

## **SUMMARY OF RESPONSES TO 'PROPOSALS FOR GAMBLING COMMISSION FEES - CONSULTATION PAPER'**

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**Question 1: Do you have any comments on the services to be funded from fees?**

**Summary of consultee responses**

Many respondents agree with the principle that Gambling Commission fees should be set on a full cost recovery basis, but a number of responses have questioned whether the level of regulatory activity by the Commission is proportionate (in general terms or in respect of their sectors) and the effect this has on the proposed level of fees. In addition, many argue that the costs of enforcement (in the licensed and/or unlicensed sectors,) should not be included in the calculation of licence fees (some noting that unlicensed enforcement costs were not going to be under the Regulatory Impact Assessment published with the 2005 Act). They used the analogy that enforcement of the 2005 Act is identical or similar to enforcement by the police of the criminal law and thus an activity from which everyone benefits, which should be communally funded from the Exchequer. It is further argued that the system set out in the 2005 Act could be seen to represent a system of social contracts between operators and society which is designed to ensure that the risks that gambling poses to all society are minimised and that enforcement activities of the Commission are calculated to increase trust in gambling which, in turn however minimally, increases trust in society as a whole (which should bear the related costs). However, a number of respondents argue that enforcement costs in the licensed and unlicensed sectors should be included. Other points made dispute that operating and personal licences are not of indefinite duration (due to the annual / 5-yearly maintenance fees) and emphasise that arrangements should be in place to ensure that the Commission operates fairly in line with its regulatory responsibilities and gives value for money.

**Government and Gambling Commission Response**

When the Government published its plans for modernising gambling laws in 2002 in the document "A safe bet for success – modernising Britain's gambling laws", it included the creation of a new, independent and powerful regulator to undertake the full range of its responsibilities allocated to it, and for it to operate on a cost recovery basis under its licensing activities. It thus established the Gambling Commission, which took over the responsibilities of the Gaming Board for Great Britain and took on additional ones for regulating betting and remote gambling and for investigating and prosecuting illegal gambling and other offences under the 2005 Act. The move from the existing fees to the new fees regime was always going to be financially challenging as in some sectors the low existing fee rates meant that it was impossible to avoid significant increases to accommodate full cost recovery of the requirements now imposed by the 2005 Act. The Government is satisfied in overall terms that the fees model framework proposed in the consultation document is a fair and reasonable basis for identifying the necessary level of regulatory activity and setting fees for the Commission to operate on a full cost recovery basis - and no more than that. Therefore, the Department does not accept that the level of identified regulatory activities is disproportionate to the range of Commission responsibilities now required under the 2005 Act. However, as is explained in relation to other consultation questions below, a further review has taken place of the workload assessments and category bands which has resulted in a number of changes in the new fees structure, especially to ensure its fairness and flexibility for smaller operators.

The Department understands the points about the services to be paid for by licence fees in relation to the argument that the industry already pays tax and duty to the Government, which should be directed to pay for the regulatory work of the Commission. However, it is important that the Commission should be properly resourced to undertake its full range of responsibilities under the 2005 Act and to be a position to respond effectively and speedily to changing circumstances in the industry. The Gambling Review Body in 2002 concluded that this would be best achieved if the Commission operated on a full cost recovery basis, funded by licence fee income. In turn, the Government agreed with this approach and Parliament endorsed it through the provisions of the 2005 Act. The option of financing the costs of regulation through general taxation was rejected, since gambling tax and duty paid by the gambling industry are regarded as part of the Exchequer, used for all the purposes dictated by Parliament, and hypothecation of all or part of those funds might only have some virtue if they were raised in accordance with the social harms arising from gambling. However, Parliament has decided that the Government should have the power to regulate for separate fees for this purpose under the 2005 Act and so has explicitly rejected any hypothecation, as advocated by some respondents. The Department has therefore concluded that the services to be funded (as set out in the consultation document) are fair and reasonable and does not intend to make any changes to the regulatory services of the Commission to be funded through licence fees.

On the question of including the recovery of enforcement costs through annual fees, the type of analogy used by some respondents between the 2005 Act and the criminal law is not accurate, since the operation of the criminal law benefits most members of society while enforcement of gambling laws benefits principally gambling firms and their customers. Aspects to consider include:

- 1) Only operators who are deemed trustworthy are licensed to supply gambling services - those who attempt to do so without a licence undermine the informational value of the licence to both suppliers and customers and the Commission needs to make sure that the system is as rigorous and hence informative as possible on their behalf but not for non-gamblers, who should not thus need to contribute towards this;
- 2) A licence represents a right to take part in and earn income from the gambling industry. Hence, pursuit by the Commission of illegal operators might represent enforcement of valuable property rights on behalf of legitimate operators - again, it is difficult to understand why non-gamblers should contribute towards this; and
- 3) Some benefits might accrue to all citizens because enforcement assures them that the gambling industry does not impose significant social costs or undermine trust. If such social benefits were significant they might reasonably be expected to be met by the Exchequer - however, compared with those benefits flowing from the criminal law, it is believed that they will be of minor significance.

The Department has concluded that in the case of gambling the first two considerations are very likely to outweigh the third. It should also be noted that the costs of enforcement against the unlicensed sector are estimated at £0.5m per annum, which has only a small impact on fee levels or the total increase in costs to the industry of the new regulatory regime. For these reasons, and (as stated in the consultation document) to ensure that the legitimacy of the regulatory regime is neither undermined nor suffers economically or reputationally, the Department has concluded that enforcement costs in both the licensed and unlicensed sectors should (at least initially) be recovered through the annual fees charged to operators.

On the duration of operating and personal licences, they are generally indefinite, subject to surrender, lapse, forfeiture and the Commission's regulatory powers of revocation and suspension. Initial and annual fees will be payable for operating licences but annual fees are not payable for personal

licences. However, the Department believes that it is reasonable for a maintenance fee to be paid for personal licences every five years in order to keep records up to date and so that licence holders contribute to the costs of compliance and monitoring the activities under their licences while they remain in the industry.

The Department agrees that the way that the Commission operates and the level of fees should be kept under regular review to ensure that it operates efficiently and provides value for money. The Government and Commission have already agreed to consult on and review fees annually, with the aim that any necessary increases in costs should where possible be absorbed by efficiency savings, so that fee levels are kept to a minimum - if there is a reduction in regulatory costs, fee levels will decrease as appropriate. In addition, standard Non-Departmental Public Body control documents (Funding Agreement, Management Statement and Financial Memorandum) have been agreed between the Department and Commission to ensure that there is clarity about the aims of the Commission and how it should operate.

