

From: [REDACTED]
To: [REDACTED]
Subject: RE: FOI response (210316-[REDACTED])
Date: 15 April 2021 14:31:00

Thank you, I've amended as you suggested

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, April 9, 2021 3:58 PM
To: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Cc: [REDACTED]
Subject: RE: FOI response (210316-[REDACTED])

My comment would be to change

However, I can confirm that we do hold BetIndex Limited's unaudited financial statements for the year ended 31 December 2017 and the year ended 31 December 2018. Further to this, we also have Betindex Limited's unaudited internal management accounts for the year ended 31 December 2019. These documents formed part of specific correspondence with the operator and are not currently within the public domain.

Because the request makes no mention of management accounts I would suggest the narrative is changed to

However, I can confirm that we do hold BetIndex Limited's unaudited financial statements for the two years ended 31 December 2018 and note they are not currently within the public domain.

Kind regards

[REDACTED]

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

[REDACTED]

[REDACTED]

www.gamblingcommission.gov.uk

From: [REDACTED]
Sent: Friday, April 9, 2021 2:42 PM

To: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Cc: [REDACTED]
Subject: FOI response (210316-[REDACTED])

Hi All

Please see below draft response to and FOI request regarding financial information we hold for Bet Index.

This response will be going out on 15/04/2021. If you could please let me have any comments/ammendements by 13/04/2021.

[REDACTED] due to the nature of ths response please could you raise this with the "Correspondence Clearer" group on Monday.

Any issues please let me know.

Many thanks
[REDACTED]

Dear Sir/Madam

Thank you for your request which has been processed under the Freedom of Information Act 2000 (FOIA).

In your email you have enquired as to the following:

1. Does the Gambling Commission hold in its possession annual audited accounts for the company Bet Index Limited trading as Football Index.
2. If the answer to question (1) is YES, please state for which financial years.
3. Please provide a copy of the latest set of annual audited accounts held by the Gambling Commission for Bet Index Limited trading as Football Index.

Following a search of our records, I can confirm that the Gambling Commission does not hold copies of any of Betindex Limited's audited accounts.

However, I can confirm that we do hold BetIndex Limited's unaudited financial statements for the year ended 31 December 2017 and the year ended 31 December 2018. Further to this, we also have Betindex Limited's unaudited internal management

accounts for the year ended 31 December 2019. These documents formed part of specific correspondence with the operator and are not currently within the public domain.

The Commission is a regulatory body with licensing, compliance and enforcement functions. Through our regulatory activity, the Commission aims to protect consumers and the wider public, and to raise standards in the gambling industry. The Commission seeks to ensure, through its ongoing compliance work, that licensees remain suitable to hold a licence and that they conduct themselves in a way which is consistent with the licensing objectives, the requirements of the Act, and the conditions of their licences and related codes of practice.

We release details of our enforcement activity through [public statements](#) which can be found on our website. The public statements will detail the nature of the failings by the operator and the amount of the fine or settlement. Further to this, the Commission also publishes a list of recent [regulatory sanctions](#) we have imposed on licence holders.

When we publish these statements and sanctions we take care to present as much information as possible to ensure that lessons can be learned by operators. However, we must also be careful not to reveal any information that could hinder our ability to conduct investigations or enable those we may investigate to avoid detection.

We encourage licensees to be as thorough and as detailed as possible when communicating and we expect Licensees to work with us in an open and cooperative way and to inform us of anything we might need to be aware of in order to regulate effectively. They would not do this if they believed that the information they provided to us would be released and as a result, the quality of the information we receive would suffer. For these reasons the Commission does not ordinarily publish further details of information generated during investigations.

Whilst I am able to confirm that we do not hold the specific information that you have requested, the Commission is of the view that any financial information that we do hold in relation to Bet Index, not otherwise in the public domain, is exempt from disclosure under section 31(g) FOIA and therefore will not be released.

For further explanation of this exemption please see the attached document.

Kind regards

Review of the decision

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

If you are not content with the outcome of our review, you may then apply directly to the Information Commissioner (ICO) for a decision. Generally, the ICO cannot make a decision unless you have already exhausted the review 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.

Freedom of Information Team
Gambling Commission

Victoria Square House
Victoria Square
Birmingham B2 4BP