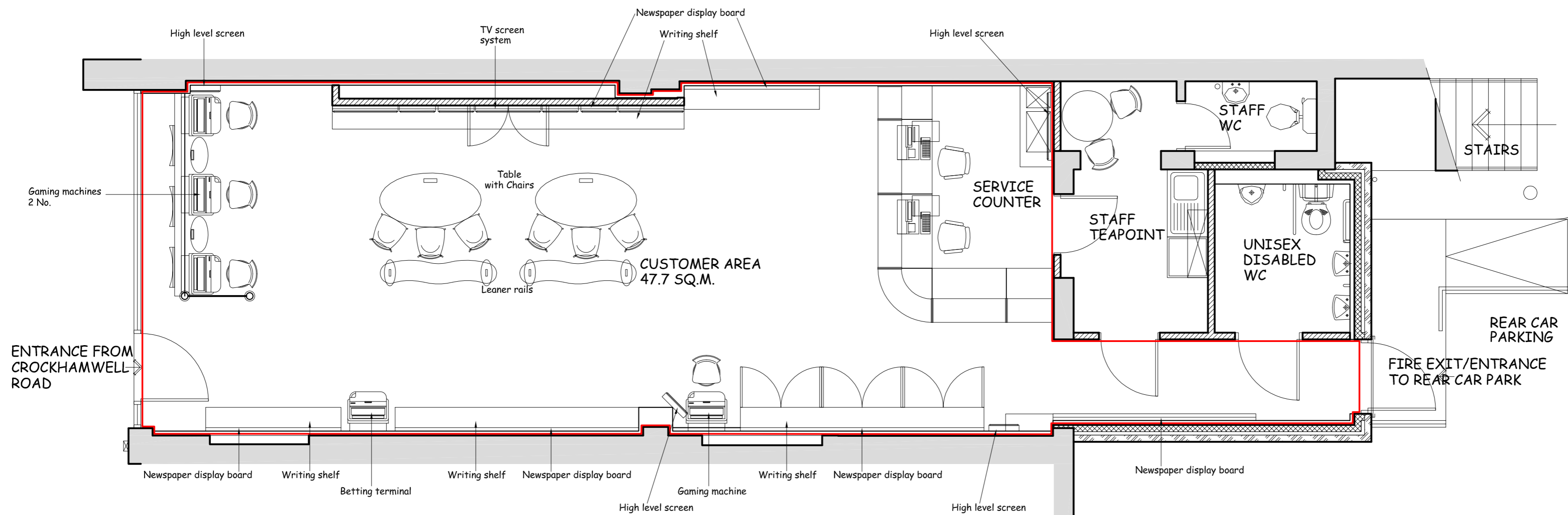
Coral Racing Ltd

This is to certify that following an inspection of a number of premises operated by the above company, GamCare is pleased to award certification for high standards of socially responsible practices

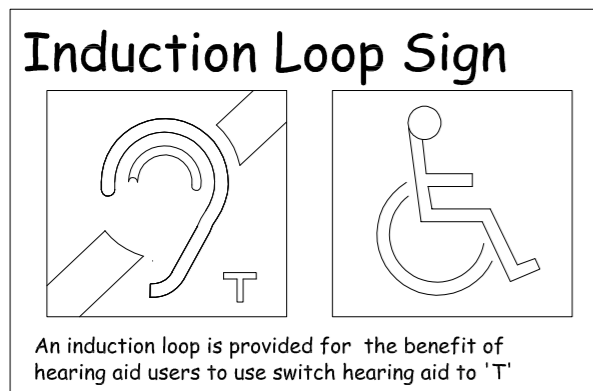
A handwritten signature in black ink, appearing to read 'Dirk Hansen'.

Dirk Hansen Chief Executive, GamCare

Valid until July 2016



GROUND FLOOR PLAN (1:50)



SITE LOCATION PLAN (Scale 1:1250)
 Ordnance Survey, Crown Copyright © 2008,
 All Rights Reserved License No. 100035607
 Scale Bar @ 1:1250

KEY

The location and extent of that part of the premises which will be used to provide facilities for gambling in reliance of the licence



CORAL

GENERAL NOTES
 DO NOT SCALE FROM THIS DRAWING, ALL DIMENSIONS TO BE CHECKED ON SITE.

Rev	Amendment	Date

Company Name & Address:
 CORAL
 One Stratford Place,
 Montfichet Road,
 London
 E20 1EJ

Project Name & Address:
 Proposed Licensed Betting Office at
 143 Crockhamwell Road,
 Woodley,
 Reading, RG5 3JP

Drawn by: RRDS
 Date: 5 September 2014
 Scale: 1:50 @ A2

Drawing No: **COR1739/LP1**

Recent example of a similar style Coral shop





Coral 6 The Parade, Earley – This shop is adjacent to Maiden Erlegh School entrance



Coral

School Entrance

School outlined in red - - - -



**Coral Racing 6 the Parade Silverdale Road Earley.
The Walking time to Maiden Erlegh School is 30 seconds**



Entrance to Maiden Erlegh School, it is a college for 11 -18 year olds



Voluntary Code of Safety and Security National Standards for Bookmakers

June 2014

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Purpose of This Document

This document outlines agreed voluntary standards of workplace safety and security for the betting industry in England, Scotland and Wales with a view to reducing the risk of robbery and other forms of violence in the workplace.

Please Note

The Association of British Bookmakers (“ABB”) in offering this advice wishes to make it clear that:

- Operators are not exempted from their own statutory responsibilities;
- Legislation may change over time and the advice given is based on the information available at the time the guidance was produced. It is not necessarily comprehensive and is subject to revision on the light of further information;
- This advice is not intended to be a definitive guide to, nor substitute for, the relevant law. Independent legal advice should be sought where appropriate; and
- The purpose of this document is to provide advice to bookmakers and should not be used in anyway such as to impose legal responsibilities on bookmakers over and above their statutory responsibilities.

Acknowledgements

This document has been developed by the Association of British Bookmakers in conjunction with an external industry stakeholder group which includes representatives from: Metropolitan Police, Community Union, the Institute of Conflict Management and Crimestoppers.

There is universal commitment on behalf of all the operators consulted to develop best practice as far as the safety and security of Licensed Betting Office (“LBO”) staff is concerned.

Other Industries

Whilst this document has been developed primarily for the bookmaking industry with a view to managing the risk of violence within LBOs, it may also be of interest to stakeholders in other industries.

Foreword



ASSOCIATION OF CHIEF POLICE OFFICERS OF ENGLAND, WALES AND NORTHERN IRELAND

Violent crime affects many high street operations, assaults and robbery cause great distress to staff and customers. These offences can result in devastating consequences including, in some cases, the business closing down.

The Association of British Bookmakers and its members have worked tirelessly to identify an achievable, realistic and cost effective solution to reduce the offences against their members, staff and customers. In 2009, working closely with the police and other key agencies the industry identified a set of security policies and procedures, which bookmakers would be able to adopt, implement and most importantly, sustain. These standards were named The Safe Bet Alliance.

The Safe Bet Alliance has proved to be not only an effective tool for reducing violent crime, but also a clear example of best practice for partnership working. The collaboration of police, bookmakers and other key stakeholders has led to an initiative that has stood the test of time.

The Safe Bet Alliance has been in operation since 2009, in the first year, in London alone, there was a 46% reduction in robberies and a 55% detection rate. The decline in offences has continued, highlighting the sustainability of the initiative.

In 2011 the Safe Bet Alliance won the prestigious Home Office Tilley award for Acquisitive Crime reduction. This award highlights the continued commitment of the ABB and its members to a safer betting environment. The standards have also assisted local licensing officers to identify consistent and relevant security measures for bookmakers.

I commend the work of the ABB and those associated with the document and recommend it as essential reading for all bookmakers and licensing officers.

Matt Jukes
South Wales Police
Assistant Chief Constable
ACPO Commercial Robbery Area Lead

Introduction

Having been operating on the high street and in town centres for over fifty years, betting shops now serve eight million customers a year, and employ over 40,000 people. Generally, betting shops offer customers and staff a safe and secure place to enjoy their leisure time or work. As with any other retail business, bookmakers can and do suffer from crime, including robberies and work-related violence

The Safe Bet Alliance was formed in 2010 to tackle collectively these sorts of crimes – both as an industry and with law enforcement and other partners, including the Metropolitan Police, Community Union (representing staff), Crimestoppers, local government and the Institute of Conflict Management.

Since its formation, the Alliance has achieved some real successes – the number of robberies for example fell in London by 60% in two years, and won the prestigious Home Office Tilley Award. The SBA has now, as you will have seen, also been endorsed by the Association of Chief Police Officers.

Over recent months, the Safe Bet Alliance has been meeting to review our progress and see where we can build on success or improve in other areas. This updated document sets out the new guidelines, and which I believe will help the Safe Bet Alliance go from strength to strength.

Sarah Simpson MBE
Chair, Safe Bet Alliance
Institute of Conflict Management

Definition: Work-Related Violence

Work related violence is described by the Health and Safety Executive (HSE) as: *“Any incident in which a person is abused, threatened or assaulted in circumstances relating to their work”*. Examples of violence in the workplace are set out below:

- verbal abuse, in person, over the telephone or by email;
- unreasonable and/or offensive remarks or behaviour;
- written abuse;
- rude gestures;
- intimidation;
- harassment, including sexual and racial abuse;
- threatening behaviour e.g. squaring- up without physical contact;
- ganging up, bullying and intimidation;
- physical or sexual assault;
- spitting;
- malicious damage to the property of staff, customers or the business.

The effects of violence in the workplace will vary from individual to individual, however all examples of violence should be treated seriously.

Understanding the Standards

All the voluntary standards contained in this document deal with measures aimed at reducing the risk of robbery and other forms of violence in the workplace. However the document is split into five Sections (A to E) for ease of use by operators.

Section A sets out voluntary standards aimed at reducing violence in general. These standards recommended the adoption of operator-wide policies and procedures.

Section B describes the five steps to reducing risk, explains the importance of the shop-specific risk assessment and offers guidance on carrying out the risk assessment.

Section C states the key principles of crime prevention.

Section D sets out the voluntary national standards that define specific security and safety measures designed primarily to reduce the risk of robbery, albeit with the additional benefit of helping to reduce the risk of other forms of violence. Operators are encouraged to apply appropriate security and safety measures for each shop based on the findings of a shop-specific risk assessment.

Section E covers the voluntary national standards on training which are critical to the successful implementation of the standards.

Section A: National Standards - Violence in the Workplace

1 Policy Adoption

1.1 LBOs are generally safe places for staff and customers, but some LBO staff, like other staff in the retail sector, experience incidents of violence in the workplace. LBO operators will take all reasonable steps to prevent and respond to incidents of violence, up to and including reporting incidents to the police for possible prosecution.

1.2 The risk to staff from violence in the workplace needs to be included in the wider risk assessment process. Protecting the welfare of LBO staff going about their business is just as important as managing the risk of LBO robbery.

1.3 Many of the security measures put in place to protect against robbery also reduce the risk of physical injury to LBO staff. However those measures do not rule out the possibility of staff facing abuse or aggression which can have negative consequences both for the individual and for the business.

1.4 Facing assault, abuse or aggression or having to work in an intimidating environment is not “part of the job” and all reasonable measures should be taken to reduce the risks of these incidents.

2 Consequences of Violence in the Workplace

2.1 Work-related violence has serious consequences for employees, the businesses they work for and the wider community.

2.2 *Consequences for employees*

2.2.1 Victims may suffer both physical injury and psychological harm including anxiety and stress. The cumulative effect of sustained verbal or physical abuse can wear someone down, both mentally and physically. Even if other members of staff seem to be coping, some individuals may experience feelings of isolation, fear, anxiety, suffering, humiliation, loss of confidence, reduced self-esteem and de-motivation.

2.2.2 Stress arising from violence in the workplace can damage physical health, social relationships and the way people function at work and at home. Stress can manifest itself in a range of symptoms including the following:

- i. physical signs like headaches, insomnia, indigestion, high blood pressure, alopecia, loss of appetite;
- ii. emotional factors such as irritability, lack of concentration, anxiety, loss of confidence, low morale;
- iii. behaviour aspects such as poor work performance, accidents, poor relationships at home and work;
- iv. abuse possibly leading to dependence on tobacco, drugs and alcohol;
- v. immediate, and often long-term disruption to interpersonal relationships;
- vi. if the situation persists, physical illness, psychological disorders.