**Question 2: Given the Government's requirement to move to full cost recovery of the Commission's licensing and regulatory activities, what is your view on the issues we have sought to address in deciding what is and is not included in the assessment of fee levels?**

**Summary of consultee responses**

Overall, the issues identified in the consultation document for inclusion in the assessment of fee levels are considered reasonable and are seen as consistent with published principles for setting fees. However, concerns have been raised about the estimated levels of regulatory activity in 2008/09 and 2009/10 in Table 3. These years show increased costs to reflect the predicted level of new operators entering the gambling sector but some respondents believe that new entrants have been over-estimated because the level of regulatory control will act as a barrier to entry.

**Government and Gambling Commission response**

The Department and the Commission are pleased that the issues identified for inclusion in the assessment of fee levels are broadly acceptable and that the industry recognises that the significant changes to the regulatory regime necessarily impact upon fees, which must be set in line with H.M. Treasury Fees and Charges guidance i.e. operating on a full cost recovery basis and avoiding cross-subsidisation between gambling sectors. Nevertheless, the Department and the Commission are committed to keeping all fee issues identified under review, including the reasonableness of the Commission's estimated unit (daily) costs and projected workload assumptions, to ensure that fees are as low as is commensurate with the new regulatory regime. Any adjustments that are deemed necessary, in respect of initial fees or in the future, will be to comply with the requirement that full costs (and no more) are recovered for services provided, while at the same time ensuring fairness and value for money for the gambling industry. The Department and the Commission agree that it is undesirable to create barriers of entry to the market for potential new operators by seeking to recoup costs through unnecessary regulatory activity.

**Question 3: Do you have any views on the framework for establishing the Commission's planned activity levels?**

**Summary of consultee responses**

There is concern about the assumptions and methodology used in the fees model (as set out in the consultation document) for establishing workload assessments for the Commission's planned activity levels (i.e. the average number of person days to complete functions of licensing, compliance and enforcement for each sector). Many respondents consider them to be disproportionately high in terms of workloads to potential risk (and hence fees) and/or that there are unfair disparities between sectors. Respondents have questioned the validity of the estimated average compliance and enforcement workloads and consider that the consultation document provides insufficient information to justify the planned levels of activity and proposed fees. There is particular concern that there may be a disproportionately high financial burden imposed upon smaller and independent operators. Respondents believe that the workload assumptions should be reviewed as a matter of urgency before the level of fees are finalised.

**Government and Gambling Commission response**

The consultation document explained that the fee proposals generated by the Commission's fees model (which was created by professional consultants) reflect: the Commission's best estimates of average workload (in person days) for each category and type of licensable activity; estimated average number of operators in each type of activity; and the full day rate costs required to achieve full cost recovery given the Commission's expected workload and operational requirements.

The Department and Commission understand the concerns raised in relation to the stated workload assessments of planned regulatory activity made in the consultation document (although at least one set of comments were based on a materially incorrect understanding of Table 1 <sup>see Note \*</sup>). These concerns have also been highlighted in meetings that the Commission have held during the consultation period with industry and trade representatives from each sector of the gambling industry. In the light of comments made and from information received in response to consultation exercises about other aspects of the Commission's work (which has improved Department and Commission understanding of all sectors of the gambling industry), the Commission reviewed its planned activity levels and workload assumptions taking into account:-

- i) Changes in requirements or approaches in licensing, compliance and enforcement work as a result of all the consultations that have taken place;
- ii) The relative workload overhead for small and larger licensed operators; and
- iii) The original assessment of potential risk and workload across all the industry sectors.

In the light of this review, the Department and the Commission are satisfied that the workload estimates and assumptions underpinning its planned

regulatory activity levels are generally robust and (subject to minor amendments) should be adopted to enable the Commission to complete each of its activities as set out in Tables 1, 2 and 3 of the consultation document. However, for smaller operators in the bingo, general betting, and family and adult gaming machines sectors, it has been decided that the workload assumptions should be revised on the basis of a lower risk assessment e.g. the Commission now anticipates undertaking visits to these sectors over a two-year cycle instead of annually. This revision feeds through to the lower licence fee arrangements for smaller operators, as explained in responses below.

*Note \* Comments by one respondent that the estimated workloads have been wrongly calculated in Table 1 are based upon a misinterpretation of the estimated average workloads. Table 1 shows the average workloads i.e. per operator application or per effort per operator for annual costs of the Commission. These seem to have interpreted as total effort by the Commission for all applications / annual costs, which makes a material difference to the workload assumptions in Table 1 and hence their interpretation.*

**Question 4: Do you have any views on the fees structure proposed for non-remote operating licences?**

**Summary of consultee responses**

There are a number of key concerns that run through the majority of the responses in relation to non-remote operating licences in terms of both the impact and proposed categories of licensable activity in the fees structure. These are: -

- i) The fee levels and category bands are 'anti-competitive' because they present barriers to growth in scale at the margins of the fee bands and large scale unit costs are lower compared to smaller operators. Therefore, the fee levels are unfair to small operators in comparison with larger organisations and would potentially lead to closure of businesses and a virtual monopoly of the gambling sector by larger organisations. For example, the average annual fee costs per licensed premises for bookmakers would be far higher for the small operator compared to the average costs of larger operators who fall within a higher licensed premises category. It is suggested that it would be fairer to base the fee levels on a fixed charge per licensed premises;
- ii) Smaller independent operators (i.e. small on- and off-course bookmakers and bingo operators and adult and family gaming centres) and the 'independent sector' (i.e. adult and family gaming centres) consider that the proposed fee levels are too high, especially when compared to current fee levels. They note that fees in the betting and gaming machine sectors have historically been low and the regulatory regime has been very light touch. For example, an on-course bookmaker currently pays £160 for the first three years and £20 for each three years thereafter. Whilst it is accepted that current fees need to be revised to reflect the changed regulatory regime, the level of fees now proposed will drive many smaller operators out of business; and
- iii) The proposed category bands to define the types of gambling (by size of operator) are unfair and unreasonable and it would be better if the categories came from a formula-based fee structure, linked to the number of premises or turnover of the licensed operator.

**Government and Gambling Commission response**

The Department and the Commission have considered very carefully all the points made in respect of the proposed fees structure for non-remote operators. It is important to remember that the new regulatory regime under the 2005 Act requires a more stringent approach, for instance as regards protection of gamblers, and the change from the old regime (with its very low fees in some sectors) to the new regulatory regime is financially challenging. Current fees are set at such a low rate that it is impossible to avoid a significant increase to accommodate the requirements required from the Commission by the 2005 Act. It is also important to note that licence fees for operators must reflect the level of regulatory control (and hence costs) that the Commission assesses as necessary for it to license operators in line with the licensing objectives of the Act - fees should not thus be premises-based: it is operators, not premises, that the Commission is licensing and operator risks that it must consider, which will not be directly proportionate to the number of premises from which they carry out business.

