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The purpose of this document is to clearly outline how William Hill Organization will implement the company’s health and safety policy developed in accordance with the requirement of Section 2(3) of The Health and Safety at Work etc Act 1974.

This policy document will apply to all William Hill Organization operations throughout the United Kingdom.

This policy document is based upon the Health and Safety Executive’s guidance “managing for health and safety” (HSG65) and will address the following key areas that are outlined in HSG65:

- Policy
- Organising
- Planning and implementation
- Measuring performance (Monitoring)
- Audit
- Review

These elements are kept under review with our Primary Authority Partner - Westminster City Council with whom we agree our national policy, process and local authority inspection program.

This policy should be read in conjunction with the contents of the Health and Safety Manual.
2.0 **CORPORATE HEALTH & SAFETY POLICY STATEMENT.**

We are committed to ensuring the health, safety and welfare of all persons in our employment and all other persons who use our facilities or are affected by the way in which we conduct our undertaking.

The Corporate Health and Safety Policy will cover all LBOs, the Greyhound Stadia, Supply and Repair Depots and all Administration Offices in the UK.

We will consider customers, visitors, contractors, neighbours and the general public in the way we conduct our daily business.

We recognise the key elements of successful health and safety management and constantly strive to improve our performance by considering the health and safety implications in all activities under our control.

Management and employees will exercise personal responsibility and co-operate in preventing harm to themselves, others and the environment. All persons will consider every aspect of their working duties and eliminate any unsafe acts or omissions.

We will provide suitable facilities or make the necessary arrangements for the welfare of all our employees whilst at work.

We will undertake and continuously review a program of risk assessments in all significant areas of our business and address any areas of deficiency as appropriate. Copies of relevant risk assessments can be found in the Health and Safety Manual or The William Hill Health and Safety Manual for Greyhound Stadia.

William Hill plc also has business interests in other jurisdictions and we expect in country managers not only to ensure compliance with local laws, but to adopt the standards articulated in this corporate health and safety policy. Accountability on a Group basis will be managed through the Steering Group.

Employees will be provided with information and/or training and we will monitor application and understanding of the safety instructions through a system of safety audits, line management and the Health and Safety Steering Group.

We have a commitment to ensuring compliance with statutory requirements.

**SIGNATURE:**

**POSITION:** Chief Executive

**DATE:** April 2015

**REVIEW DATE:**
3.0 **ORGANISATION FOR HEALTH & SAFETY.**

To ensure the effective implementation of the health and safety policy it is essential that all employees within the company understand their responsibilities and obligations and are clear about the reporting procedures that have been established.
3.1 ORGANISATIONAL CHART.
3.2 **ROLES & RESPONSIBILITIES.**

**Chief Executive**

The Chief Executive is ultimately responsible for health and safety in William Hill. He fulfils this role through the Health and Safety Steering Group (chaired by the Corporate Affairs Director) who has the specific responsibility for ensuring the company’s compliance with legislative requirements. The Chief Executive is also responsible for ensuring that:

- Systems are in place to review the health and safety policy to ensure that it remains suitable for the business.
- A system for monitoring and performance measurement is in place that ensures the effective implementation and compatibility of the health and safety policy.

**Corporate Responsibility Committee**

The CR Committee is responsible for overall corporate governance in the area of health and safety; holding the Board of Directors, the Steering Group, its attending Directors and its members to account, receiving reports on health and safety matters and setting board objectives in this area.

**Directors**

Are responsible for the health and safety of the areas under their control and must:

- Assist the Corporate Affairs Director in the periodic review of the health and safety policy to ensure that it remains suitable for the needs of the business.
- Ensure that health and safety responsibilities are clearly communicated to managers and employees.

**Group Corporate Affairs Director**

The Corporate Affairs Director has been appointed as the Executive Director with responsibility for health and safety at William Hill. He has the specific responsibility for ensuring that the company is compliant with health and safety legislation and is responsible for the planning and implementation of the health and safety policy.

The Corporate Affairs Director will:

- Ensure that the Chief Executive is informed of any health and safety risk management issues.
- Ensure that the Corporate Responsibility Committee is provided with reports on the Group’s health and safety performance.
- Chair the Health and Safety Steering Group.
- Ensure that competent persons are appointed to enable William Hill to comply with its health and safety responsibilities and to identify, evaluate and manage the risks to the health and safety of staff, customers and others.
- Ensure that a system is in place to review the health and safety policy and procedures where appropriate.
- Ensure that a system is in place for communicating health and safety responsibilities to all managers and employees.
3.2 **ROLES & RESPONSIBILITIES.**

**Health and Safety Steering Group**

The Health and Safety Steering Group has been established to review all general health and safety issues concerning William Hill and will meet at least every three months.

