



Generic operating strategy, shop management and site specific measures.

309-311 Caledonian Road, Islington.

Company background:

Jennings is one of the oldest independent bookmakers in the UK having been operating since the introduction of the Betting Gaming and Lotteries Act 1963 and is based in Epping, Essex. During this period the company has continuously held a Betting Office Permit (under the Betting Gaming and Lotteries Act 1963) and since September 2007 a Gambling Commission Operating Licence. In addition it has held numerous individual Betting Office Licences and currently holds 85 Betting Premises Licences throughout England.

Jenningsbet prides itself on being a well-run modern professional organisation with an unblemished regulatory record. It has been visited by the Gambling Commission for corporate visits following the initial grant of the Operating Licence. During these visits all aspects of the business including promotion of the Licensing Objectives and Operating Policies were examined and all documentation approved by the Gambling Commission.

Jenningsbet represents the independent betting shop sector at the Betting and Gaming Council (BGC) and is proactive on the Safer Gambling committee within the BGC and previously held a similar voice at the Association of British Bookmakers (ABB) before it was incorporated within the BGC

Operational Strategy and Shop Management:

Responsible Gambling:

Jenningsbet operate in a socially responsible manner, have created specific policies for Social Responsible Gambling and Customer Interactions within our branches and operate in accordance with the Gambling Commissions LCCP and the 3 Licensing Objectives from the Gambling Act (2005);

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- Ensuring that gambling is conducted in a fair and open way.
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

All Jenningsbet shop leaflets and responsible gambling marketing materials reference GamCare's website (www.begambleaware.org), all shops display posters and "please gamble

responsibly" leaflets providing information and contact details for GamCare. This information is positioned next to gaming machines, at the counter, each entrance/exit and in at least one other discreet area. Further reference should be made to our Social Responsibility Policy.

Customer Interaction

Social Responsibility is at the forefront of Jenningsbet culture. Senior Management are encouraged to use a customer-outcomes based approach with a focus on minimising gambling related harm (GRH). It's important to us that customers are assisted in staying in control of their gambling and we provide tools and information which helps them to stay in control and keep their gambling fun in a safe environment. We are committed to working to detect, prevent, and minimise the risk of gambling related harm to our customers. Our staff are trained to carry out impactful customer interactions that form part of our controls in preventing harm. Our controls for GRH prevention are framed by the three key components:

1. **Identify**

Customer behaviours and physical triggers that may/will warrant a customer interaction.

2. **Interact**

Customer Interactions, Observations and Reviews

3. **Evaluate**

Reviewing a customer's profile and additional actions concerning a customer

Further reference should be made to our Customer Interaction Policy.

Money Laundering and Terrorist Funding

Jenningsbet are committed to ensuring that criminals cannot launder the proceeds of crime through Jenningsbet products or services. We continue to scrutinise abnormal customer betting activities in order to assess risk and spot gambling-related crime. Whilst some relationships with customers will be transient or temporary in nature, consideration to this issue in relation to all customers is given.

Preventing Money Laundering (ML) and Terrorist Funding (TF) requires clear communication of the policies, procedures and controls to all employees, along with robust mechanisms to ensure that they are carried out effectively, weaknesses are identified and improvements are made wherever necessary.

We have in place an AML/CTF Procedures and Control document, an AML Risk Assessment and AML Policy for all our employees to adhere to. Our employee training forms as a primary control against the majority of the ML/TF risks. Every member of the shop team is trained on the regulatory framework Jennings operates in with emphasis on individual responsibilities and accountability. The training programme covers: what money laundering is and what incidents they may detect that could constitute money laundering, our controls and to reporting/escalation procedures.

Training takes the form of face-to-face workshops upon induction and yearly online refresher courses. Updated AML Policy and AML Procedures and Controls documents are read as part of staff's required training. Should new risks be identified and felt to warrant more face-to-face training these are delivered on an ad-hoc basis. Further reference should be made to the supporting AML/CTF documents.

Crime and anti-social behaviour (ASB):

Historically labelled a 'low level crime', ASB can have a deep impact on victims, genuine customers and communities. Jenningsbet provide conflict management training at induction and refresher training when required. This training along with physical systems such as 'Staff Guard' an external central operational control team and Security department with monitored two-way audio & visual support mitigate potential risk of ASB and conflict. Staff Guard are able to provide immediate response to any assistance required by employees. Jenningsbet recognises that public nuisance can escalate in certain circumstances and that it has a responsibility to work in partnership with local residents and authorities to reduce environmental impact. Jenningsbet operates a reporting system that flags up any branches identified as having particular anti-social behaviour issues to the security department and compliance team. This is escalated to Head of Compliance and if any customer is deemed to be creating ASB they are provided with banning notices. Further reference should be made to the supporting AML/CTF documents.

Site Specific Control Measures:

- Full CCTV will be installed to cover all areas with the facility to record at least 31 days of footage. Live footage can also be viewed by the Operational control team and Security department.
- StaffGuard also provide a live link to an operator and can call for Police assistance if deemed necessary. If the StaffGuard facility is triggered due to criminal activity the audio is recorded and used as evidence. Adherence to procedures is monitored via both the security department and compliance team.
- A concealed safe will be installed with appropriate time delays
- Staff Guard lanyards in shop which the shop team wear upon themselves with full visibility to the customers.
- Full height security screen
- Intruder Alarm and external shutters
- Front entrance door with electronic lock enabling the shop team to control access remotely from behind the counter
- Customer toilets, controlled and monitored by the shop team via buzzer entry system operated from behind the counter

Operating Hours:

Despite the mandatory hours allowed by the Gambling act being 07:00 – 22:00 we do not envisage opening before 08:00

Supporting documents attached:

- AML/CTF Risk Assessment
- AML/CTF Policy
- AML/CTF Procedures and Controls (Shops)
- Social Responsibility Gambling Policy
- Customer Interaction Policy
- Complaints and Disputes Procedure