In response to the main concerns above, it is acknowledged that a clearer explanation needs to be developed for the nature of operating licence fees and the reasons for the category bands proposed. Therefore, category bands which are to be based on the Commission's fees model, assess the relative complexity of organisations and the impact of that complexity on the work required to consider applications and monitor operating licences. The proposed category bands were produced after consideration of: the different risks and workloads associated with the different sectors; information on the distribution of operators within the industry; an initial fees model that reflected the complexity of the industry and the relative fee levels between industry sectors (as judged in the light of prior regulatory experience and accumulated sectoral knowledge).

The Department and Commission will be making two main changes to the original proposals in the consultation document. First, it is accepted that on-course bookmakers in the general betting category constitute a distinct group, which should be treated differently to off-course bookmakers in the licence fee proposals. The Department and the Commission will therefore introduce a new category band for on-course bookmakers within the 'General Betting' band category, with three size bandings. These bandings still have to be finalised but are currently being modelled on Horseracing Betting Levy Board attendance data (i.e. number of pitch days) with fees levels reflecting the relatively low risk profile of the smallest operators. Holders of a General Betting licence will be able to provide on and/or off course betting. Holders of the restricted General Betting licence will only be able to provide on-course betting. The new category is included in relevant Tables below and in responses to other consultation questions.

Second, with regard to easing the marginal burden between category bands (see Table 1 below), we will be splitting the current unit band 'A' for Bingo, General Betting (i.e. off-course bookmakers), Adult and Family Gaming Centres to allow a better phasing of the fee levels across the smallest operators. The revised band limits within the split band 'A' will help to ensure a more consistent approach for the lower size band categories. Note that the marginal impact of an additional unit within any band will always be zero and that average costs on a per premises basis will necessarily remain higher for small operators in order to reflect the appropriate level of regulatory risk. Whilst there are significant marginal cost impacts at the boundaries of licence fee category bands, the change from one category band to another reflects the additional regulatory work the Commission will need to carry out to satisfy itself that the licensed operator is capable of satisfying the requirements of the 2005 Act for the level of activity covered by the new category band. It is therefore proposed to revise the premises-based band categories for small operators (i.e. general betting, bingo and adult and family gaming centres), which it is believed will ameliorate the level of fees impact and between band categories.

*Table 1: Proposed banding model for premises based operations (Bingo, General Betting, Adult Gaming Centres and Family Entertainment Centres)*

<b>Band</b>	<b>Range of premises</b>	<b>Justification</b>
A1	1- 4	Small business, usually run by a single owner/manager or small partnership. Span of control is manageable within this range to allow an individual to have effective control over the delivery of 2005 Act objectives.

A2	5 –15	Small business, but needs management system in support of owner manager/ partners to deliver 2005 Act objectives. Likely to be geographically diverse and likelihood of variations in implementations of policies, attracting different clientele etc. Requires a greater level of work from the Commission to assess this on annual basis. Marginal increase in fee should not exceed the initial fee per unit.
B	16 – 50	Medium-sized business requiring complex corporate structures which exercise control. More likely to have formal internal systems for control and compliance. Capable of system-based review with sample visits to locations.
C	51 – 99 (199 for general betting)	Large business with complex corporate structures, usually owned by shareholders. Will tend to have in-house compliance structures and procedures at a formal level. Commission approach will be to identify and assess systems and sample check at local sites.
D	200+	Very large corporate operators, complex corporate structures operating sophisticated internal compliance procedures. Commission approach will be to identify and assess systems and sample check at local sites.

In addition for both non-remote and remote category banding for External Lottery Managers, the Department and the Commission accept that the bandings originally proposed (based on annual proceeds) were too small and will instead use the same category band limits as apply to other commercial undertakings (e.g. gaming machines). It is believed that this will more truly reflect the nature of External Lottery Managers and it reduces their potential licence fee burden. The new category bands for both non-remote and remote External Lottery Managers will be as follows:

**Table 2: External Lottery Managers**

ELMS	Value of annual proceeds	Under £0.5m	£0.5m - £6m	Over £6m
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Appendix 1 is a revised table of all the category band types for non-remote licences, with the proposed banding changes as explained above. The revised fees for non-remote operating licences taking account of these changes are shown in Appendix 2.

**Question 5: Do you have any views on the fees structure for remote operating licences? What are views on the categories of ancillary fees for remote activities associated with non-remote provision (Type H)?**

**Summary of consultee responses**

There are three key concerns (similar to non-remote operators) that run through the majority of the responses in relation to remote operating licences. First, the level of remote licence annual fees for small operators is seen as too high in terms of its perceived impact on business activity / viability of some operators. Secondly, respondents think that the proposed categories of licensable activity and workload regulatory assumptions should be reviewed and, thirdly, greater clarity is required about when the ancillary licence (Type H) will be applicable, especially in respect of lotteries.

**Government and Gambling Commission response**

The Department and the Commission proposed the same annual fees for all remote activity categories within each band, excluding society lotteries. It is clear from the comments received that this approach is considered unfair and is seen as being likely to force some operators out of business, with particular attention having been drawn by respondents to what are considered excessive licence fee levels for operators with relatively low volume telephone or remote general levels of business and remote telephone exchanges. In addition, it is noted that remote small lotteries will be liable to significantly higher fees than their non-remote equivalent. These concerns are understood, but it is not possible at this stage to propose a different level of fees as the Commission considers that the fees proposed for remote lottery provision are at the lowest level commensurate with the risks involved. The Department and the Commission have however agreed to adjust the band limits for lottery managers so that they will fall in lower fee bands than originally proposed.

The ancillary licence fees have been devised to cover the situation which might arise where the extent of the remote gambling provision is purely ancillary to the provision of non-remote gambling by the holder of a non-remote gambling licence. Such remote provision is considered limited and low risk, and is designed specifically to cover circumstances as described. The ancillary licence fee is in fact a concession for holders of non-remote gambling licences and its provision will be kept under review to ensure that its use is in line with the circumstances that have been identified. The Department and the Commission have reviewed the workload assumptions required for the ancillary licence and have concluded that the initial application fee and annual fee should be reduced from £200 to £100 and £25 respectively.

The revised fees for all remote operating licences, including ancillary fees (Type H) are shown in Appendix 1.

