



Customer Interaction Policy

October 2022

INTRODUCTION

Jenningsbet are committed to providing excellent customer service to all our customers. Getting to know our customers is at the forefront of what we do and part of providing an enjoyable customer experience. Looking after our customers is a priority and is reflected in the pro-active approach we take to safer gambling.

For the majority of people, gambling is an enjoyable form of entertainment. We must however not forget there exists a number of players who view gambling as addictive and for whom gambling has a negative impact on their lives. Jenningsbet recognises that to these players we have a duty of care.

The third licencing objective is '*protecting children and other vulnerable persons from being harmed or exploited by gambling*' and it is conditional on our operating licence that we have effective controls in place to protect the young and vulnerable including those at risk of gambling related harm.

WHY DO WE NEED TO INTERACT WITH CUSTOMERS?

There are many benefits to having a Customer Interactions, in addition to minimising the risk of harm to customer. These are:

- Checking in on customers can show that we care and build trust.
- Helps us provide a service that is sustainable and enjoyable for the customer and for you working in the branch.
- Reduces the risk of profiting from the proceeds of crime or from those with gambling problems
- Interactions help remain up to date with the customers current circumstances and provide generally better customer service.

WHAT CAN HAPPEN IF WE IGNORE SIGNS OF GAMBLING HARM?

A gambling addiction can have a serious impact on an individual's life and as a licenced operator it's important to put things into perspective to help us understand the consequences of developing a gambling problem.

Examples of these include:

- Homelessness
- Taking their own life
- Turn to other addictions
- Crime/Prison
- Relationships with loved ones disruption, conflict or breakdown– and the impact this can have on these 'affected others'
- An overall negative impact on society

Customer interactions are only one part of supporting a person with gambling problems. An individual will likely need support from gambling support services, charities or their GP. They will need to take action themselves and hopefully receive support from their loved ones. Jenningsbet employees are not expected to 'solve a customers problems' but interacting with a customer at the right time when they are experiencing harm may just have the desired positive impact to help them reflect on their situation.

Customer interactions are comprised of three elements:

1. **Identify**

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

2. **Act**

Customer Interactions, Observations and Reviews. This involves tailoring the action to the trigger shown. For example if a customer has spent a long time in the branch it can be helpful to suggest a break. If the customer is spending more than they have said they planned to it can be helpful to suggest a spend limits on the EGM

3. **Evaluate**

Reviewing a customer's profile and additional actions concerning a customer. If you feel the situation needs escalating to compliance for further support.

IDENTIFY

Part of knowing our customers is identifying those that may be at risk of GRH. Combining what you know about the customer with relevant indicators of harm helps you to decide if you need to interact. In this section we have set out some indicators or signs that a customer may be requiring an RGI.

Behaviours

Life events or changes to an individual customer's circumstances may mean that a person becomes more or less vulnerable to experiencing gambling harms. The rising cost of living may have had a negative impact on a customer's life who previously was not considered to be at risk of harm. They may be experiencing new financial difficulties or stress.

Events such as these as well as other life changing events such as divorce may affect rationale even for just a short period of time. If a customer has a pre-existing condition such as Dementia, Parkinsons or a mental health condition it may affect their ability to make informed decisions. Vulnerable customers also do not always appear vulnerable.

Anything that may make us question if that customer can make an informed choice about gambling is important to observe. Examples such as a lack of self-care, alcohol dependency, homelessness, having a language barrier, criminal behaviour, loneliness or unemployment adds to the picture of a customer's well-being.

Some of the more outward behaviours exhibited by a customer such as chasing losses, displaying rude behaviour, anger at their losses, a belief that the games are fixed, physical & verbal signs of distress, mood swings, regularly gambling until all their money is lost, returning to gamble after losing all their original money, gambling without a break or trying to borrow /loan money to extend their gambling and excessive losses in relation to their known wealth.

Customers may not display obvious signs, or overt behaviour associated with, problem gambling. However, there are physical signs that a customer may be experiencing gambling related harm such as reaching a cash or debit card limit or exceeding their voluntary limits set upon the electronic gaming machines (EGMs). There will be occasions when the compliance team will request you have a further interaction with a high staking customer who has hit the companies trigger levels in either turnover or losses.

A persons affordability should be considered when looking for potential signs of harm. Customers may be vulnerable if they have problems with money such as debt they can not pay, or if their debt is escalating out of control. This can mean they don't have enough money for food, rent, clothing to meet their own or their family's needs. A customer should only spend their disposable income on Gambling. Jenningsbet exercises precaution when considering customers in certain groups, that will be under financial pressure, for example students or customers that are recently unemployed.

It is important to remember that even if you think the customer can afford it, they may still be experiencing gambling harms. All customers must be considered at risk of gambling related harm even those who have been customers for a years or whose source of wealth is well known. A vigilant approach should also be maintained not matter the volume of business or time of day.

Mandatory Interactions

In addition to those behaviours outlined above there are certain customer actions whereby it is mandatory to perform a customer interaction.

Below we have outlined six customer actions which must lead to a Customer Interaction, all of which can be easily identified:

1. Customer exceeds set voluntary (time/spend) limits on an EGM.
2. Customer playing 2 EGMs at the same time
3. Customer debit card declines
4. Customer informs you they have set up a facility with their bank to block gambling transactions.
5. Customer placing an over the counter (OTC) bet of £10,000+
6. Customer receives an APAS alert on the EGM.

