

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Data
Date: 07 December 2022 13:28:00

Thanks [REDACTED]. I'm not sure what reference you are recalling about figures we have seen. Unless submitted as part of the call for evidence process, we do not routinely have access to (or a regulatory need) for race by race data. In terms of market data you will be aware from your previous industry roles we collect financials by product via our regulatory returns. I did refer to some crude calculations I had done based on non-remote and remote licensee regulatory returns. Excluding pool and on-course returns, they show for the period Apr 2021 – Mar 2022 combined turnover down 0.6% on the 2019/20 period and GGY down 1.3%. I appreciate you are suggesting your more recent data suggests a fall.

In addition to our regulatory returns we have more recently, and initially in response to the pandemic collected additional headline data from a sample of the largest operators. Whilst this data set is more timely as it is submitted monthly, it is not as granular in breaking down betting activity by product.

On a consumer level, whilst things have moved on considerably since the field work, the patterns of play research provided some interesting insight into pre-covid betting activity including the demographics and turnover/GGY breakdowns of accounts where there had been betting on horseracing.

Regards

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From: [REDACTED]

Sent: Wednesday, December 7, 2022 11:53 AM

To: [REDACTED]

[REDACTED]

Cc: [REDACTED]

Subject: RE: Data

Morning [REDACTED]

Thank you for your time and candour on Friday. Any data you can provide which you consider helps improve our understanding of industry trends would be welcome and will help inform our work. I can confirm we would treat the information as commercially sensitive and use it only to inform internal considerations. As you will understand from your legal background my FOI team have advised me to flag the following to inform your decision.

As a public authority all recorded information, we hold is subject to potential disclosure under the FOIA. Each request for information needs to be considered on a case by case basis. However, we are aware of the sensitive nature of data we hold and would not be in a position to release information which is of detriment to us or the provider of the information. Section 43 (the exemption for commercial interests) provides a way to block disclosure of information that will harm the commercial interests of both public bodies and other organisations that they do business with. But it is a qualified exemption – subject to a public interest test – so, while this is potentially an appropriate exemption, there are no absolute guarantees.

Regards