



## **Social Responsibility Gambling Policy**

**October 2022**

## **POLICY PURPOSE**

This document has been created to detail the policies and procedures followed by Jenningsbet in respect of social responsible gambling to meet the responsibilities and guidance outlined in the Gambling Commission's Licence Conditions and Code of Practice (LCCP). Compliance with these is a condition of our operating licence therefore any breach of them may lead the Gambling Commission to review our licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose Jenningsbet to the risk of prosecution.

Jenningsbet recognises the importance of social responsible gambling and regularly reviews its policies and procedures and their effectiveness to our customers.

The third licencing objective of the Gambling Act 2005 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 appropriate controls in place. The need to prevent young and vulnerable persons from being able to access our products and services is of paramount importance.

Jenningsbet are members of the Betting and Gaming Council (BGC) the industry's trade body and works within it to industry-wide objectives. This work involves collaboration on policies and procedures especially concerning harm minimisation to ensure a shared approach across the industry.

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.

## **GOVERNANCE AND RESPONSIBILITIES**

The key personnel responsible for the Governance of the business are:

Greg Knight (Director) - Overall strategy and delivery of gambling operations and Marketing and commercial development.

Peter Jowett - Regulatory compliance

Micheal Haskett - Gambling related IT provision and security

Mike Langford - Financial planning, control and budgeting

The responsible gambling framework is overseen by the Head of Compliance whom holds full accountability for this area. Senior Management and the Board meet regularly as part of the Jenningsbet risk management framework. All relevant changes to legislation, enforcement action cases and any guidance documentation are discussed at this level. Any advances from the Responsible Gambling Roadmap Group or other BGC working groups are also discussed and implemented accordingly. The decisions made at the meetings are actioned with designated project managers to plan and implement any changes to the Social Responsibility framework.

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. This ethos stretches across all departments and is not limited to just those in Compliance. A member of the Compliance team attends at every fortnightly Operations Team meeting to ensure collaboration between departments is effective and messages conveyed.

## **TRAINING**

Jenningsbet are committed to ensuring that all key staff understand their responsibilities in respect of responsible gambling and this policy, and in particular the triggers to be alert to and the requirement to report concerns, knowledge, or suspicion to the Compliance Team.

All shop staff are required to complete compliance and social responsibility training which covers areas such as Age Verification, Responsible Gambling Interactions and harm-minimisation, Anti Money Laundering and Self-Exclusion. Refresher training is held every 12 months and new starters are trained upon induction. Ad hoc training sessions are provided to react to developing risks in particular areas.

The training framework is supported by the Jenningsbet compliance policies and procedures, with a copy of these being held in all shops and available in their Staff Portal. The policies are reviewed regularly and communicated to all staff. All shop staff are required to acknowledge their understanding of its contents and as well as the contents of any updates that have been issued. Key customer-facing head office staff (including the Trading, Machine and Customer Care Teams) are also required to complete this training.

Jenningsbet currently use an ELearning programme for training and this will be used to a greater degree for the foreseeable future in light of the Covid-19 pandemic. All staff are to ensure they are checking what Elearning exams they have outstanding as these need to be completed. Face to face training sessions either one to one or in a group will be carried out with social distancing measures in place as per government guidance. Oversight of training will continue to be carried out by the companies Training Manager who should be contacted for all training related enquires.

## **AGE VERIFICATION POLICIES**

To ensure that the 'Under-18' law is complied with at all times Jenningsbet operates a Think 21 (or if appropriate a Think 25) policy. This requires all customers who appear to be under 21 (or 25 if appropriate) to be approached by shop staff and their age verified by the production of the appropriate valid ID document as soon as entering the premises or as soon as possible thereafter but BEFORE gambling.

Staff are permitted to ask any customers wearing face masks or coverings to remove them to allow staff to identify them and request identification. Staff are reminded to be vigilant at this time as covering faces may be a technique used by those underage to gamble undetected.

