

# Example of a Recent Serve Legal Think 21 Report

**From:** Serve Legal [mailto:info@servelegal.co.uk]  
**Sent:** 10 October 2014 12:20  
**To:** Area Manager  
**Subject:** 2220 - PASS

Hi,

The visit to Coral, Silverdale Road at 3:35pm on 9/10/2014 was a **Challenge On Entry**.

## Site Review

### Premises Details

Premises Name	Coral, Silverdale Road
Address 1	6 The Parade Silverdale Road
Address 2	Earley
Address 3	Reading
Premises City	Berkshire
Post Code	RG6 7NZ

### Site Details

Store Code	2220
Org Level 1	SW
Org Level 2	SWA5

### Visit Details

Actual Date of Visit	09/10/2014
Actual Time of Visit	3:35 pm
Visit Result	Challenge On Entry, PASS

## Report

Question	Response
<b>ON ENTRY / BROWSING</b>	
What was the time when you entered the betting shop?	3.31
As you entered the shop was eye contact made by a member of staff?	Yes
If you were acknowledged by a member of staff, please describe any eye contact or greeting you were given (e.g. brief eye contact/long enough to make an assesment of age/welcome to the branch/immediately asked for ID/another greeting):	Eye contact and age assesment as I entered.
If you were NOT acknowledged as you entered the shop, please explain what may have prevented staff from greeting you (e.g. serving other customers, checking odds etc.):	N/A
Were you challenged for ID on entry (e.g. before you put coins in the machine), at the machine or after machine play? (Please indicate below at which point of your visit you were challenged):	On entry to the shop / Whilst browsing
If so, please describe the manner in which you were challenged and add any other comments you feel are relevant:	I was challenged on entry and she was really friendly.
If you were challenge for ID, did the staff member appear to record any of the details from your ID?	Yes
If you were challenged at any of these points, please accurately describe the member of staff (gender, height, hair colour/length, and any distinguishing features):	Female. 5'6. Light brown hair, short, styled in a bob below the ear. She was wearing uniform but no name badge. Had a grey hoodie on over uniform.
From their name badge, what was the name of the staff member:	N/A
<b>MACHINE PLAY</b>	
Did you play on a machine before placing a bet?	Yes
If not, please state why:	N/A
Was the gaming machine you played visible from the counter?	Yes
Were there any 'Think 21' stickers or posters visible from the machine area?	Yes
If you played on the machine, did it stop working at any point?	No
What was the number of the machine you played (usually located at knee level on the front of the machine 1 - 4):	1
<b>PLACING THE BET</b>	
Please describe what the server was doing as	

<b>you approached the counter (e.g. serving a customer, talking to colleagues):</b>	<b>Working behind the desk.</b>
<b>Did the person who served you challenge you for ID at the counter while you placed your bet?</b>	<b>No</b>
<b>If so, please describe the manner in which you were challenged and add any other comments you feel are relevant:</b>	<b>N/A</b>
<b>Did the person who served you make eye contact with you?</b>	<b>Yes</b>
<b>If eye contact was made, when was it FIRST made?</b>	<b>Before the transaction</b>
<b>Please accurately describe the person who served (gender, height, hair colour/length, and any distinguishing features):</b>	<b>Female. 5'6. Light brown hair, short, styled in a bob below the ear. She was wearing uniform but no name badge. Had a grey hoodie on over uniform.</b>
<b>Was the person who served you wearing a badge with their name on?</b>	<b>No</b>
<b>Please enter the 10-digit operator number at the bottom right of the betting slip:</b>	<b>0048007922</b>
<b>Please enter the long 12-digit number at the very bottom of the betting slip (above the bar code):</b>	<b>222002927857</b>
<b>OVERALL VISIT EXPERIENCE</b>	
<b>How many staff were on duty in the shop at the time of your visit?</b>	<b>2</b>
<b>When were the staff first aware of you in the shop?</b>	<b>On entry</b>
<b>How many customers were in the shop at the time of your visit?</b>	<b>3</b>
<b>Did you see any "Think 21" Posters in the shop?</b>	<b>Yes</b>
<b>Did you see any "Think 21" Posters behind the counter?</b>	<b>Yes</b>
<b>Please give a report of your visit, providing a full description of your experience from entering to leaving the shop:</b>	<b>I entered at 3.31 and eye contact was made from the staff member and I was asked for ID. She was extremely friendly. I browsed for a couple of minutes and bet 50p on machine 1 and didn't win. I then placed a one pound bet at the counter with the same staff member, the other staff member offered me a drink. I left at 3.43</b>
<b>What time did you leave the shop?</b>	<b>3.43</b>
<b>Please use this space to explain anything unusual about your visit or to clarify any detail of your report:</b>	

# Self-Exclusion and Reinstatement



# INTERACTION, SELF-EXCLUSION AND REINSTATEMENT REGISTER

Shop Number:

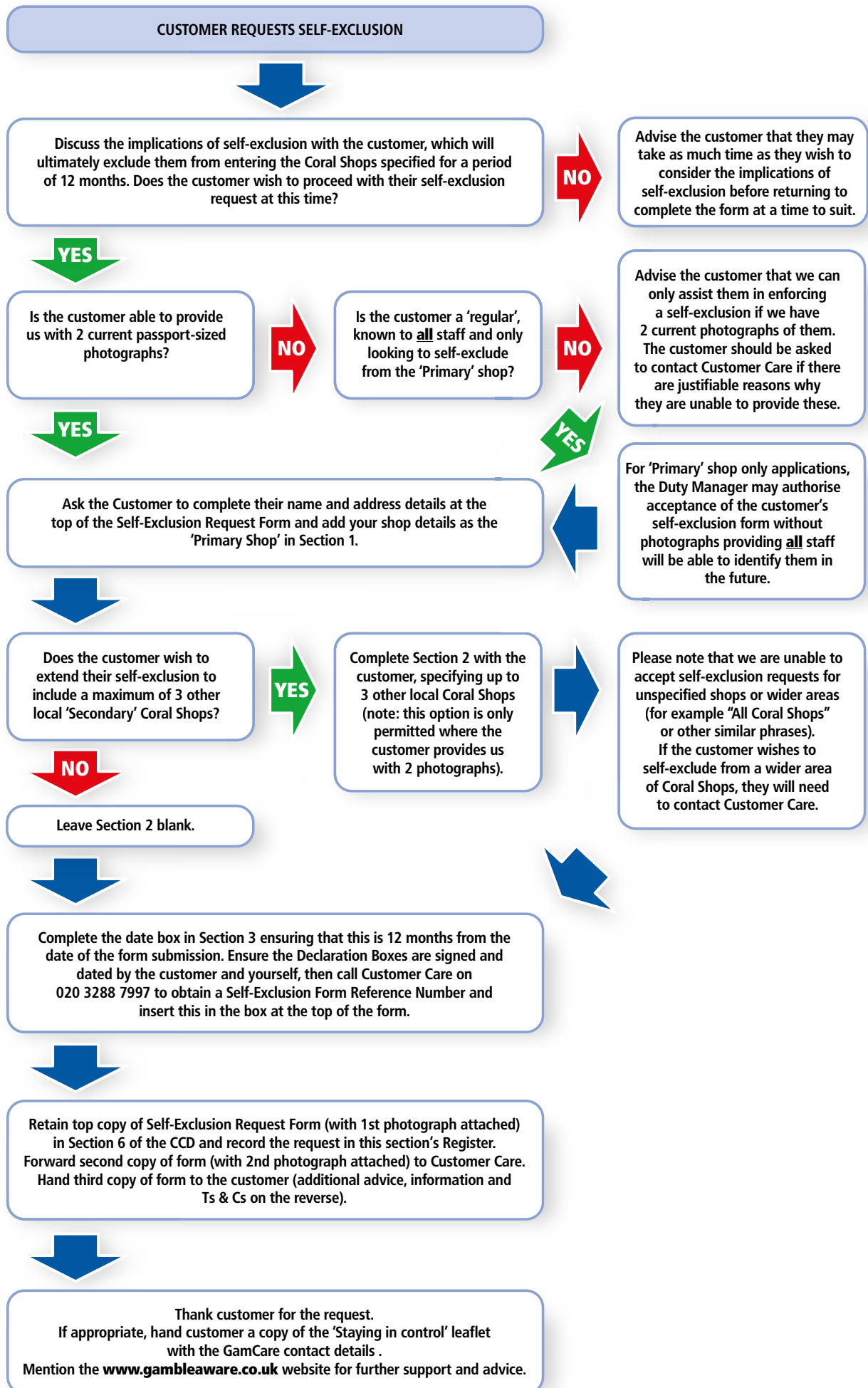
**For the recording of Customer Interactions, Self-Exclusions and Reinstatements (including breaches of self-exclusion and agreement terminations)**

**For Self-Exclusion Agreement terminations**

- 6 months after an agreement has expired and where no further contact from the customer has been received, the self-exclusion agreement terminates.
- The top copy with photo attached may then be forwarded to Customer Care to be securely destroyed (please mark the form as 'terminated' with the current date).
- Alongside the original self-exclusion entry here, record the 'termination date', the original Customer Care Reference Number and your initials in the last two columns provided.
- The customer is then free to re-enter/gamble on our premises at a later date, without needing to complete the Reinstatement process.

DATE AND TIME OF APPROACH	NAME OF CUSTOMER (WHERE KNOWN)	NATURE OF ISSUE (INTERACTION, SELF-EXCLUSION, REINSTATEMENT)	OUTCOME	REPORTED TO (E.G. CUSTOMER CARE)?	EMPLOYEE NAME AND POSITION (DUTY MANAGER / SUPERVISOR)	SELF-EXCLUSION AGREEMENT TERMINATION DATE & CC REF NUMBER	INITIALS
/ / :						/ /	
/ / :						/ /	
/ / :						/ /	
/ / :						/ /	
/ / :						/ /	

# Self-Exclusion Communication Process



# SELF-EXCLUSION REQUEST FORM

Customer Name:

Customer Address:

Date of Birth:

Phone No:

Reason for Self-Exclusion:

2 x Photos

## Section 1 – Primary Shop

Shop Code:

Customer Care Ref No:

Shop Address:

Please complete your details above, and ask the member of staff to add the 'primary' shop details and Customer Care Reference Number. 2 x current passport sized photographs are required unless otherwise authorised by the Duty Manager. Further information and advice on completing this form is provided on the reverse

## Section 2 – Secondary Shops

If you wish to extend your self-exclusion to include other 'secondary' Coral shops (maximum of 3), please complete details below with the member of staff – otherwise please leave this section blank. To self-exclude from Coral Shops in other areas, please contact Customer Care on 0800 169 0299

Shop Address:

Shop Code:

Shop Address:

Shop Code:

Shop Address:

Shop Code:

## Section 3 – Coral Connect or Coral Online Accounts

If you hold a Coral Connect Card for Shop use only or for Shop & Online Use (Multi-Channel), or otherwise hold a Coral Online or Telebet account, you must provide the details of the account(s) below in order for the self-exclusion to be applied to your accounts

Connect Card Number

Connect Card Number

Online or Telebet Username/Account Number:

## Section 4 – Period of Self-Exclusion & Renewal

This self-exclusion is for 12 months up to and including:

The date entered in this box must be exactly 12 months from the date entered in the declaration section below

**YOU DON'T NEED TO RETURN TO THE SHOP TO RENEW YOUR EXCLUSION ONCE IT HAS EXPIRED  
SELF-EXCLUSIONS CAN BE EXTENDED FOR A FURTHER 12 MONTHS BY CALLING CUSTOMER CARE ON 0800 169 0299**

## Declaration

I confirm that I have read and understood the Terms & Conditions as detailed on the back of this form

Customer Signature:

Date:

Staff Name:

Staff Signature:

Date:

As part of this process we recommend that you also self-exclude yourself from using other operator's services by contacting them directly.

