

Betwatch toolkit

Information note 2018

1 Betwatch schemes

- 1.1 Betwatch is a community based crime prevention scheme run by gambling licensees to create safer gambling environment. It has the support of the Association of British Bookmakers (ABB), senior management teams within the large bookmakers, various police forces and the Gambling Commission. The goal is to include other gambling sectors in the schemes and since December 2017 there has been involvement from the casino sector and discussions are underway with Adult Gaming Centre (AGC) operators to include AGC premises in some of the existing schemes.
- 1.2 There are over 40 Betwatch schemes in operation around the country already which clearly demonstrates an ongoing commitment amongst bookmakers to mitigate the perception of such premises as crime generators whilst identifying and, where necessary, increasing confidence amongst staff to report crime.
- 1.3 This information note issued by the Gambling Commission (the Commission) does not constitute guidance under section 25 of the Gambling Act 2005 (the Act). It sets out the principles behind Betwatch and showcases various formats taken by Betwatch schemes around the country, in order to enable others to choose and adapt as appropriate for their area.

2 Betwatch overview

- 2.1 Similar in principle to the well-established [Pubwatch](#) schemes in place in alcohol licensed premises, the origins of Betwatch can be traced back to the Safe Bet Alliance initiative that was set up by the ABB to bring all their members together to reduce crime and disorder. Launched in 2010, [Safe Bet Alliance](#) (SBA) has played a key role in making the UK's betting shops safer for staff and customers. The guidelines within the SBA document were developed in partnership with the Metropolitan Police, Crimestoppers, the Institute of Conflict Management and Community Union.
- 2.2 Betwatch schemes can take different approaches to sharing information as showcased in the examples in Annex 1. However all have the central goal of bringing together gambling operators, local police forces and local authorities (LAs) to share information and work together in order to reduce crime and disorder in and around gambling premises, principally bookmakers, but the schemes can be extended to other types of gambling premises.
- 2.3 Those involved in a scheme agree:
 - on the standard of behaviour that is expected of customers using their premises and,
 - to take collective action against problematic customers who do not meet those standards, by banning them from all gambling premises within the local Betwatch scheme.

3 What is the trigger for setting up a Betwatch scheme?

- 3.1 Typically the driver for setting up a scheme is an increase in reported crime or calls for assistance from gambling premises in a particular area however schemes can be set up without such drivers or for any other reasons where involved parties think benefits would be felt from their introduction. The police and or LA will have records and can track trends of which areas would most benefit from a scheme. It is also prudent to consider the likelihood of displacement when setting up a scheme and as such it may be decided to include neighbouring areas in the scheme which have no history of risk around criminal / antisocial behaviour. Schemes may also be introduced as a deterrent to prevent the development of issues in any area.
- 3.2 Willingness of operators to actively participate in a scheme is likely to result in reduced compliance and enforcement activity.

How does Betwatch help?

- Reduces crime & disorder
- Creates effective banning system
- Improves partnership working
- Improves information sharing and communications

4 How to implement a scheme

- 4.1 Ascertain the level of demand for scheme and identify areas for scheme implementation through reference to police call logs and discussion with LA. Police data can be accessed through the Design Out Crime Officer (DOCO) who can be identified by Sharon Horner, West Midlands police, details at Annex 2.
- 4.2 Prioritise areas according to highest number of calls for police assistance and / or reported crime within a set radius which contains gambling premises. Identify one area to focus development of scheme on with a view to expanding or adding schemes as required once a scheme is functional in one area. The area can be as small as a section of a high street, as large as a central business district or anything in between. **Schemes which attempt to encompass large areas in a blanket fashion are far less successful than targeted schemes within defined areas.**
- 4.3 It is suggested that the Neighbourhood Police Team and / or LA conducts familiarisation visits, with the support of the Commission's Compliance Manager if appropriate, to raise awareness of issues faced within betting shops and measures already in place to counter these. Use these visits to raise awareness of shop staff and managers of the principles of Betwatch ie "banned from one banned from all", data sharing options and the mechanics of the overall scheme. See Annex 3 for handout that can be given to staff.
- 4.4 Arrange date for first meeting and issue invites.