If shop staff are in any doubt of a customer's age they abide by the principle of 'Young Stranger', whereby if the customer is young and a stranger to shop staff, they should always be challenged for proof of age. Acceptable forms of documentation include:

- a) Any ID carrying the PASS logo (e.g. Citizen Card, Connexions Card) Full Driving Licence with photo card.
- b) Provisional Driving Licence with photo card or International Passport
- c) Military Identification Card

Shop staff check to see that the ID is acceptable or not acceptable and then record either outcome in the Company's on line SR reporting system where the approach took place either on entry or at the counter/machines and also make a record in the shop's hard-copy Think 21 Challenge Register.

If a customer's age cannot be verified and the customer managed to play on a machine the machine play will be terminated. The customer's name and address will be requested and the customer will be informed that no winnings will be paid out and their stakes will be returned only in attendance with their carer, guardian and/or parent. If the customer managed to place an Over the Counter (OTC) bet they will be asked for their receipt/ betting slip, the customer's name and address will be requested and the customer will be informed that no winnings will be paid out and their stakes will be returned only in attendance with their carer, guardian and/or parent. Any OTC bet placed will then be manually voided in our till system. For both of these scenarios shop staff must immediately contact their Area Manager and Customer Care for a full investigation to take place.

Think 21/25 signage should be positioned on or close to the entrance/exit door, upon the counter and displayed in conjunction with existing signage, which is a legal or Jenningsbet display requirement.

Jenningsbet also employ an external company, 'Serve Legal', to carry out test bet purchases in our shops. Serve Legal use 18-19 year olds to ensure the aforementioned policies in place are robust and adhered to by our shop teams. The results of these tests are provided to the Gambling Commission via our trade body the BGC.

The Gambling Commission and Local Licensing Authority may also conduct underage test bet purchases to assess whether or not Jenningsbet shops are allowing under- 18's to enter or gamble on the premises.

If at any time shop staff are informed that they have been the subject of an underage test bet purchase by the Gambling Commission and/or the Local Licensing Authority, this is immediately reported to the Compliance Team.

All age verification test bet purchase failures are fully investigated by the Area Manager and/or the Compliance Team. Performance is constantly monitored and further training may be given to shop staff if necessary to react to developing risks in particular areas.

## **SELF EXCLUSIONS**

Under the Social responsibility code provision 3.5.1 in the LCCP Jenningsbet must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.

Jenningsbet have both an internal self-exclusion agreement process and are part of the Multi Operator Self Exclusion scheme (MOSES). When administering a self-exclusion agreement staff will signpost the individual to further support.

Self Exclusion agreements and the Self Excluder Database are kept securely with data destroyed as appropriate. Please refer to our Customer GDPR policy and our Data Retention Policy.

Staff are permitted to ask customers to remove any face masks or coverings if they suspect they could be a self-excluded customer. This should be done as discreetly as possible whilst maintaining a social distance.

## **Internal Self-Exclusion Procedure**

Self-Exclusion may be requested by the customer at any time and can be dealt with by shop staff on request. Customers can request to self-exclude for a period of 12 months by completing a Self-Exclusion form available from all Jenningsbet shops and or via the Compliance Team at Head Office. If any other time period is requested or communicated on the form, it will be defaulted to 1 year and communicated to the customer via post. The 12 month timeframe offered in our shops helps to ensure that we hold recent photographs of the self-excluder to assist in enforcement.

Customers may opt to Self-Exclude from one 'primary' Jenningsbet shop and up to eight additional 'secondary' Jenningsbet shops (if required). In order to assist with the enforcement of the Self - Exclusion, it is currently necessary for the customer to provide us with two current passport sized photographs.

On completion of the form, the customer copy with additional advice, information and terms & conditions is handed to the customer. The Jenningsbet primary excluding shop then retains one copy with a photo attached, the second Jenningsbet copy is sent to the Compliance Team (who send on copies to any secondary shops if applicable).

Self-Exclusion requests for unspecified shops/ areas, for example where customers simply state 'all Jenningsbet shops', or for other time periods, cannot be accepted. Any customer wishing to extend their Self-Exclusion to a wider area will need to contact the Jenningsbet Compliance Team directly.