**Question 6: Do you agree that a lower fee should be charged to non-remote operators in the first year that they are licensed to reflect the reliance the Commission will place on its work in issuing a licence?**

#### **Summary of consultee responses**

For the reasons set out in the consultation document, there is considerable support for the Commission charging a lower annual fee to non-remote operators in the first year that they are licensed (due 30 days after the operating licence is issued and at a level of 25% below current workload assumptions) to reflect the fact that elements of the work carried out by the Commission in the licence application process should not be duplicated. In the second and subsequent years, it is accepted that the full annual fee will be payable by all licensed operators. Respondents also agree for the reason stated in the consultation document that a lower fee should not be applied to remote operators, but some seek a fuller rationale.

#### **Government and Gambling Commission response**

The proposed lower first annual fee for non-remote operators will be set for the period of 30 days from the date of licence issue within which the first annual fee must be paid, with the full annual fee being payable in subsequent years. This means that, for operators who are issued with licences that start on 1<sup>st</sup> September 2007 (i.e. as a result of advance applications), the 30 day period will run from 1<sup>st</sup> September 2007 and not any earlier date on which the licence was issued. – and subsequent annual fees will be payable before 1<sup>st</sup> September each year. For all other operators with a licence issued after 1<sup>st</sup> September 2007, the first annual fee payment will be due 30 days after the licence issue date so that, for example, for a licence issued on 1<sup>st</sup> April 2008, it will be payable before 1<sup>st</sup> May 2008, and subsequent annual fees will be payable before 1<sup>st</sup> April each year.

The situation is different for remote operators as this is the first time that remote gambling has been regulated in Great Britain. The Commission and the Department have made an assessment of the additional systems compliance work that will be required to enable the operator to begin operation and for the Commission to be an effective independent regulator, and have concluded that the level of regulatory activity required will mean that remote operators should not benefit from a lower annual fee in the first year.

**Question 7: Do you agree with the level of discounted fees to be paid for multiple licensable activities for non-remote and remote licensed operators?**

**Summary of consultee responses**

There is broad agreement with the principle and proposed levels of discounted fees for multiple activities for remote and non-remote operators, but clarification has been sought regarding the level of discounts to be applied for initial application and especially annual fees for multiple activities, and to which sectors the discounts will apply. There is some disappointment that the level of 10% discount on annual fees is not higher.

**Government and Gambling Commission response**

The Department and the Commission are pleased that the principle and level of discounted fees for multiple activities is broadly welcomed by the majority of respondents. The discounts will apply to sectors of the gambling industry and the level of discount reflects the extent to which the Commission expects to be able to place reliance on corporate control arrangements (and so reduce its costs). As with all aspects of licence fees, the level of discount will be kept under review - changes will be made as appropriate and if they do not undermine the Commission's ability to meet its licensing objectives as a national regulator.

On a point of clarification about discounts for annual fees where operating licences are held for multiple activities, in the first year the amount paid will be 75% of the full annual fee for the most expensive licence type and 75% of 90% of the full fee for each of the other types of activity. In subsequent years, the annual fees will be the full annual fee for the most expensive licence type plus 90% for each of the other types of activity.

**Question 8: What are views on the proposed fee rates for operating licence holders in Appendix 1?**

**Summary of consultee responses**

As already stated in summarising responses to consultation questions 4 and 5, the majority of respondents have some concerns about the impact of the licence fee rates as proposed. For non-remote operators these are that: i) fee levels and band categories are 'anti-competitive'; ii) for smaller operators and the independent sector, the fees are too high and are seen as potentially putting operators out of business; and iii) definitions of category bands are considered unfair and should be based on a formula-based fee structure linked to the number of premises or turnover of the licensed operator. For remote operators, concerns are about: the flat rate approach proposed for annual licence fees and clarity on the application/use of the ancillary licence (Type H), especially in respect of lotteries.

**Government and Gambling Commission response**

The Department and the Commission have already explained how we will respond to the comments made in responding to questions 4 and 5 above, with the impact on the Commission's forecast necessary regulatory costs being the driving factor for changes to the original proposals. The impact of all the changes to be made as a result of considering the comments is set out in the revised Commission fees table below in Appendix 1.

**Question 9: Do you have any views on how fees will be set for the Commission's other regulatory activities?**

**Summary of consultee responses**

Most respondents thought that the approach taken and principles adopted to setting fees in Table 7 of the consultation paper for the Commission's other regulatory functions (i.e. change of business control, variations to and copy of licence etc) were reasonable. The Table reflects the relative effort (therefore cost) that the Commission's workload fees model shows is required to undertake these activities. However, a number of respondents did raise concern that the level of 75% of standard licence fee for change of control was either unfair in principle or too high (i.e. a barrier for businesses to operate), especially if the new controlling organisation already has an 2005 Act licences appropriate to its existing business, and an explanation should be given as to why this is so.

**Government and Gambling Commission response**

The Department and the Commission have noted the divided opinions on the fees to be set for the Commission's other regulatory activities. It is not accepted that the principle is unfair or that level of fees will act as a barrier to operators wishing to provide a gambling service, as they simply reflect the level of regulatory activity that the Commission considers that it will have to undertake in an industry which is not static, but fast-changing. Therefore the level of fees set out in the consultation document will be the ones to be charged by the Commission.

**Question 10: What are views on the proposed fee rates for personal licence holders in Appendix 1?**

**Summary of consultee responses**

The majority of responses accept that the proposed level of personal licence fees (application, periodic maintenance [also see Q.11 below] and other fees) are reasonable for the level of regulatory activity that the Commission will undertake. However, concern is raised about the number of personal licences that each operator will be required to obtain as, if numerous, the overall cost may be significant.

**Government and Gambling Commission response**

The Department and Commission are pleased that the levels of personal licence fees are broadly acceptable - they reflect the estimated cost of the Commission's regulatory activity in processing applications. In its consultation document *Licence Conditions and Codes of Practice* (March 2006) the Commission set out its proposals for setting Personal Management Licences (PML) and Personal Functional Licences (PFL). In summary, the Commission proposed that (as part of its handling of operating licence applications) those who hold the roles or the functions usually associated with chief executive, finance director, chief compliance officer and marketing director should hold PMLs. As a result of other consultation, the Commission is considering also including the role of head of gambling-related (e-gambling) activities in remote operations. In larger operations, where responsibility for issues of regulatory interest is delegated, managers responsible for regions will also be required to hold PMLs. For PFLs, the Commission will continue the existing system of requiring personal certificates for certain people in the casino and bingo sectors and (possibly) parts of the betting industry. Full details can be found in the Commission document and the Commission will be happy to advise operators on the number of personal licences that they require.

The overall principle in relation to personal licences is that they will be required by the minimum number of people necessary for the Commission to feel confident in carrying out its role of upholding and ensuring compliance with the licensing objectives set out in the 2005 Act. Hence, for example, PMLs will not be required for those organisations that will be classed as Small Scale Operators, since the work necessary to issue an operating licence should provide sufficient assurance to the Commission.