5 Who should be invited?

- 5.1 Consider contacting the following, where appropriate:
- Bookmaker Area Managers / Security Managers
 - Police (DOCO)
 - Local Authority Licensing Managers (LA)
 - Bookmaker shop Managers / staff
 - Police Neighbourhood Team Sergeants
 - Business Improvement District Manager / Warden (BID)¹
 - Gambling Commission Compliance Manager (watching brief only)
 - Representatives from other gambling premises in the area, such as arcades or casinos.

6 First few meetings

- 6.1 If a Safe Bet Alliance forum is already in operation in the area then it is suggested that Betwatch discussions forms part of those meetings otherwise arrange a standalone meeting.
- 6.2 Identify a venue for monthly meetings. This is usually a betting shop within the scheme area rather than a police or LA premises as you are more likely to obtain continuity of access to a betting shop and less travel for staff means higher levels of attendance.
- 6.3 It is recommended that either the DOCO or LA chairs the first three meetings, thereafter handing the chair position to a shop manager / staff.
- 6.4 Initial meetings should be at one month intervals to allow time for actions arising to be completed and cascaded across all organisations. The frequency of meetings is suggested to be maintained at monthly but can be tailored to suit the demands of each scheme.

Suggested content for first few meetings:

	Discussion items
Meeting 1 Month 1	Recap on aims and mechanics of scheme Share information about the issues encountered in premises and individual to be banned Agree geographic remit and whether to include other types of gambling premises Agree data sharing process. Set up accounts for data sharing platforms if required

¹ A BID is a defined area in which a levy is charged on all business rate payers in addition to the business rates bill. This levy is used to develop projects which will benefit businesses in the local area. There is no limit on what projects or services can be provided through a BID. The only requirement is that it should be something that is in addition to services provided by local authorities. Improvements may include, but are not limited to, extra safety/security, cleansing and environmental measures, and therefore a Betwatch scheme could be considered as a project in a BID. Further information about BIDS and a list of where they are <http://britishbids.info/>

Meeting 2 Month 2	Share information about incidents in premises and potential individuals to be banned Finalise and sign data sharing agreement Training, if required on how to use the data sharing platforms
Meeting 3 Month 3	Share information about incidents in premises and potential individuals to be banned Evaluation of scheme to date If appropriate, agree the official launch of scheme and press coverage Issue posters for display in participating betting shops/other gambling premises Agree frequency of meetings going forward eg monthly/bimonthly and who will chair – ideally a shop manager or staff

7 Scheme operation

- 7.1** Once the scheme is launched ongoing input is minimal. The monthly shop level meetings allow discussion around banned individuals and their behaviour. Should a disagreement arise as to the proportionality of a ban this can be escalated to the Safe Bet Alliance meeting, if it exists, or to a standalone Betwatch meeting for discussion with operators, police and the LA.
- 7.2** The scheme area can be extended or contracted as required.
- 7.3** New scheme areas can be identified using the same process as the first area.
- 7.4** Banning notices should be reviewed at the end of the banning period. Where there is reasonable cause to extend a ban a new notice should be produced and issued. (see section 9 for more detail).
- 7.5** Should a scheme reduce unwanted behaviour to the extent that no reports are being made then meetings could move to less frequent basis eg quarterly. Staff should continue to share information as per previously during such a period.

8 Information sharing agreements

- 8.1** Once the area for the scheme has been identified through evidence based risk analysis and support from all key parties then an Information Sharing Agreement must be agreed and signed by all parties. A key factor for developing Information Sharing Agreement is to ensure that personal information is being processed fairly and lawfully by all parties in the scheme. See Annex 4 for the issues to be considered as part of any agreement. Where a DOCO is involved it is suggested they lead on producing the information sharing arrangements.
- 8.2** The Commission has produced [information for gambling operators](#) about compliance with the General Data Protection Regulation (GDPR).

