

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]
Date: 14 June 2021 14:06:00
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.png](#)
[image004.jpg](#)

Dear [REDACTED]
Thank you for your email and I look forward to speaking to Malcolm and [REDACTED] later this afternoon.

Regards

[REDACTED]
[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)
Website: www.gamblingcommission.gov.uk

From: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Monday, June 14, 2021 11:16 AM

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED] (if I may)
[REDACTED] is away today, may I please introduce myself as [REDACTED] at Henderson Chambers.
I wanted to let you know, as [REDACTED] referenced below, that you will be joined on the call today by [REDACTED] [from Henderson Chambers](#) who is working with Malcolm on this matter.

If I can be of further assistance please do not hesitate to contact me.

Regards

[REDACTED]
[REDACTED]
[REDACTED]

Henderson Chambers | 2 Harcourt Buildings | Temple | London EC4Y 9DB

Direct: [REDACTED] Tel: [REDACTED]
Email: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk) Website: www.hendersonchambers.co.uk
[Chambers continuity Covid 19 service arrangements available here](#)

HC-LOGO



Barristers at Henderson Chambers are regulated by the Bar Standards Board. For further information about chambers, including our terms of engagement, [please visit our website](#).

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee, please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

From: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: 09 June 2021 21:07

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]

Dear [REDACTED],

Good evening. Having liaised with Malcolm, may I please arrange for Malcolm (and possibly a Barrister colleague who will be supporting him) to have an initial call with you on Monday 14 June 2021 if that works for you please? Anticipate 1 hour and we can arrange by MS teams (or similar platform).

The purpose of the call will be to:

1. Discuss the review
2. Allow you to explain the choice of documents sent through
3. Discuss your views on who would be the most appropriate person(s) at the GC for Malcolm to speak to in relation to the review.

In advance of the call please can you provide Malcolm with an organisation chart for the GC so that he can understand how the GC is organised and where possible persons that he may meet with will fit into the organisation chart.

Please do let me know should you have any queries.

We look forward to hearing from you.

Kind regards

[REDACTED]

Henderson Chambers | 2 Harcourt Buildings | Temple | London EC4Y 9DB

Tel: [REDACTED] 020 Direct Line: [REDACTED] Mobile: [REDACTED]

Email: [REDACTED]@hendersonchambers.co.uk Website: www.hendersonchambers.co.uk

[Chambers updated Covid 19 business operation arrangements available here](#)

Follow us:



Barristers at Henderson Chambers are regulated by the Bar Standards Board. For further information about chambers, including our terms of engagement, fee transparency and our complaints procedure [please visit our website](#).

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee, please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

From: [REDACTED]

Sent: 09 June 2021 16:16

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]

[REDACTED]@hendersonchambers.co.uk>; [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]

Dear [REDACTED],

Good afternoon and thank you very much for your earlier email.

To acknowledge and confirm safe receipt of the electronic bundle received on Monday afternoon thank you, this has been passed on to Mr Sheehan for his review.

Kind regards

[REDACTED]

Henderson Chambers | 2 Harcourt Buildings | Temple | London EC4Y 9DB

Tel: [REDACTED] Direct Line: [REDACTED] Mobile: [REDACTED]

Email: [REDACTED]@hendersonchambers.co.uk Website: www.hendersonchambers.co.uk

[Chambers updated Covid 19 business operation arrangements available here](#)

Follow us:



Barristers at Henderson Chambers are regulated by the Bar Standards Board. For further information about chambers, including our terms of engagement, fee transparency and our complaints procedure [please visit our website](#).

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee, please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Sent: 09 June 2021 09:43

To: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>; [REDACTED] <[REDACTED]@hendersonchambers.co.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Papers for Malcolm Sheehan

Dear [REDACTED]

I trust our bundle in relation to this matter was received on Monday.