Therefore, the fees stated in the consultation document will be the ones that are charged in relation to personal licences.

**Question 11: Do you have any views about the payment of five yearly periodic fees for personal licence holders?**

**Summary of consultee responses**

The majority of responses agree that the Commission should undertake five-yearly maintenance checks for personal licences to ensure that records about personal licence holders are kept up to date and that the compliance/enforcement functions of the licensing system are fit for purpose. In addition, most respondents are content that fees should be charged for this activity and set at the same level for application fees for both types of personal licence. However, some respondents have questioned the need for maintaining personal licences and the nature of the work required - this (together with the fee being proposed), is thought to be bureaucratic, an additional cost to the industry and unnecessary. The view of some respondents seems to be that the onus should be on operators to keep good records of its licensed staff and pass this information to the Commission to keep its registers up to date, which may obviate the need for a personal licence maintenance fee to be charged.

**Government and Gambling Commission response**

The Department and the Commission are pleased that the majority of respondents support both the role of the Commission (in undertaking general monitoring, compliance and enforcement functions of the personal licensing system and keeping its registers of personal licence holders up to date) and that it is reasonable to achieve this through a periodic maintenance fee paid on the fifth anniversary of the date of the issue of each personal licence. One of the purposes of personal licences is to give holders a direct stake in supporting the licensing objectives of the 2005 Act by seeking to ensure the personal integrity of each licence holder in respect of the gambling service he/she provides - this in turn should enhance the confidence of customers and other stakeholders. To that end, the Department believes that it is important for the Commission (as a national regulator for the UK) to hold up to date source of information on personal licence holders in the form of a central register. For these reasons it is considered reasonable to charge a fee and that this is most cost effectively achieved through a requirement to pay a five-yearly maintenance fee to the Commission, which thus provides a mechanism for licence holders to contribute towards the compliance and monitoring costs of the Commission while they remain in the industry. The Department and the Commission are not persuaded at present that their aims would be achieved by relying on operators to pass on information about their licensed staff. However, the payment of maintenance fees and the effectiveness of keeping a central register will be kept under review.

**Question 12: What are your views about the period for reviewing fees and how increases/decreases in fee levels will be assessed?**

**Summary of consultee responses**

The proposal to review fees after a year and make adjustment to licence fee levels in light of the review, is welcomed by all respondents and it is suggested that this should be done on an annual basis, especially while the new regime beds in. One respondent thought that the review should be carried out by an independent body.

**Government and Gambling Commission response**

The Department and the Commission can confirm that licence fee levels and what should be included in them (including enforcement costs against unlicensed operators) will be reviewed as a whole and, at least initially, on an annual basis for each industry sector with the aim (where possible) of absorbing any increases in regulatory costs via efficiency savings, so keeping any increase in fees for future years to a minimum. In line with the principle of full cost recovery, any reduction in regulatory costs would be matched by a decrease in fees levels (and vice versa). The Department believes that there is at this stage no need for an independent body to carry out a review - hence, the Commission will do so but will need to present rationale, cost workings, findings and recommendations to the Department for consideration. Ministers make final decisions on licence fees and will do so with the dual intention of enabling full cost recovery for the Commission (in accordance with the 2005 Act), while ensuring fairness and value for money for the gambling industry.

**Comments on other aspects of the consultation document**

**Summary of consultee responses**

It is argued that the Regulatory Impact Assessment is incorrect when it states that the gambling industry does not currently pay the full cost of its regulation and there exists an annual subsidy to the gambling industry. In addition, the gambling industry should not be charged the costs of regulation because the Government already collects considerable amounts of taxation for the Exchequer which easily cover the costs of the regulatory activities of the Commission. There is concern that the estimate regulatory costs across all sectors of the industry does not include the internal costs of regulation for licensed operators and other additional compliance costs arising from the 2005 Act such premises licence fees and payments to the Fixed Odds Betting Tribunals. Other issues raised are about the fairness and inconsistencies of the fee structure, and costs of tackling illegal enforcement etc; have been responded to in earlier parts (see relevant consultation question above) of this document.

**Government and Gambling Commission response**

The Department is still of the view that the costs of regulating the gambling industry are currently subsidised from general taxation. This is illustrated by considering the following table setting out the activities of the Gaming Board for Great Britain/Gambling Commission for 2005/06<sup>1</sup>:-

£ '000s	Gaming Board for Great Britain 6 months to 30 <sup>th</sup> September 2005	Gambling Commission 6 months to 31 <sup>st</sup> March 2006	Total Year ended March 2006
<b>Costs of Regulation:</b>			
Staff Operating	1,443	1,816	3,259
Other Operating	2,765	3,687	6,452
Depreciation	3	8	11
<b>Total</b>	<b>4,211</b>	<b>5,511</b>	<b>9,722</b>
<b>Financed by Industry:</b>			
Fees and Charges	1,368	1,314	2,682

<sup>1</sup> Source: Gambling Commission, Annual Report 2005/06

CRB Recovery	54	48	102
Total Fees	1,422	1,362	2,784
Financed from Other Sources	2,789	4,149	6,938
Of which Grant-In-Aid for Operations	2,384	2,879	5,263

During the year ended March 2006 the costs of regulating the industry via the Gaming Board/Gambling Commission amounted to £9.7m. Of this, only £2.7m - or just under 28% - came from the gambling industry in the form of fees and charges. The remainder came principally from the Exchequer in the form of grant-in-aid. In addition, it should be noted that the above table does not take into account any shortfall between costs of regulation and fees charged which may have been met by local authorities or the courts. Whilst it might entertain debate of the use of the word 'subsidy' to describe the situation, the Department is of the firm view that at present the costs of regulating the gambling industry are borne principally by taxpayers and not by the industry or its customers.

The Department also rejects the suggestion that the financing the costs of gambling regulation should be through general taxation because of the amount of tax and duty revenues already paid by the gambling industry to the Exchequer. Parliament already has this option. Duties on gambling and taxes paid by gambling companies are regarded as part of the Exchequer and are used for all the purposes dictated by Parliament. Hypothecation of all or part of gambling taxes for gambling-related purposes might have some virtue if those taxes were levied in accordance with the social harms arising from gambling. However, Parliament has decided that the Department should have the power to regulate for separate fees to cover the regulatory costs of the Gambling Commission as set out in the provisions of the Gambling Act 2005. It therefore follows that Parliament has explicitly rejected the hypothecation of existing gambling taxes, as advocated by some respondents.

The Department believes that the proposed fees potentially raise three issues that might affect competition in the gambling industry, as follows:

- i) they might materially impede entry into the industry by charging disproportionately high fees for small businesses;
- ii) they might provide a significant disincentive for business growth and innovation; and
- iii) they might be structured in such a way that there is a strong incentive to adopt a particular business model with the result that the regulations, rather than business risks and rewards, determine the supply structure of the industry.