9 The banning process

- 9.1** Local schemes will need to agree the sort of behaviour and actions that would trigger an individual being banned, for example:
- Violent or abusive behaviour toward staff or other customers
 - Physical damage to the premises
 - Money laundering
 - Drug use or dealing
 - Behaviour that is deemed not acceptable by the bookmaking industry via a collective agreement.
- 9.2** Where a person displays the unwanted behaviour set out by the scheme, the typical process would be:
- The person is banned from the bookmakers where the behaviour was displayed
 - The person who has been banned at that premises is then put forward to receive a joint banning notice at the next Betwatch meeting
 - If all bookmakers agree then the person will be given a joint banning notice which is then served on them when entering another bookmakers (or other type of gambling premises that is in the scheme).
 - If an offence is committed and police attend then the person would automatically receive a joint banning notice.
- 9.3** When agreement is made that an individual should be jointly banned, the chair of the Betwatch group should produce a joint banning notice for distribution to attendees. This joint notice can then be served by either shop staff, area managers, security managers or Neighbourhood Police Team. An example banning notice can be found at Annex 5.
- 9.4** The banning notices are enforced by the bookmakers ceasing trade with that individual. If the person breaches a ban and refuses to leave the bookmakers will call the police informing them of the ban. In some cases the bookmakers will work with the police to provide evidence to support a Criminal Behaviour Order (CBO).
- 9.5** All banning notices last for a minimum of 6 months and are then reviewed at Betwatch or Safe Bet Alliance meetings. If the meeting feels that the ban should be extended for a further 6 months then it will be extended. If there has been no breaches and the group feels the person is no longer a threat then the ban will be lifted.
- 9.6** Should a banned person wish to appeal, they would write to the individual bookmakers who instigated the ban, who in turn would bring the letter of appeal to the Betwatch or Safe Bet Alliance meeting where the appeal would be considered. A collective decision would be made and communicated to the person appealing their ban.

10 Training

- 10.1** Ascertain at the first meeting who needs access to the chosen data sharing platform, who needs training, who can provide it and agree a suitable venue.
- 10.2** Where a BID exists they may be able to provide support for this training (and/or the data sharing platform itself eg Facewatch or DISC, city centre schemes). Cascade training can also be provided from areas where those data sharing platforms are already in use.

11 Scheme launch

- 11.1** The key to the success of a scheme is awareness within the community where the scheme is in operation. Posters (see section 12) go a large way to achieving this but ideally this is supplemented by a launch event.

- 11.2 Local newspapers, radio and TV should be invited to the event and hopefully the police, the LA and/or the operators' communications teams will assist with this.
- 11.3 The event can be brief and take the form of a statement as to what the scheme aims to achieve and that the “*banned from one banned from all*” approach along with partnership working between operators, police and LA will be used across the scheme area going forward.
- 11.4 A photograph to accompany written pieces is useful. The standard presentation is of representatives from all parties holding a scheme poster. The location should not be in front a betting shop to avoid accusations of favouritism. A local landmark or police premises is suggested. See Annex 6 for an example press release.

12 Posters

- 12.1 Publicity is key to the success of the scheme and the [Senet Group](#) will provide posters, free of charge, to use in gambling premises to inform customers that they are part of the scheme. Posters, to which you can add your own logos, are available for free from betwatch@gamblingcommission.gov.uk



Benefits of Banned from one Banned from All

- Safer environment for staff
- Safer environment for customers
- Staff retention increases
- Customer retention increases
- Decrease in criminal damage costs
- Increase in profits



In association with



13 Costs

- 13.1 Depending on the information sharing platform chosen, costs maybe incurred. For example, Facewatch can be used for free as a “read only” resource but there is a nominal cost associated if Facewatch is used as a police reporting and information sharing tool (@£3/month). However if the BID already uses Facewatch, then it may provide access and the necessary funding.

14 Let us know

- 14.1** If you have set up a Betwatch scheme please send details and the main point of contact to betwatch@gamblingcommision.gov.uk

Annex 1 - Case Studies

Some examples of the various Betwatch schemes in operation which have developed in different formats and using different data sharing platforms:

Betwatch West Midlands

Data sharing platform: Facewatch

The first Facewatch based Betwatch scheme was launched in 2015 in response to concerns raised by West Midlands Police (WMP) around criminal and antisocial behaviour at bookmakers' premises in Birmingham City Centre. These issues had been ongoing for several years with attempts at resolution being conducted through an adversarial approach focussing on individual premises. This approach resulted in WMP and Birmingham City Council expending large amounts of resource in pushing operators into measures, such as door supervisors in premises, which were costly and temporary in nature. These measures did not resolve the issues but simply moved them from one premises to another.