It is important to remember that these symptoms may have nothing to do with stress but they are often danger signs which should not be ignored.

Stress may - if unrelieved – ultimately contribute to other physical and psychological disorders including clinical depression.

2.3 *Consequences for business*

2.3.1 For employers violence in the workplace can represent a real financial cost through:

- i. low staff morale contributing to high staff turnover. This in turn may affect a business' profitability and even its viability;

- ii. low staff morale contributing to poor staff performance, reducing revenues and increasing costs;
- iii. increased commercial insurance premiums;

- iv. sick pay for staff who are absent as a direct or indirect result of violence in the workplace;
- v. compensation claims, including not only the value of the claim itself and any legal fees but also the management time required to deal with it;
- vi. damage the company's image which may make recruitment more difficult and/or costly.

2.4 *Consequences for the wider community*

2.4.1 The costs of dealing with the impact of violence in the workplace include:

- i. costs of health care and long-term rehabilitation for victims;
- ii. costs of unemployment and retraining for victims who lose or leave their jobs;
- iii. breakdown of trust in society.

3 Developing a Policy on Violence in the Workplace

3.1 All LBO operators are expected either to develop a separate policy on violence in the workplace issues or to incorporate the elements of such a policy into existing health and safety policies. This document provides references to source material that should help to enable all operators to develop their own policy on violence in the workplace.

3.2 A policy document should include the following:

- i. a definition of violence in the workplace;
- ii. a commitment to monitoring and reducing the number and severity of incidences of violence which emphasises how seriously this issue is taken by the organisation;
- iii. identification of who within the organisation is involved in the implementation of the policy, a description of their role and responsibilities as relevant to the policy, and noting any links that they may have with relevant third parties;
- iv. general advice on staff behaviour/ prevention advice;
- v. explanation of the risk assessment procedure;
- vi. list of any agreed control measures that can be applied;
- vii. summary of all training available;
- viii. explanation of the reporting procedure and a copy of the relevant form;
- ix. a summary description of the support available to victims.

3.3 Procedures should be reviewed annually or after a serious incident, whichever is the earlier. The policy should be discussed on a regular basis in staff forums.

3.4 Risk assessments should also consider the risk to ancillary staff on the premises (e.g. cleaners, maintenance staff) and visitors and the possible need to make special arrangements to manage any risk of violence towards them.

4 Training

4.1 As part of an employee's induction training, there should be awareness training regarding issues of violence in the workplace. After initial training, staff should:

- i. be aware of the issue of violence in the workplace;
- ii. understand any relevant policies and procedures issued by their employer in order to manage the risk of violence.

4.2 There should be both ongoing and refresher training that should allow staff to:

- i. know how to prevent and reduce violence in the workplace;
- ii. be able to deal appropriately with difficult, aggressive or violent customers.

4.3 The ABB has developed a basic training package on dealing with violence in the workplace. It is necessary for operators to carry out a training needs analysis and either to develop further in house training programmes or identify third party providers who can provide relevant training in conflict management.

4.4 It is reasonable that staff should receive training within their induction programme and on a continuing basis. See Section E.

5 Incident Reporting

5.1 Beyond meeting the business' statutory responsibilities, there are a number of further advantages in encouraging comprehensive reporting of incidents. These include:

- i. it indicates to staff that the issue is taken seriously and that violence in the workplace is not regarded as "part of the job";
- ii. it allows the business to monitor trends, to react to emerging findings and to inform the ongoing risk assessment process;
- iii. it provides a platform for a cultural change if one is needed.

6 The Reporting Threshold

6.1 There is sometimes debate about when an incident should be reported. For example one person may find an incident disturbing or upsetting whereas another may not be affected. To ensure that incidents are readily reported, management should not impose their own threshold, but staff should be encouraged to report incidents which fall within the definition of violence in the workplace provided above. Even if others think the incident is "low-level" but that particular member of staff perceives it to be abuse or aggression then it should be reported.

7 A Clear and Effective Reporting Policy

7.1 LBO staff should clearly understand how to report incidents and to whom. The depth of the report and the response to it should be proportionate to the seriousness of the incident being reported. The reporting process should be standardised with a standard report form and a clear route for the report. It should be clear whose responsibility it is to review and investigate. Reported incidents should be categorised so that internal statistics can be readily maintained and trends monitored.

7.2 It is suggested that the incident report should contain the following information:

- i. form of assault (e.g. weapon, physical, biting, hitting);
- ii. form of abuse or threatening behaviour (e.g. swearing, sexual harassment, racial harassment, damage to the fabric of the building);
- iii. surrounding circumstances of the incident (identifying "flash points", details of witnesses etc);
- iv. timing of the incident;
- v. outside agencies involved/medical attention needed;
- vi. area of incident (e.g. counter, gaming machines, customer area).

7.3 Staff should be confident that a reported incident will be properly considered and where necessary investigated. Feedback on the outcome of any investigation should be made to the person who made the report (even if only to explain why enquiries into an incident could not be progressed any further). Communication is fundamental to the process and is a key agent in cultural change.

7.4 In large organisations with central reporting processes, someone whom the member of staff involved recognises as being within their own immediate line management chain should be given responsibility for liaising with the person who made the report over the incident, including providing feedback and support.

8 Support for Victims

8.1 After an incident a member of staff (or group of staff) may require support. The nature of that support will be governed by the seriousness of the incident. The key points to remember are:

- i. victims of aggression will be affected in different ways and with differing levels of severity;
- ii. sensitive and appropriate support is needed to reduce the suffering of the victim;
- iii. there may be a requirement for further training.

8.2 In the case of more serious incidents, LBO staff should be fully aware of what to do in the immediate aftermath of that incident. This will include immediate medical and welfare support for the victim, having a clear communications strategy (notifying the police, operations room, security staff and relevant managers), preserving evidence at the premises and securing the premises.

8.3 Staff should be given an opportunity to talk openly about the incident, express their feelings and should receive constructive support. People are more likely to cope with an incident, be less afraid, and have increased job satisfaction and commitment, if they get positive support from colleagues and managers. But bear in mind that some people will not wish to talk about the incident, or may wish to do so at a later date.

8.4 Whilst the welfare of the victim is paramount, consideration should be given to the effect on other staff of any reported violence. This includes staff who may not have been involved in the incident or even present at the time that it occurred.

8.5 If it is available, staff could be offered confidential counselling services. These may be offered either in-house or from local professionals such as Victim Support or GP services. Managers should ensure that staff know that counselling is available and encouraged. Where in-house services are offered, employers should ensure staff are fully trained and competent.

8.6 Any time off which may be necessary for recovery should be granted, and sympathetic and supportive contact with victims maintained in accordance with the operator's HR policy. After the victim returns to work, managers will need to continue to lend support and monitor for ongoing effects of the incident.

9 External Agencies

The LBO Manager should liaise with their local police Safer Neighbourhood Team on an ongoing basis. The Safer Neighbourhood Team may be contacted via the local police authority.

10 Conclusions

10.1 Following the advice in this document and meeting the relevant standards will not prevent all incidents happening, but it will reduce risk and enable LBO staff to deal more effectively with incidents.

10.2 Those responsible for developing and delivering policies and procedures in this area can find more information on the HSE website. This includes a “toolkit” at: <http://www.hse.gov.uk/violence/toolkit/index.htm>.

10.3 An example policy that can be used by smaller LBO operators can be found as

Appendix 1.

Section B: National Standards - Risk Assessment

1 The importance of risk assessment

1.1 The standards aimed at robbery reduction are LBO-specific and therefore underpinned by risk assessment. For operators with five or more staff, risk assessments must be in writing, but in any event operators must be able to demonstrate that they have carried out the process. It is a requirement of Regulation 3 of the Management of Health and Safety at Work Regulations 1999 for the significant findings of a risk assessment to be recorded in a retrievable format where the employer has five or more employees. The employee number relates to the entire business not just in one shop, so if the business has five shops all employing one person there is requirement to record the risk assessment findings.

1.2 A standardised process can be used to assess the risk of robbery The ABB believes that it is right to use a risk assessment methodology that will already be familiar to many LBO operators and their staff. The Health and Safety Executive's "five steps to risk assessment" reflects good risk assessment practice. Some operators already have a formalised approach to risk assessment. For example, they use between two (general or enhanced) and five categories of risk.

1.3 Participation in the Safe Bet Alliance does not necessarily entail redesigning existing formal process, but making sure that the operator takes a structured approach to risk assessment.

1.4 The key is following the five steps to risk assessment and determining what preventive or crime reduction measures are appropriate to manage the risks. For ease of reference the steps are:

- i. identifying the hazards;
- ii. deciding on who might be harmed and how;
- iii. evaluating the risks and deciding on precautions;
- iv. recording the findings and implementing them; and v. review.

1.5 Not all LBOs present the same risk. Some LBOs have never been robbed. An LBO may be located in an area where there is little or no business or street robbery. However, the process of carrying out risk assessments must be dynamic to meet emerging circumstances. All risks must be considered.

1.6 The appropriate starting point is proportionate and evidence based standards for all LBOs, with a menu of enhanced measures being used when risk assessment shows that a particular premises presents a greater risk. Where there is a higher level of risk then further measures need to be taken.

1.7 There are a range of professional and factual judgments to be applied when deciding what are the appropriate control measures to be applied in a particular LBO; for example, an analysis of trends and the strengths and weaknesses of particular crime prevention measures. This document assists with that analysis.

1.8 As part of the risk assessment process which should be premises specific, local management and LBO staff must be consulted. An assessment should take account of the age and experience of the staff working in the premises. Younger or less experienced staff may lack the interpersonal skills to effectively manage the risk of violence without the support of colleagues.

1.9 There are two distinct statutory schemes covering staff consultation on health and safety issues: one where unions are recognised by the employer and the other where they are not. As a minimum, it is important to make sure that consultation mechanisms are established which ensure that either all employees or elected representatives of employee safety are consulted. Further details can be found on the HSE website
<http://www.hse.gov.uk/pubns/indg232.pdf>

1.10 In coming to a view about the level of risk, the most simple and objective method for existing shops is to take into account the most relevant and current crime and other statistics and also consider the history of a particular premises in terms of the number and type of incidents to which it has been subjected. For example, if the statistics show that the risk of business robbery and other crime is low and there has been no history of robbery in that shop (say in the past two years) then that shop may be lower risk for robbery. For new shops one should consider the crime statistics and the experience of other similar shops in the immediate area.

1.11 Likewise the identification of a pattern of offences occurring in a particular area may require re-evaluation of the risk in particular shops even if the particular shop in question has not been subject to a serious offence. The number of robberies in a particular area or region endures will be a determining factor when carrying out a risk assessment.

1.12 Following risk assessment, it will be necessary to justify the measures taken to reduce the risk of robbery. The key question is: "Were the measures taken to reduce the identified risk reasonable and proportionate in the circumstances?"

1.13 Whilst the large and medium sized operators have their own professional security staff, other sources of information are local police crime prevention and police Safer Neighbourhood Teams, local Environmental Health Officers and local business crime reduction partnerships. Some of the larger metropolitan forces publish their own business crime statistics at area level.

1.14 Carrying out the risk assessment and taking appropriate action is the responsibility of the operator. Where there are gaps in an operator's knowledge or expertise, then consultation with those external resources identified above is very much part of the process.

1.15 Nobody wants to see a rise in the level of robbery or other incidents in their area and betting operators should give every assistance to local crime prevention and investigating officers, particularly during a spate of local robberies when risk assessments may need to be revised to meet the changing circumstances. Whilst it is hoped that this will never be the case, this does not mean agreeing to requests for the implementation of disproportionate security measures across whole estates as a reaction to a spate of localised incidents.

1.16 A partnership approach should be adopted, but ultimately it is for the operator, having consulted where necessary with those responsible for health and safety compliance and the prevention and detection of crime,

to implement the appropriate measures to reduce risk. Adopting the standards set out below will assist operators to meet their legal obligations. The ABB can help independent members determine their current level of risk from LBO robbery and advise on the suggested measures set out in the tables below. The five steps involve identifying the risk (in this case the real risk of robbery and violence in the workplace), identifying what has been done already to reduce risk, establishing what else needs to be done, and finally who is responsible for delivering the agreed measures and reviewing the process.