The fee structure was designed - and has been refined in the light of consultation - to take account of these possible problems. In so doing, the Department believes that regulatory risk and the effects on competition have both been reduced to acceptable levels.

Consideration of the potential impediment to entry on the part of small businesses prompted a reconsideration of the regulatory risk attached to licensing and monitoring such businesses in the gambling industry. This review suggested that, for the smallest firms, it was appropriate to refine risk assessments, increase the number of size categories and review the workload assumptions accordingly. That has now been done, with size bands amended and an extra size category being introduced. The Department is satisfied that any disincentives to new entry by small businesses are now as small as possible given the regulatory risks posed.

It was judged that the fee structure originally proposed by the Gambling Commission may have provided a disincentive for growth for companies approaching the upper end of a Band, since they would face a step change in fees due. This potential has been partly addressed by the revision of an extra band which assists in smoothing the progressivity of fees. It has also been reduced by redefining the bands in the case of general betting and bingo so as to reduce the large increases in per premise charge as a firm's size crosses into a higher band. Fees charged under the new bands are believed by the Commission and the Department to provide a relatively small disincentive for growth and innovation.

Any banded fee structure may encourage firms to design their business model so as to minimise regulatory costs. It may also ossify a particular industry structure. To some extent, these risks have been reduced by the changes already proposed in response to the formal consultation and meetings held with industry sectors during the consultation period. Nevertheless, the Department believes that the risks could only be fully addressed by the introduction of a more flexible method of charging than is afforded by fee bands. At present, there is insufficient information to allow any such more flexible alternative to be implemented. However, the Department expects that, as more complete industry information is collected, the present fee structured is likely to be reviewed by the Gambling Commission and revised to take account of this issue, if appropriate.

Consideration of the potential impediment to entry on the part of small businesses prompted a reconsideration of the regulatory risk attached to such businesses. This review suggested that for the smallest firms it was appropriate to refine risk assessments and review the workload assumptions accordingly. This has led to the introduction of new Bands A1 and A2 into the fee structure. The Department and the Commission are satisfied that any disincentives to new entry by small businesses are now as small as possible given the regulatory risks posed.

It was judged that the fee structure originally proposed may have provided a disincentive for growth by companies approaching the upper end of a fee band. This potential has been partly addressed by the addition of a new lower Band A1 which assists in smoothing the progressivity of fees. It has also been reduced by redefining the bands in the case of general betting so as to reduce the large increases in per premise charge as a firm crosses into a higher band. Fees charged under the new bands are believed by the Department and the Commission to provide a relatively small disincentive for growth and innovation.

Any banded fee structure may encourage firms to so design their business model to minimise regulatory costs. It may also ossify a particular industry

structure. To some extent, these risks have been reduced by the changes already proposed. Nevertheless, the Department and the Commission believe that they can only be fully addressed by the introduction of a more flexible method of charging than is afforded by fee bands. At present, there is insufficient information to allow this more flexible alternative to be implemented. However, the Department and the Commission expect that as more complete industry information is collected the proposed fee structure will be reviewed and revised to take account of this issue.

**Appendix 1**

Category of Licence	Unit	Type A	Type B	Type C	Type D	Type E
Existing Casinos: Licensed under 1968 Act	Gross gaming yield	Up to £5m	£5m - £100m	Over £100m		
New Casinos: Licensed under 2005 Act	Nature of premises licence	Small	Large	Regional		
Bingo	Licensed premises	4 or less	5 - 15	16- 50	51 - 99	100 and above
General betting - standard	Licensed premises	4 or less	5 - 15	16- 50	51 - 199	200 and above
General betting - limited	Levy board attendances	0 – 75	76 – 199	200 and above		
Pool betting	Gross betting yield	Up to £5m	£5m - £100m	Over £100m		
Betting intermediaries	Gross betting yield	Up to £5m	£5m - £100m	Over £100m		
Gaming machine general: Adult Gaming Centre	Licensed premises	4 or less	5 - 15	16- 50	51 - 99	100 and above

Category of Licence	Unit	Type A	Type B	Type C	Type D	Type E
Gaming machine general: Family Entertainment Centre	Licensed premises	4 or less	5 - 15	16- 50	51 - 99	100 and above
Gaming Machine technical: Full	Value of gross sales	Under £0.5m	£0.5m - £6m	Over £6m		
Gaming Machine technical: Supplier	Value of gross sales	Under £0.5m	£0.5m - £6m	Over £6m		
Gaming Machine technical: Software	Value of gross sales	Under £0.5m	£0.5m - £6m	Over £6m		
Gambling software	Value of gross sales	Under £0.5m	£0.5m - £6m	Over £6m		
Lottery Operating Licence: Society lottery	Annual Proceeds	Under £100k	£100-£500k	Over £500k		
Lottery Operating licences: External lottery manager	Annual Proceeds	Under £0.5m	£0.5m - £6m	Over £6m		

Licence Categories	Unit	Type F	Type G	Type H
Remote Casino Licence Remote Bingo Licence Remote General Betting Licence Remote Betting Intermediary Licence Remote Pool betting Licence	Gross gambling yield	Up to £5m	£5m - £100m	Over £100m
Remote General betting – telephone only	Gross gambling yield	Less than £0.25m		
Remote Lottery Licence - society lottery	Annual Proceeds	Under £100k	£100-£500k	Over £500k
Remote Lottery Licence - lottery manager	Annual Proceeds	Under £0.5m	£0.5m - £6m	Over £6m
Gaming Machine Technical (remote)	Value of gross sales	Under £0.5m	£0.5m - £6m	Over £6m
Gambling Software (remote)	Value of gross sales	Under £0.5m	£0.5m - £6m	Over £6m

**Appendix 2**

**Revised Proposal**

Operating licence type	Proposed Licence Application Fees							
	Non-Remote					Remote		
	A	B	C	D	E	F	G	H
Casino: 2005 Act	28988	38047	43482			28988	34423	38047
Casino: 1968 Act	6588	9882	19765			28988	34423	38047
Bingo	988	1647	3294	17295	20753	1647	3294	16471
General betting - limited	180	360	990					
General betting - standard	988	988	3459	17295	40518	988	3294	16471
Pool betting	659	1647	4941			659	1647	4941
Betting intermediary	200	200	200			9882	13176	16471
Gaming machine general: AGC	988	988	1647	4941	16471			
Gaming machine general: FEC	988	988	1647	4941	16471			
Gaming machine technical: manufacturer	988	1647	16471			988	1647	16471
Gaming machine technical: supplier	988	1647	4941			988	1647	4941
Gaming machine technical: software	988	4941	16471			988	4941	16471
Gambling software	988	4941	16471			9882	13176	16471
Lottery managers	988	1647	2306			988	1647	2306
Society lotteries	165	247	329			165	247	329