West Midlands Police can only endorse the use of an Information Sharing Platform that is a member of [Secured by Design](#) ie Facewatch. Facewatch is a secure online crime reporting and networking environment that enables businesses, public and police to tackle low-level crime by sharing images within groups for the prevention of crime and by submitting CCTV evidence and witness statements to the police to help solve crimes. Facewatch is fully compliant with the requirements of the UK Data Protection Act. Many BIDS already utilise Facewatch.

How does Facewatch work?

- Facewatch can be used on any internet enabled device and retains its security when used over any connection method. As such operators have been able to enable Facewatch access by shop staff using phones and tablets in addition to hard wired equipment such as PCs or tills
- Facewatch allows real time information sharing among scheme members to include CCTV / still image footage of individuals of interest
- Facewatch gives option to report to Police including CCTV / still image & statement in much reduced timeframe, on average total time taken is ten minutes by trained user
- Facewatch allows Police to build effective picture of issues in and around premises to allocate resource accordingly
- Facewatch acts as record of issues around individuals which can then be used to apply Criminal Behaviour Orders
- Police Officers often carry Facewatch enabled devices meaning reports can be seen in real time and respond accordingly where resources are appropriate.

Where a Business Improvement District is not in place or does not use Facewatch (this is rare) there is a cost to operators, however the cost is minimal with a figure of £3 per month per premises being cited as at 2017.

Royal Borough Greenwich Betwatch

Data sharing platform: secure email box and reporting form

The Community Safety team in Royal Borough of Greenwich set up a Betwatch in Woolwich in 2015. Woolwich town centre was chosen following a data driven exercise highlighting higher risk across the large numbers of LBOs and the associated ASB crime figures in those premises. 60.0% of all betting shops in Greenwich were the location for at least one crime or ASB incident. In Woolwich town centre that figure rose to 80.0%.

Betwatch partners have included representatives from community safety, licensing, police licensing, drug and alcohol service and a local community engagement service.

BOs report concerns to a secure email reporting box managed via Greenwich and a town centre radio scheme is available if shop staff need immediate police assistance during incidents. Meetings are held approximately every 6 weeks with area managers and shop staff to discuss issues and agree bans using the bar from one, bar from all approach. Once a ban is agreed the recipient is sent a letter addressed from the scheme and the Met police confirming the details with the police often using the intelligence to challenge persistent offenders across the borough.

Development work is now taking place to comply with forthcoming General Data Protection Regulation requirements.

Manchester Business Crime Reduction Partnership

Data sharing platform: DISC

The Manchester Business Crime Reduction Partnership (BCRP) is coordinated by CityCo, Manchester's city centre not for profit Management Company, in association with Greater Manchester Police and Manchester City Council. It creates a safe and secure city for customers, staff and visitors by reporting and tackling business crime, offering expert security training and providing information and alerts to the commercial community.

As of 2018 there are 18 LBO members of the NITENET STORENET System plus 2 casinos and an AGC.

Manchester's BCRP offers its members:

- Access to a secure online portal (DISC) to access data about offenders, risks, new training packages and reporting.
- Training is provided and user guide issued to aid and encourage engagement. In addition training is provided on the smart phone version of DISC ensuring members receive real time alerts. The range of information is extensive including information on City Centre related Injunctions / CBOs / CPN Warnings & CPN Orders (Community Protection Notices).
- NITENET/ STORENET provide a valuable service to operators of licensed premises by facilitating the sharing of 'live' information; enabling them to work pro-actively together as and when issues arise locally. The radio link is also connected to the Council's CCTV control area, enabling camera operators to assist when circumstances allow. In addition all transmissions are recorded to assist with evidence gathering in violent / threatening situations. The system also has a priority alert button which ensures all radios shut down and monitor transmission in case of emergency at a venue. Whilst not a physical response service the radio system has proved to be of reassurance to staff lone working.

Manchester BCRP's civil exclusion scheme to deter repeat offending:

Exclusions are time limited to 2 years; in instances where further incidents are recorded the partnership may extend the exclusion period by 12 months per additional recorded offence. Historically some bans have been issued in gambling premises where violence to staff or equipment in branches has been reported.