1.17 A practical example of this approach in action can be seen on the HSE website. www.hse.gov.uk/risk/casestudies/pdf/bettingshop.pdf

1.18 Crime prevention techniques and methodology obviously come in to play here. Designing an LBO to reduce the risk of robbery (by limiting the opportunity or inclination of a potential offender to commit the crime) or implementing measures to deal with a particular situation and look at making individual betting premises a harder target for attack, is all part of the process.

1.19 However, many medium sized and small betting operators do not have the resources to employ specialist security staff (it is another function of management) nor do they have funds to pay for expensive reviews by security consultants. Therefore following an approach which is already in use by many operators to manage their health and safety risk and spreading simple and effective practice across the whole industry seems sensible. Experience has also shown that Crime Prevention, Licensing Authority and Environmental Health Officers also encourage this approach.

1.20 Whilst all reasonable measures should be taken to reduce robbery and other risks, it is also important to provide support for staff after an incident has occurred consistent with that contained in the Violence in the Workplace Policy.

Section C: National Standards – Crime Prevention

Whilst it is staff that should be encouraged to adopt the following principles, managers must implement and constantly reinforce them.

1 Crime prevention

1.1 Being vigilant - This means maintaining awareness of what is happening in the shop, identifying unusual occurrences or suspicious individuals and not being afraid to report suspicions to the police.

1.2 Giving good customer service - Great customer service reduces the risk of robbery. Building relationships with your existing customers, challenging strangers with a "Can I help you?" and running a clean and efficient shop discourages would be offenders.

1.3 Minimise cash - minimising the amount of cash that an offender can get their hands on is the single most important factor in reducing the incidence of robbery, preventing repeat robberies or stopping a spate of robberies by the same individual or group. This means making sure large amounts of cash are not available at the till and, where available, time delay safes or other dispersal alternatives are used.

1.4 Utilise existing security measures properly - This means following established security procedures, ensuring security equipment e.g. CCTV is working at all times and that security devices where fitted, such as Maglocks are working at all times

1.5 Avoid establishing a routine – staff should avoid banking or emptying machines at the same time and establishing predictable patterns for would be offenders to observe.

1.6 Stay calm and remain passive, but in control – whilst staff should do as the offender asks and never do anything to challenge the offender, there may be things that staff can do which help the situation. For example, breaking eye contact or appearing to comply with instructions while looking at opportunities to preserve evidence. Staff should do no more than they are asked to e.g. staff should not volunteer concealed cash or security processes. This could put colleagues in danger.

1.7 If robbed, the shop must be secured immediately after the incident - The shop is a crime scene where police may be able to recover forensic evidence, including DNA. Staff should preserve the scene by not touching or moving anything and prevent access by members of the public (although this does not mean ushering out those customers who were present during the incident).

1.8 All these principles should be underpinned by staff training.

2 The Ten Principles of Crime Prevention

2.1 Target hardening.

2.2 Target removal.

2.3 Remove the means to commit crime.

2.4 Reduce the payoff.

2.5 Access control.

2.6 Visibility/surveillance.

2.7 Natural surveillance.

2.8 Environmental design.

2.9 Rule setting.

2.10 Increase the chance of being caught.

Section D: National Standards – Security & Safety Measures

1.0 The following voluntary security standards are based on surveys of premises that have been subject to robbery offences, the 10 principles of crime prevention (see Section C), and good practice that is currently adopted within the bookmaking industry.

1.1 An “off the shelf” accreditation scheme for robbery prevention may not necessarily be appropriate for a LBO.

1.2 In tandem with providing proper training (see Section D) sometimes it will be necessary to impose these working practices if it is felt that staff will be better protected by their use.

1.3 The following voluntary security standards are colour-coded as follows:

1.3.1 GREEN represents a standard that UK bookmakers have agreed to work towards as a national voluntary standard.

1.3.2 BLUE represents a guide to best practice that it may be appropriate to implement depending on the findings of a shop-specific risk assessment.

LBO Shop Front

Location	Advice	Standard
Front door	The front door is the first opportunity for controlling entry to the LBO premises. It is important that the door and the doorframe are of sound construction. All locking mechanisms should be regularly maintained and meet relevant BSI standards.	<p>The front door and surround must be of sound construction and locks should meet relevant BSI standards.</p> <p>Where the risk of repeat robbery offences is assessed as significant at the site, an electromagnetic lock maglock or an alternative entry control system should be installed, except in exceptional circumstances. Staff should be trained to ensure these measures work well.</p>
Corporate Signage	It is important that customers and staff are aware of the security used on the premises. It is a legal requirement to clearly advertise the use of CCTV and the reasons for its use. All CCTV usage must comply with Home Office rules.	<p>LBOs must have a clear corporate security notice that details security measures, and includes contact details</p> <p>Where CCTV is operated, the signage must incorporate a CCTV notice, and be compliant with Data Protection Act and Home Office guidelines.</p> <p>Corporate signage and / or VDU screens should indicate to customers that operators may refer offences committed against staff to the police.</p>
Advertising / door/windows	It is important that staff have an opportunity to identify potential risks before they enter the premises. It is also important that members of the public can see into the premises.	Where reasonably practicable, advertising should be restricted to allow for clear viewing into and out of the premises.
Lighting	<p>In some premises the structure and internal layout of the premises prevents clear viewing. In such cases alternative security measures e.g. external CCTV should be considered.</p> <p>External lighting is important to support external CCTV (where installed) and clear vision to aid the use of maglocks etc. Where possible external lighting also assists to identify potential risk during hours of darkness.</p>	Care must be taken to ensure that lighting does not create mirror effects thus reducing visibility for staff.

LBO Shop Floor

Location	Advice	Standard
Furniture	<p>Consideration needs to be given to the type of furniture used within the LBO. Dependent on the risk, furniture may need to be secured to the floor or of such construction that it cannot be used as a weapon or tool for causing damage.</p>	<p>Appropriate furniture must be used in the LBO.</p> <p>Where there is an identified problem consideration should be given to securing furniture or removing portable items e.g. stools.</p>
Customer Desks and writing benches	<p>Desks and benches placed near windows and doors in some LBOs can become attractive to undesirable “customers” e.g. drug dealers. These people cause a number of problems:</p> <p>Scaring off regular customers, Causing local disorder problems.</p>	<p>When particular problems have been identified consideration should be given to the removal of desks and writing benches from front window positions where the structure of the premises permits.</p> <p>Liaison with local police to discuss appropriate action.</p>
Fire exits	<p>Fire exits are another potential entry / escape route for offenders. In some cases fire exits cannot be seen from the cash office. The introduction of alarms on all fire exits will ensure that staff will be aware when fire doors are opened. CCTV will allow the capture of images of persons using the door.</p> <p>Fire doors must not be used as an alternative entrance / exit from the LBO unless it is an agreed exit.</p>	<p>All fire doors must have signage that the doors are only to be used in an emergency only.</p> <p>All fire doors must be fitted with appropriate locking systems.</p> <p>Fire exits not accessible to the public or viewable from the counter must be fitted with an audible alarm.</p> <p>Strengthened fire doors should be fitted as part of all new builds and refits</p>
Toilets	<p>In LBOs where toilets are available to members of the public, staff need to be aware of the potential misuse of the facilities. Robbers have been known to wait in toilets until premises are closed.</p> <p>Where misuse becomes an issue consideration should be given to controlling entry to the toilets or withdrawing the facility.</p>	<p>All toilets must be regularly checked by staff for evidence of misuse and for anyone loitering there at closing</p> <p>Where there is evidence of misuse the management should control access to the customer toilets.</p> <p>Consideration should be given to temporarily withdrawing facilities if the control systems prove inadequate and misuse is evident. This may involve seeking advice from local police.</p>
Gaming Machines	<p>Certain issues can be linked to the operation of Gaming machines: Stolen money being laundered, Underage persons using the machines and</p>	<p>A procedure must be in place that ensures that gaming machines are only opened when staff are sure that it is safe to do so in</p>

	<p>Criminal Damage to the machines and robbery when being emptied.</p>	<p>compliance with company policy. Gaming machines will operate following the policies set out in the ABB Code.</p> <p>Remote control on/off switch for the machines should be in the Cash Office, allowing isolation of the machines.</p> <p>CCTV to cover gaming machine areas and capture images.</p> <p>Company policies must make clear that machines must not be opened if it is not safe to do so.</p>
<p>Signage</p>	<p>It is important that internal signage should reinforce the message of the corporate signage at the points of entry.</p>	<p>Security messages must be prominently displayed in the cash office by means of corporate signage and / or VDUs.</p>
<p>Internal CCTV</p>	<p>CCTV must be in good working order and fit for purpose for which it was installed.</p> <p>CCTV is essential for post robbery investigations. For this reason it is vital that at least one camera is capable of obtaining a head and shoulders image of all persons leaving the premises. A minimum of a second camera is required to see what has happened in the store.</p> <p>All CCTV images to be recorded using frame rates appropriate to the operational requirements.</p> <p>Images must be retained for a minimum period of not less than 14 days.</p> <p>A regular maintenance plan for the CCTV system must be in place</p> <p>All CCTV must comply with the Data Protection Act and should take account of the Home Office / ACPO National CCTV Strategy</p> <p>http://www.crimereduction.homeoffice.gov.uk/cctv/index.htm</p>	<p>CCTV must provide clear images of the counter, entrances and exits. The camera angle, where possible, should capture the general floor area (including gaming machines)</p> <p>Consideration should be given to installation of a covert camera to capture facial images.</p> <p>Processes must be in place to allow police access to images as soon as possible following an incident.</p>
<p>Lighting</p>	<p>Lighting plays an important part in creating an environment that feels safe and secure. Lighting is also essential for the capture of CCTV images.</p>	<p>Internal and external lighting should support high quality CCTV images and recordings.</p>

LBO Cash Office and Counter

Location	Advice	Standard
Counter	<p>The door to the cash office is in many cases the last barrier between the public area and the safe and tills. It is important that this door and the surround are of suitable construction to withstand an attack, and open outward.</p> <p>Where the door to the cash office is a fire door there may be restrictions on the type of door and security used.</p>	<p>Where fitted, doors and door surround must be of sound construction and where possible open outwards. For existing premises where doors open inwards, bolts are acceptable.</p> <p>All cash office doors should be of suitable construction and be secure.</p> <p>Where staff cannot see the exterior a spy hole or clear glass panel must be in place in the cash office door.</p>
Security Screens	<p>Security screens serve two main purposes: prevention of assault of staff and a barrier to stop access to the cash office.</p> <p>Where criminal incidents or risk assessments result in premises being assessed as higher risk, screens should be installed.</p> <p>It is important that the security screen is correctly fitted and of the appropriate type.</p> <p>Re- assessment of the screen situation should take place following a significant incident.</p>	<p>Shops graded as high risk should have a security screen.</p> <p>Security screens should be of an appropriate height and construction to prevent offenders climbing over the screen.</p> <p>The gap between the counter and the bottom of the screen should be sufficiently restricted to make access by customers difficult</p> <p>Where a premise is identified as high risk, consideration should be given to having a full screen.</p>
Hold Up Alarms	<p>A Hold-Up Alarm may be operated to summon urgent Police assistance when an assailant enters a previously defined area with the obvious intention of harming or threatening any person within that defined area. Source: (ACPO 2008)</p> <p>Alarms may be fixed position or discreet personal holdup alarms carried by staff.</p> <p>Where hold up alarms are installed or made available, staff must be trained and confident in the use and operation of the alarm.</p> <p>Alarms must be appropriately placed and regularly maintained.</p>	<p>Staff must have access to a shop telephone capable of direct dialling 999.</p> <p>Following an attack the police should be contacted using 999.</p>

Cash minimisation

Reducing the amount of reward available to offenders is a key crime reduction principle.

A maximum till limit must be identified for each LBO.

A realistic maximum limit for cash in tills must be identified for each store.

The maximum limit must be enforced.

All cash in excess of this limit must be placed in the safe, not hidden in the shop!

It is unlikely that the maximum till limit will need to exceed £300 per till.

Safes and time delay

It may be advisable in certain shops with a high cash turnover to fit a second hidden safe (floor) or a time delay mechanism or insert. Introducing a time delay mechanism or hidden safe reduces the chance of offenders obtaining large quantities of cash from the main safe.