The Health and Safety Steering Group membership is made up of the following persons:

- Corporate Affairs Director
- Group Director of Security and Community Affairs
- Head of Development & Construction
- Operations and Communications Manager
- Area Operations Manager
- Regional HR Business Partner
- Field Services Controller
- Legal Adviser
- Deputy Company Secretary (Secretary to the Steering Group)

Plus other departmental representatives co-opted from time to time

In addition, an external Health and Safety Consultant attends the Health and Safety Steering Group Meetings in an advisory capacity.

The role of the Health and Safety Steering Group is to review all general health and safety issues of the organisation and will include the review of the following:

- UK wide audit reports
- Incident and accident reporting (in accordance with the requirements of Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013).
- Implementation of legislation and regulations concerned with health and safety.
- Planned legislation for the purpose of anticipating possible effects on the Company.
- Representations made to the Steering Group by Human Resources Business Partners and Colleague Forum Representatives.
- Health and safety training employee briefing and communication.
- General security matters and issues (including the approach to lone working).
- Co-ordinate health and safety matters arising from security meetings and betting office design committee meetings.
- Controls in place over the key health and safety risks identified by the company. These risks include fire, company property, building and construction, security, lone working and litigation relating to health and safety matters.
3.2 ROLES & RESPONSIBILITIES.

Roles and Responsibilities of Members of the Health and Safety Steering Group

Group Director of Security and Community Affairs

The Group Director of Security and Community Affairs is responsible for ensuring that policies and procedures are in place within William Hill to ensure the safety of all employees who may be vulnerable to violence and aggression.

To this end the Group Director of Security and Community Affairs will:

• Ensure that a system for assessing and managing the risk to employees from violence and aggression is in place.

• Provide information to the Betting Office Design Team on the appropriate standards of security equipment to be included in shop design.

• Keep the business informed of the changes in intelligence that may lead to employee safety being jeopardised.

• Ensure that a system for monitoring compliance with security procedures is in place at William Hill.

• Liaise with Police and industry bodies with regards to employee security.

Head of Development & Construction (“HDC”)

The HDC is responsible for setting and monitoring William Hill standards. They are responsible for all activities within these areas, and through the Building and Shop Fitting, will ensure compliance with relevant H&S requirements.

The Building and Shop Fitting Controller is responsible for building and shop fitting works at all William Hill premises in the UK and must ensure that adequate measures are in place to ensure compliance with H&S requirements, particularly with contractors undertaking works on WH premises.

In addition they are also responsible for the maintenance of all William Hill premises in the UK and must ensure that adequate resources are allocated to ensure that buildings are properly maintained.

In particular the Maintenance Controller will ensure that systems are in place to:

• Investigate and respond to reported hazards and take corrective action where required.

• Ensure that contractors will comply with William Hill standards.

• Maintain an asbestos register and management system.

• Monitor the management of electrical safety.

• Monitor the system for health and safety performance of contractors undertaking maintenance and refurbishment work particularly with contractors undertaking works on William Hill premises.

Operations and Communications Manager

The Operations and Communications Manager (“OCM”) will in consultation with the Group Director Retail ensure implementation of policy and process within the retail estate and ensure...
3.2 **ROLES & RESPONSIBILITIES.**

managers are carrying out their audit and inspection functions. They will also act as a point of contact between the retail estate and the Health and Safety Steering Group. The Operations and Communications Manager will report how well policies and procedures are being implemented in the LBO estate and any issues from an operational perspective.

The OCM will liaise with the Group Retail Director and other senior operational managers to ensure any relevant process and procedure is properly implemented within the retail estate.

**Area Operations Manager**

The Area Operations Manager will provide input with regard to current operational practice and experience.

**Senior HR Business Partner**

The Regional HR Business Partner will:

- Act as a point of contact for the external Health and Safety Consultant.
- Co-ordinate the preparation and periodic review of the health and safety policy
- Bring to the attention of the Corporate Affairs Director any material changes in circumstances or activity of William Hill that would necessitate the revision of the health and safety policy, general risk assessments or procedures.
- Review the adequacy of health and safety training to ensure that it is effective.
- Advise the Health and Safety Steering Group of any issues raised via the Regional Human Resource Business Partners.