For further information on responsible gambling please log on to [gambleaware.co.uk](http://gambleaware.co.uk) or call the National Gambling Helpline free on 0808 8020 133.

### CHECKLIST (Staff use only – please tick boxes to confirm):

- Customer Care Reference Number obtained
- 2 x Photos received
- Individual shop details completed (i.e. "All Coral Shops" not acceptable)
- Customer's details and any accounts are written correctly
- 12 month extension process discussed
- 24 hour "cooling off" period and Reinstatement process discussed
- Terms and Conditions on reverse have been highlighted to the customer
- Form has been signed and dated by customer and member of staff

TOP COPY (AND PHOTO 1) - RETAIN IN CCD SECTION 6 SECOND COPY (AND PHOTO 2) - TO CUSTOMER CARE THIRD COPY - TO CUSTOMER

# FURTHER INFORMATION

You can use this form to:

- Self-exclude yourself from being able to enter your local 'Primary' Coral shop as well as up to a maximum of 3 other local 'Secondary' shops
- In addition, self-exclude yourself from your Coral Connect Account (In Shop Only) and/or
- Self-exclude yourself from your Coral Connect Account (Multi-Channel) or a standard Coral online or Telebet account

**Please note that we are unable to accept self-exclusion requests for unspecified Coral shops, for example "All Coral shops". To self-exclude from Coral shops in other areas, you will need to contact Customer Care who will agree further secondary shops where a justifiable concern is present in respect of problem gambling**

**The original and copies of this form held by Coral will be kept confidential. Coral reserve the right to contact you should any further information be required**

## Terms & Conditions – Shop Entry:

**I acknowledge that:**

- This agreement becomes effective immediately; however, it may take up to 5 working days for any 'Secondary' shops listed to receive appropriate notification
- Failure to provide 2 passport sized photographs in order to assist with the exclusion will greatly reduce Coral's ability to enforce this request
- Coral's responsibility is only to take reasonable steps to seek to prevent me from entering the premises I have identified
- If I visit any of the premises detailed during the term of this exclusion and I am not identified by Coral staff, I will be requested to leave the premises. If I refuse to co-operate and/or become a trespasser, I will be removed
- This is a voluntary request which is not enforceable in any way whatsoever against Coral

## Terms & Conditions – Coral Connect & Online Accounts:

**I acknowledge that:**

- I must specify my Coral Connect Card number (either In Shop or Multi-Channel account) and/or my Coral online/Telebet account details in order for my self-exclusion to be extended to these accounts
- Where I provide account details, the account(s) specified and any other Gala Coral Group accounts belonging to me (where located and defined as galacasino.com, galabingo.com and Coral online, Connect (Multi-Channel & In Shop) and Telebet accounts) will be closed for the period of the self-exclusion. Any remaining funds will be returned by a method to be determined by the Gala Coral Group (conditional upon complete account verification where appropriate)
- Coral accepts no responsibility of liability if I fail to provide or provide inaccurate or incomplete information which prevents Coral in their sole discretion from applying the self-exclusion to my accounts
- Coral may refuse to apply my self-exclusion to any Gala Coral Group account if there is any doubt at Coral's sole discretion whether the account belongs to me
- It may take up to 5 working days for a self-exclusion request to be applied to accounts
- Any returns from 'running bets' placed online or in shop with an account will be forwarded on request
- If I visit any Coral shop and attempt to use a self-excluded Coral Connect or online account, I will be requested to leave the premises. If I refuse to co-operate and/or become a trespasser, I will be removed

## Terms & Conditions – General:

**I acknowledge that:**

- I cannot revoke, rescind or withdraw this self-exclusion agreement prior to the stated expiry date. New Gala Coral Group accounts of any kind may not be opened
- Coral will take reasonable steps to ensure that I will no longer receive marketing materials. Where account details are provided, Coral will also employ reasonable automated checks to endeavour to ensure that I can no longer transact with Gala Coral Group accounts
- During my period of self-exclusion, I have an equal undertaking not to seek to circumvent the self-exclusion agreement by entering or continuing (or asking a 3rd party on my behalf) to participate in gambling and betting services via Gala Coral's online operations, the Telebetting service, or Coral shops.
- In the event (or in circumstances that are beyond Gala Coral's reasonable control)
  - o I inadvertently receive marketing material and I continue gambling as a result; and/or
  - o I circumvent my self-exclusion agreement by (including but not limited to) (i) continuing to gamble; or (ii) by opening and operating new accounts; and/or (iii) automated checks and/or IT or software programmes fail to recognise any attempt by me to circumvent my self-exclusion:
    - The Gala Coral Group shall have no responsibility or liability to me or any third party and is therefore under no obligation to return any deposits, winnings, or other funds in respect of such activity online
    - The Gala Coral Group and its employees will be released for any liability claims for losses I should suffer in the event of circumventing my agreement in a Coral shop. Any bets inadvertently accepted in a Coral shop will stand, win or lose unless cancelled by mutual consent prior to the start of the first event

## Terms & Conditions – End of Self-Exclusion Period:

**I acknowledge that:**

- At the end of the self-exclusion period I can discuss my options with a member of Coral staff, either in the shop where the form was submitted or by calling Customer Care on 0800 169 0299
- I may then decide to either renew my self-exclusion for a further 12 months or opt to resume access to Coral shops (and any accounts linked to the original exclusion) by completing a Reinstatement Request Form
- The self-exclusion agreement will remain in place for a further 6 months after the expiry date (at which point it will be terminated) unless I renew the agreement as above, or I complete the reinstatement process and opt to return. During this time, I will be subject to a 24 hour 'cooling off' period before I can re-enter Coral shops and/or recommence activity on an account
- Please allow up to 5 working days for accounts to be re-activated following reinstatement.
- I understand that if I have requested Coral Shop self-exclusion and account self-exclusion, and my self-exclusion agreement has terminated, I must contact Coral Customer Services in order to reactivate any accounts subject to my original request and will be subject to a 24 hour 'cooling off' period before accounts are reactivated
- I understand that if I hold any Gala Coral Group account which has been self-excluded as a result of this request that I may not reinstate these accounts until any existing Coral shop self-exclusion agreement has terminated or the reinstatement process has been completed
- I will be given the opportunity to opt in to receiving marketing from Coral upon reinstatement



## Self-Exclusion

- Self-exclusion may be requested by the customer at any time and should be dealt with by any member of staff on request.
- However during busy periods or in instances of lone person working, it may be necessary to ask the customer to complete the form with a member of staff at a quieter time.
- Where possible the customer should be given the opportunity to discuss self-exclusion and the implications in a quiet area of the shop.
- The member of staff will assist the customer with the completion of the Self-Exclusion Request Form (available within) in accordance with the communication process detailed in this section.
- Self-exclusion is for a period of 12 months from the date of the form submission, which the customer may renew annually by either calling Customer Care or returning to the original shop to complete a new self-exclusion form.
- Customers may opt to self-exclude from one 'primary' Coral shop and up to three additional 'secondary' Coral shops (if required).
- In order to assist with the enforcement of the self-exclusion, the customer will be asked to provide us with two current passport-sized photographs. Only in instances where the request is solely for a 'primary' shop and the Duty Manager is satisfied that the customer is already sufficiently known to **all** staff (including 'relief' staff who may cover the shop), may the self-exclusion form be accepted without such photographs.
- This option does not extend to 'secondary shops' and where requested, photographs must be provided by the customer to assist with their exclusion.
- Should the customer be unwilling or unable to provide these they will need to contact Customer Care who will establish if we are still able to accept the self-exclusion request without them (Customer Services will then provide confirmation details of the call/agreement to the customer and relevant shops).
- Self-exclusion requests for unspecified shops/areas (for example where customers simply state 'all Coral shops'), or for other time periods **cannot** be accepted under any circumstances.
- Any customer wishing to extend their self-exclusion to a wider area will need to contact Customer Care who will agree further secondary shops where a justifiable concern is present in respect of problem gambling (and will notify them accordingly).
- On completion of the form, the top copy with photo '1' attached should be retained in this section, with the second copy and photo '2' attached forwarded to Customer Care at the following address:  
**Coral Customer Service, 1 Stratford Place, Montfichet Road, London E20 1EJ**
- The third copy with additional advice, information and Terms & Conditions on the reverse should be handed to the customer.
- All customer requests for self-exclusion should be recorded in the register in this section and reported to Customer Care in accordance with the communication process.
- Once implemented the self-exclusion request cannot be withdrawn by the customer for any reason.
- Coral will take all reasonable steps to assist with a customer's self-exclusion request. However the onus is on the customer to self-exclude and therefore should any bet be inadvertently accepted during a period of self-exclusion, it will stand, win or lose unless cancelled by mutual consent prior to the start of the event (or first event in the case of a multiple bet).
- As part of this process we should recommend that the customer also self-excludes themselves from using any other Operators' services.