It is highly recommended that all betting offices be fitted with a safe in an appropriate location.

Where safes are used they must be closed and locked at all times when not in use.

If fitted, inserts must remain locked unless in use.

Banking Procedures

Banking should take place as and when required. The following points should be noted. No fixed day or time should be arranged for banking.

Excess cash should be placed in the safe.

Banking must be a random activity not restricted to certain days or times.

Staff uniform including badges must not be visible when banking.

Staff and management must be trained in relation to banking procedures.

Opening and Closing

Opening

Staff should remain vigilant when unlocking the premises, looking for anyone waiting in the vicinity of the premises. If the member of staff is suspicious of any person they should not unlock the shop but move to a place of safety where they can call police.

Staff engaged to open premises should be fully trained and briefed and be given the confidence to delay or cancel opening if they are at all suspicious.

Opening and closing procedures must be introduced and complied with.

If it is safe to do so once the door is opened staff should enter quickly locking the door behind them until they are ready to open the premises to the public.

Closing Time

Good preparation and teamwork is key. A check must be made of all

areas, toilets etc to ensure that no one is concealed within the building. Lock the door with the key don't rely solely on the maglock (where fitted). Now is the only time that the shop's total cash should be fully checked and counted. Lock all cash away in the safe equipment provided.

It is advisable that if there are 2 staff members they leave together and maintain vigilance.

If staff are suspicious of any person they should not leave the building, but wait until the person leaves or call police. Do not leave via back doors onto unlit areas and car parks etc.

LBO Procedures

Location	Advice	Standard
CCTV	CCTV is essential for the identification and conviction of offenders.	<p>Consideration should be given by all operators to installing CCTV when new premises are opened or refitting is undertaken. A rolling programme of increasing CCTV coverage is desirable.</p> <p>All London betting offices should be fitted with internal CCTV (see above)</p>
Training	Training is an essential element for security. Staff need to know what to do before, during and after a robbery. All staff from cleaners to managers and contractors play an essential role in reducing robbery. Appropriate training reduces the risk of injury, reduces the financial loss and improves the possibility of identifying and convicting offenders.	<p>All staff and operational managers and others should receive comprehensive security training to ensure that they are aware of their duties and responsibilities.</p> <p>Training for all staff must be provided in relation to robbery awareness.</p> <p>Refresher training needs to be undertaken at regular intervals</p>
Police Liaison	<p>Liaison with local police officers is always advisable, irrespective of where you trade from and the associated risks.</p> <p>The method of policing has recently changed. With the introduction of Safer Neighbourhood Teams “SNTs” (and their local equivalents in Scotland who can be contacted via the local police station) there is a need for businesses to engage with the police at this local level. The SNT is a valuable resource for addressing local disorder problems, passing information and reassurance of staff and should be encouraged to visit the premises on a regular basis</p>	<p>Establish who is the local Neighbourhood Police Team or equivalent and develop that relationship for advice, visits and support and know the contact number for local police team.</p>
Sharing information	Local Business Watch type schemes do have advantages in reducing crime. The timely sharing of information, the ability to identify local issues before they become problems and the opportunity to communicate with police, local authority and other organisations make the time invested a worthwhile expenditure.	Operators (especially those without dedicated security departments) should share information locally and consider affiliation to their local Business Crime Reduction Partnerships or similar initiatives like Crimestoppers, Betwatch or Facewatch.
Recruitment and retention	It is essential staff are trustworthy and comply with security	A robust recruitment and reference checking process should be in place

of staff	<p>procedures. Staff have access to cash on site and to security procedures and operations.</p> <p>All staff need to be vetted to the appropriate level.</p>	<p>for all potential employees.</p>
Management of Staff	<p>It is important to adopt a pro-active management style that has a positive impact on staff ensuring that they follow procedures at all times. Managers who fail to ensure that security policies are complied with are failing to manage.</p> <p>Disciplinary action should be considered for any breaches of procedure by managers or staff, taking into account all mitigating factors.</p>	<p>Managers must ensure that all staff have access to policies and procedures at all times and that they understand and follow those procedures.</p> <p>Where it is evident that security procedures have not been followed it is advisable that staff involved receive appropriate action in line with company policy.</p>
Property Management	<p>Investment in security equipment can be compromised if it is not correctly installed and maintained. Unfortunately many investigations are frustrated because faulty CCTV has not been reported or remedied and robberies have occurred because of faulty installations e.g. incorrectly fitting maglocks.</p> <p>The shop manager, where possible, should ensure that all security equipment is working correctly and maintained to acceptable standards. Daily and periodic checks should be completed.</p> <p>A detailed log of all work required, date of reporting and date of rectification needs to be maintained by the manager. This log should include, where appropriate, to whom the matter was reported, date and time and outcome of the reported incident.</p>	<p>Security equipment must be correctly installed and maintained.</p> <p>A scheduled check of security equipment must be undertaken and a maintenance log maintained.</p> <p>Internal or external service level agreements should be in place with engineers.</p>
Incident Report Log	<p>Many offenders reconnoitre the premises prior to a robbery to identify what security is in place and how staff are likely to react. It is vital that details of suspicious persons and vehicles are recorded, as these events may be key to any investigation.</p> <p>Where schemes are in place it is important that relevant information is passed to the interested parties.</p>	<p>All LBOs should record suspicious incidents in the shops incident log.</p> <p>Each entry must record the date, time and location of the suspicious activity.</p> <p>Details of suspicious persons must include a description including:</p> <ul style="list-style-type: none"> • gender • age

Excellent Customer Service

Staff should be encouraged to welcome customers at the time they enter the shop. This customer focus may deter offenders who are conducting a pre-raid reconnaissance.

- height
- race
- marks, scars, tattoos, jewellery
- clothing
- items carried
- accent
- vehicle make
- vehicle colour
- registration mark

All staff should be encouraged to acknowledge customers as they enter the shop and maintain a customer focussed approach.

Lone Working

Whilst lone working is sometimes unavoidable and is not necessarily a factor which increases susceptibility to robbery or other violence in the work place, it does in some respects increase the vulnerability of workers.

All operators should have a lone working policy which addresses staff safety.

Operators should only allow lone working once a risk assessment has been carried out and where there is evidence to show that lone working at a particular time of the day is safe.

Where an operator allows lone working managers should maintain regular contacts with lone workers.

Some staff feel more vulnerable when they are working alone and research has shown that lone workers who are subject to incidents take longer to recover and may experience more acute feeling of distress.

Based on the risk assessment the operator should define the minimum number of staff and their experience levels necessary to run the shop securely.

A significant proportion of robberies occur after 1830 in the evening and in shops where the risk of robbery is heightened this factor needs to be taken into account.

Where following risk assessment, lone working is considered appropriate and robbery is a heightened risk then operators should consider additional measures such as remote monitoring systems, controlled entry and hold up alarms.

Secure areas of retreat

Rather than engage with offenders or potential assailants at the counter, where it is safe to do so, it is often effective for staff to retreat to a secure area. This means that the employee avoids contact and retreats to a place of safety within the secure staff area.

Where there is a policy of "secure area" use, staff must be fully trained in procedures.

"Secure areas" may be dual purpose (e.g. back office or toilet), but they must also be fit for purpose with means of outside communication (telephone land line or other communications system) and secure from attack.

Reporting, Action and Feedback

In addition to those matters which must be reported for HSE and Gambling Commission purposes, staff should be encouraged to report all incidents where they have suffered abuse that is personal in nature (as opposed to derogatory comments about the business or its policies). Incidents of sexual or racial abuse should always be reported as should shouting or swearing where the employee feels intimidated by that action.

“Secure areas” doors should open outwards and be fitted with a spy-hole for looking out from inside the safe haven

Operators should have clear reporting processes and procedures which are communicated to staff. Staff clear about who in the business will deal with their report.

Reports should always be actioned and the member of staff given feedback about the outcome of their report.

Data

Data is essential in enabling operators to carry out risk assessments and to monitor trends within their own business (as well as assisting in the monitoring and analysis of industry trends).

The operator shall maintain the following records:

- i. all customer incidents where police are called, including robbery (required for Gambling Commission purposes); and
- ii. incidents which result in an employee being absent (through injury) for more than seven days (required for HSE purposes).

Additionally the operator will provide a formal mechanism for staff to report incidents defined as “violence in the workplace”.

Section E: National Standards – Training

1 The Importance of Training

1.1 Efficient, effective and regular training of staff is crucial to the effectiveness of the implementation of the standards. Without such training staff may be reluctant to deploy certain security measures when an incident takes place, perhaps fearing that offenders may be incited to greater levels of violence. The following aims to provide a useful reference for operators to consider when putting together training programmes, rather than to stipulate mandatory subject matter or the manner in which training is delivered.

1.2 Health and safety law requires sufficient training is provided to all employees to ensure, so far as is reasonably practicable, their health and safety. Training and information must be provided to ensure that the health and safety risks to employees are managed. The risk of violence should be managed in the same way as any other workplace risk and staff need to understand their employer's health and safety policies, expected working practices and procedures for reducing violence and dealing with it. A range of training should be available to staff and managers that is appropriate to their duties and responsibilities.

1.3 All staff and operational managers should receive training that covers comprehensively security practices and procedures, robbery awareness and dealing with issues of violence in the workplace.

1.4 The ABB can provide training packages to operators which deal with reducing robbery risk (including safe banking practices) and dealing with violence in the workplace. As part of the training process, staff should be allowed to discuss their experiences and share their concerns. Where training is provided online, this might be via discussion with their line manager.

1.5 The training should be based on the standards set down in the National Occupational Standards for Prevention and Management of Work-Related Violence. The National Occupation Standards for the Prevention and Management of Work Related Violence are designed to support the development of good practice and awareness in the workplace, and the needs of employers and employees. They have been developed and reviewed in consultation with employers, sector specialists, stakeholders and awarding bodies. They are widely imported into other suites of national occupational standards and mapped to awards and development programmes.

1.6 The list of units included in the Occupational Standards is included in Appendix 4.

1.7 The training must also specifically cover robbery awareness. The training will need to be on-going, covering induction training, further training and refresher training (as set out in Section A, paragraph 4).

2. Conclusion

2.1 Good safety and security starts with people; cleaners to managers all have a vital role in ensuring the safety and security of your premises. Good policies and procedures that all staff understand and comply with are an essential starting point. Implementation of operator wide policies and security measures appropriate to the level of risk faced by the individual LBO will only be effective if staff utilise them properly. These standards are intended to be a starting point for a safer and more secure LBO environment.

2.2 There is a need for operators to continually review and adapt their policies to meet emerging threats and risks to staff, customers and business. The ability of staff to identify and report suspicious activity is vital, as is liaising with the local police and other businesses to identify local problems or trends. Following the standards contained within this document offer no guarantee that incidents will not occur; however these standards are designed to reduce the risk.

2.3 If the ABB can be of any assistance with the implementation of any security initiative please do not hesitate to call on **020 7434 2111**.

1 Background

1.1 [OPERATOR NAME] betting shops are generally safe places for staff and customers, but some betting shop staff, like other staff in the retail sector, experience incidents of violence in the workplace. [OPERATOR NAME] will take all reasonable steps to prevent and respond to incidents of violence, up to and including reporting incidents to the police for possible prosecution.

1.2 Following the advice in this document and meeting the relevant standards will not prevent all incidents happening, but it will reduce risk and enable betting shop staff to deal more effectively with incidents.

1.3 The risk to staff from violence in the workplace needs to be included in the wider risk assessment process. Protecting the welfare of betting shop staff going about their business is just as important as managing the risk of betting shop robbery.

1.4 Many of the security measures put in place to protect against robbery also reduce the risk of physical injury to betting shop staff. However those measures do not rule out the possibility of staff facing abuse or aggression which can have negative consequences both for the individual and for the business (see below).

1.5 Facing assault, abuse or aggression or having to work in an intimidating environment is not “part of the job” and all reasonable measures will be taken to reduce the risks of these.

2 Consequences of Violence in the Workplace (ViW)

2.1 Work-related violence has serious consequences for employees [OPERATOR NAME] and the wider community.

2.2 *Consequences for employees*

2.2.1 Victims may suffer both physical injury and psychological harm including anxiety and stress. The cumulative effect of sustained verbal or physical abuse can wear someone down, both mentally and physically. Even if other members of staff seem to be coping, some

individuals may experience feeling of isolation, fear, anxiety, suffering humiliation, loss of confidence, reduced self-esteem and de-motivation.