Once implemented the Self-Exclusion request cannot be withdrawn by the customer for any reason. Jenningsbet will take all reasonable steps to assist with a customer's Self-Exclusion request. However 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 shop staff will discuss the MOSES scheme to customers so they can Self-Exclude 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 shop staff within this time frame to reinstate themselves, they will be advised of the reinstatement process (see below).

Alternatively, should the customer ask to extend their Self-Exclusion for a further period of 12 months, they will be asked to complete a new Self-Exclusion agreement. If 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 will be forwarded to the Compliance Team where it will be securely destroyed (an electronic record is kept for auditing purposes). At this point the customer is no longer self-excluded from the premises.

## **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. This can be done via branch or centrally by the Compliance team.

Additional photographs are only required if the customer's image has changed significantly from the photographs provided with the original form.

## **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.

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 the Compliance Team will communicate to any other secondary shops listed on the customer's original Self-Exclusion form and advise them that the customer is now reinstated.

A self-excluded customer cannot re-enter a Jenningsbet 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.

## **Breach of Self-Exclusion**

We will take all reasonable steps to assist with a customer's Self-Exclusion request. However the onus is on the customer to adhere to their self-exclusion.

If a self-excluded customer is able to gamble, the following actions will be taken for the respective scenarios;

- a) If a customer has gambled on an Electronic Gaming Machine the ticket will be printed and any returns paid to the customer
- b) If the customer has placed bets over the counter, they will be retained and any outstanding winnings or voided bets that are yet to take place will be paid out to the customer.
- c) At no point will losses accrued prior to the customer being identified as self-excluded be returned.

As soon as the breach is discovered the customer should be informed of the Self-Exclusion agreement to which they have entered and should be asked to leave the premises immediately after scenarios a and b above are concluded.

The shop team will then also send a notification to the shops that were included on the 'secondary shops' (and primary shop if required) part of the customer's Self-Exclusion form informing them that this breach has occurred.

All breaches of Self-Exclusion must be reported to the Compliance Team and logged on the SR on-line reporting system.

## **MULTI OPERATOR SELF EXCLUSION SCHEME (MOSES)**

MOSES, the self-exclusion scheme for betting shops in the UK is run by the Multi-Operator Self Exclusion Scheme Ltd (an independent body set up to promote responsible gambling standards) and allows customers a one-stop facility to exclude themselves from all betting shop operators in an area. Under the scheme, a customer calls the nationwide Self-Exclusion helpline and speaks to a trained central team of advisers who will then tailor their Self-Exclusion based on locations they frequently visit. The helpline advisor will also be able to give customers information about how to get help, including the details of counselling services or treatment programmes.

The central team will then forward on the MOSES form to Jenningsbet's Compliance Team who will add it to their records and inform the relevant Jenningsbet shops. Self-Exclusion expiries, renewals and reinstatements will apply as outlined above.

If the breach is associated with a MOSES form, a notification will be sent to all Jenningsbet shops included on the MOSES form and Jenningsbet will notify the MOSES central team of the breach, detailing the time/date, location and the type of breach (gambled/not gambled).

Customers who continually breach their Self-Exclusion agreement or show serious concerns with being able to adhere to it, may be subject to barring orders. This will be at the discretion of the Jenningsbet Compliance Team.

## **PRODUCTS & RISK MITIGATION**

Jenningsbet offers customers the opportunity to bet on fixed odds betting events over the counter (OTC), via self service betting terminals (SSBTs) and via B3 category games on electronic gaming machines (EGMs).

To identify and manage the risks associated with the above products in relation to potential problem gambling Jenningsbet applies controls in four broad ways.

**BEHAVIOURS AND INTERACTIONS:** Training staff to be aware of behaviours which may be indicative of problem gambling issues and how and when to interact with these customers. Also, how to report any concerns to the Compliance Team.

**CUSTOMER PROFILING:** Providing facilities for in-shop customer monitoring, allowing staff to log customer information, transactions and emerging concerns.