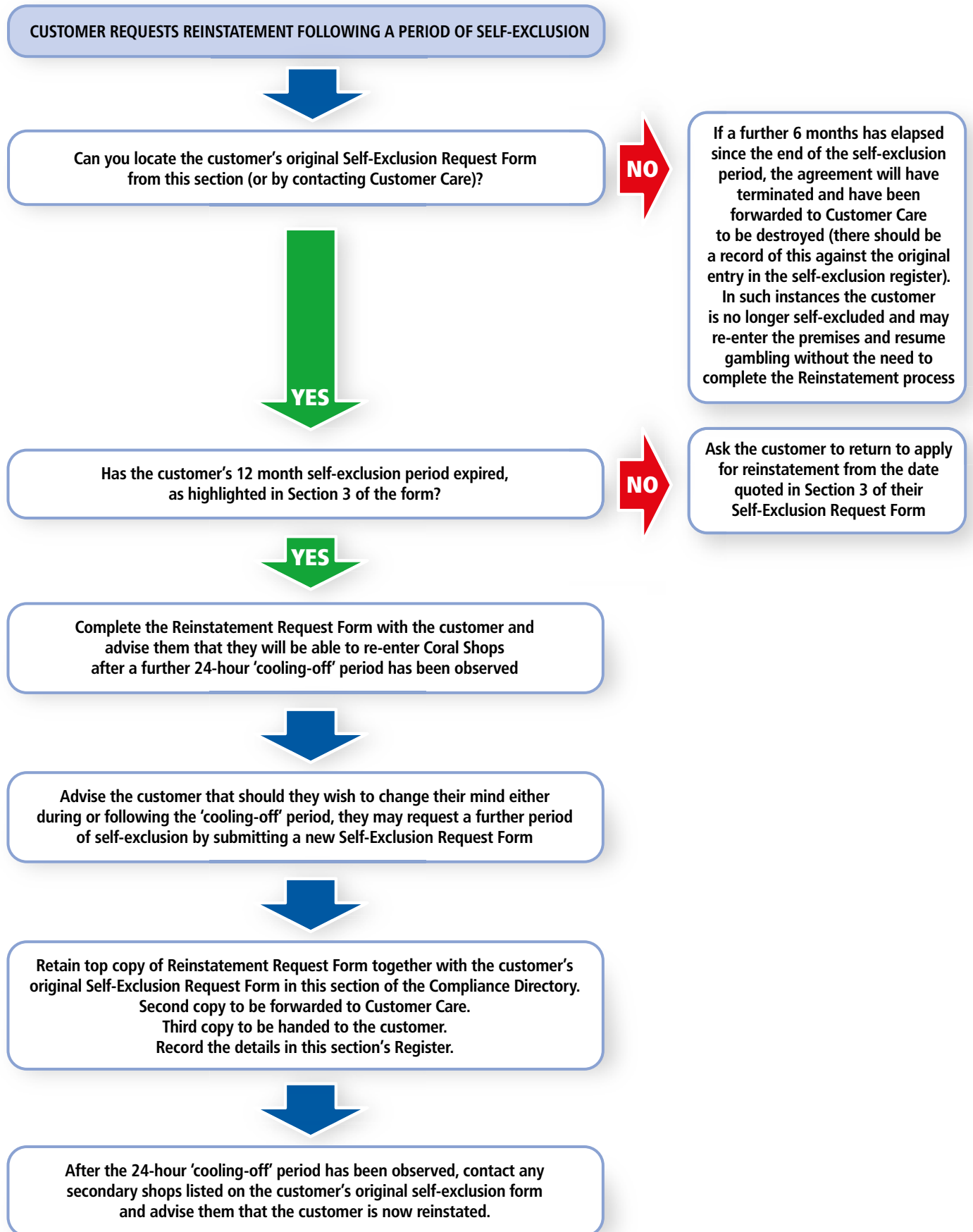
## Self-Exclusion Expiry

- Following the expiry of a period of self-exclusion, a customer remains self-excluded from the specified shop(s) for a further period of 6 months unless they take positive action to reinstate themselves during this time.
- Should the customer approach you within this time frame to reinstate themselves, they should be advised of the Reinstatement process as outlined in the following section.
- Alternatively, should the customer ask you to extend their self-exclusion for a further period of 12 months, they should be asked to complete a new self-exclusion form (or call Customer Care who will facilitate this – see next section).
- If however, no further contact is received from the customer by the end of the additional 6 month period, the self-exclusion agreement terminates and the top copy together with photo attached should be forwarded to Customer Care (marked terminated, with the date) where it will be securely destroyed (an electronic record is kept for auditing purposes).
- The date of this termination, original CC Reference Number and your initials should be recorded alongside the original entry on the self-exclusion register.
- At this point the customer is no longer self-excluded from the premises and may subsequently re-enter/gamble unchallenged (i.e. without the requirement for additional documentation to be completed and/or submitted).

## Self-Exclusion Renewal

- Following the end of a period of self-exclusion a customer may opt to extend their self-exclusion for a further period of 12 months.
- The customer may do this either by returning to the primary shop where they completed the original self-exclusion form and submitting a new self-exclusion form to staff in accordance with the usual procedure, or by contacting Customer Care who will arrange to 'renew' the latest form for a further period of 12 months (the 'renewal' process of the existing agreement can only be completed by Customer Care).
- Customers must complete this process on each occasion that they wish to extend their self-exclusion for an additional 12 months.
- If submitting a new form in shop, additional photographs are only required if the customer's image has changed significantly from the photographs provided with the original form.
- With shop submissions the new self-exclusion form top copy should be kept with the previous version(s) in this section for reference purposes.
- If extending the agreement via Customer Care, a separate 'renewal form' will be completed by the operator, which will confirm that the customer's self-exclusion has been extended for a further period of 12 months.
- Customer Care will confirm to the customer that the terms and conditions to which they agreed with their original self-exclusion, will remain in place for the new agreement and will offer to send the customer a copy of the renewal form and revised expiry date for their reference.
- Customer Care will then send a copy of the renewal form to the primary (and any secondary) shop(s) listed on the original form to advise them of the revised expiry date.
- On receipt staff should locate the original self-exclusion form from this section and staple the renewal form to it, ensuring **all** staff (including regular relief staff) are updated of the date extension as soon as possible.
- Details of the update should also be added as a separate entry in this section's Interaction, Self-exclusion and Reinstatement Register for reference purposes.

# Reinstatement Communication Process



# REINSTATEMENT REQUEST FORM

To be completed by customers requesting reinstatement at any time during the 6 month period immediately following the expiry of a self-exclusion agreement originally requested in shop.

Customer Name:

Customer Address:

Phone No:

Date/Time:

Shop Code:

Shop Address:

Original Self Exclusion Request Form Number:

## Reinstatement Request

- Following the expiry of my period of self-exclusion, I confirm that I wish to apply for re-entry into the Coral shops and any accounts subject to my original self-exclusion request
- I fully understand the implications of the request and am aware of the facilities and contact numbers that Coral is able to provide as part of its commitment to responsible gambling
- I understand that access will be granted following a 24 hour 'cooling-off' period after I submit this request unless I subsequently choose to extend my self-exclusion for another 12 months by contacting Coral Customer Care or by completing another self-exclusion form during this 24 hour period
- I acknowledge that it may take up to 5 working days for any accounts subject to my original self-exclusion request to be re-opened
- I further acknowledge that any accounts subject to my original self-exclusion will not be re-opened until any other Coral shop self-exclusion has been terminated or the reinstatement process has been carried out in respect of those agreements

Customer Signature:

Staff Name:

Staff Signature:

For further information on responsible gambling please log on to [gambleaware.co.uk](http://gambleaware.co.uk) or call the National Gambling Helpline free on **0808 8020 133**

## Office Use Only – Instructions to Shop Staff:

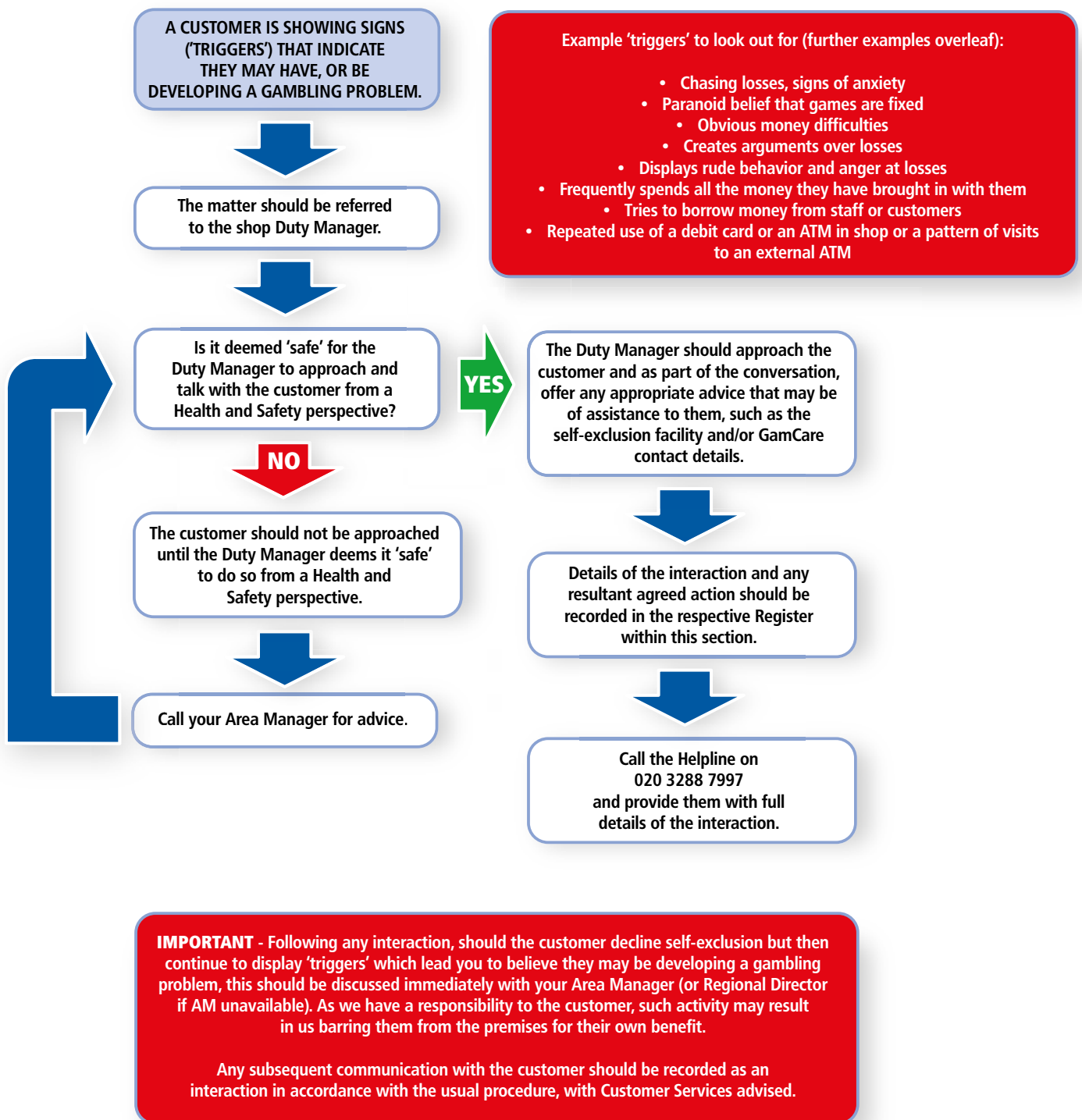
- If customer is reinstating accounts, ask if they wish to receive marketing. If so, tick here
- Top copy of completed form to be filed with original Self-Exclusion Request Form and retained in the 'Self exclusion & Reinstatement' section of the Coral Compliance Directory
- Second copy to be forwarded to Customer Care
- Third copy to be handed to the customer
- After the 24 hour 'cooling-off' period has been observed, contact any Secondary shops listed on the original self-exclusion form and advise them that the customer is now reinstated

# Reinstatement

- Following completion of a period of self-exclusion and within a further 6 months of the expiry date, a customer may request to re-enter our shops by completing a Reinstatement Request Form.
- Reinstatement may only occur at the request of the customer in person at the Coral shop where the original Self-Exclusion Request Form was submitted (or by telephone to Customer Care if the original form was posted to the customer by CC - a written request is not acceptable).
- A member of staff will assist the customer with the completion of the Reinstatement Request Form in accordance with the flow chart detailed in this section.
- Once completed, the customer must observe a further 24-hour 'cooling-off' period before being permitted to re-enter our shops.
- If during this period the customer changes their mind and wishes to stay excluded they may do this by submitting another Self-Exclusion Request Form to a member of staff.
- After the 24-hour 'cooling-off' period has been observed a member of staff should contact any other Secondary shops listed on the customer's original self-exclusion form and advise them that the customer is now reinstated.
- All customer requests for reinstatement following a period of self-exclusion should also be recorded in this section's Register (there is no requirement to contact Customer Care with this information as they will receive a copy of the Reinstatement Request Form as part of the process).
- **A self-excluded customer cannot re-enter a Coral Shop and start betting or gaming again within 6 months of their self-exclusion period expiring, until they have submitted a Reinstatement Request Form and complied with the subsequent mandatory 24-hour 'cooling-off' period.**

# Signs of Problem Gambling and Interaction ('Triggers')

# Problem Gambling and Interaction – Communication Process





## Signs of Problem Gambling and Interaction ('Triggers')

- All staff have a requirement to recognise behavioural 'triggers' which may lead them to believe that a customer is showing signs of developing a gambling problem.
- These could include:
  - Chasing losses - displaying signs of anxiety believing that only with continued play will they retrieve their losses.
  - A paranoid belief that their gambling losses are as a result of the game being 'fixed'.
  - Mood swings, irritability, agitated, restlessness, not caring about their appearance or even personal hygiene.
  - Obvious money difficulties and debts.
  - Seeing gambling as a way to 'make money'.
  - Being totally absorbed in the activity, continually trying to beat the system.
  - Creating arguments, rows and using rude behaviour in anger over their losses.
  - Constant, repetitive and competitive discussion about money losses and blaming others for it.
  - Trying to borrow money from other customers or staff.
  - Frequently spending ALL the money they have brought with them.
  - Using our products several times a week for long periods of time.
  - Repeating a pattern of leaving the business and returning the same day with more cash to gamble.
  - Repeated use of a debit card or an ATM in shop, or a pattern of visits to an external ATM.
- Take Care - This is not an exhaustive list. Don't take these signs in isolation as they could also indicate other issues. Look at these indicators in context with other evidence where other evidence is available.
- If the customer is showing any sign of the above 'triggers', the Duty Manager should consider approaching the customer in accordance with the previous flow chart, mindful that such an approach should only be made in light of a 'positive' Health and Safety Assessment.
- If under any circumstances the Duty Manager is uncertain of the consequences, or the risk to staff and/or other customers, the interaction should not take place with the matter referred to the Area Manager for advice.
- All interactions should be logged in this section's Register and reported to the Helpline in accordance with the communication process.