Escalation

If a customer has said something that causes you concern or displayed very worrying behaviours this should be logged on the SR log and escalated to the Compliance Team for further action. Examples of these include (but are not limited to):

- Customer stating they are in debt and cannot afford their gambling
- Customer frequently expresses a desire to self exclude but never carries through with the process
- Customer is a known self excluder in other local competitor branches/Jenningsbet branches
- Customer expresses concern that gambling is making them depressed/affecting their lives/work/relationship with loved ones

Please note any mention of suicide by a customer due to gambling harm should be immediately escalated to the Compliance Team and if out of office hours the Raceroom.

ACT

Interactions

After identifying customers who may be at risk of GRH it is important to act quickly to help protect them. Where you have concerns that their behaviour may indicate problem gambling intervene at the earliest opportunity and conduct a Responsible Gambling Interaction (RGI). That said your safety is number one priority in carrying out interactions. If a customer is being aggressive or angry we do not expect you to try and resolve this. Use staffguard as needed. Interact when the customer has calmed down and note the behaviour down as an observation. If a customer's behaviour is frequently aggressive or difficult to manage please escalate to the compliance team for advice and support.

In its simplest form an RGI is a conversation with the customer which relates to responsible gambling. It likely will encourage them to reflect on their behaviour and aims to have a positive impact on the customer.

Following an RGI or observation staff are required to record details of it via our Social Responsibility (SR) online reporting system.

When recording RGIs include the below detail:

1. Customer – *what is their name?*
2. Behaviours/Triggers – *why did you decide to interact?*
3. The RGI - *what was said? Where tools or further support signposted?*
4. Outcome – *what did the customer do next? Does further intervention need to take place?*

For some customers, making them aware of why you are concerned may be enough to prompt them to think and make a change. Some customers will need more support or advice.

Observations

There will be some occasions where a customer exhibits a trigger, however it is not safe or it is not possible to leave the counter area and have an interaction at that time. In these instances this should be recorded as an 'Observation' on the SR online reporting system.

Note: All 'Observations' MUST be followed up with an interaction at the next possible occasion, generally upon the customer's next shop visit.

Recording Interactions and Observations

Shop team members must record all RGIs that take place on a day to day basis. The Daily Task List contains reminders during each day to ensure these are logged.

The branch SR Report can be accessed via the Reports tab on the Shopworks platform. It is important to use appropriate date ranges to view all interactions that have taken place in that branch to assist in understanding customer profiles. You will need to interact with some customers a number of times and it is important to see what interactions have already taken place.

These logs are regularly and routinely checked and reviewed by our Compliance Team.

By following the reporting procedure we are able to ensure:

- Evidence that RGIs are taking place
- Compile a full interaction history by customer in a single location, including all Interactions, and Observations.
- Prompts for actions, including alerting duty managers where further action is required
- Improve central visibility on all customers potentially at risk of gambling related harm.

Signposting to Help

Any customers who show cause for concern should be given a MOSES leaflet and signposted to Gamcare as standard.

If you feel safe to do so and it is appropriate you may find it helpful to make the interaction less 'generic' and more personal to the customer's situation. Examples of this include:

- If a customer has expressed they are struggling financially signposting them to Citizens Advice Bureau
- If the customer has said they feel they have no one to talk to and are lonely signpost to Samaritans
- If the customer is female signpost to BetKnowMore the gambling support charity who offer a woman only programme 'New Beginnings'
- It can be helpful to use google translate if there is a language barrier for a customer (although the use of this can be limited)

If you want to suggest a particular type of support for a customer based on their circumstances please get in touch with the Compliance Team for more advice.

EVALUATE

Feedback from consumers shows that they often respond better to being informed about their behaviour and why, rather than being "told" what to do. But for some customers, and particularly if the behaviour continues to cause concern, you may need to take a more proactive approach. In some cases, you may need to take action for the customer. This may mean making an immediate decision based upon customer's welfare and may request that they leave the branch to take a break from their gambling. This could also mean working with the Compliance team if you believe the issue needs escalating.

All RGIs should have an outcome; a customer may decide to take a break, they may continue as before or they may take a leaflet about further support. It is important to record the outcomes of RGIs both those that happen at the time and after. An example may be a visible change in the customer's gambling which could be attributed to the interaction. It is even worth noting when you have interacted and the customer has continued exactly the same behaviours. When thinking about outcomes consider if the customer has understood the information or advice you gave.

Customer Review

In certain circumstances the compliance team will work with the shop team to consider if a customer's behaviours and or actions warrant them being refused service in order to protect them from gambling related harm this is referred to as an SR exclusion. The circumstances of this decision will vary on a case by case basis but will take into account:

1. What we know about the customer
2. What action has been taken
3. What signs of harm have been displayed

All SR exclusions are to be made by the compliance team and not the shop team directly. The Compliance Team will decide how best to communicate this decision to the customer.

Looking After Our Customers

It is vital that as a responsible operator everyone is aware of their responsibilities in managing customers who may be at risk from gambling and ensuring that our Customer Interaction Policy is followed at all times. The company has licensing obligations set out in the LCCP, so not only is it good practice to care for our customers who may show signs of being at risk, we also have legal and regulatory reasons for doing so.

If you have any questions or are unsure of your responsibilities please speak to a member of the Compliance Team.

Monitoring This Policy

To ensure that the policy continues to be fit for purpose:

Jenningsbet are committed to carrying out an ongoing assessment of its Customer Interactions, tailoring this policy and training around new products and newly identified measures as appropriate.

At a minimum this policy will be reviewed annually or upon the release of any relevant guidance published by a public body including the Gambling Commission.

This Policy has been drafted based on the principals of the Customer Interaction Guidance dated 12th September 2022 (the "Guidance") and has been implemented for the utilisation of the Compliance Team as guidance on how to recognise signs of a problem, and how to pro-actively interact with customers to minimise the risk of customers experiencing GRH.

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