

No	Request	Relevant Exemption
1	“External legal counsel instructed by the Gambling Commission The Gambling Commission has previously confirmed that it instructed Leading Counsel on or around 10 March 2020 concerning BetIndex/Football Index and received draft advice on 19 March 2020. a) Please provide, where disclosure is possible: i) the name of the chambers from which Leading Counsel was instructed; ii) the name of the instructing solicitor, legal officer or department within the Gambling Commission; iii) the date the instruction was authorised; iv) the date the instruction was issued; v) the date the advice was received; vi) the professional title of the person instructed (KC/QC/other); vii) the total amount paid to that chambers or counsel in relation to the instruction; viii) any invoice, purchase-order or payment reference relating to the instruction, with privileged substantive information redacted if necessary. I am not requesting the legal advice itself or any privileged legal analysis.”	Please see response to previous FOI request 19 August 2025 1a(i) – Section 40 1a(ii) – Section 40 1a(iii) – The Commission does not hold this information. 1a(iv) and (v) – Section 21 – see pages 93-4 at paragraphs 99 and 104 of the Sheehan Report 1a(vi) – Section 40 1a(vii) - Section 43(2) 1a(viii) – Sections 40 and/or 43(2)

2	2. Other external legal advice concerning Football Index a) Please provide a list of all external solicitors, barristers, chambers or other legal providers instructed by the Gambling Commission in relation to BetIndex/Football Index between 1 January 2019 and 31 March 2021. b) For each provider, please provide: i) name of the provider; ii) whether they were solicitors, Leading Counsel/KC/QC or another legal provider; iii) date first instructed; iv) date last instructed; v) general subject matter of the instruction; vi) total expenditure paid to that provider. Again, I am not seeking the substantive content of privileged advice.	2(a) – Section 40 2(b)(i) – (ii) – Section 40 2b(iii) – Section 21 – see paragraph 99 at page 93 of the Sheehan Report 2b(iv) – The last date of instruction in this period was 31 March 2021. 2b(v) – Section 42 2b(vi) – Section 43(2)
3	3. Legal expenditure a) Please provide the total expenditure incurred by the Gambling Commission on external legal services relating specifically to BetIndex/Football Index for: i) 2019; ii) 2020; iii) 2021 up to 31 March. Where possible, please provide the expenditure broken down by external legal provider.	3a(i) to (iii): Section 43(2) and section 40.

4	4. BetIndex's external legal representation The Independent Review into the regulation of BetIndex records that BetIndex obtained advice from Leading Counsel in November 2020 concerning whether its product fell within the FCA regulatory perimeter. a) Please provide any non-privileged administrative information held by the Gambling Commission identifying: i) the solicitor/law firm representing or corresponding on behalf of BetIndex in relation to that advice; ii) the chambers from which BetIndex's Leading Counsel was instructed, if recorded; iii) the date on which the Gambling Commission was informed that BetIndex intended to obtain Leading Counsel's advice; iv) the date on which the Gambling Commission received or was provided with that advice; v) any invoice, payment or administrative record held by the Commission identifying the external legal providers involved. I am not requesting the contents of BetIndex's privileged legal advice.	Please see response to previous FOI request 13 Jun 2024 4a(i) Section 40 4a(ii) Section 40 4a(iii) see para 141 at page 106 and Annex 4 of the Sheehan Report 4a(iv) see para 129 at page 103, para 145 at page 107, para 149 at page 108 and Annex 4 of the Sheehan Report. 4a(v) The Commission does not hold this information
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5	5. Gambling Commission / FCA correspondence a) Please provide non-privileged correspondence between the Gambling Commission and the Financial Conduct Authority concerning the regulatory classification of Football Index between 1 January 2019 and 31 March 2021, specifically correspondence concerning: i) spread betting; ii) Contracts for Difference (CFDs); iii) Article 85 of the Regulated Activities Order; iv) FSMA 2000; v) whether the "Shares" element of Football Index fell within the FCA regulatory perimeter; vi) which regulator had jurisdiction over any part of the product. This request includes emails, meeting records, letters and briefing notes. Where correspondence contains legally privileged material, please redact the privileged material and disclose the remainder where reasonably possible.	5a (i) to (vi) – Section 41
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6	6. 14 February 2020 spread-betting enquiry The Gambling Commission has previously confirmed that on 14 February 2020 it contacted the FCA concerning whether Football Index could constitute spread betting. a) Please provide: i) the date and time of the correspondence; ii) the sender and recipient job titles; iii) the subject line; iv) the FCA's response, if held; v) any subsequent non-privileged correspondence arising from that enquiry. If the substantive content is considered exempt, please provide the metadata, sender, recipient, date, subject line and document description.	6a(i) – An email was sent at 13:06 on that date. 6a(ii) – section 40 6a(iii) – section 41 6a(iv) - sections 40 and 41 6a(v) - Please see response to previous FOI request 12 May 2026 The further request is already addressed in the above responses.
7	7. Records relating to the March 2020 Leading Counsel instruction a) Please provide a schedule of documents held relating to the Leading Counsel instruction made on or around 10 March 2020, including: i) document title; ii) date; iii) document type; iv) author; v) recipient(s); vi) general description; vii) exemption relied upon if withheld. I am not requesting disclosure of privileged legal advice itself.	Please see response to previous FOI request 19 August 2025 7a (i) to (vii) – Sections 40 and 42