## Potential outcomes of Interacting with a Problem Gambler

The following are examples of potential outcomes, which could occur either during or following an interaction with a customer:

- A general discussion on responsible gambling including ways in which the customer may control their spending.
- The customer is issued with the GamCare 'Staying in control' leaflet outlining the help and support available if required.
- The option of self-exclusion and implication of this being requested is clearly explained to the customer.
- A self-exclusion form is completed with the customer and officially submitted (comes into force immediately).

**IMPORTANT** - Following any interaction, should the customer decline self-exclusion but then continue to display 'triggers' which lead you to believe they may be developing a gambling problem, this should be discussed immediately with your Area Manager (or Regional Director if AM unavailable). As we have a responsibility to the customer, such activity may result in us barring them from the premises for their own benefit.

Any subsequent communication with the customer should be recorded as an interaction in accordance with the usual procedure, with Customer Services advised.

# RESPONSIBLE GAMBLING BRIEFER

## INDUSTRY IMPROVEMENTS TO MACHINE INFORMATION AND PLAYER PROTECTION

As part of the industry's ongoing commitment to ensure that customers are fully aware of the support available to help with problem gambling and new measures designed to prevent it, the Association of British Bookmakers (ABB) has published the **ABB Code for Responsible Gambling and Player protection in Licenced Betting Offices in Great Britain.**

The code includes a number of improved measures for all industry gaming machines, such as better sign posting to Responsible Gambling information, clearer information on game types and stake and prize levels, blocked terminal facility and more detailed information on profit margins and 'return to player' percentages.

This briefener will ensure that all Coral colleagues are fully up to speed on the changes, some of which will be visible on all betting office gaming machines from December. Functionality which alerts customers to the amount of time they have played and how much they have spent during one session will be available later in the new year and briefed separately.

### FROM DECEMBER 31ST:

- Every shop will have the blocked terminal facility
- The top screen on the machine will display seven different responsible gambling messages whilst customers are playing
- The machines menu will change to provide customers with a 'Responsible Gambling Information' button
- This will link into other screens which provides detailed information on:
  - o Responsible Gambling and tips for staying in control
  - o The National Gambling Helpline number and [www.gambleaware.co.uk](http://www.gambleaware.co.uk)
  - o Types of games and differences in relation to stakes and prizes and spin cycles
  - o Payout and profit margins and 'Return to Player' percentages

## CUSTOMER PROTECTION: TOP SCREENS

The messages which will be displayed are:

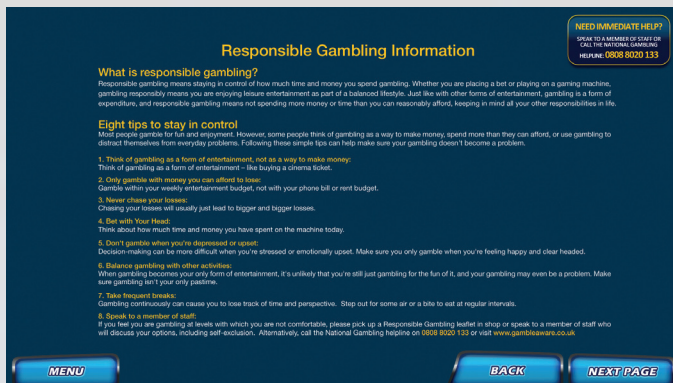


- Think of gambling as a form of entertainment, not as a way of making money
- Only gamble with money that you can afford to lose
- Think about how much time and money you have spent on the machine today
- Don't gamble when you're depressed or upset
- Balance gambling with other activities
- Take frequent breaks
- If you feel you are gambling at levels with which you are not comfortable, please speak to a member of staff

# CUSTOMER PROTECTION: MENU CHANGES



- From Tuesday 31st December, every terminal across the estate will have the new menu
- This is an industry standard, every bookmaker will have exactly the same message



- 1st Page - explains what is responsible gambling
- Highlights the 8 tips to staying in control

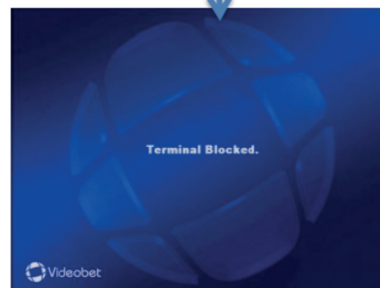
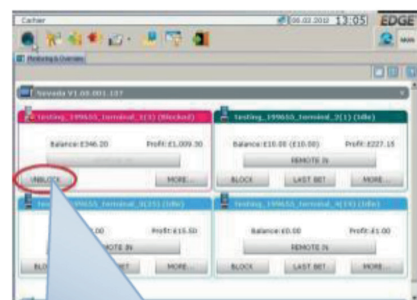
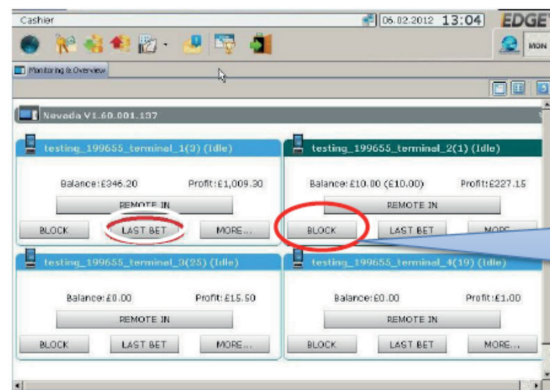


- 2nd Page - highlights the following:-
  - o Different categories on the terminals
  - o The stakes and prizes for each category
  - o Spin cycle for each category



- 3rd Page - highlights the following:-
  - o Probability
  - o Return To Player

# CUSTOMER PROTECTION: BLOCKED TERMINAL FACILITY



## Standard Operating Procedure for use of the Machines Block Facility

### 1. When should the Machines Block Facility be used?

The block facility should only be used to help manage the following situations:

- Customer violence around or involving machines where the police have been called to the incident
- Think 21 issue in the shop where the staff member does not feel safe approaching the customers
- Member of staff does not feel safe approaching customers in the shop regarding machines
- A customer(s) refuses to leave the shop at the end of the evening AFTER the advertised closing time

### 2. How should the Machines Block Facility be used?

- The block facility should only be used in a situation where the member of staff does not feel safe managing the incident in the shop
- The block facility should be used by exception only and as a last resort
- The block facility should be used for a maximum of 5 minutes
- The block facility should not be used on more than one machine at the same time
- The only time that the block facility should be used for longer than 5 minutes is if the police are called to an incident. In this instance the block should be activated until the police arrive or the persons involved in the incident leave the shop
- Should a customer(s) refuse to leave the shop at the end of the evening, the block facility may be used to help manage this, however the block should only be engaged AFTER the advertised closing time
- Whenever the block facility is used, the reason should be recorded in the Compliance Diary and will be checked by the Area Manager or/and National Machines Manager when visiting

### 3. Monitoring usage of the Machines Block Facility

- A daily and weekly report is delivered to Area Managers and National Machines Managers detailing exactly when and for how long the block facility is used in every shop
- This can be a very important facility to support shop colleagues in difficult situations however it is important that there is no abuse of the block facility outside of the above usage standards. Any abuse will be investigated and may lead to disciplinary action

## SHOP COLLEAGUE SIGN OFF

As this is an important update, every shop colleague needs to understand the changes and be confident in being able to signpost a customer to them if/when required.

We know it's difficult to recognise behavioural triggers, but you will be trained on this as part of the forthcoming 'Coral Connect' training sessions in January and February.

Could you please sign the briefer to say you have read, and understood the respective changes.

ITEMS	INSERT INITIALS & DATES					
Can explain the reason for the responsible gambling button						
Can explain the 8 tips to stay in control						
Can explain the key points of Payout and Profit Margins						
Can explain the stakes and prizes for B2 and B3						
Can explain when to use the blocked terminal facility						

Having read the document, every colleague will need to complete the **Machines-Player Protection Assessment**. The assessment is located on The **Coral Academy's Online Learning Portal** and consists of 15 questions based on the information you have read. The pass mark is 100%. To access the assessment, login to the learning portal, click on '**My Learning**' tab and then '**Machines-Player Protection Updates**'. The deadline to complete this is **12th January 2014**.

If you have any questions regarding the information, please call your Area Manager, National Machines Manager or Service Delivery Manager.

Regards

Machines Team

# OUR COMMITMENT TO SOCIAL RESPONSIBILITY

All colleagues should have a sound knowledge of the industry commitment to social responsibility and understand how as a responsible operator Coral fulfils this requirement in accordance with our operating licence. The key areas on which you may be asked questions by the Gambling Commission, Local Authorities or other bodies connected with the industry (such as GamCare) during local inspections are covered below, with supporting information also provided in the identified sections of the Coral Compliance Directory (CCD) and more specifically in Section 9 "Who can visit my shop?".

## 1 / THE GAMBLING COMMISSION'S THREE LICENSING OBJECTIVES

### Q. What are the three Licensing Objectives? (CCD Section 2 and on till stickers)

- A.
  - To prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;
  - To ensure that gambling is conducted in a fair and open way;
  - To protect children and the vulnerable from being harmed or exploited by gambling.

## 2 / PREVENTING UNDERAGE GAMBLING

### Q. How do you ensure everyone entering the premises is of the legal age to do so?

- A. Coral operates a strict 'Think 21' policy whereby every 'young stranger' who enters the premises is immediately challenged for photographic ID to prove they are over 18. No ID = No entry (CCD Section 3).

## 3 / SOURCES OF HELP & RESPONSIBLE GAMBLING INFORMATION

### Q. Do you provide information for problem gamblers?

- A. Our responsible gambling leaflet is located in the main betting and gaming areas as well as in another discreet location within the shop. It provides information on 'trigger' signs to look out for, the option to self-exclude, plus contact details for the free National Gambling Helpline service (0808 8020 133). Similar information is also provided on our Self Service Betting and Bet In Play Terminals and on our gaming machines via a dedicated 'Responsible Gambling Information' button. We also provide a separate 'Employee Guide to Responsible Gambling' leaflet for all colleagues (CCD Section 11).