2.2.2 Stress arising from violence in the workplace can damage physical health, social relationships and the way people function at work and at home. Stress can manifest itself in a range of symptoms including the following:

- i. physical signs like headaches, insomnia, indigestion, high blood pressure, alopecia, loss of appetite;
- ii. emotional factors such as irritability, lack of concentration, anxiety;
- iii. loss of confidence, low morale;
- iv. behaviour aspects such as poor work performance, accidents, poor relationships at home and work ;
- v. abuse possibly leading to dependence on tobacco, drugs and alcohol;
- vi. immediate, and often long-term disruption to interpersonal relationships;
- vii. if the situation persists, physical illness, psychological disorders.

2.2.3 It is important to remember that these symptoms may have nothing to do with stress but they are often danger signs which should not be ignored.

2.2.4 Stress may – if unrelieved – ultimately contribute to other physical and psychological disorders including clinical depression.

2.3 *Consequences for business*

2.3.1 For [OPERATOR NAME] violence in the workplace can represent a real financial cost through:

- i. low staff morale contributing to high staff turnover. This in turn may affect profitability and even viability;
- ii. low staff morale contributing to poor staff performance, reducing revenues and increasing costs;
- iii. increased commercial insurance premiums;
- iv. sick pay for staff who are absent as a direct or indirect result of violence in the workplace;
- v. compensation claims, including not only the value of the claim itself and any legal fees but also the management time required to deal with it;
- vi. damage the company's image which may make recruitment more difficult and/or costly.

2.4 *Consequences for the wider community*

The costs of dealing with the impact of violence in the workplace include:

- i. costs of health care and long-term rehabilitation for victims;
- ii. costs of unemployment and retraining for victims who lose or leave their jobs;
- iii. breakdown of trust in society.

3 Definition of Violence in the Workplace

3.1 Work related violence is described by the Health and Safety Executive (HSE) as: “Any incident in which a person is abused, threatened or assaulted in circumstances relating to their work”

3.2 Examples of violence in the workplace are set out below:

- verbal abuse, in person, over the telephone or by email;
- unreasonable and/or offensive remarks or behaviour;
- written abuse;
- rude gestures;
- intimidation;
- harassment, including sexual and racial abuse;
- threatening behaviour e.g. squaring-up without physical contact;
- ganging up, bullying and intimidation;
- physical or sexual assault;
- spitting;
- malicious damage to the property of staff, customers or the business.

3.3 The effects of violence in the workplace will vary from individual to individual, however all examples of violence should be treated seriously.

4 Commitment to monitoring and reducing the number and severity of incidents [*OPERATOR NAME*] is committed to monitoring and reducing the number and severity of incidents of violence in the workplace.

5 Key people

The following table identifies who at [*OPERATOR NAME*] is involved in the implementation of this policy, describes their role and responsibilities as relevant to this policy, and notes any links that they may have with relevant third parties:

Staff involved with ViW Policy implementation	Description of role & responsibilities relevant to the ViW policy	Relevant links to third parties (e.g. local Safer Neighbourhood Team)
[INSERT SPECIFIC DETAILS]		

6 Staff behaviour and prevention of violence

6.1 *Be vigilant* – maintain awareness of what is happening in the shop, identify unusual occurrences or suspicious individuals and do not be afraid to report suspicions to the police.

6.2 *Give good customer advice* – great customer service reduces the risk of robbery. Building relationships with your existing customers and challenging strangers with a “Can I help you?” Running a clean and efficient shop. All these help to discourage potential offenders.

6.3 *Minimise cash* – minimising the amount of cash that an offender can get their hands on is the single most important factor in reducing the incidence of robbery, preventing repeat robberies or stopping a spate of robberies by the same individual or group. Make sure large amounts of cash are not available at the till and, where available, time delay safes or other dispersal alternative are used.

6.4 *Utilise existing security measures properly* – follow established security procedures, ensuring security equipment (e.g. CCTV) is working at all times and that security devices where fitted (e.g. maglocks) are working at all times.

6.5 *Avoid establishing a routine* – staff should avoid banking or emptying machines at the same time and establishing predictable patterns for would be offenders to observe.

6.6 *Stay calm and remain passive, but in control* - whilst staff should do as the offender asks and never do anything to challenge him or her, there may be things that staff can do which help the situation. For example, breaking eye contact or appearing to comply with instructions while looking at opportunities to preserve evidence. Staff should do no more than they are asked to e.g. staff should not volunteer concealed cash or security processes. This could put colleagues in danger.

6.7 If robbed, the shop must be secured immediately after the incident. The shop is a crime scene where police may be able to recover forensic evidence, including DNA. Staff should preserve the scene by not touching or moving and prevent access by members of the public (although this does not mean ushering out those customers who were present during the incident).

6.8 All these principles will be underpinned by staff training.

7 Risk Assessment procedure

[INSERT OPERATOR'S RISK ASSESSMENT PROCEDURE]

8 Control measures to be applied

[INSERT SPECIFIC CONTROL MEASURES TO BE APPLIED]. The Safebet Alliance Voluntary Code of Safety and Security National Standards for Bookmakers Section D offers a guide)

9 Summary of available training

(INSERT SPECIFIC TRAINING AVAILABLE TO STAFF). This may include online training available via the web-site of the Association of British Bookmakers www.abb.uk.com)

10 Reporting procedures and documentation

10.1 Betting shop staff should clearly understand how to report incidents and to whom. The depth of the report and the response to it should be proportionate to the seriousness of the incident being reported.

10.2 The reporting process is standardised with a standard report form, a clear route for the report and clear allocation or responsibility for following up.

10.3 It is suggested that the report should contain the following information:

- i. form of assault (e.g. weapon, physical, biting, hitting);
- ii. form of abuse or threatening behaviour (e.g. swearing, sexual harassment, racial harassment, damage to the fabric of the building);
- iii. surrounding circumstances of the incident (identifying "flash points", details of witnesses etc);
- iv. timing of the incident;
- v. outside agencies involved/medical attention needed;
- vi. area of incident (e.g. counter, gaming machines, customer area).

HR	Day 2	<ul style="list-style-type: none"> • contact the employees involved and advise what assistance may be available • consider RIDDOR requirements and file a report if applicable • follow up with EHO as appropriate
	Day 4	<ul style="list-style-type: none"> • arrange external counselling if necessary
	5-28 days	<ul style="list-style-type: none"> • visit employees who are absent due to effects of incident • maintain Company records

10.5 Reported incidents should be categorised so that internal statistics can be readily maintained and trends monitored. The Safebet Alliance Voluntary Code of Safety and Security National Standards for Bookmakers Appendix 5 provides a template for data collection.

11 Follow up

11.1 Feedback on the outcome of any investigation should be made to the member of staff involved (even if only to explain why enquiries into an incident could not be progressed any further).

11.2 Procedures should be reviewed annually or after a serious incident, whichever is the earlier. The policy should be discussed on a regular basis in staff forums.

11.3 Risk assessments should also consider the risk to ancillary staff on the premises (e.g. cleaners, maintenance staff) and visitors and the possible need to make special arrangements to manage any risk of violence towards them.

12 Training

12.1 Employee induction training will include awareness training regarding issues of violence in the workplace. After initial training, staff should:

- i. be aware of the issue of violence in the workplace;
- ii. understand any relevant policies and procedures issued by their employer in order to manage the risk of violence.

12.2 There will be both ongoing and refresher training that should allow staff to:

- i. know how to prevent and reduce violence in the workplace;
- ii. be able to deal appropriately with difficult, aggressive or violent customers.

12.3 The ABB has developed a basic training package on dealing with violence in the workplace. [OPERATOR NAME] will carry out a training needs analysis and either to develop further in house training programmes or identify third party providers who can provide relevant training in conflict management.

13 The reporting threshold

13.1 Staff are encouraged to report incidents which fall within the definition of violence in the workplace provided above. Even if others think the incident is “low-level” but that particular member of staff perceives it to be abuse or aggression then it should be reported.

14 Support for victims

14.1 After an incident a member of staff (or group of staff) may require support. The nature of that support will be governed by the seriousness of the incident. The key points to remember are:

- i. victims of aggression will be affected in different ways and with differing levels of severity;
- ii. sensitive and appropriate support is needed to reduce the suffering of the victim;
- iii. there may be a requirement for further training.

14.2 In the case of more serious incidents, betting shop staff should be fully aware of what to do in the immediate aftermath of that incident. This will include immediate medical and welfare support for the victim, having a clear communications strategy (notifying the police, operations room, security staff and relevant managers) and preserving evidence at the premises (securing the premises).

14.3 Staff should be given an opportunity to talk openly about the incident, express their feelings and should receive constructive support. People are more likely to cope with an incident, be less afraid, and have increased job satisfaction and commitment if they get positive support from their colleagues and managers. But bear in mind that some people will not wish to talk about the incident, or may wish to do so at a later date.

14.4 Whilst the welfare of the victim is paramount, consideration should be given to the effect on other staff of any reported violence. This includes staff who may not have been involved in the incident or even present at the time that it occurred.

14.5 If it is available, staff could be offered confidential counselling services. These may be offered either in-house or from local professionals such as Victim Support or GP services. Managers should ensure that staff know that counselling is available and encouraged. Where in-house services are offered, employers should ensure staff are fully trained and competent.

14.6 Any time off which may be necessary for recovery should be granted, and sympathetic and supportive contact with the victims maintained. After the victim returns to work, managers will need to continue to offer support and monitor for ongoing effects of the incident.

15 External Agencies

[*OPERATOR NAME*] will liaise with relevant local police Safer Neighbourhood Teams

(and/or their equivalents in Scotland) and with EHOs on an ongoing basis.

16 Keeping the policy up-to-date

16.1 more information is available at the HSE website. This includes a “toolkit” at:

<http://www.hse.gov.uk/violence/toolkit/index.htm>.

16.2 [*OPERATOR NAME*] will review this policy annually, and after any especially serious incident.

Appendix 2

Health and Safety Risk Assessment Form - Blank

TEMPLATE RISK ASSESSMENT FORM

Company Name:

Date of risk assessment:

Review Date:

What are the hazards?	Who might be harmed and how?	What are you already doing	What further action is necessary?	Action by whom?	Action by when?	Done

Appendix 3 Health and Safety Risk Assessment Form – Completed Example

Important Note

The following is an example of a shop-specific risk assessment. Risk assessments will vary between different shops, and “further actions” may depend on the actual level of risk identified. For example, in this example shop “furniture is fastened to the floor so that it cannot be used as a weapon or tool”. That will not be necessary in every shop.