**Field Services Controller**

The Field Services Controller will act as a point of contact between the Field Services Department, Group Services, Compliance and the Health and Safety Steering Group. The Field Services Controller will report how well policies and procedures are being implemented in Field Services and Group Services and any issues that may be encountered. He will also have responsibility for the capturing of data via the Help Desk for input into the wider health and safety reporting system.

**Legal Adviser**

The Legal Adviser will be the primary point of contact with the external adviser and in conjunction with the adviser keep the Health and Safety Steering Group informed of any health and safety legal issues affecting the company. They will also provide advice on any issues raised from a legal perspective, in particular on business risks from a health and safety perspective. He will also deal with any contentious litigation issues and enforcement notices; appointing external legal advisers where appropriate. The Legal Adviser will also act as the communications lead for our Primary Authority Partnership with Westminster City Council.

**Deputy Company Secretary**

In addition to acting as the Secretary to the Health and Safety Steering Group the Deputy Company Secretary will act as a point of contact between the Steering Group and the Corporate Responsibility Committee. The Deputy Company Secretary will liaise with Corporate Responsibility Committee which sets Terms of Reference for the Steering Group and has oversight of health and safety issues. He also acts as a liaison with William Hill Insurers and Brokers who are periodically invited to attend the Steering Group.
3.2 ROLES & RESPONSIBILITIES.

Health and Safety Roles and Responsibilities for Employees who are not members of the Health and Safety Steering Group.

CEOs William Hill Online, Australia and the US

Will be the post holders responsible for Health and Safety within William Hill Online, Australia and the US. They are expected to meet as a minimum the local or UK William Hill standards whichever is the higher. They will receive minutes of all meetings of the Health and Safety Steering Group and respond to any requirements that may affect the Online office locations. Regular reports on Health and Safety matters within those jurisdictions will be forwarded to the Steering Group and ultimate responsibility for the management of health and safety in these jurisdictions rests with the post holder.

Facilities Manager

Will act as a point of contact between the Administration Offices and the Health and Safety Steering Group, and report on how well policies and procedures are being implemented or any issues raised by the administration buildings.

Regional HR Business Partners

The Regional Human Resource Business Partners will:

- Act as a point of contact for health and safety matters.
- Ensure that adequate systems for health and safety training and briefings are in place.
- Co-ordinate and respond to any health, safety and environmental issues from Environmental Health Officers or Fire Officers.
- Co-ordinate election of Colleague Forum Representatives and ensure they receive appropriate training.
- Provide information to Colleague Forum Representatives of visits from Environmental Health or Fire Officers on matters of health and safety.
- Provide information to Colleague Forum Representatives on accidents and incidents.

Duty Managers, Regional Office Managers / Ops. Coordinators and Field Service Supervisors

To ensure a positive approach to the implementation of the policy, Duty Managers, Regional Office Managers / Ops. Coordinators and Field Service Supervisors will:

- Ensure that a copy of the Corporate Health and Safety Policy and the LBO Health and Safety Manual is available and has been brought to the attention of all employees.
- Ensure that all members of their team are aware of their health and safety responsibilities.
- Ensure that where hazards have been identified action is taken to minimise the risk and records are maintained.
- Undertake regular scheduled inspections and audits of the areas under their control.
- Ensure that buildings are in a safe condition and any defects are reported to the Property Department.
3.2 **ROLES & RESPONSIBILITIES.**

- Investigate and report all accidents and dangerous occurrences in order to produce permanent preventative measures in accordance with the William Hill Accident & Incident management reporting procedure.

- Inform the Human Resource Business Partners of any visit by an Environmental Health Officer or Fire Officer with copies of any reports or Enforcement Notices for the premises under their control.

- Ensure that adequate first aid arrangements are in place for the area.

- Ensure that a sufficient number of people are available to take charge in the event of an incident.

- Ensure that local inductions for all new employees or transferred employees are completed.

- Ensure that all employees are made aware of any health and safety issues that are specific to the workplace including the results of any risk assessments.

**Colleague Forum Representatives**

William Hill accepts that for any safety management system to be effective it must involve employees in managing any risk. To this end the company has put in place a system to elect Colleague Forum Representatives one of whose duties is to represent their constituents on matters of health and safety.

The Colleague Forum Representative will:

- Represent their colleagues on matters of health and safety in discussions with management and where appropriate liaise directly with Environmental Health Officer or Fire Officers.