## 4 / RESPONSIBLE GAMBLING AND PLAYER PROTECTION

### Q. What facilities do you provide customers to assist them with gambling responsibly?

- A. In addition to the information outlined in Q3, all our gaming machines offer the player the facility to set voluntary limits on how much they wish to spend and for how long they wish to play. Once reached, an alert is displayed during an enforced 'pause' in play, after which time the customer may decide whether or not to continue playing. Where a player opts not to set such limits, a similar mandatory reminder will be displayed after the player has either spent over a certain amount or played for a certain period of time as determined by the ABB Code on Responsible Gambling and Player Protection. Further information on setting machine limits is provided on the machines themselves and also in our 'Know your limits. Set your limits' leaflet. Our machines also display tips for staying in control via rotating screen messages.

Customers opening Connect accounts in shop are advised that responsible gambling information may be obtained through the shop team, via the website, or by contacting online Customer Services. The latter can also assist with setting up deposit limits on their account, a facility to which holders of multi-channel accounts also have online access.

## 5 / PROBLEM GAMBLING INDICATORS

### Q. What might lead you to believe that a person has a gambling problem?

- A. There are a number of 'trigger' warning signs to look out for including:-

- Chasing losses (often increasing stakes to try and win back previous losses)
- Repeated use of a debit card or local ATM to fund gambling
- Hiding the extent of gambling from family or friends
- Suffering financial difficulties as a result of gambling
- Neglecting the welfare of themselves and their family as a result of gambling
- Feeling unable to 'take a break' when gambling for prolonged periods for fear of missing out on a win
- Trying to borrow money from other customers or staff to continue gambling

However please note that this is not an exhaustive list and if you feel a customer maybe showing any 'triggers' which gives you reason to believe that they may have, or be developing a gambling problem, you should inform the Duty Manager immediately (CCD Section 5).

## 6 / INTERACTION

### Q. What is an interaction?

- A. An interaction is a discussion which takes place between a customer and the Duty Manager in respect of responsible gambling. It may either be initiated by the customer or by the Duty Manager as a result of circumstances that give us concern for their welfare. The interaction is recorded in accordance with the policy outlined in Section 5 of the CCD.

## 7 / SELF-EXCLUSION

### Q. What do you do if a customer wishes to self-exclude? (CCD Section 6)

- A.
  - Fully explain to the customer the implications of entering into a self-exclusion agreement and outline the process to which they must agree.
  - The self-exclusion agreement is for a default period of 12 months after which time the customer may opt to extend it for a similar period (via the shop or by calling Customer Care), or reinstate themselves by completing the reinstatement process.
  - If the customer wishes to proceed, assist them with the completion of the self-exclusion request form and liaise with Customer Care for a reference number.
  - The customer must provide us with 2 current passport-size photographs with their form. Only in exceptional circumstances agreed by the Duty Manager and Customer Care can we accept the form without them, but the customer should be advised that this will make the agreement difficult to enforce.
  - Self-exclusion may only be accepted for 'Primary' and/or 'Secondary' shops. We cannot under any circumstance accept applications for non-specified shops, for example 'All Coral Shops'.
  - Once completed the agreement becomes effective immediately and cannot be withdrawn under any circumstances.
  - At the end of a period of self-exclusion, the agreement remains in place for a further period of 6 months unless otherwise extended by the customer. During this 6 month period the customer may opt to submit a Reinstatement Request Form (see Q10).
  - 6 months after a self-exclusion period has expired and where no further communication with the customer has been received, the agreement terminates and should be destroyed via Customer Care. The customer is then free to enter the premises again without the need to complete the reinstatement process.

## 8 / EXTENDING SELF-EXCLUSION TO OTHER GAMBLING OPERATORS

### Q. How would a customer extend their self-exclusion?

- A. When completing a self-exclusion agreement, we should recommend that the customer also enters into similar agreements with other operators they may use. An ABB leaflet providing contact details for other operators is provided for this purpose, which should be handed to the customer with the copy of their form.

## 9 / BREACH OF SELF-EXCLUSION

### Q. What is a breach of self-exclusion?

- A. A breach of self-exclusion occurs when a self-excluded customer enters a shop during the period in which the self-exclusion is active. The customer should be asked to leave the premises immediately in accordance with their signed agreement. The incident should be logged, with the Helpline also contacted in accordance with our reporting procedures (CCD Section 7). If appropriate, it may also be beneficial to provide the customer with a responsible gambling leaflet directing them to the National Gambling Helpline should they require any additional support. It should also be noted that all bets placed (or machine play) in breach of a self-exclusion agreement stand, unless cancelled by mutual consent prior to first event starting.

## 10 / REINSTATEMENT

### Q. What is Reinstatement?

- A. During the 6 month period immediately following the expiry of a self-exclusion agreement, a customer may opt to re-enter our premises by completing a Reinstatement Request Form. Upon submission of this form and after a further 24-hour 'cooling-off' period has been observed, the customer may then re-enter our shops (CCD Section 6).

## 11 / RESPONSIBLE GAMBLING TRAINING

### Q. Are colleagues trained on Social Responsibility and Problem Gambling issues?

- A. All colleagues received initial training at induction and have completed a series of related e-Learning modules and assessments covering all aspects of the ABB Code on Responsible Gambling and Player Protection. This includes a renewed focus on interacting with customers to ensure that they are fully aware of the facilities in place to assist them in gambling responsibly. Refresher training is conducted annually, with supporting information also provided in the CCD (Sections 5 and 11).

## 12 / RESPONSIBLE GAMBLING INFORMATION FOR EMPLOYEES

### Q. Employees are not immune to problem gambling, what information is provided for them?

- A. As a socially responsible operator Coral provides all colleagues with the 'Employee Guide to Responsible Gambling' leaflet at induction (leaflets also available in the staff area of each shop). If a colleague alerts you to the fact that they may have, or be developing a gambling problem, they should be given a further copy and referred to their line manager or Human Resources for additional support.

## 13 / RESPONSIBLE GAMBLING SUPPORT FOR RELATIVES

### Q. What would you do if a relative of one of your customers came in to advise you that the customer had a gambling problem?

- A. Offer understanding but respectfully advise that unfortunately for confidentiality reasons we cannot discuss another customer's details with them. However direct them to the National Gambling Helpline details in our responsible gambling leaflet and also hand them an ABB leaflet with the contact details for other operators (CCD Section 11). The Duty Manager should observe the customer on the next occasion that they visit the shop and interact as appropriate, in accordance with the policy outlined in the CCD (Section 5).

## 14 / RESPONSIBLE GAMBLING INFORMATION DATA

### Q. How do we record Responsible Gambling information?

- A. Responsible Gambling information is recorded through our EPoS system and by Customer Care, who collate it centrally for the Compliance Department, for onward reporting to the Gambling Commission.

## 15 / COMPLAINTS PROCESS

### Q. Do you have details of what a customer must do if they have a complaint/dispute?

- A. The 'How did we do..?' leaflet in shops outlines our complaints procedure and also provides details of IBAS, a third party Independent Betting Adjudication Service, to whom the customer may also refer a bet settlement issue if the complaint cannot be resolved through our internal process (CCD Section 8).

## 16 / BETTING AND GAMING RULES

### Q. Where may I find information on the types of betting and gaming provided?

- A. Our main rules and terms & conditions are provided on posters displayed in the shops and on our Self Service Betting and Bet In Play Terminals with gaming guides displayed on the gaming machines themselves. Information is also provided on the reverse of our various betting slips.

## 17 / ADVERTISING AND PROMOTIONS

### Q. What are the rules surrounding advertising and promotions?

- A. Gambling advertising and promotions must not be targeted at children, or suggest that gambling can provide an enhanced lifestyle or be a solution to financial concerns (CCD Section 14 outlines the full codes and promotional guidelines). Betting advertisements should carry the following socially responsible message:

'Bet Responsibly. Need Help? Call the National Gambling Helpline on 0808 8020 133 or visit [www.gambleaware.co.uk](http://www.gambleaware.co.uk)'.

# abb

association of british bookmakers ltd

## THE ABB'S CODE FOR RESPONSIBLE GAMBLING AND PLAYER PROTECTION IN LICENSED BETTING OFFICES IN GREAT BRITAIN

### September 2013



[www.abb.uk.com](http://www.abb.uk.com)



# CONTENTS

1. Introduction - Page 2
2. Existing Best Practice in Responsible Gambling - Page 5
3. Harm Minimisation Strategies - Page 9
4. New Harm Minimisation Strategies for Machine Players - Page 13
5. Compliance & Evaluation - Page 17
6. Contact Points - Page 19
7. Legal Disclaimers - Page 20

# CHAPTER 1

## INTRODUCTION

The Association of British Bookmakers (ABB) is the leading trade association for Licensed Betting Offices (LBOs) in Great Britain and represents the operators of around 80% of LBOs in Britain, including Gala Coral, Ladbrokes, Paddy Power, William Hill and about 100 independent bookmakers.

Betting is a popular British pastime with around 8 million people visiting LBOs. The vast majority of customers enjoy betting responsibly and safely. Retail bookmakers are already highly regulated and socially responsible businesses committed to upholding the highest standards and complying with a dual-licensing regime. They require an operating license from the Gambling Commission and a premises license from a local authority. In addition, certain senior individuals are required to hold a personal license, also issued by the Gambling Commission. A combination of the 2005 Gambling Act, Licensing Conditions and Codes of Practice (LCCP), Gaming Machine Technical Standards and Premises License Conditions provide exacting standards to which operators must adhere. It is within this context that overall rates of problem gambling have remained stable and relatively low in the UK, at under one per cent, since 1999.

However, we fully understand that there is some public and political concern. As a responsible business sector we consider one problem gambler to be one too many and we are seriously committed to providing a responsible, safe and enjoyable leisure experience on the high street. To this end we intend to create a step change in responsible gambling thinking based around informed choice by adult customers. This is the first code of its kind to be published in the world, implementing new consumer protection measures that will make a difference.

Our new “Harm Minimisation Strategy” focuses on improving our performance at four levels of harm minimisation:

- Issuing clearer and more accessible information on how to gamble responsibly and highlighting the sources of help available;
  - Providing customers with new tools such as mandatory time and money based reminders, the ability to set spend and time limits on gaming machines and to request machine session data;
  - Training staff to detect the signs of potential problem gambling more quickly and how to interact more effectively with those identified; and
  - Undertaking more consistent central analysis of data to identify abnormal activity both in specific shops and, where possible, that relating to individual customers.
-



We do recognize that there needs to be more research undertaken into what measures are most effective at ensuring harm minimisation. The industry is cooperating fully with the extensive research project into player behaviour (specifically on high stake gaming machines) being conducted by the Responsible Gambling Trust. Given the results of this research will not be available until next year we are launching the ABB's new Code for Responsible Gambling and Player Protection (the Code) now. This builds on current best practice and implements new player protection measures, many of which go beyond current regulatory requirements, to protect vulnerable people. Launching the first of its kind for the betting shop sector in the world, the Code will include new gaming machine initiatives such as mandatory time and money spent alerts for all players and setting voluntary limits on spend and time.

Expertise in player protection is evolving around the world and the Code will also develop over time with input from key stakeholders and a growing body of empirical evidence. However, the ABB is committed to ensuring that the new measures in this code will come into effect on 1st October 2013 and compliance with it will become a mandatory part of ABB membership. Some technologically driven measures will take 3-6 months to deliver due to need for testing and development of new software solutions being installed in 33,000 gaming machines in betting shops in Great Britain. However, ABB members will work with machine operators to ensure that the time frames are as short as possible. These timescales are clearly indicated in the Code.

