

Response

Thank you for your request for information in relation to the in relation to the Fees Discussion paper of 1st September 2015 and the summary of responses.

Please find our response to your questions below.

a) a full list of all of those parties that responded to the fees discussion exercise;

Please find attached a list of respondents. Please note that there were two individuals who submitted responses on their own behalf (as opposed to on behalf of an organisation). We consider this is personal data and therefore exempt under section 40 of the Freedom of Information Act 2000 and have therefore removed their names from the list.

Trade associations

1. Association of British Bookmakers
2. East of Scotland Bookmakers' Association
3. Northern Bookmaker's Protection Association (now the British Racecourse Bookmakers' Association)
4. Federation of Racecourse Bookmakers
5. Remote Gambling Association

Other representative bodies

6. Gambling Business Group

Sports Betting Integrity Groups

7. ESSA
8. Sports Betting Group/Sports and Recreation Alliance

Licensed operators

9. Mason Gaming (Arcades)
10. Eldorado Leisure (Arcades)
11. Cecil Howells Racing (LBO)
12. Julie Jenkins (LBO)
13. Roger Hunt Bookmakers Ltd (LBO)
14. Gala Coral Group
15. Leigh Smith (Machine supply)
16. Geoff Banks (Online betting)
17. Metropolitan Police Lottery
18. Nicholas Fowler (on-course bookmaker)
19. Hugh King (on-course bookmaker)
20. John Speakman (on-course bookmaker)
21. W. Boden & Co. Ltd. (on-course bookmaker)
22. The Rank Group
23. Realistic Games Limited (gambling software)
24. William Hill
25. Talarius

Other respondents

Two individuals also submitted a response.

b) identify the two parties that responded to the sports betting integrity aspect;

ESSA and the Sports Betting Group were the two parties that submitted responses regarding the betting integrity aspect.

c) access to any comments by responders to sports betting integrity issues.

Gambling Commission Fees Discussion Paper – Submission by the Sports Betting Group

The Sports Betting Group

The Sports Betting Group (SBG) brings together the governing bodies of the major sports and player associations to consider threats to the integrity of sporting competition and to promote best practice in tackling sports betting corruption. The SBG was formed in 2010 following the report of the Sports Betting Integrity Panel chaired by Rick Parry. We work closely with others who have an interest in preserving sports betting integrity, including the Gambling Commission, and further information can be found at:

www.sportsbettinggroup.org.

Protecting the integrity of sport and sports betting is a key priority for sports governing bodies and player associations and we recognise the role played by the Gambling Commission in achieving this objective. In this context, the way in which fees to are set to cover the costs of the Commission's integrity functions is important and the Sports Betting Group welcomes the opportunity to respond to the discussion paper.

Comments on the discussion paper

While we do not have specific comments on the detailed fee-setting proposals in the paper, the SBG would make the following key points:

- Protecting the integrity of sport and sports betting must continue to be a key priority for the Commission and be resourced appropriately. The establishment of the Sports Betting Integrity Forum to deliver the Sport and Sports Betting Integrity Action Plan is a welcome step and the Commission has provided a helpful leadership role in this area. However the challenge is to ensure this good work is built upon and that the resources match the scale of the SBI Action Plan's ambition to make the UK a recognised leader in terms of betting integrity. In this context, it is important that the Commission's fees are set at a level that ensures resources are available to implement the Plan in full.
- Any fee structure put in place should be flexible enough to keep pace with developments in the gambling sector and, by extension, changes to the nature of betting corruption threats. In recent years the sports betting market has grown significantly whilst at the same time undergoing a radical shift towards online, remote betting. Further, the Gambling (Licensing and Advertising) Act 2014 has brought new operators within the regulatory framework, a number of whom are now in the process of consolidating into a smaller number of large operators. Looking ahead, these developments will pose new and different challenges to the integrity of sport and sports betting. The fee structure therefore needs to reflect the consequences of these shifts in terms of the Commission's integrity-related functions and enable sufficient costs to be recovered regardless of the way in which the market develops.
- The costs of integrity-related activity can often be difficult to predict with certainty, in particular due to costs incurred in carrying out criminal investigations and prosecutions. In this context we believe the Commission should consider introducing some form of discrete contingency fund to ensure resources are available in the event the Commission needs to undertake additional integrity activity, for example to pursue a criminal investigation using its powers under the Gambling Act 2005. Any such fund could be rolled over where there is an underspend for use in future years. An alternative might be some form of annual ex-post adjustment levied on operators

to cover costs where they have exceeded the forecast. Overall, it would be disappointing and send the wrong message if activity to tackle sports betting corruption, particularly the pursuit of criminal wrongdoing, were to be curtailed simply due to lack of funds.

Sports Betting Group October 2015

Our records indicate that you submitted the response on behalf of ESSA which has also been published here: <http://www.eu-ssa.org/wp-content/uploads/British-GC-licence-fees-discussion-paper-Oct-2015-Final.pdf>

Review of the decision

If you are unhappy with the service you have received in relation to your Freedom of Information request and wish to make a complaint or request a review of our decision, you should write to FOI Team, Gambling Commission, 4th floor, Victoria Square House, Victoria Square, Birmingham, B2 4BP.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner (ICO) for a decision. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by the Gambling Commission. The ICO can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Request

You have recently published a summary of the "Responses to our discussion exercise on our approach to setting fees".

In that you state that there were 27 responders but do not provide a list of those parties or access to the full responses provided.

<http://www.gamblingcommission.gov.uk/Gambling-sectors/Discussion-paper-on-the-Commission's-approach-to-setting-fees.aspx>

can you therefore please provide:

- a) a full list of all of those parties that responded to the fees discussion exercise;
- b) identify the two parties that responded to the sports betting integrity aspect; and
- c) access to any comments by responders to sports betting integrity issues.