**Revised proposal**

Operating licence type	Proposed Annual Licence Fees							
	Non-Remote					Remote		
	A	B	C	D	E	F	G	H
Casino: 2005 Act	36619	72694	145388			12733	34176	66341
Casino: 1968 Act	12267	15537	221654			12733	34176	66341
Bingo	1327	5308	12645	26842	58573	12733	34176	66341
General betting - limited	150	350	950					
General betting - standard	1327	5308	12645	27647	159279	12733	34176	66341
Pool betting	1591	3062	3062			12733	34176	66341
Betting intermediary	200	3062	3062			12733	34176	66341
Gaming machine general: AGC	1212	4848	9696	19866	27647			
Gaming machine general: FEC	878	3512	7024	15966	26842			
Gaming machine technical: manufacturer	2221	4744	10631			12733	34176	66341
Gaming machine technical: supplier	1801	2432	3062			12733	34176	66341
Gaming machine technical: software	1151	2896	4641			12733	34176	66341
Gambling software	1151	2896	4641			12733	34176	66341
Lottery managers	1486	1696	1906			12733	34176	66341
Society lotteries	261	519	1044			2372	4370	6361

	Licence fee	Annual fee
General Betting restricted remote - phone betting only and GGY up to £0.25m	660	1500
Ancillary remote fee (per Regs)	100	25

	Charge
<b>Changes in control</b>	
Change in control	75% of standard licence fee
Change resulting from mergers/divisions	75% of standard licence fee
<b>Variations</b>	
Add licensed activity	25% of standard licence fee
Amend licensed activity	25% of standard licence fee
Remove licensed activity	£25 admin fee
Change details	£25 admin fee
Add a condition to the licence	25% of standard licence fee
Amend a condition to the licence	25% of standard licence fee
Remove a condition to the licence	25% of standard licence fee
<b>Copy of licence</b>	£25 admin fee
<b>Copies of the register of operating licences (NB available on the internet for no charge)</b>	£25 admin fee

Personal Licences	Fees	
	Licence	Maintenance
Management Licence	330	330
Functional Licence	165	165

Variations	Charge
Add licensed activity	25% of standard licence fee
Amend licensed activity	25% of standard licence fee
Remove licensed activity	£25 admin fee
Change details	£25 admin fee
Add a condition to the licence	25% of standard licence fee
Amend a condition to the licence	25% of standard licence fee
Remove a condition to the licence	25% of standard licence fee
<b>Copy of licence</b>	£25 admin fee
<b>Copies of the register of personal licences (NB available on the internet for no charge)</b>	£25 admin fee

### Appendix 3

#### List of Respondents

- 134 bookmakers made the same comments in relation to Questions 1, 3 and 4
- 28 customers of one remote gambling operator made the same comments

1.	A.G. Backus	24.	British Casino Association
2.	Alan Newland	25.	British Holiday & Home Parks Association Ltd
3.	Alan Whitelaw	26.	Bruce and Christian Kean
4.	Alex Anderson	27.	Business In Sport and Leisure Ltd
5.	Alex Finn	28.	Carlton Bingo
6.	Allan Gooch	29.	Carnegie Racing Ltd
7.	A. Maynard	30.	Casino Operator's Association
8.	McBurney	31.	DalGLISH
9.	Ansells	32.	C.G. Shepherd (C&R Racing)
10.	Anthony Crolla	33.	Charles Dickinson
11.	Arthur Turner Bookmakers	34.	Chas Kendall (Turf Accountants) Ltd
12.	Association of British Bookmakers	35.	Cheshire Racing
13.	BACTA	36.	Choice Bet
14.	BISL (James Radford)	37.	Chris Pluck Ltd
15.	Backhouse bet (Will Roseff)	38.	Clifford M. Smith (CMS Racing)
16.	B.D. Mason	39.	Colin Ashton
17.	Beaney (The Bookmakers Ltd)	40.	College Racing (Beckenham) Ltd
18.	Beeline Promotions Ltd	41.	Collins Bookmakers (K.R. Collins)
19.	Bet-A-Bet	42.	Coverdale Racing
20.	Bet bet bet 27/7	43.	Davee
21.	Betterbetcorbett	44.	Dave Hampson
22.	Bingo Association	45.	Dave Nelson
23.	Bourne Leisure (Nick Arron)	46.	David Newton

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|-----|--|------|---|
| 47. | David Piper                                | 80.  | Helmut Kauter                             |
| 48. | David Pluck                                | 81.  | Hospice Lotteries Association             |
| 49. | D.C. Smith                                 | 82.  | Howard Mayne (The Mayne Bookmaker)        |
| 50. | Deeside Bookmakers                         | 83.  | Ian Chadwick                              |
| 51. | D.E. Foulkes (Oakfield Bookmakers)         | 84.  | Ian Davies (BackAndLay.com Ltd)           |
| 52. | Dennis Birch (Wannabet)                    | 85.  | Ian Norris (Norway Racing)                |
| 53. | D.J. Newton                                | 86.  | Ian Wilson (Thames Bookmakers)            |
| 54. | Derek J. Hartfield                         | 87.  | Inter Lotto (UK) Ltd                      |
| 55. | Russell Bookmakers                         | 88.  | J. Livingstone                            |
| 56. | Cook                                       | 89.  | Jack Taylor (Taylor's Racing Service Ltd) |
| 57. | Eugene Wiz                                 | 90.  | James Allan Racing                        |
| 58. | Fairbet Racing                             | 91.  | James Winwood                             |
| 59. | Federation of Racecourse Bookmakers Ltd    | 92.  | Janet Pluck (Chris Pluck Bookmaker)       |
| 60. | F.H. Johnson                               | 93.  | Janet Pluck (Sennatelyn Ltd)              |
| 61. | New Turf Account Ltd                       | 94.  | Jason Jennings (Joe Jennings Bookmakers)  |
| 62. | Frank Irish                                | 95.  | J & C Turf Accountants                    |
| 63. | Frank Whitehouse Ltd                       | 96.  | J. Daws                                   |
| 64. | Gala Coral Group                           | 97.  | J. Horley                                 |
| 65. | GamingKing plc                             | 98.  | Jeffrey Mabey                             |
| 66. | Gary Wintle                                | 99.  | Joe Jennings Bookmakers                   |
| 67. | Geoff Banks (Rails Bookmakers Assoc)       | 100. | John Anderson                             |
| 68. | Geoffrey Pratt                             | 101. | John Bryan                                |
| 69. | George Chernev                             | 102. | John Dunn                                 |
| 70. | Champion Bookmakers Ltd                    | 103. | John Page                                 |
| 71. | Gillinghams                                | 104. | Johnny Ridley (A. Ridley)                 |
| 72. | G.J. Tudor (Sandwich Turf Accountants Ltd) | 105. | John Russell (Scotscoup)                  |
| 73. | GR Racing                                  | 106. | John Tomlinson                            |
| 74. | Graham Ellis                               | 107. | J. Thomson                                |
| 75. | Graham Malpas                              | 108. | J.W. Crombie                              |
| 76. | Greenacres                                 | 109. | K.A. Hanlon (Clover Racing)               |
| 77. | Grimes Bookmakers                          | 110. | Keith Davies                              |
| 78. | G.W. Carrigill Ltd                         | 111. | Keith Tomlin                              |
| 79. | Harry Macadam                              | 112. | Ken Howells (Sports Betting)              |
|     |  | 113. | Kerzner International                     |