Please do let me know if you require any additional information at any point, whether that be written or oral.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Website: www.gamblingcommission.gov.uk

From: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Sent: Saturday, June 5, 2021 9:45 AM

To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>; [REDACTED] <[REDACTED]@hendersonchambers.co.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Subject: Re: Papers for Malcolm Sheehan

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Thank you very much for the kind introduction and confirmation, we are most grateful.

Have a good weekend.

Kind regards

[REDACTED]
[REDACTED]
Henderson Chambers

On 4 Jun 2021, at 16:32, [REDACTED] <[REDACTED]@gamblingcommission.gov.uk> wrote:

Dear All

I understand that you are expecting a bundle of papers from us for the attention of Malcolm Sheehan re the Independent Review of BetIndex.

This email is by way of introduction as I will be your point of contact on this matter, and also to confirm that we intend to send the papers on Monday afternoon.

Regards

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]
Date: 23 June 2021 15:15:00
Attachments: [FCA GC MOU Final version.pdf](#)
[image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)

Dear [REDACTED]
When I spoke to Malcolm and [REDACTED] re this matter I promised to send on a copy of the MoU we were developing with the FCA when it was finalised. Accordingly, please find attached to pass on. We will be publishing the MoU on our website as will the FCA.
We will also be publishing a short update on our website about the BetIndex case which I will also share in due course in the interests of transparency.
Kind regards

[REDACTED]
GAMBLING COMMISSION
Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)
Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>
Sent: Tuesday, June 15, 2021 7:15 PM
To: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@hendersonchambers.co.uk>
Cc: [REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]
CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],
Good evening and thank you very much we are most grateful. I have passed this on to Malcolm and [REDACTED]
Kind regards

[REDACTED]
Henderson Chambers | 2 Harcourt Buildings | Temple | London EC4Y 9DB
Tel: [REDACTED] Direct Line: [REDACTED] Mobile: [REDACTED]
Email: [REDACTED]@hendersonchambers.co.uk Website: www.hendersonchambers.co.uk
[Chambers updated Covid 19 business operation arrangements available here](#)

Follow us:



Barristers at Henderson Chambers are regulated by the Bar Standards Board. For further information about chambers, including our terms of engagement, fee transparency and our complaints procedure [please visit our website](#).

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee, please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: 15 June 2021 19:03

To: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]

[REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]

Dear [REDACTED] and [REDACTED]

During my call with Malcolm and [REDACTED] yesterday I promised them an updated org chart as our new interim CEO started at the Commission today. Accordingly, please find this attached.

I mentioned yesterday but set out her for clarity, that when we discussed key people they may wish to speak to who had been involved in this case, 2 key personnel have now left the organisation but their names may appear in the papers. They are [REDACTED] who was [REDACTED] and [REDACTED] who was [REDACTED].

I also committed to sending a note re any acronyms. The key acronyms within the index are as follows:

CMG	Case Management Group	Identifies and manages emergent risks and provides clarity, support and direction to those undertaking casework from case commencement until closure.
IMG	Issue Management Group	IMG is responsible for collaboratively directing emerging issues or , novel and/or contentious matters identified across the Commission to the most appropriate means of managing them.
IRF	Information Referral Form	Matters are presented to IMG via and Information Referral Form (IRF) which summarises for the points for discussion.
LCCP	Licence Conditions and Codes of Practice	The rules set by the Commission which licensed operators must observe.

Finally, I will share a copy of the Memorandum of Understanding we are agreeing with the Financial Conduct Authority when it is finalised, which we hope will be this week. We are awaiting any further comments from the FCA on the latest draft.

Regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Monday, June 14, 2021 11:16 AM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED] (if I may)

[REDACTED] is away today, may I please introduce myself as [REDACTED] at Henderson Chambers.

I wanted to let you know, as [REDACTED] referenced below, that you will be joined on the call today by [REDACTED] [from Henderson Chambers](#) who is working with Malcolm on this matter.

If I can be of further assistance please do not hesitate to contact me.