The Code of Conduct will be evolutionary. ABB is fully committed to both monitoring compliance to the code and to updating and strengthening the code as new technological solutions are developed, new empirical evidence is produced or new concerns emerge over the coming months/years. The ABB will also formally evaluate the effectiveness of the measures contained in this code by establishing new Responsible Gambling Committee which will meet at least quarterly and review both compliance with the code and the detail of the code, making recommendations as necessary. The Committee will have an independent (non-bookmaking) chairman and an independent adviser who is knowledgeable and respected in this area of gambling related harm. The ABB Responsible Gambling Committee will be operational by 1 January 2014.

We will also ask the RGT if they could evaluate the impact of the new machine measures as part of their machines research.

In the context of the Gambling Commission's new surveys on participation and problem gambling ABB members are willing to work together in partnership with the Gambling Commission, RGT and RGSB to develop and fully fund the framework of a British Gambling Prevalence Study in 2014, with a view to adding to the knowledge base to help guide new harm prevention strategies. We believe this prevalence study is one way of measuring the effectiveness of the current statutory regulations and the new measures detailed in the ABB's voluntary Code of Conduct.



## CHAPTER 2

# EXISTING BEST PRACTICE IN RESPONSIBLE GAMBLING

## SHOP SAFETY

The level of security within LBOs is very high. Betting shops are generally modestly sized, so that surveillance from the counter is good. Most have CCTV provision. Some have direct links to centralised, rapid response, security facilities. Shop features such as security screens, safe havens, time lock safes, etc. have significantly reduced the incidence of robbery. LBOs are therefore safe retail environments that neither welcome nor attract a criminal and/or disorderly element.

The Association of British Bookmakers and its members have worked constantly to identify an achievable, realistic and cost-effective solution to reduce the offences against their members, staff and customers. For example, the Safe Bet Alliance was launched in 2010, after a series of robberies in LBOs in London. The Metropolitan Police Flying Squad had been tracking these incidents and worked with the industry, through the ABB, to put in place a voluntary code of safety and security, setting single national standards for bookmakers, covering shop safety and security for the first time.

In the first year of SBA's operation, 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 Safe Bet Alliance also stipulates that operators should only allow lone working once a risk assessment has been carried out, should have a lone working policy which addresses staff safety and should maintain regular contact with lone workers. To highlight the key principles of the national standard the ABB is launching a new accreditation scheme in all shops before December 2013.

The ABB is committed to evolving and improving this national standard with support from stakeholders such as the Met Police, ACPO, BRDO, DWP, DCMS, Gambling Commission, Institute of Conflict Management and Community Union.



## FINDING LOCAL SOLUTIONS

Bookmakers are responsible businesses that are always willing to engage and work pro-actively to tackle any issues in communities alongside the police, local authority and other businesses. Since January 2012 ABB members have successfully worked with a number of local authorities to address local issues, many of which do not specifically relate to betting shops.

Betwatch schemes and Local Partnership Agreements are examples of effective tools:

- Bet Watch schemes such as the Ealing project encourage the sharing of information between operators and the police including barring customers who exhibit signs of serious anti-social behaviour from all betting shops in the area.
- Local Partnership Agreements between operators, local authorities and the police set out what councils and the police can do to support local businesses, and how businesses themselves can help to keep the local area safe, clean, green and pleasant places to live. In Lewisham, for example, ABB members have signed the Council's Deptford High Street Charter and are working alongside the council, police and other businesses to tackle such issues.

The ABB and its members, who appreciate the role that local authorities have in responding to community concerns, are in discussion with a number of councils about similar schemes and welcome further local approaches and dialogue to resolve local issues. The ABB is also committed to evaluating the success of these schemes.

## ANTI-MONEY LAUNDERING AND TERRORIST FINANCING

The ABB has published guidance for its members helping them to adhere to their anti-money laundering responsibilities under the Proceeds of Crime Act 2002, Gambling Act 2005 and Terrorism Act 2000.

Through the detailed guidance, the ABB aims to assist its members to implement policies and reporting procedures to ensure the betting sector's continued compliance with relevant legislative requirements and to prevent betting operators being used in connection with money laundering or terrorist financing.

This is another example of the ABB's drive to keep crime out of LBOs on an on-going basis.



## BETTING INTEGRITY

Bookmakers will always have a vested interest in sports integrity, because it is they who are likely to suffer financial loss from betting related corruption.

The ABB and its members work closely with the Gambling Commission and the European Sports Security Association (ESSA) to identify and investigate unusual betting patterns that may be related to corruption in sport. When an unusual betting pattern is identified and deemed to be suspicious, other operators, ESSA and the Gambling Commission are immediately informed. Information is shared, as appropriate with the relevant sport's governing body once it has been notified to the Gambling Commission.







## CHAPTER 3

# HARM MINIMISATION STRATEGIES

## STAFF TRAINING AND AWARENESS

The ABB and its members believe that staff initiated interaction with customers along with the responsible gambling information and tools made available can help to protect customers and assist them in making informed choices regarding their gambling.

The aim is to create a cultural shift in the staff mindset which firmly plants more player protection at the heart of activities undertaken by existing staff and makes new staff ambitious to aspire to these high standards.

Specific new measures include:

- All shop staff will be trained, in consultation with providers of responsible gambling expertise, to recognise a wider range of problem gambling indicators and will aim to identify those customers at risk of developing a gambling problem.
- All shop staff will be actively encouraged to 'walk the shop floor' as part and parcel of an enhanced customer engagement role, including initiating customer interaction in response to specific customer behaviour which needs to be addressed.
- All ABB members will nominate a member of staff who will be responsible for responsible gambling on a local basis and will receive additional training to deal with more complex responsible gambling interactions.
- Compliance objectives will be added to the performance agreements of all relevant middle and senior managers working for ABB members and compliance will be a standing item agenda at LBO level performance reviews. The ABB will develop a minimum industry standard for staff training which is hoped will evolve into an accredited system.

This new industry standard will be implemented before March 2014 and reviewed annually. The standard will include:

- Provision of appropriate information on the effects of problem gambling
- Recognition and identification of the indicators of problem gambling
- Conflict management
- Customer interaction in response to specific customer behaviour, referral, and follow up processes
- Effective self-exclusion processes at a local level
- The application of a Think 21 policy, especially with regard to machine players
- The identification of vulnerable groups
- Regular refresher training
- Auditing and testing of staff at least every two years

## SELF-EXCLUSION

All gambling operators are committed to effective self-exclusion measures but it is widely recognised that it is a challenging area for everyone. Self-exclusion is an important step for individuals who are not in control of their gambling in addressing their behaviour. The most effective system of self-exclusion is a localised one where the self-excluded person excludes from shops where the customer has been a regular attendee and is known to staff. When a customer requests self-exclusion, it should be facilitated with immediate effect for that particular shop by any member of staff. The ABB reiterates its commitment to the following measures:

- All ABB members will maintain a central self-exclusion register, monitor the number of self-exclusions in each of their shops, have processes to make sure that shop staff are properly implementing self-exclusion, and conduct regular audits of their scheme's effectiveness.
- Internal arrangements for exclusion from the operator's other channels and removal from marketing databases.

Bookmakers already encourage customers to enter into a wider self exclusion from other betting shop premises and ABB members will develop processes to ensure positive reinforcement and signposting to those who wish to self exclude e.g. notices which, amongst other information, will include helpline numbers for all the major betting operators.

ABB members will pro-actively encourage customers to also self-exclude from other gambling premises such as arcades, bingo halls and casinos in the immediate local area.

The ABB will consult and collaborate with stakeholders such as other trade bodies, RGT and RGSB before December 2013 with a view to developing monitoring mechanisms (to test the effectiveness of these measures) and improving the above self-exclusion processes before March 2014.

## AGE VERIFICATION



The industry takes its responsibility to protect children and young people very seriously and is committed to building on the ABB's High Street Betting Industry Action Plan and Supplementary Code of Practice on Age Verification (2010).

All operators already enforce a rigid 'Think 21' policy, and the large national operators employ their own independent testing companies to ensure standards are maintained at a high level.

Recent overall results of independent test purchasing exercises are comparable, or favourable, to those for other age-restricted products in general. This clearly demonstrates that LBO staff members are trained and proactive in asking young-looking customers to provide proof-of-age and refusing service if they cannot do so.

However, we have higher aspirations and wish to raise the bar on compliance systems, risk assessment and monitoring in general. We also recognise that there needs to be even more focus on ensuring that gaming machines cannot be accessed by young people and we need to meet the challenges faced by betting shop staff by developing an environment where intervention and challenge around gaming machines is a "non-negotiable". ABB members are also committed to siting all machines where they can be adequately supervised from the counter.

The ABB is therefore committed to supporting these new initiatives:

- All shop staff will be actively encouraged to 'walk the shop floor' and implement the Think 21 policy amongst machine players.
- The ABB will revise and re-launch the High Street Betting Industry Action Plan with a focus on AV compliance. Members will ensure staff get specific training to prevent under age access to machines. In particular, to encourage the use of the remote counter facility to prevent play prior to the completion of appropriate age verification procedures. The new plan will be launched before December 2013.
- The ABB will fund a new programme of compliance testing undertaken by an independent test purchasing company for independent ABB members where necessary before March 2014.
- The major operators also fully support the Government's new plans to extend Primary Authority to age restricted sectors by entering into Primary Authority partnerships as soon as Parliament passes the legislation.



## **ADVERTISING AND PROMOTIONS**

Advertising is subject to the Committees of Advertising Practice (CAP) and UK Code of Broadcast Advertising (BCAP) advertising codes, which are both administered by the Advertising Standards Authority (ASA) and apply to all gambling operators and advertisers permitted to advertise in Great Britain.

The CAP and BCAP codes cover the content and placement of advertising and ensure that gambling

---

advertising is socially responsible. The rules ensure that gambling advertising is not aimed at children or young people and that it does not leave vulnerable people open to exploitation and harm.

The Gambling Industry Code for Socially Responsible Advertising was published on 7 August 2007. It is monitored by the Review Group for Socially Responsible Advertising and goes further than the CAP and BCAP codes in some areas. For example, the code covers the inclusion of educational or warning messages, and advertising after the watershed, with the exception of sporting events. Advertising and promotions will not target children. Demonstration games, tournaments and other free bets are also guaranteed to operate at the same statistical target return to player percentage rates as paid game play over a statistically significant amount of plays.

The ABB is committed to the following new measures:

- ABB members will pro-actively promote Responsible Gambling messages such as Gamble Aware and the National Gambling Helpline in all shops. The ABB Responsible Gambling Committee will review the effect of these messages before March 2014.
- The ABB Responsible Gambling Committee will address any concerns about advertising (raised by the industry itself or the public); with members being held to account for any individual cases which whilst not breaching regulations are against the spirit of the legislation. The committee will also have regular discussions with the responsible authorities on this issue. The measure will come into effect before March 2014.

## **RESEARCH, EDUCATION AND TREATMENT OF PROBLEM GAMBLING**

In addition to a commitment to a high standard of staff training in LBOs, the sector makes a voluntary contribution to the Responsible Gambling Trust (RGT). Together, all gambling sectors raise nearly £6 million per annum to minimise gambling-related harm. Key to this are effective education and prevention techniques, designed to prevent people getting to a stage where they have a problem with their gambling. Those that do develop problems require fast and effective treatment and support.