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| 114. | Kevin Kelly                         | 148. | N. Jones (J & C Turf Accountants)              |
| 115. | K.P Racing                          | 149. | National Caravan Council                       |
| 116. | K.R. Collins                        | 150. | Nicholas Hatton                                |
| 117. | K.R. Yeates                         | 151. | Nick Alston                                    |
| 118. | Lakeland Racing                     | 152. | Nick Arron                                     |
| 119. | Lawrence Racing Ltd                 | 153. | Nigel Beevers                                  |
| 120. | Lewis Bookmakers                    | 154. | Nigel W. Pugh (Turfmount Ltd)                  |
| 121. | Leisure Link                        | 155. | Off-Course Bookmakers Ltd                      |
| 122. | Licensing Legal                     | 156. | Ostlers Ltd (P. Foxall)                        |
| 123. | Lillywhite Racing Ltd               | 157. | Paddock Ltd (S.P. Holland)                     |
| 124. | Littlewoods Gaming Ltd              | 158. | Pamela Lowe (Lowe Brothers)                    |
| 125. | Lowe Bros Ltd                       | 159. | Pamela Swift                                   |
| 126. | Maldon Borough Council              | 160. | Parsons and Co (Bookmakers)                    |
| 127. | Mark Edern (Eden Bookmakers)        | 161. | Paul Haigh                                     |
| 128. | Martin Densham                      | 162. | Peter Howard                                   |
| 129. | Martin Johnstone                    | 163. | Phil Hardy                                     |
| 130. | Max Thomas 'Cash' Ltd (M. Thomas)   | 164. | Phil Reed                                      |
| 131. | M. Cook Bookmakers                  | 165. | Philip Love                                    |
| 132. | Metrobet Ltd                        | 166. | Picken Racing Ltd                              |
| 133. | McBurney Racing                     | 167. | P. Jones (M.J. Racing Ltd)                     |
| 134. | Michael Aylward                     | 168. | P.J. Widdicombe                                |
| 135. | Michael Corbett, (betterbetcorbett) | 169. | Racecourse Promoters Association Ltd           |
| 136. | Michael Gentle                      | 170. | Raceways Sports Betting                        |
| 137. | Michael Kyriakov                    | 171. | Rank   |
| 138. | Michael M.J. Smale                  | 172. | R.A. Gilbert                                   |
| 139. | Mick Skeff                          | 173. | R.C. Maltby                                    |
| 140. | Mike Chadney                        | 174. | Remote Gambling Association                    |
| 141. | Million -2-1 Ltd                    | 175. | Responsible Gambling Solutions Ltd             |
| 142. | Ministry of Defence (Kathryn Essex) | 176. | Reuben Page Ltd                                |
| 143. | M.J. Anderton                       | 177. | R.G. Etchells (Chartered Surveyors)            |
| 144. | Morrisons Bookmakers                | 178. | R.G. Holbrook                                  |
| 145. | Mr. Iace                            | 179. | R.H.E. Harris (Robinson Bookmakers)            |
| 146. | National Joint Pitch Council        | 180. | Richard Dixon (Sterling Management Centre Ltd) |
| 147. | N. Charles Bookmakers               | 181. | Richard Mather                                 |

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| 182. | Richard Parrish (Pinnacle Racing)                   | 209. | Tom Sheldon Ltd   |
| 183. | R. Jenkins (Blenheim Racing (Turf Accountants) Ltd) | 210. | Tony Ashley (Tony Ashley Racing)  |
| 184. | R.M. Fuller (Goodwin Racing Ltd)                    | 211. | Tony Kendall  |
| 185. | Robert McKay  | 212. | T. Dunn   |
| 186. | Rupert Smith  | 213. | The Mayne Bookmaker (Edward Mayne)  |
| 187. | Sam Johnson Bookmakers                              | 214. | The Weather Lottery   |
| 188. | Sandie Carrington (Chiron)                          | 215. | Timebox Ltd   |
| 189. | Sandwich Turf Accountants Ltd                       | 216. | T. Rickard  |
| 190. | Scook   | 217. | Tobias Dijksta  |
| 191. | Scotscoup The Bookiers                              | 218. | Tom Fisher  |
| 192. | Scott. Little                                       | 219. | Tony Thompson   |
| 193. | Scottish Independent Bookmakers Assoc               | 220. | Truelap Ltd   |
| 194. | Sean Murphy   | 221. | Val Brace   |
| 195. | Sennatelyn Ltd                                      | 222. | Vantis  |
| 196. | S.D. Bookmakers Ltd                                 | 223. | Vegas 24/7 (Adrian Ham)   |
| 197. | Sham Pridmore                                       | 224. | Watson (Andrew Watson)  |
| 198. | Simon Herring                                       | 225. | W. Bright   |
| 199. | Sisson Marketing International Ltd                  | 226. | Weston Racing   |
| 200. | South East Racing                                   | 227. | Wilf Gilbert (Staffs) Ltd – three responses dated 9 <sup>th</sup><br>August, 2 <sup>nd</sup> October and 6 <sup>th</sup> October. |
| 201. | S.P. Holland  | 228. | Wit Gryko   |
| 202. | Stacey Racing                                       | 229. | William (Billy) Bunter  |
| 203. | Stan James Ltd                                      | 230. | William J. Aubrey   |
| 204. | Stuart Creed  | 231. | Winters Bookmakers  |
| 205. | Sunderlands   | 232. | W.S. Hook   |
| 206. | Super Soccer  | 233. | Xavier Kennedy  |
| 207. | T.A. Riverside Racing                               | 234. | Yates and Company   |
| 208. | T.H. Jennings (Harlow) Ltd                          |      |   |