EXAMPLE RISK ASSESSMENT OF ROBBERY / VIOLENCE RISKS IN A BETTING SHOP

Company Name: Smith's Betting Office

Date of risk assessment: 01/04/2010

Review Date: 01/04/2011 (or post incident)

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by whom?	Action by when?	Done
Robbery (physical and non- physical violence associated with such incidents)	Staff may suffer ill health such as stress and/or physical injury from threats or physical violence during the event of a robbery	Shop Front f Front door is locked and maintained f Security notices are displayed clearly f Lighting is adequate so that staff can identify risks during hours of darkness	Shop Front f Install an electromagnetic lock (maglock) to control access at high risk times f Allow clear viewing into and out of the premises where possible	Manager		
		Shop Floor/ Office f Furniture is fastened to the floor so that it cannot be used as a weapon or tool f Fire doors are secure f Fire exits are not used as exit (e.g. cigarette break and staff trained on this) f Toilets are regularly checked for misuse f CCTV is installed f Security messages are displayed in the cash office (e.g. staff cannot access the safe) f The door to the cash office is secure and of sound construction and has a spy hole f All staff have immediate access to a telephone capable of dialling 999 f A safe is provided with time delayed access f All excess cash is placed in the safe f Trips to the bank are random with no fixed time and staff are trained in this procedure	Shop Floor/ Office f Control entry to the toilets f Remind staff not to misuse fire exits f Instruct and train staff to lock the front door when gaming machines are being emptied f Adjust CCTV to cover counter, entrance and exit to capture facial images f Consider provision of a full security screen to restrict access and protect staff (consult with staff) f Consider installing fixed or personal hold up alarms and train staff in their proper use (consult with staff) f Introduce a £300 till limit f Provide refresher training for staff in banking procedure	Manager Manager Manager/ staff Manager/ contractor Manager Manager Manager		

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by whom?	Action by when?	Done
Robbery (physical and non- physical violence associated with such incidents) <i>continued</i>		Opening /Closing <ul style="list-style-type: none"> f All areas checked (inc toilets) prior to closing f Door securely locked with key prior to cashing up/ closing procedure starts f All cash is locked away in the safe f Where possible 2 staff leave together f Staff trained to check vicinity before opening / closing f Staff informed to report anything suspicious to 	Opening /Closing <ul style="list-style-type: none"> f Re-train staff in the opening/ closing procedure f Instruct staff never to leave via back door onto unlit area 	Manager Manager		
		Procedures <ul style="list-style-type: none"> f Training is provided to all staff in what to do before, during and after a robbery f Refresher training is provided periodically f All staff are vetted appropriately f All security equipment is logged and checked regularly f All suspicious incidents are logged by staff and if necessary passed to the Police f All staff are trained to acknowledge staff and maintain a customer focused approach to deter potential offenders f Additional safeguards are in place to protect staff when it is necessary for them to work alone (regular contact/ remote monitoring) f A lone working policy is in place with additional control measures to protect staff working alone f Gaming machine procedure in place for emptying (e.g. only when safe to do so) f Post incident support is available to staff as detailed in the Safeset Alliance document 	Procedures <ul style="list-style-type: none"> f Extend training to cleaning staff f Establish contact details for the Police and ensure all staff are aware. Encourage them to visit and provide advice and information f Review lone working arrangements (consider additional measures to make staff feel less vulnerable) f Utilise the back room as a place of safety for staff to retreat by providing a telephone line, door lock, spy hole and train staff in correct use f Introduce a mechanism for staff to report all violent incidents 	Manager Manager & staff Manager Manager & staff Manager		

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by whom?	Action by when?	Done
Assault, abuse and anti-social behaviour (verbal abuse, offensive behaviour, written abuse, rude gestures, intimidation, harassment, racial & sexual abuse, physical assault, malicious damage to property of staff customers or the business)	Staff may suffer ill health such as stress or physical injury from assaults, threats or abuse, etc from members of the public	<ul style="list-style-type: none"> f Staff are aware informed that such incidents are not tolerated and are trained in reducing such occurrences f All staff are encouraged to acknowledge customers as they enter the shop f Staff are encouraged to report incidents which they find offensive or threatening and feedback is provided about the outcome of their report 	<ul style="list-style-type: none"> f Display signage to inform customers that offences committed against staff may be referred to the Police f The number and type of incidents will be monitored, introduce procedure f Further training to be provided so that staff know what to report, who to report to and what action will be taken 	Manager Manager Manager		

* Local Police Safer Neighbourhood Teams

Appendix 4**National Occupational Standards for
Prevention of Work Related Violence (“WRV”)**

Detailed below is the catalogue of learning units. For further information contact the HSE hotline 0845 345 0055 or visit <http://www.hse.gov.uk/violence/information.htm>

UNIT CATALOGUE

Unit Number	Unit Title
WRV 1	Make sure your actions contribute to a positive and safe working environment
WRV 2	Protect yourself from the risk of violence at work
WRV 3	Identify, assess and review the risk of violence to workers
WRV 4	Develop effective policies and procedures for minimising the risk of violence to workers and review their effectiveness
WRV 5	Implement policy and procedures to reduce the risk of violence at work
WRV 6	Promote a safe and positive culture in the workplace
WRV 7	Resolve and evaluate work-related violent incidents
WRV 8	Support individuals involved in violent incidents at work
WRV 9	Investigate and evaluate incidents of violence and work
WRV 10	Make sure communication is effective following an incident of violence at work
WRV 11	Develop and maintain an effective management information system for incidents of violence at work
WRV 12	Managing aggressive communication within an organisation
WRV 13	Make sure your own actions minimise the risks of aggressive communication
WRV 14	Managing lone working

Appendix 5 Model Data Collection

Monthly Summary of Reported Incidents (Month)

Incident type	Number of reported incidents
Assault – customer on staff	
Assault – customer on customer	
Robbery – attempted	
Robbery – actual	
Criminal damage – retail	
Criminal damage – gaming machines	
Aggressive or abusive behaviour	
Total for month	

Appendix 6 List of Resources, References & Websites

Organisation		Reference
Association of British Bookmakers (ABB)		www.abb.uk.com 020 7434 2111
BIS	Employment Regulations 2003	www.bis.gov.uk/whatwedo/employment/discrimination/emp-equality-regs-2003
BRC	British Retail Consortium	http://www.brc.org.uk
Community Union		0800 389 6332
Crimestoppers		www.crimestoppers-uk.org 0800 555 111
HSE	Work related violence toolkit:	http://www.hse.gov.uk/violence/index.htm
	LBO example risk assessment:	http://www.hse.gov.uk/risk/casestudies/pdf/bettingshop.pdf
	Training Information	http://www.hse.gov.uk/business/training.htm http://www.hse.gov.uk/pubns/indg.163.pdf
	Risk Assessment	http://www.hse.gov.uk/involvement/index.htm http://www.hse.gov.uk/pubns/indg73.pdf http://www.hse.gov.uk/pubns/hse31.pdf http://www.hse.gov.uk/pubns/indg345.pdf
	Employee Involvement	
	Working Alone Safely	
	Information and guidelines	
ICM	Institute of Conflict Management	http://www.conflictmanagement.org/icm/
Occupational health helpline		020 7203 1871
RIDDOR	Reporting	http://www.riddor.gov.uk

Scottish Centre for
Healthy Working
Lives

<http://www.healthyworkinglives.com>

Advice line: 0800 019 2211

TUC

Trade Union
Congress

<http://www.tuc.org.uk>

Victim Support

<http://www.victimsupport-gm.co.uk/index.html>

Appendix 7 Example Incident Report Form

Name of staff member and Job Title _____

Date _____

Time _____

Location of Incident _____

Type of incident, whether face to face or by telephone:-

Assault – customer on staff Assault – customer on customer Robbery - attempted

Robbery - actual Criminal damage - retail Criminal damage – gaming machines

Aggressive or abusive behaviour

Any other form of violence please describe below

Account of what happened (including details of injuries and damage)

Name of Assailant (or description if name unknown, see overleaf)

Names and contact details of witnesses

Further investigation required

Date RIDDOR form submitted to Enforcing Authority _____

Police incident No. (if applicable) _____

Details of preventative measures implemented to prevent recurrence

Date employee informed of preventative measures taken to prevent recurrence _____

Working time lost _____

Line Manager / Responsible Person Signature _____ Date _____

If the attacker or aggressor is not known please use the pro forma overleaf to give as much information as possible as to their description

(Continued)

Description of person responsible

Sex	Male	<input type="checkbox"/>	Female	<input type="checkbox"/>						
Age	Under 16	<input type="checkbox"/>	16-24	<input type="checkbox"/>	25-50	<input type="checkbox"/>	over 50	<input type="checkbox"/>		
Build	Slim	<input type="checkbox"/>	Medium	<input type="checkbox"/>	Heavy	<input type="checkbox"/>				
Ethnic Appearance	White	<input type="checkbox"/>	Asian	<input type="checkbox"/>	Black	<input type="checkbox"/>	Mixed	<input type="checkbox"/>		
Facial Hair	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>						
Glasses	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>						
Hair Colour	Blonde	<input type="checkbox"/>	Brown	<input type="checkbox"/>	Black	<input type="checkbox"/>	Grey	<input type="checkbox"/>	Bald	<input type="checkbox"/>
	Red	<input type="checkbox"/>	Dyed	<input type="checkbox"/>						

Please describe.....

Accent	Local	<input type="checkbox"/>	Other (please				
	state).....	<input type="checkbox"/>	Tattoo	Yes	Please		
	describe.....	<input type="checkbox"/>					

Scar **Yes** **Please describe.....**

Clothing please describe
.....
.....
.....

..... Other Witnesses	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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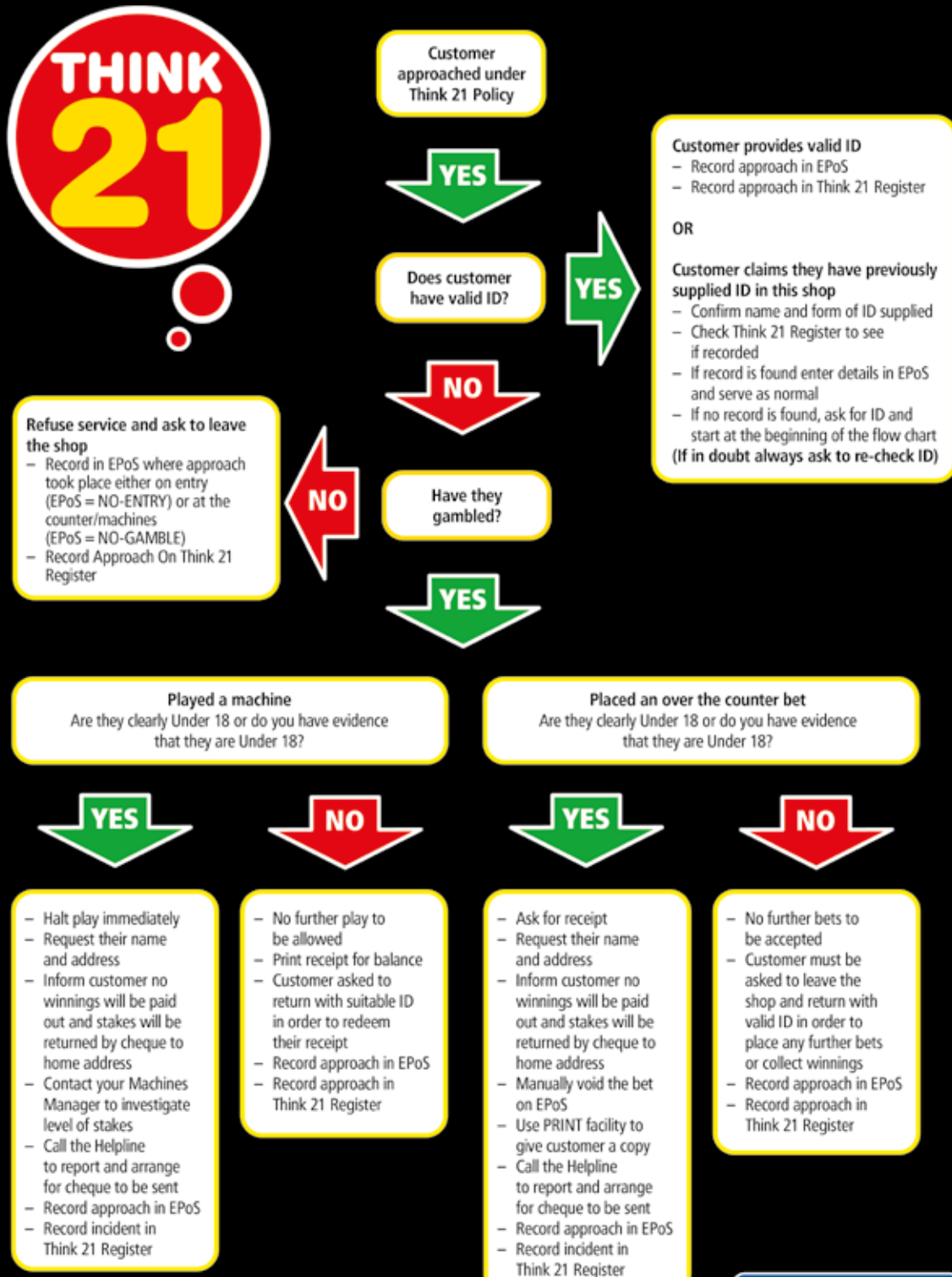
If yes, please give details

For further information, please contact the ABB on 020 7434 2111 or email mail@abb.uk.com

Think 21 Policy

SHOP TEAM PROCESS

YOUNG STRANGER = ASK FOR ID



March 2012

Think 21 Policy



- To ensure that the 'Under-18' law is complied with at all times Coral operates a Think 21 Policy which requires that all customers who appear to be under 21 are approached and their age verified by the production of the appropriate valid ID document.
- If you are in any doubt of a customer's age then remember '**Young Stranger**'. If the customer is young and a stranger to you, they should **always** be challenged for proof of age.
- Acceptable forms of documentation include:
 - Any ID carrying the PASS logo (eg Citizen Card, Validate UK, Connexions Card)
 - Full Driving Licence with photocard
 - Provisional Driving Licence with photocard
 - UK or International Passport
 - Military Identification Card
- For examples of these documents please refer to 'ID Acceptance' later in this section
- If ID cannot be produced in accordance with the above, then the customer should be politely requested to leave the premises with the incident subsequently recorded in the Think 21 Register.
- The Think 21 signage should be positioned in accordance with the instruction given at the end of this section and displayed in conjunction with existing signage, which is still a legal/Coral display requirement.
- As part of Gambling Commission reporting requirements, all challenges under the Think 21 Policy must be recorded as either related to 'Entry' into the shop or an attempted 'Gamble' whilst within the shop.
- The Gambling Commission and Local Licensing Authority may conduct Test Bet purchases to assess whether or not Coral shops are allowing under-18's to enter or gamble on the premises. If at any time shop staff are informed that they have been the subject of a Test Bet purchase (pass or fail), this should be immediately reported to your Area Manager and the Security Department on **020 3288 7888** (refer to Section 4 - Think 21 Test Bet Procedure).