**SYSTEM CONTROLS:** Implementing betting and gaming controls and other in-shop processes to mitigate areas of potential risk.

**REPORT ANALYSIS:** Carrying out proactive analysis of betting and gaming activity to help detect problem gambling issues. This is supported by record keeping, monitoring and customer reviews.

Each is considered in turn below:

### **PREVENTING GAMBLING RELATED HARM**

To support you to implement this policy, our **Customer Interaction Policy** document outlines a number of requirements.

The policy is framed by the three key components in preventing customers experiencing gambling related harm:

- 1. Identify**

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

- 2. Act**

*Customer Interactions, Observations and Reviews*

- 3. Evaluate**

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

## **CUSTOMER PROFILING**

### *SR Online Reporting System*

Shop teams have the ability to monitor customer's behaviours and to record observations and interactions via our SR online reporting system. These are monitored centrally by the Compliance Team.

### *Monitored Customer Electronic Profiles*

As well as the SR online reporting system shop staff have the ability to monitor customers by creating an electronic profile on the in shop till system. This profile will include a 'Nom De Plume' (or real name if known), stakes, returns and bets. The profile allows OTC betting to be monitored by manually linking the profile to bets placed by the customer when they visit the shop thereafter to help assess betting trends.

The information on both systems is regularly collated and reviewed by the Compliance Team and any actions required cascaded to the shop team.

## **HIGH VALUE CUSTOMERS**

Jenningsbet do not define any customers as a 'HVC' (High Value Customer) and do not offer bespoke preferential HVC treatment or rewards system to any customers including but not limited to any of the below:

- i. Invitation to hospitality, events, dinners, or other enhanced services
- ii. Personal account management/dedicated point of contact
- iii. Individualised bonuses, benefits, or gifts.

No contact in regards to incentives to gambling are permitted outside the Jenningsbet's policies, procedures or systems with any customer.

## **SYSTEM CONTROLS**

For machine play, complementing our interactions around behavioural, physical and analytical work Jenningsbet has in-shop controls on our machines to help our customers gamble responsibly. Both voluntary and automatic time and spend reminders are available on our machines to help customers keep track of their play.

### *Voluntary machine limits*

When money is added to a gaming machine at the start of a session, the screen will give the customer the opportunity to set a voluntary time and/or spend limit for that session. The minimum and maximum limits that can be set are 5 minutes - 180 minutes, and/or £1-£10,000. The screen will again offer the ability to set limits when new money is added to the machine during a session.

Limits can be changed mid-session by clicking on the 'Set Limits' button on screen and clearing the existing limit before creating a new one.

Where money is inserted in excess of a spend limit, customers can collect the excess money, collect all money on the machine, or set new limits. A 30 second pause must be observed if setting a new limit.

Once a time limit is reached, two options will be displayed on the screen - to stop playing, or to set a new limit. A 30 second pause must be observed if setting a new limit, or clearing an existing limit.

Once a customer has exceeded any voluntary machine limit set, this information is flagged to our shop team via the back office system.

#### *Mandatory Time Reminders*

Reminders will be shown on the screen every 30 minutes elapsed in a session and a message will appear on the back office system.

#### *Anonymous Player Awareness System (APAS)*

APAS involves a real-time in-session algorithm tracking play in every session. It identifies specific player behaviour which may indicate harmful play. This behaviour triggers an alert (enforced break in play) to the player (on-screen) and to staff (via back-office terminal) facilitating a RGI where appropriate.

Responsible gambling information and game information including Return To Player (RTP) ratios are displayed on all EGM terminals. When a customer exceeds set voluntary (time/spend) limits on an EGM or triggers an APAS alert it is mandatory that staff have a Responsible Gambling Interaction with the customer.

### **RESPONSIBLE GAMBLING INTERACTIONS**

In its simplest form an RGI is a conversation with the customer which relates to responsible gambling. Staff should try to ensure RGIs are carried out discreetly at the counter or, if on the shop floor that social distance guidelines are maintained at all times.