The ABB is committed to the following new measures:

- All members will fully support and co-operate with the work of RGT and will make an annual contribution to the research, education and treatment of problem gambling.
- In the context of the Gambling Commission's new surveys on participation and problem gambling ABB members are willing to work with RGT and RGSB to fully fund a new British Gambling Prevalence Study in 2014, should RGT and RGSB believe that such a study will add to the knowledge base to help guide new harm prevention strategies.
- All members will ensure that Gamble Aware information indicating where help can be obtained is displayed prominently on machines and elsewhere in shops.
- All members will promote new Responsible Gambling campaigns undertaken by Gamble Aware and the National Gambling Helpline.

## CHAPTER 4

# NEW HARM MINIMISATION STRATEGIES FOR MACHINE PLAYERS

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

The industry accepts that there is some public and political concern about this product and that is why the ABB is going to create a step change in our responsible gambling thinking. This is the first code of its kind to be published in Europe, implementing new consumer protection measures that will increase public confidence in the industry and more importantly make a difference to those machine players at risk of developing a problem with their gambling. ABB members are committed to implementing these measures as minimum standards of harm minimisation which could develop over time. If monitoring and evaluation by the ABB Responsible Gambling Committee, which will have access to independent advice, shows the measures are only marginally effective, then ABB and its members are also committed to replacing measures or changing the specific metrics associated with these measures. As new technological solutions emerge they will also be assessed in terms of improving harm minimisation standards.

## PLAYER PROTECTION

**1. Voluntary Monetary Limits** – Customers will be able to set limits on the maximum amount of money spent during a single session of play. Academic research by Professor Mark Griffiths states this may be particularly useful for games where they can spend a long time on the machine<sup>1</sup>. When the player's personal limit is reached an alert will inform the customer that this money has been spent and the customer will be asked to make a decision as to whether or not to continue to gamble. The question will be asked: 'Do you want to stop playing?' According to the above academic research this is a better psychological option than asking the customer to continue playing and it means the customer has to read and acknowledge the duration of their play. Game play will be suspended for 30 seconds and during this time the screen will display responsible gambling messages (in consultation with Gamble Aware and other stakeholders with expertise in this area). The next spin cycle will not commence until after the break in play. In the past GamCare's protection code has advocated a break in game play for 3 seconds and ABB members believe it is socially responsible to provide a longer break. Activation of the alert will also appear behind the shop counter which may offer opportunities for customer interaction. It is intended that this new technology will be installed in all member shops before March 2014.

**2. Voluntary Time Limits** – Customers will have an option to set limits on the maximum amount of time spent during a single session of play. According to the above academic research under 1 this enables customers to plan and pre-set their gambling behaviour. When the player's personal limit is reached an alert will inform the customer that the time allocated has been reached and the customer will have to decide whether to continue to gamble or not. The question will be asked: 'Do you want to stop playing?' Game

---

<sup>1</sup> Auer & Griffiths, 2013; Griffiths 2003; Smeaton & Griffiths, 2004; Griffiths & Wood, 2008

play will be suspended for 30 seconds and during this time the screen will display responsible gambling messages (in consultation with Gamble Aware and other stakeholders with expertise in this area). The next spin cycle will not commence until after the break in play. Activation of a time limit alert will also appear behind the shop counter which may offer opportunities for customer interaction. It is intended that this new technology will be installed in all member shops before March 2014.

**3.** The industry faces challenges in defining a customer session as personalised data is not recorded on machines. To provide a better and consistent understanding of player behaviour and to make it easier to assess and track data it is important that the industry agrees to a **uniform data set and software specification**. This will include an agreed definition of a player “session” and give each operator the capability to correctly identify the majority of sessions using these agreed definitions before December 2013.

**4. Mandatory money based reminders** – Academic research by Professor Mark Griffiths suggests that mandatory reminders are particularly important for players who might find it difficult to adhere to self-imposed limits<sup>2</sup>. A mandatory reminder will inform all customers automatically should they have lost £250 (and every £250 thereafter). The alert will also appear behind the shop counter which could offer opportunities for customer interaction. It is intended that this new technology will be installed in all member shops before March 2014.



**5. Mandatory time-based reminders** – As the above academic research under 4 suggests that mandatory reminders are particularly important for players who might find it difficult to adhere to self-imposed limits this will also apply to time spent. According to Professor Mark Griffiths mandatory reminders after 60 minutes could provide players with a ‘time out’ period to reflect on whether they wish to continue gambling and could also inhibit a player from using gambling as a way to escape their problems. The ABB believes it is socially responsible to implement an earlier time reminder than has been advised and the machines will inform all customers automatically that they have been playing for 30 minutes (and every 30 minutes thereafter). The alert will also appear behind the shop counter which could offer opportunities for customer interaction. It is intended that this new technology will be installed in all member shops before March 2014.

<sup>2</sup> Griffiths, Wood, Parke & Parke, 2006; Wood & Griffiths, 2007

**6. Session data on player cards** – Whilst card technology is not fully developed or universally available in LBOs ABB members who offer machine cards to customers are committed to promoting the schemes and making them more accessible. They will utilize the data as a tool for player protection, customer interaction and centralized monitoring. According to the above research clear data enables customers to see the monetary outcomes of their gambling and diminishes the cognitive heuristics they have when ignoring incurred losses. The card users will be able to request their session data which includes money won or lost and time spent on gaming machines. This measure will be available with members who offer card schemes before December 2013. Due to issues around session data the industry is currently unable to provide this facility to all customers. Following the initial establishment of a uniform data set and software specification (see point 3), requiring further technical development, ABB members will give all customers the voluntary option of accessing, on gaming machines, a time and win/loss summary for their current session before March 2014.

**7. Money loading** – It is generally accepted in the academic literature that repeated money loading can be a sign of a player developing or experiencing problems with their gambling. Whether cash is loaded into the Gaming Machine or a debit card is used at the counter (credit cards are not accepted), customers are forced to make individual decisions about each £20 denomination to be used as stakes. This means that customers are making a number of conscious decisions and have time to reflect before loading a particular amount. Shop staff will be trained to recognise the opportunity for customer interaction. This measure will be available before December 2013.

**8. Exception Reporting** – Unusual transactional data, cash-in, and gross win data will be centrally monitored. Analysis may then lead to customer interaction or further investigation as appropriate. This measure will supplement existing compliance processes and be available from October 2013.

**9. Cash machines in betting shops** – From October 2013 ABB members will not site ATMs that can be used from within a betting shop.

## **CUSTOMER INFORMATION**

**10. “Responsible Gaming”** - The responsible gambling page will contain more prominent and clear messages on staying in control (e.g. “Bet with Your Head”) and will aim to improve customer understanding (e.g. “Just because there have been a series of losing spins does not mean this will be followed by a series of winning spins”). These measures will be available before January 2014.

**11. Customer Help Pages** – Customers will have easier access and clearer information on help pages to enable them to understand concepts such as ‘return to player’ (RTP), the effect of randomness on potential returns, and voluntary player controls. This measure will be available before January 2014.

**12. Increased Frequency of Responsible Gambling Messages** – Responsible Gambling messages will be clearly visible on machine receipts, machine screens, and within the betting shop. This measure will be available before January 2014.

---

**13. More Informative Leaflets in Gaming Machine Areas** – Leaflets will explain the tools available to a player to control their gambling, including voluntary player controls and self-exclusion. This measure will be available before March 2014. Leaflets will also publicise the Gamble Aware website and the National Gambling Helpline more prominently. This measure will be available by October 2013.

**14. Games Design** – Games designers will be encouraged to ensure that the nature of play, and odds relating to, their games are clearly explained and easily accessible to customers.

**15. Websites** – Operators with corporate websites will provide a click through to the Gamble Aware website for anyone who feels they may have a problem with their gambling.





## CHAPTER 5

### COMPLIANCE AND EVALUATION

Compliance with the code of conduct will be a mandatory condition of ABB membership from 1 September 2013. The measures contained in the code are based upon the evolving body of evidence from around the world as to what does, and does not, work in terms of harm minimisation. The ABB has been advised in this regard by Dr Mark Griffiths, who is Professor of Gambling Studies at Nottingham Trent University's International Gaming Research Unit and has referenced the academic research in this area to support new measures contained in this code.

However, we acknowledge that harm minimisation, as opposed to harm identification and treatment, is a relatively new concept. There are different measures being trialled across the world and the body of evidence as to what are proven effective harm minimisation measures is constantly evolving. In Great Britain the upcoming research by RGT is highly significant and will hopefully add to our knowledge in the area of harm minimisation. We will recommend to the RGT that they evaluate the impact of the new machine measures as part of this research.

The ABB and its members are fully committed to both monitoring compliance to the code and to updating and strengthening the code as new evidence emerges over the coming months/years. The ABB will also formally evaluate the effectiveness of the code by establishing measurable KPI's and other success indicators and monitoring performance against them on a regular basis.

The ABB will set up a new Responsible Gambling Committee which will meet at least quarterly and monitor and review both compliance with the code and the detail of the code itself, making new recommendations as necessary. The Committee will have an independent (non bookmaking) chairman and an independent adviser who is knowledgeable and respected in this area of gambling related harm. The panel will also include members with knowledge of gambling and harm prevention and will seek to tap into the expertise available within RGT, RGSB, Gamcare, Gordon Moody Association, The National Problem Gambling Clinic and the Gambling Commission. The panel will receive data reports from ABB members, including feedback from machine players on the effectiveness of the measures, and consider breaches of the code. The panel will agree a terms of reference and set measurable indicators before December 2013. Measures will be assessed six months after their implementation. The reviews will take place in March and September of each year.

The committee will also engage with a wide range of stakeholders in the area of gambling and gambling related harm. The ABB will provide secretariat support to the committee and it will report its findings to the council of the ABB, through the ABB Chairman who will attend committee meetings as required. The panel will propose sanctions to the ABB Council if members are in breach of the Code.

The ABB Responsible Gambling Committee will be operational by 1 January 2014 and will be responsible for reviewing and evaluating the impact of the enhanced player protection measures.

---



## CHAPTER 6

### CONTACT POINTS

Any person wishing to comment on this code or report incidents of non-compliance with its provisions should, in the first instance, contact the Chairman of the ABB:

Neil Goulden  
Chairman – Association of British Bookmakers  
25 Buckingham Palace Road  
London SW1W 0PP

E: [neil@neilgouldenconsulting.com](mailto:neil@neilgouldenconsulting.com)  
T: 02074342111

Once the ABB Responsible Gambling Committee is established contact points for its members will be published in the code.

The ABB code will be prominently displayed on its website and all ABB members will receive copies, and sign an agreement to comply with its provision. Hard copies of the code will be available on request from the ABB.



association of british bookmakers ltd

## CHAPTER 7

### LEGAL DISCLAIMERS

Whilst this Code is designed to improve informed choice and self help strategies for customers, it should not be construed as creating a legal duty of care on the part of operators for problem gamblers or customers at risk of becoming problem gamblers. Minimum industry standards are established under the provisions of the Gambling Act 2005 and the associated regulatory framework.

Nothing in this Code shall be taken to override data protection law or the obligations of operators and their employees under health and safety legislation.