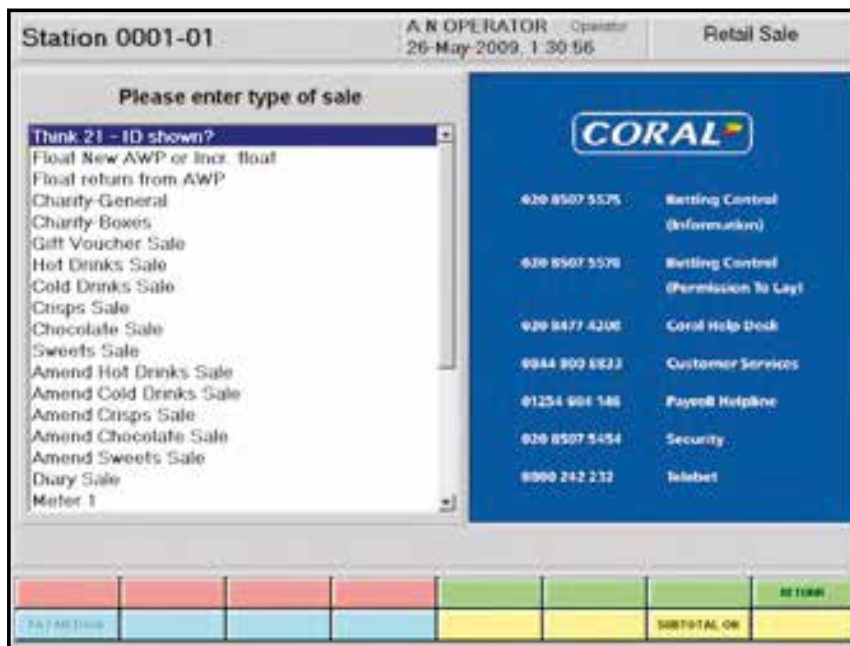
- In the event that the above is conducted by an Official from the Authority (as opposed to an underage accompanied representative), please also notify the appropriate department in accordance with the procedure outlined in Section 9 ('Who can visit my shop?').
- The following pages document the procedure that must be followed in respect of all approaches under the Think 21 Policy. Details are also provided in the 'Gambling Act 2005' section of the Coral Retail Directory.
- All staff should be aware that the potential consequences of breaching the Think 21 Policy (through an internal or external authority test purchase), could result in any or all of the following:
 - Staff Disciplinary Action (potential Gross Misconduct)
 - Prosecution fine (up to £5,000), 51 weeks imprisonment, or both (note: an individual can be prosecuted as well as the company)
 - Review and potential revocation of the Premises Licence
 - Senior Manager loss of Personal Management Licences
 - Company loss of Operating Licence

Think 21 Procedure

1. A customer is approached and provides suitable ID - the following two actions must be taken:

a) Record the approach in EPoS as follows:

- Select 'Admin'
- Select 'Retail Sales'
- Select 'Think 21 – ID shown?' should be at the top of the list and highlighted
- Press 'Enter'
- Screen shows 'Please enter sale amount'
- Enter '1' (ie 1p) and press 'Enter'
- Screen shows 'Was ID provided? YES/NO'
- Enter 'YES' and press 'Enter'



b) Record on the Think 21 Register providing the following details:

- Date & time
- Name of customer
- Type of approach (ie ENTRY or GAMBLE)
- Type of ID supplied
- Employee name
- Position (ie SM, DM, AM, CSA)

2. A customer is approached after entering the shop or is loitering in the general shop area and does not provide suitable ID, the following three actions must then be taken:

a) All service must be refused and the customer politely asked to leave the shop

b) Record the approach in EPoS as detailed below:

- Select 'Admin'
- Select 'Retail Sales'
- Select 'Think 21 – ID shown?' should be at the top of the list and highlighted
- Press 'Enter'
- Screen shows 'Please enter sale amount'
- Enter '1' (ie 1p) and press 'Enter'
- Screen shows 'Was ID provided? YES/NO'
- Enter 'NO - ENTRY' and press 'Enter'

c) Record on the Think 21 Register providing the following details:

- Date & time
- Name of customer
- Type of approach (ie ENTRY)
- Type of ID supplied
- Employee name
- Position (ie SM, DM, AM, CSA)

If the customer refuses to leave the premises when requested the police should be called to assist.

3. A customer is approached at the point of attempting to gamble (presenting a slip or about to play a machine) and does not provide suitable ID, the following three actions must then be taken:

a) All service must be refused and the customer politely asked to leave the shop

b) Record the approach in EPoS as detailed below:

- Select 'Admin'
- Select 'Retail Sales'
- Select 'Think 21 – ID shown?' should be at the top of the list and highlighted
- Press 'Enter'
- Screen shows 'Please enter sale amount'
- Enter '1' (ie 1p) and press 'Enter'
- Screen shows 'Was ID provided? YES/NO'
- Enter 'NO-GAMBLE' and press 'Enter'

c) Record on the Think 21 Register providing the following details:

- Date & time
- Name of customer
- Type of approach (ie ENTRY or GAMBLE)
- Type of ID supplied
- Employee name
- Position (ie SM, DM, AM, CSA)

If the customer refuses to leave the premises when requested the police should be called to assist.

4. A Customer is approached, has no ID but states they have previously provided ID.

- Regardless of whether or not the customer states they have previously provided ID, if they are not known to you or any other member of staff on duty at the time of the approach, they must provide valid ID again to be able to remain on the premises
- This is to prevent an underage individual from trying to gain access by referencing details of a person or friend he may know has previously provided us with valid ID
- As the customer has no ID, they should politely be asked to leave the premises until such time that they are able to return with valid ID
- Follow either step 2 or 3 depending at which point the customer was approached
- If having left the premises the customer then returns with valid ID, this should be recorded as normal in accordance with step 1

5. A Customer is approached under Think 21 and has already managed to place an 'Over The Counter' (OTC) bet or is presenting a winning slip:

- Customer age must be checked and recorded following step 1
- If ID supplied – continue service
- If ID cannot be supplied – no further bets must be accepted. The customer must be asked to leave the shop and return with appropriate ID in order to redeem their winnings or place a bet. The incident should then be recorded following step 3

6. A Customer is approached under Think 21 and is playing the Gaming Machines:

- Customer age must be checked and recorded following step 1
- If ID supplied – allow play to continue
- If ID cannot be supplied – play must be halted and a receipt for the balance must be printed

The customer must be asked to leave the shop and return with appropriate ID in order to redeem their receipt. The incident should then be recorded following step 3

7. An individual who is clearly under 18 or we have evidence that they are under 18

If the individual is on the premises but not yet placed a bet or played on the machine they must be asked to leave the premises immediately

a) Record the incident in the Think 21 Register detailing the following:

- Date & time
- Type of approach (ie ENTRY or GAMBLE)
- Reason customer is known to be under 18
- Employee name
- Position (ie SM, DM, AM, CSA)

b) Record in EPOS

8. A customer enters the shop with a Child (includes baby in a pram/pushchair)

- The Customer should be politely informed that it is against the law for a child to be on the premises even if they are only accompanying an Adult.
- The Customer should be politely asked to leave the premises and asked to return without the child, at which time we will be able to serve them.
- The incident should be reported as per step 7.

9. An individual who is clearly under 18 or we have evidence that they are under 18 and has placed an Over The Counter bet

a) Complete the following actions:

- Request the receipt from the underage person
- Request their name and address
- Inform the customer that no winnings will be paid and their stakes will be returned by cheque to their home address
- Manually void the bet in EPoS
- Using the print facility in EPoS, print a copy receipt and give it to the customer
- Call the Helpline who will arrange for a cheque to be issued to the underage person

b) Record the following information in the Think 21 Register

- Date & time
- Reason the customer is known to be under 18
- Void slip number
- Employee name
- Position (ie SM, DM, AM, CSA)

c) Record in EPoS

10. An individual who is clearly under 18 or we have evidence that they are under 18 and has played or is playing a Gaming Machine:

a) Complete the following actions:

- Play must be halted immediately
- Request their name and address
- Inform the customer that no winnings will be paid and their stakes will be returned by cheque to their home address
- Call your Machines Manager to establish the level of customer stakes. This may require further investigation
- Call the Helpline who will arrange for a cheque to be issued to the underage person

b) Record the following information in the Think 21 Register:

- Date & time
- Reason the customer is known to be under 18
- Incident (OTC bet or Machines played)
- Employee name
- Position (ie SM, DM, AM, CSA)

c) Record in EPoS

Frequently Asked Questions

Who should I challenge to provide me with ID proof of age?

Any **'Young Stranger'** who enters the premises regardless of how old they look.

When should I challenge them?

Ideally as soon as they first enter the premises, but if you are dealing with a customer at the time, as soon as possible thereafter.

What are the acceptable forms of ID?

Any valid document from the following list: identification carrying the PASS logo (e.g. Citizen Card, Validate UK, Connexions Card), Full Driving Licence (with Photocard), Provisional Driving Licence (with Photocard), UK or International Passport, Military Identification Card. If you are unsure as to whether or not the ID offered by the customer is acceptable, please contact the **Helpline** on **020 3288 7997** for clarification.

What shall I do if someone does not provide ID and will not leave the shop?

Inform them that we are implementing our Think 21 Policy and if they do not leave the shop you will call the Police to assist in removal

What happens if someone provides ID that does not have the PASS logo?

We only accept forms of ID as listed in the Think 21 Policy or that which includes the PASS logo. They must return with the correct ID for verification before any bets can be accepted

Why do I have to record the Under 21 approach in EPoS and the shop Register?

It is important that we can provide the Gambling Commission with evidence that we are implementing the Think 21 Policy.

- The info via EPoS allows us to collate the information centrally.
- The register is needed for your AM to check you are managing the policy and for any Gambling Commission or Licensing Officer visits who will check your register

What do I do if I identify a person who I know is clearly under 18 but have not placed a bet?

They must be asked politely to leave immediately and the incident should be reported as detailed in the Think 21 Policy.

What do I do if a person informs me that they are under 18 and have been playing the machine or placed an OTC bet?

No winnings must be paid out. Ask the youth to verify that they are under 18. If you are satisfied that this is the case, please follow the process as outlined in points 9 and 10 of this section.

What shall I do if a customer who is over 18 objects and complains that they do not carry ID?

Explain to them that we are following the Gambling Commission guidelines and implementing the Think 21 Policy and that they are unable to continue to enjoy our facilities unless they are able to provide ID to prove they are legally entitled to enter a betting shop.

I am on my own in the shop, and am serving other customers when I see a person enter who looks 21. What action should I take?

Serve the customers in the queue but at the earliest opportunity approach the customer and ask them for their ID – then follow the Think 21 procedure as normal.

If a person under the age of 18 has placed a bet or has played a machine and subsequently returns to collect their winnings with an adult over the age of 18 – should I pay the winnings?

No - The person who placed the bet is under 18 and is only therefore entitled to have their stake money refunded.

How do I distinguish someone who is 'clearly under age'?

Examples of a person 'clearly under age' would be a child accompanying an adult (including those in a pushchair/pram) or young person (e.g. 16 or 17 year old) who comes into the shop (with or without an adult). You may already have previous evidence that they are under 18 because they are known to you, or the ID they previously provided showed them as being under 18.