- Attend the in-house William Hill fire risk assessment course and undertake all health and safety distance learning packs with regard to William Hill health and safety standards.

- Ensure that they are aware of health and safety issues in the areas where their constituents work.

- Notify management of any issues that may affect the health and safety of colleagues.

- Regularly hold employee consultation days.

- Attend Colleague Forum meetings.

- Carry out fire safety risk assessments.

**Colleague Forums**

The Colleague Forums within William Hill are in place as a means of consulting with employees and allow the company to comply with its statutory obligation to consult with employees on matters that affect their health and safety. For further information on the role of the colleague forum please refer to the constitution of the relevant colleague forums held by the appropriate HR Team.
4.0 **POLICIES.**

The Company has a full set of policies, copies of those relevant to retail colleagues can be found in the Health and Safety Manual. There are specific policies for the management of the following:

- Accident & Incident Reporting
- Air Conditioning Servicing
- Asbestos Containing Materials
- Bomb Threats
- Cash Protection
- CCTV 1
- COSHH (Control of Substances Hazardous to Health)
- DDA (Disability Discrimination Act)
- Driving at Work
- Electrical Hard Wire Testing
- Fire Risk Assessment
- Fire Safety
- First Aid
- Gas Appliance Testing
- Legionella testing
- Lone Working
- Magnetic Door Locks
- Management of Workplace Stress
- Manual Handling
- Occasional Vehicle Use Policy
- Personal Protective Equipment
- Pest Control
- Portable Appliance Testing
- Robbery Prevention
- Security Risk Assessment
- Security Screens
- Violence at Work
- Void Estate Policy
- Working at Height
- Working Time Regulations
- Workstation and DSE Risk Assessment
5.0 MONITORING.

It is recognised by William Hill that the monitoring of standards and procedures is fundamental to the success of the safety management system as monitoring allows organisations to identify failings in the system to enable appropriate action to be taken to rectify the situation.

William Hill system uses both “active” and “reactive” monitoring.

The “active” monitoring system allows the company to gain feedback on their performance before an incident or ill health occurs. The program includes monitoring the operation of the safety management systems and compliance with performance standards set and also includes scheduled safety inspections of the premises, plant and equipment. The frequency of the Active monitoring of the estate is as follows and is carried out by an independent auditor:

Retail Estate Licensed betting Offices – a number of locations spot checked annually
Supply Depots - All annually
Administration Offices - All annually

The information from health and safety monitoring and the regular audits will be used as part of the review process.

The “reactive” monitoring system is triggered after an event and allows the company to investigate the causes of any deficiencies to identify corrective action to prevent re-occurrence.

5.1 HEALTH & SAFETY INSPECTIONS.

In order to ensure that the safety management system is monitored, William Hill has implemented a six monthly inspection checklist for all areas of the business. The results of which are collated by Central Operations. The listed improvements are collated and actioned by competent colleagues and overseen by the steering committee.

5.2 STATUTORY INSPECTIONS.

William Hill will ensure that all plant and equipment owned and managed is inspected, examined and tested in accordance with legislative requirements, British Standards and/or industry practice and manufacturer’s recommendations.

The planned preventative maintenance schedule includes the following:

- Lifting equipment and accessories - FLT’s MHE.
- Fire equipment.
- Portable electrical appliances.
- Fixed electrical systems.
- Gas Boilers & Equipment.
- Water systems.
- Asbestos monitoring.
5.3 **ACCIDENT & INCIDENT REPORTING.**

William Hill has introduced a system for recording and investigating workplace accidents and incidents which is contained in the Health and Safety Manual. In the event of an accident employees must notify their Line Manager who will complete the Accident / Incident Reporting and Investigation form. DOMs should ensure the integrity of the reporting systems including liaising with HR Central to ensure all RIDDOR reports are properly actioned.

6.0 **AUDIT.**

An audit assesses the degree to which an organisation has its health and safety risk under control by testing the structure of its health and safety management system against recognised best practice.

William Hill will be audited by an independent Health and Safety Consultancy on an agreed cycle. The audit tool will be based on the Health and Safety Executive’s guidance on health and safety management systems “Managing for health and safety” (HSG65).

7.0 **REVIEW.**

The health and safety management systems will be reviewed on a regular basis or when there is evidence to show that they are no longer valid. The information from health and safety monitoring and the regular audits will be used as part of the review process.