Manchester's BCRP is accredited with the only current national standard Safer Business Award by the National Association of Business Crime Partnerships. Manchester. The accreditation requires the demonstration of effective management process to ensure DPA compliance and systems for audit amongst many other assessments. Systems operated by the partnership have automatic audit process and supplemented by manual oversight.

Exclusion period are date set within the online members secure system (DISC) and the Partnerships Management and Analysis system (NBIS) the latter is not accessed by members. Unless continued offending is presented the online system automatically removes the prohibition at the time of expiration. Continued offending is responded to by the partnership who liaise with Manchester City Council's antisocial behaviour (ASB) team to provide evidence on behalf of our membership of all incidents of ASB /criminality.

Contact detail for more information: BCUreporting@cityco.com

Annex 2 – Single points of contact

Organisation	Name	Email
Gambling Commission	Richard Hollis	betwatch@gamblingcommisison.gov.uk
Police	Sharon Horner	s.horner@west-midlands.pnn.police.uk
William Hill	Emma Robinson	erobinson@williamhill.co.uk
Betfred	Kim Dowell	kim.dowell@betfred.com
Ladbrokes / Coral	Jeanette Cheetham	jeanette.cheetham@ladbrokes.co.uk
Paddy Power / Betfair	James Harman	James.Harman@paddypowerbetfair.com
Jennings Bet	Derek Somers	derek.somers@jenningsbet.com

Annex 3 – Benefits of Betwatch (handout for staff)

Benefits to those involved in Betwatch

<p>For the operator/local staff</p> <ul style="list-style-type: none"> • By working together to identify and exclude known troublemakers, crime within the premises can be reduced. The person that smashes up a machine in shop A is quite likely to do so in shop B so it makes sense to ban such people from all bookmakers within the area. • This leads to a safer environment for staff and customers • Enhanced public confidence. ASB deters the majority of customers from entering the premises or staying any longer that they have to. There is an obvious benefit to having a happy customer base enjoying a range of products, which in turn leads to increased profits. • It gives staff ownership of the environment in which they work. If they feel secure in the workplace they are more likely to stay with the employer and be more effective in their role • Improved staff retention. 	<p>For the police</p> <ul style="list-style-type: none"> • By using a secure system low level crime can be reported and used to inform the bigger picture. The person smashing the machine could also be a known shoplifter or aggressive beggar. They may well be wanted for questioning so tracking movements through Betwatch reports could lead to an arrest • Betwatch reports can be used as a statement reducing the need to send someone out to the shop • CCTV images can be shared instantly if the scheme is linked to Facewatch • Monthly Betwatch meetings are a source of useful information regarding activities of banned individuals and others of interest to the police.
<p>For the local authority</p> <ul style="list-style-type: none"> • It supports the protection of the public in their area and the number of incidents would help them assess the local risk. • Safe city centres are more likely to attract economic investment • Less adverse publicity. 	<p>For the Gambling Commission</p> <ul style="list-style-type: none"> • This supports the first licensing objective of the Gambling Act 2005 ie preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime. • Brings together all local agencies to work collaboratively to support the licencing objectives • Uses the new technology available to reduce gambling related crime and demonstrates innovation in an area often seen to be relying upon an old fashioned approach.
<p>For the consumer</p> <ul style="list-style-type: none"> • Safer environment in which to gamble • Staff within the premises are to spend more time monitoring play and encouraging socially responsible gambling • By making gambling premises less attractive to criminals it can reduce street crime and anti-social behaviour in the area 	

Annex 4 – Suggested content for Information Sharing Agreement

Please note this is not an exhaustive list and any Information Sharing Agreement will need to be subject to review by your own legal advisors to ensure compliance with data protection requirements.

1. Introduction /purpose

Set out the purpose of the agreement

2. Partners

List all signatories to the agreement

3. Powers

This Agreement fulfils the requirements of the following:

- The Crime and Disorder Act 1998 (section 115) statutory authorities only
- The Civil Evidence Act 1995
- The Data Protection Directive / General Data Protection Regulation (GDPR)
- Common Law Duty of Confidentiality
- Protecting life and property, preserving order, preventing the commission of offences and bringing offenders to justice
- The Rehabilitation of Offenders Act 1974
- The Human Rights Act 1998 (article 8).