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?*

More detail on Responsible Gambling Interactions can be found in our Customer Interaction Policy.

### **CUSTOMER REVIEW FILE**

In certain circumstances significant concerns may arise and the compliance team will work with the shop team to achieve an appropriate outcome. This could include a customer being refused service in order to protect them from gambling related harm. This outcome is referred to as an SR exclusion.

The circumstances of this decision will vary on a case by case basis but will predominantly take into account:

1. The amount of interactions undertaken and the response of the customer to each interaction.
2. Customer's losses over a particular time period both EGM and OTC.
3. When an Interaction has led to a discussion about Self-Exclusion, regardless of the outcome.

On occasions customer review may require further investigation including the below information:

1. Betting information including bet history and Nom De Plume
2. Responsible Gambling Interactions and Observations recorded
3. Statements/interviews containing Duty Manager knowledge of the customer (whether substantiated or not)
4. CCTV images
5. Property profile (including housing association or local authority property or property of grossly disproportionate value to betting spend).
6. Company information (disqualified directorships, liquidation, cancelled directorships, multiple 'shell' companies with no physical premises, website or contact address)
7. Credit information (i.e. pay day loans, debt collection searches) CCJs
8. Customer profiling including age and payment methods
9. Checks on customer Debit Card details used (where known) to establish links across the betting shop estate, and the name on the debit card used (where available)
10. Personal details obtained from any Jenningsbet accounts
11. Searches for previous Self-Exclusions
12. CallCheck 'credit' checks where a customer is known to hold a Jenningsbet online account.
13. Information obtained using Internet Searches including
  - a) Social Media
  - b) Professional Bodies to confirm customer vocation (i.e. Solicitors via the SRA)
  - c) Salary Range checks
  - d) Land Registry/192.com address and property value checks where an address is known
  - e) Insolvency
  - f) Police enquiry;

Information on their betting patterns based on their account play through the gaming machine supplier which captures details of gameplay and associated information on customers visits. These can be summarised under the following 6 headers:

- Losses
- Chase
- Session Length
- Frequency
- Deposits
- Stakes

When reviewing a customer's profile if we believe that they are experiencing gambling related harm and have taken no steps to self- exclude we will take the decision to refuse their business. This is referred to as an SR exclusion. Jenningsbet will withdraw their services to the customer and inform them of this either via the shop team or a letter to their home address.

## **RESPONSIBLE MARKETING**

Jenningsbet marketing team ensure that promotional material is developed in a socially responsible manner, particularly to protect young or vulnerable persons from being harmed or exploited by advertising and in accordance with the following provisions:

The Gambling Commission's LCCP;

Committee of Advertising Practice (CAP) code;

BGC Code Of Conduct

## **RESPONSIBLE GAMBLING CHARITIES**

### *BetKnowMore*

Jenningsbet support the charity BetKnowMore and have funded their women's only support group New Beginnings. BetKnowMore provide guidance to Jenningsbet on how best to communicate to customers who may be showing signs of harm. `1Q

### *YGAM*

Jenningsbet work with The Young Gamers and Gamblers Education Trust (YGAM) and are a Silver Tier supporter. YGAM is a national charity that works to educate and safeguard young and vulnerable people. Working to ensure they can make informed decisions and understand the consequences around gambling.

Jenningsbet work in partnership with YGAM and BetKnowMore to deliver training modules to staff focused around customer vulnerability and preventing customer harm.

### *GamCare*

All Jenningsbet shop leaflets and marketing materials reference GamCare's website ( [www.begambleaware.org](http://www.begambleaware.org) ) and all shops must 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.

## **MONITORING THE POLICY**

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

Jenningsbet are committed to carrying out an ongoing risk assessment of this Social Responsible Gambling policy tailoring it and any training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any responsible gambling cases, Jenningsbet will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission or BGC. At a minimum this policy will be reviewed annually.

Jenningsbet will further seek to subject this policy and its processes to a 3rd party for an independent assessment currently WoodsWhur Solicitors.