In all such instances the young person (or adult accompanying the child) should be asked to leave the premises immediately (without being served), with the incident recorded in EPOS and in the Think 21 Register.

ID Acceptance

- Many 'young persons' effectively breach the Gambling Act 2005 by either entering our shops innocently (often alongside a parent) or deliberately, not knowing that by doing so they themselves are also committing an offence
- Whilst our Think 21 Policy has been implemented to help us manage age verification, there is an ever-increasing array of fake ID cards being presented to staff, which are obtained via the internet by 'young persons' intentionally seeking to enter our premises and gamble whilst underage
- Unfortunately the onus is on us to identify and refuse such fake ID when offered, as it is not currently an offence for companies to produce and market this (many are just sold as 'novelty items')
- As mentioned at the start of this section, we accept any of the following valid ID documents **ONLY** with which to verify 'Proof of Age':

Any ID carrying the 'PASS' logo



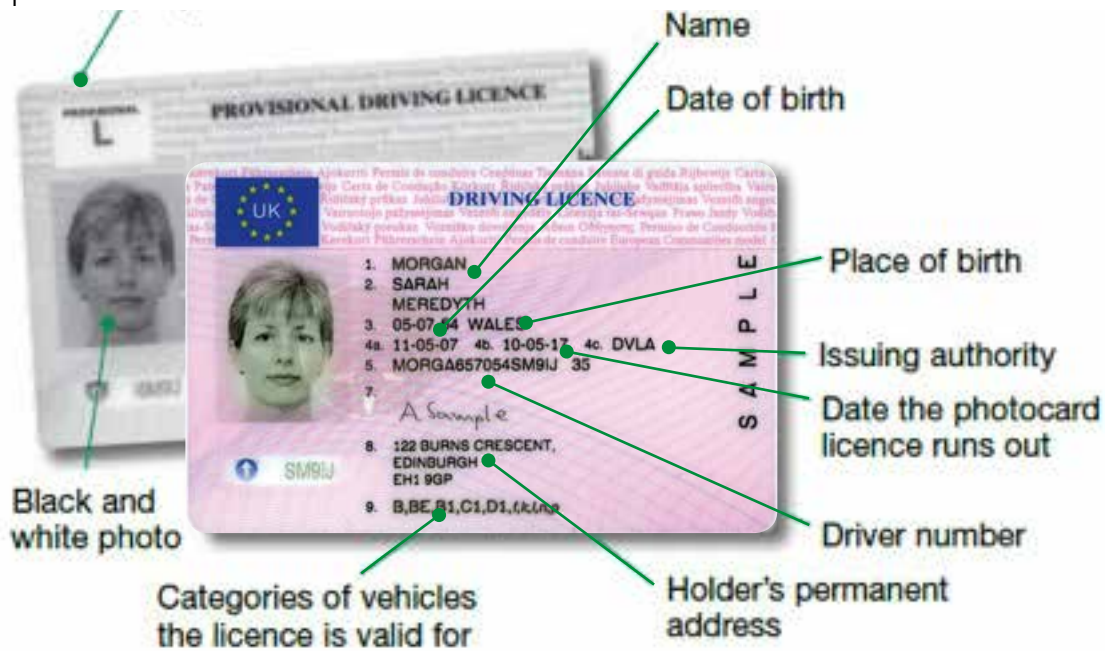
- **Check the PASS hologram:** Ensure flush to card, 3D hologram effect, tick on the 'A'
- **Check the photograph:** Printed directly on the card and of the person presenting it
- **Check the date of birth:** Printed directly on the card – is there an 18+ logo on the card? If not you still need to check the date of birth quoted to ensure the holder is over 18
- **Check the card:** Has it been tampered with or altered? Feel the card – it should be completely smooth
- **Check the person:** If you're still unsure about a person's age, your legal responsibility is to refuse entry/service

Remember - whilst an acceptable form of ID, PASS cards only guarantee that the holder is over 18 if they either state this or carry the 18+ logo (as above). On cards without this you still need to check the date of birth quoted to verify that the holder is actually over 18.

Full or Provisional Driving Licence with Photocard

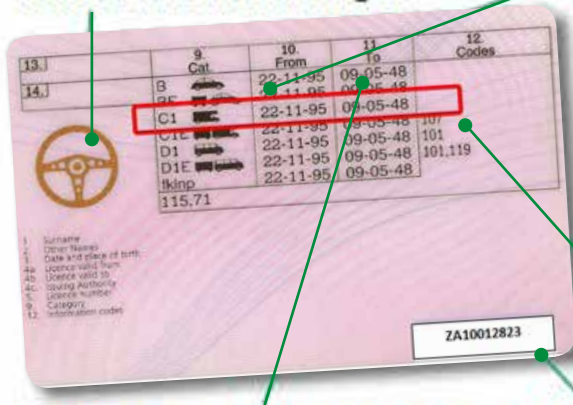
(Front)

A letter L on the provisional photocard confirms that the holder is a learner driver. The symbol is shown on all provisional photocard driving licences issued since September 1999.



(Back)

The steering wheel is a security feature. It changes colour when viewed at a different angle.



The date your entitlement to drive a category of vehicle starts. The '<' = 'earlier than' symbol (if shown) means that the date shown has been worked out using the earliest information available.

Information Codes

Any codes printed here indicate what (if any) restrictions apply

The date your entitlement to drive each category of vehicle ends. The last two figures refer to the year (for example, 34 is 2034). Categories you have provisional entitlement to drive are shown on the paper counterpart document.

Unique card identifier, used to link the photocard and the counterpart document.

Differences between old version of DL (issued April 1999 - June 2011) and new version

- Photo - Old = colour; New = black and white
- Paper counterpart - Old = pink and blue; New = pink and green

Security Features

- New version - UV feature shows royal coat of arms on the front of the card
- The front also incorporates 3 separate holograms plus inscribed steering wheel logo
- On the back of the new card, inverted triangles enclose the DVLNI logo and shows as fluorescent green under UV light

UK (or International Passport)

- Photograph digitally printed
- Page 31 and 32, sewn in, clear laminate with UV visible printing and holograms on page 31
- 9 Digit ID number printed on page 1 and perforated through pages
- The stitching thread is red, white and blue and fluoresces yellow and red in UV light
- An electronic chip and antenna is visible on page 32 (page 48 in business passports)
- The holograms are on three patches attached to the underside of the laminate on page 31
- The front and rear endpapers are printed in green, burgundy and blue intaglio (raised printing)

Changes to the UK Passport with effect from October 2010



UK passports have contained an electronic chip with the owners details since 2006. This will now be invisibly embedded in a thicker front cover, rather than in a separate page as pictured. It means the chip will be harder to replace without damaging the cover.



The passport holder's details are now spread over two pages with two images, one of which is covered with a transparent film containing holograms. It also now appears at the front of the passport, in common with other countries in Europe to help speed up passage through border controls.



The inside pages now have a variety of 10 designs showing well-known UK landmarks including the Giant's Causeway (pictured right) which stretch across both pages. The paper used contains multi-coloured fibres which make it more difficult for anyone to copy.



The inside front cover also has a new design - regularly changing the images and making them more detailed makes it harder for forgers to copy, although there's been no change in the wording, which still requests permission for the bearer "to pass freely without let or hindrance".

International Passport Example

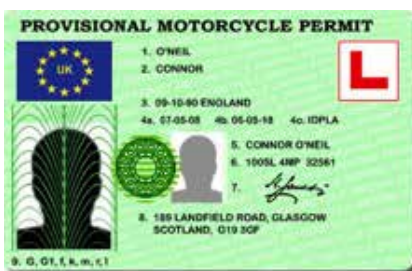


Military Identification Card



Recognising 'False ID'

- The term **'Fake ID'** is a general term for an unlawful copy of a genuine document, or a document which is a form of ID that does not exist (e.g. UK National Identification Card)
- The term **'False ID'** is a general term to include the above as well as the misuse of another person's genuine ID
- Fake ID comes in many different forms as shown below and for ID related to driving, the word 'Permit' is often used.



Reporting False ID

- To prevent unnecessary confrontation between customers and staff, Coral does not require false ID, when identified, to be seized (unless otherwise instructed)
- Customers presenting false ID should be politely asked to leave the premises and return with one of our accepted forms of ID documents
- Details of the challenge (including the type of false ID presented), should be recorded on the Think 21 register in this section.
- Advise your Duty Manager who will notify the Security Department on 020 3288 7888

Think 21 HR Policy

What constitutes a breach of Coral's Under 21 Policy?

Coral are legally obligated to follow the requirements specified by the Gambling Act 2005 and the Gambling Commission. A key element of the legislation is the need to operate responsibly and to ensure that all of our customers are of the legal age to gamble.

The Coral Disciplinary Policy May 2010 incorporates actions to be taken specifically related to underage gambling and this document provides further details of what constitutes a breach of Coral's Think 21 Policy.

The following are considered to be Gross Misconduct under the Disciplinary Policy: -

- 1) Allowing an individual who appears to be Under 21 to remain on the premises, without obtaining the relevant proof of age identification confirming that they are over 18.
- 2) Allowing an individual who appears to be Under 21 to remain on the premises once they have been asked for and subsequently failed to produce proof of age identification OR promises to bring in the documentation on their next visit.

To assist with the prevention of this:

- All shop team members who are on duty have a responsibility to ensure that all individuals who appear to be Under 21 are asked for proof of age identification.
- All Shop Managers are responsible for ensuring that their shop team members have been fully trained and briefed and are fully implementing the Coral Think 21 Policy.
- All Retail Line Managers have a responsibility to ensure that their Shop Managers are fully trained and briefed and are fully implementing the Coral Think 21 Policy.

The Disciplinary Policy states that "Gross Misconduct is generally regarded as misconduct serious enough to destroy the basis of the relationship between employee and employer, making further trust and confidence impossible, therefore warranting dismissal without prior warning or notice."

Specific actions within Coral that may constitute Gross Misconduct include:

- Failure to adhere to Coral's Think 21 procedure and seeking proof of age where the customer appears to be under the age of 21.

Potential breaches of Gross Misconduct may result in a period of suspension whilst an investigation is conducted and could lead to summary dismissal; that is dismissal without notice or payment in lieu of notice.

It is business critical that the procedures relating to Think 21 are adhered to and all employees working in the retail estate have a responsibility to ensure that this is carried out at all times. The consequences of breaching the procedures can be very serious, not just for the business, but also for the employee and it is therefore imperative that we adhere to and follow the procedures at all times in order to safeguard our licences and future employment.

REMEMBER

If you fail to comply with the Think 21 policy or any other policy outlined in this Directory, it could lead to serious consequences for you, your shop and for Coral as a company.

Coral Shop Think 21 and other Legal Signage

- The following material has been produced to support the Company's Think 21 Policy and should be displayed as indicated below. For images and ordering details, please refer to the Shop Posters, Leaflets and CCD forms section of this Directory.

Item	Display Location
Think 21 door vinyl	Outward facing on the front door glass or in a window close to the door, ideally in line with the open times sign.
Think 21 A4 internal sign	To be displayed in 3 places – primary machine area, general customer/shop area, behind counter in full view of customers
Think 21 laminated flowchart	In a prominent position visible by staff only for reference purposes.
Think 21 EPoS stickers	Placed on the back of each EPoS till screen in full view of customers.
Think 21 Shop Register	To be retained in this section of the Coral Compliance Directory.

- In addition to the above, the following signage, which is already displayed in shop for Legal and/or Company reasons, must remain in place.

Item	Display Location
GamCare ½ A2 posters (English and Welsh versions)	One to be displayed in the Machines zone and adjacent to the newspaper run.
GamCare leaflets (English and Welsh versions)	Display in the following locations: 1) on the counter, in the double dispenser with the Citizen Card leaflets 2) in the machines zone 3) in another discreet area as agreed with your Area Manager
Citizen card leaflets	On counter in double dispenser with GamCare leaflets
No Smoking	Is required by law, must be visible prior to entering shop – either on the door or on side wall
Opening Hours sign (incorporating 'No Under 18s' and 'No Alcohol' references)	On <u>all</u> entrance doors if glass or adjacent windows if not, clearly visible from outside. *Note - as some shops operate non-standard times, please check times match prior to ordering.