4. Process

- the need for information to be accurate, necessary and proportionate.
- what is meant by information exchange
- what is fair processing of information
- reasons for information exchange
- benefits of information exchange.

5. Types of Information to be shared

Set out the information that each party to the agreement may share where appropriate.

6. Constraints on the use of the information

Ensure that all principles of the GDPR 2016 are adhered to in terms of disclosures, consent, ongoing investigations.

7. Roles and responsibilities

- Nominate a single point of contact (SPOC) for each partner in the agreement, along with contact details and what their responsibilities are
- Set out how any complaints or breaches to the agreement will be dealt with
- Similarly set out how Freedom of Information requests will be handled.

8. Security

Partner organisations should establish common rules for shared data security (transfer, use, storage and retention), in order to ensure compliance with GDPR, and have appropriate security in place.

Consider secure information exchange eg Criminal Justice secure email and how to share information securely eg Government Protective Marking Scheme.

9. Specific arrangements

Frequency of Betwatch meetings, how information will be shared. What information the police can share with partner organisation if a criminal investigation is already underway.

10. Review, retention and deletion of information

Set out requirements around data retention/disposal as well as any partner organisation internal policies.

11. Review of information sharing agreement

Suggest first review six months after its implementation and annually thereafter – unless something prompts a more urgent review.

12. Disclaimer

Regarding the use of data under this agreement.

13. Signatures

Summarise the expectations/responsibilities of signatories for signing the agreement.

Annex 5 – Example banning notice issued by Safe Bet Alliance West Midlands



EXCLUSION NOTICE

Date of issue: / /

Issued to Name: _____

Date of birth: _____

Address: _____

Signature: _____

We, as part of the Safe Bet Alliance reserve the right to exclude any person from a premises or collective premises, who have demonstrated unacceptable, inappropriate and/ or criminal behaviour.

The Safe Bet Alliance hereby give you notice that you are excluded from entering any licensed betting office within Birmingham City centre, for 6 months from the date of issue subject to the conditions specified below including:

- Betfred
- Coral
- Jennings
- Ladbrokes
- Off Course Bookmakers
- Paddy Power
- Wilf Gilbert
- William Hill.

For the purposes of this exclusion, officers of the West Midlands Police Force are acting as a facilitator for the landlord.

Please note if you enter any of the above named premises again without prior approval, you will be treated as a trespasser and your personal details will be passed onto West Midlands Police. This notice may also be used in further legal proceedings.

You should also be aware that all licensed betting offices benefit from CCTV systems. Therefore footage of your actions in such premises may be used in future prosecutions.

Safe Bet Alliance and WEST MIDLANDS POLICE working together in partnership.

Annex 6 - Example Press Release

A new police-backed scheme designed to cut crime and anti-social behaviour in betting shops has been launched in Coventry – and it means troublemakers face a city-wide ban from bookies.

Betting shops across the city have signed up to a new Bet Watch initiative which enables them to share information on criminal offences or abusive punters with each other and police.

A 'banned from one, banned from all' policy is being introduced by eight of the city's betting firms as part of a partnership to help prevent crimes such as robbery, assault, theft and anti-social behaviour.

Coventry Police is working alongside bookmakers, Coventry City Council, the Business Improvement District, Bookmaking Industry and Gambling Commission through the joint approach which also aims to protect betting shop staff and other customers.

Superintendent Richard North, from Coventry Police, said: "We understand there can be a mixture of emotions inside a bookmakers but it is never acceptable to carry out criminal or anti-social behaviour.

"Those who commit such offences face a criminal record and through Bet Watch we will work together to catch those responsible and ensure that staff and other customers feel safe in their surroundings.

"By bookmakers sharing information it can help identify anyone suspected of such behaviour quicker and increase the odds of tackling issues early."

Bet Watch in Coventry launches today (31 May) and follows on from similar schemes launched in parts of Birmingham and Solihull through the force crime reduction team which co-ordinates the approach.

Shops can share information between themselves digitally or through a forum which meets on a regular basis.



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Making gambling fairer and safer

www.gamblingcommission.gov.uk