---

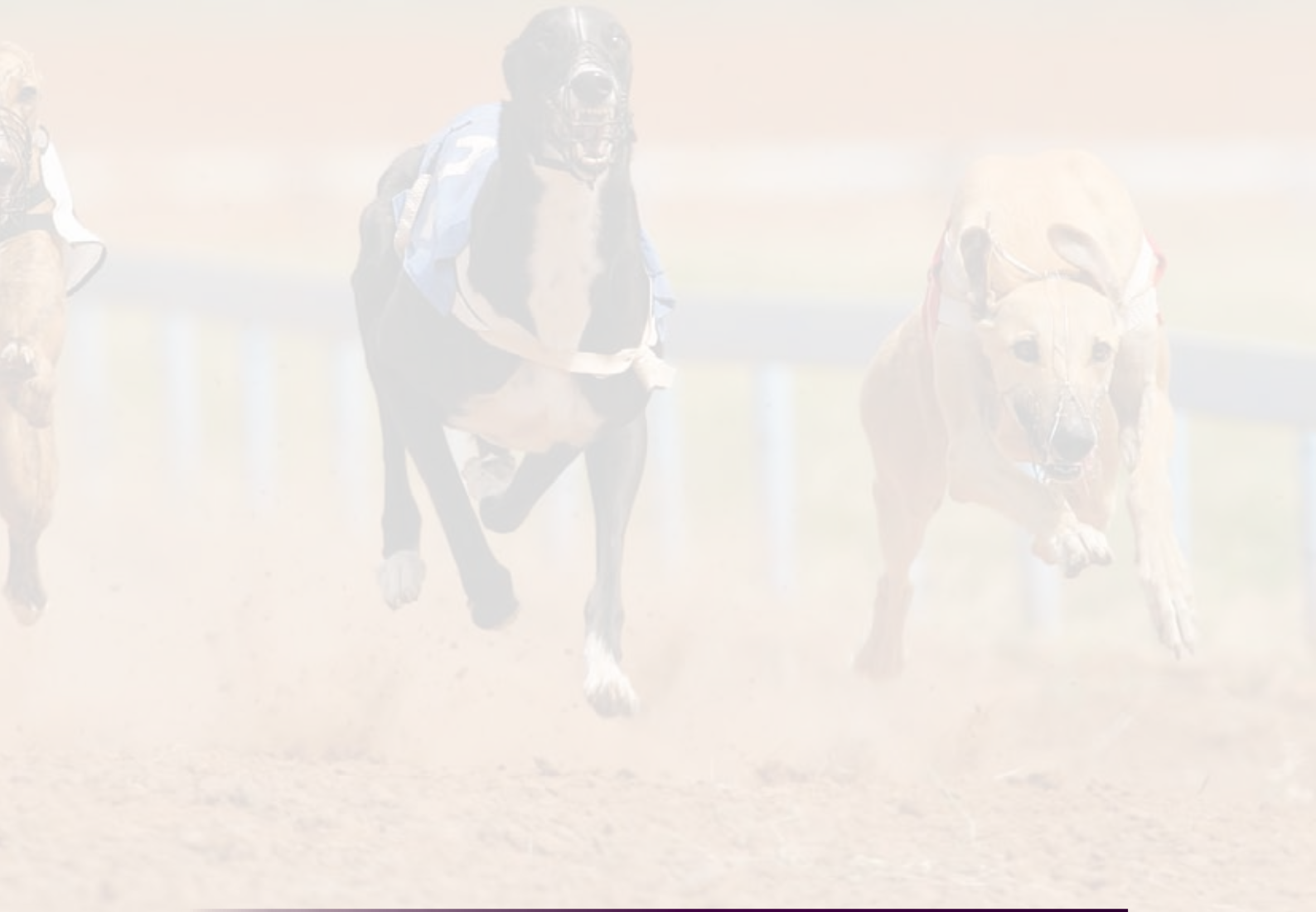


# NOTES



---

# NOTES



**Tel:** +44 (0)20 7434 2111  
**Fax:** +44 (0)20 7434 0444  
**Email:** [mail@abb.uk.com](mailto:mail@abb.uk.com)



We're now on Twitter  
you can follow us  
@BritBookmakers

Association of British Bookmakers Ltd  
Ground Floor, Warwick House,  
25 Buckingham Palace Road, London, SW1W 0PP

[www.abb.uk.com](http://www.abb.uk.com)

Monday, 15 September 2014

## Gala Coral Group Press Release

### **Coral at the heart of new responsible gambling initiative**

Today, Gala Coral Group announced that its Coral business will be at the heart of a significant new initiative on responsible gambling being driven by the four leading UK bookmakers. The commitments are being announced to the public in an open letter today from the four CEOs which will appear in national and leading regional newspapers. The open letter acknowledges that the industry is responding to growing concerns from the public about gambling and, in particular, the tone of some advertising on TV at times when children may be watching.

At the heart of the announcement is the creation of a new body, the Senet Group, which will be led by an independent standards commissioner who will hold its members to account.

The core commitments which have been made by Coral and the other three bookmakers are:

From 1 October we will:

- Introduce a voluntary TV advertising ban on sign-up offers (free bets and free money) before 9pm
- Withdraw all advertising of gaming machines from shop windows
- Commit 20% of shop window advertising to responsible gambling messages

From the start of next year:

- We will fund a major new advertising campaign to educate people on responsible gambling
- All TV advertising will have more prominent Responsible Gambling messages
- Create a new body, the Senet Group, chaired by an independent Standards Commissioner

The four bookmakers who have made the announcement today have called on the rest of the industry, both on-line bookmakers and the wider gambling industry, to join them in this important new initiative.

Carl Leaver, CEO of Gala Coral Group, said today: "I am proud of the fact that we are taking a lead on this issue. Millions of people get a great deal of enjoyment from our products and the service that we provide. The right to have a bet is an important freedom and must be balanced by our responsibility to protect vulnerable people. Gala Coral has an excellent track record on responsible gambling and the commitments that we are making now will improve this further."

Enquires:

**Email:** [corporatecommunications@galacoral.com](mailto:corporatecommunications@galacoral.com)

Forward Looking Statements

This press release may include forward looking statements. All statements other than statements of historical facts included in this presentation, including those regarding Gala Coral's financial position, business and acquisition strategy, plans and objectives of management for future operations are forward



looking statements. Such forward looking statements involve known and unknown risks, uncertainties and other factors which may cause the actual results, performance or achievements of Gala Coral, or industry results, to be materially different from any future results, performance or achievements expressed or implied by such forward looking statements.

Such forward looking statements are based on numerous assumptions regarding Gala Coral's present and future business strategies and the environment in which Gala Coral will operate in the future. Many factors could cause Gala Coral's actual results, performance or achievements to differ materially from those in the forward looking statements. Forward looking statements should, therefore, be construed in light of such risk factors and undue reliance should not be placed on forward looking statements. These forward-looking statements speak only as of the date of this press release. Gala Coral expressly disclaims any obligations or undertaking, except as required by applicable law and applicable regulations to release publicly any updates or revisions to any forward looking statement contained herein to reflect any change in Gala Coral's expectations with regard thereto or any changes in events, conditions or circumstances on which any such statement is based.

Coral Door Notice



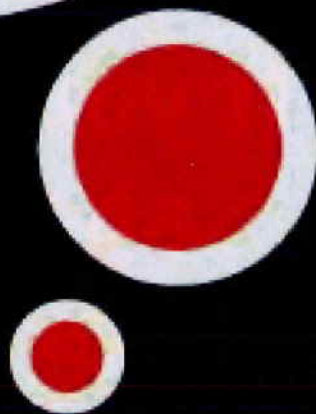
**If you're under 18 it is  
against the law to  
enter these premises**



**and if you're lucky enough  
to look under 21,  
you will be asked for ID**



**If you're lucky  
enough to look  
under 21, you will  
be asked for ID**



**Bet responsibly**

**gambleraware.co.uk**

**Examples of Window Posters Incorporating Responsible Gambling Message**

HOME OF THE NFL

PRICE  
OUT

UNBEATABLE PRICES ON THE  
MOST POPULAR NFL MARKETS



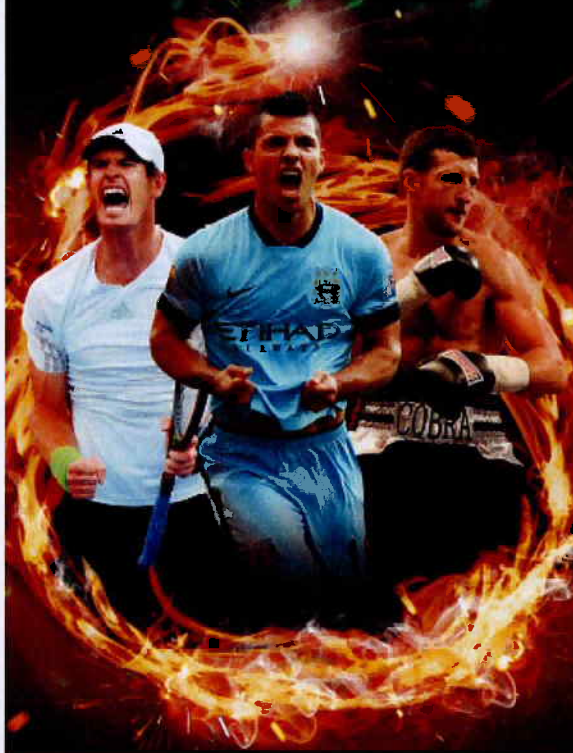
**WE TAKE YOUR  
FUN SERIOUSLY.**  
BET RESPONSIBLY

NATIONAL GAMBLING HELPLINE  
0808 8020 133 **gambleaware**  
GAMBLING CARE EXPERTS

HOME OF THE

PRICE  
OUT

UNBEATABLE PRICES ON THE  
MOST POPULAR MARKETS



**WE TAKE YOUR  
FUN SERIOUSLY.**  
BET RESPONSIBLY

NATIONAL GAMBLING HELPLINE  
0808 8020 133 **gambleaware**  
GAMBLING CARE EXPERTS

**Example of information Screens Promoting Responsible Gambling Message**

**KNOW YOUR LIMITS. SET YOUR LIMITS.**

NATIONAL GAMBLING HELPLINE 0808 8020 133

**BET RESPONSIBLY**  
gambleaware.co.uk

**WEEKEND GOALOVER**

LAST SEASON'S  
**MAN CITY 6-0 WIN**  
WOULD HAVE EARNED YOU A  
**FREE £6 BET**

WHAT WILL HAPPEN THIS WEEKEND...?

**WE TAKE YOUR FUN SERIOUSLY**

NATIONAL GAMBLING HELPLINE 0808 8020 133

**BET RESPONSIBLY**  
gambleaware.co.uk

**WEEKEND GOALOVER**

THIS WEEK'S FEATURE GAME  
**MAN CITY v TOTTENHAM**  
12.45PM, SATURDAY

- 1** Bet £10 on the feature game
- 2** Get £1 for every goal scored\*
- 3** Use your free bet on ANY Sunday match

\*Goalover bonus paid as 1 free bet

**WE TAKE YOUR FUN SERIOUSLY**

NATIONAL GAMBLING HELPLINE 0808 8020 133

**BET RESPONSIBLY**  
gambleaware.co.uk

**WEEKEND GOALOVER**

THIS WEEK'S FEATURE GAME  
**MAN CITY v TOTTENHAM**  
12.45PM, SATURDAY

**WE TAKE YOUR FUN SERIOUSLY**

NATIONAL GAMBLING HELPLINE 0808 8020 133

**BET RESPONSIBLY**  
gambleaware.co.uk

Example of information Screens Promoting Responsible Gambling Message

# KNOW YOUR LIMITS



**KNOW YOUR LIMITS. SET YOUR LIMITS.**

**BET RESPONSIBLY**

**NATIONAL GAMBLING HELPLINE 0808 8020 133**

**[gambleaware.co.uk](http://gambleaware.co.uk)**