

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Independent Review of the Regulation of BetIndex Limited - [REDACTED]
Date: 22 July 2021 14:17:47
Attachments: [REDACTED]

All

Apols if I have missed anyone off this email – please forwards on if I have.

[REDACTED]
[REDACTED] Note we can supply written responses which I would wish to do so given the detail of some of the queries.

Could you have a look at the qs so we can start thinking about responses with a view to getting response out in the first half of next week.

My quick summary would be:

1ai – this scenario per se would not make it unfair and subject to refusal. In a comparable scenario operators can change odds. Further fair and open is one of the aspects of the ongoing live case so we will need to ensure we do not pre judge the outcome of our investigation – detailed answer to follow – one for [REDACTED], [REDACTED] and [REDACTED]

1aii – duty to permit subject to LO's. Our regulatory remit does not extend to continuous, real-time monitoring of the financial health of operators within an open marketplace. When we license an operator we look at suitability, including their financial circumstances and we may review these aspects as part of any subsequent compliance activity we take, but we are not able to oversee their businesses on a day-to-day basis or monitor the financial health of all licensed operators directly. Such an approach would represent a very different form of regulation and would require a significantly different funding model to the one currently set out in legislation. [REDACTED] and [REDACTED]

2a – we consider customer spending as part of assessment – hence customer interaction and affordability as a part of that - [REDACTED] and [REDACTED]

2b – aspect of live case re fair and open but also note actions in this area including banner on website that this was Gambling Commission [REDACTED] and [REDACTED]

2c – we were aware of this mechanism and considered it.... [REDACTED]

2d – aware - [REDACTED] are you able to double check this for me asap???