Regards

[REDACTED]

Henderson Chambers | 2 Harcourt Buildings | Temple | London EC4Y 9DB

Direct: [REDACTED] 68 Tel: [REDACTED]

Email: [REDACTED]@hendersonchambers.co.uk Website: www.hendersonchambers.co.uk

[Chambers continuity Covid 19 service arrangements available here](#)

HC-LOGO



Barristers at Henderson Chambers are regulated by the Bar Standards Board. For further information about chambers, including our terms of engagement, [please visit our website](#).

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee, please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

From: [REDACTED]@hendersonchambers.co.uk>

Sent: 09 June 2021 21:07

To: [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]

Dear [REDACTED]

Good evening. Having liaised with Malcolm, may I please arrange for Malcolm (and possibly a Barrister colleague who will be supporting him) to have an initial call with you on Monday 14 June 2021 if that works for you please? Anticipate 1 hour and we can arrange by MS teams (or similar platform).

The purpose of the call will be to:

1. Discuss the review
2. Allow you to explain the choice of documents sent through
3. Discuss your views on who would be the most appropriate person(s) at the GC for Malcolm to speak to in relation to the review.

In advance of the call please can you provide Malcolm with an organisation chart for the GC so that he can understand how the GC is organised and where possible persons that he may meet with will fit into the organisation chart.

Please do let me know should you have any queries.

We look forward to hearing from you.

Kind regards

[REDACTED]

Henderson Chambers | 2 Harcourt Buildings | Temple | London EC4Y 9DB

Tel: [REDACTED] Direct Line: [REDACTED] Mobile: [REDACTED]

Email: [REDACTED]@hendersonchambers.co.uk Website: www.hendersonchambers.co.uk

[Chambers updated Covid 19 business operation arrangements available here](#)

Follow us:



Barristers at Henderson Chambers are regulated by the Bar Standards Board. For further information about chambers, including our terms of engagement, fee transparency and our complaints procedure [please visit our website](#).

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee, please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

From: [REDACTED]

Sent: 09 June 2021 16:16

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]

[REDACTED]@hendersonchambers.co.uk>; [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Papers for Malcolm Sheehan [C: 241954][B:MS][HENDCH]

Dear [REDACTED]

Good afternoon and thank you very much for your earlier email.

To acknowledge and confirm safe receipt of the electronic bundle received on Monday afternoon thank you, this has been passed on to Mr Sheehan for his review.

Kind regards

[REDACTED]

Henderson Chambers | 2 Harcourt Buildings | Temple | London EC4Y 9DB

Tel: [REDACTED] Direct Line: [REDACTED] Mobile: [REDACTED]

Email: [REDACTED]@hendersonchambers.co.uk Website: www.hendersonchambers.co.uk

[Chambers updated Covid 19 business operation arrangements available here](#)

Follow us:



Barristers at Henderson Chambers are regulated by the Bar Standards Board. For further information about chambers, including our terms of engagement, fee transparency and our complaints procedure [please visit our website](#).

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee, please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

From: [REDACTED]@gamblingcommission.gov.uk>

Sent: 09 June 2021 09:43

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]

[REDACTED]@hendersonchambers.co.uk>; [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Papers for Malcolm Sheehan

Dear [REDACTED]

I trust our bundle in relation to this matter was received on Monday.

Please do let me know if you require any additional information at any point, whether that be written or oral.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Saturday, June 5, 2021 9:45 AM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]
[REDACTED]@hendersonchambers.co.uk>; [REDACTED]@gamblingcommission.gov.uk>

Subject: Re: Papers for Malcolm Sheehan

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Thank you very much for the kind introduction and confirmation, we are most grateful.
Have a good weekend.

Kind regards

[REDACTED]
[REDACTED]

Henderson Chambers

On 4 Jun 2021, at 16:32, [REDACTED]@gamblingcommission.gov.uk> wrote:

Dear All

I understand that you are expecting a bundle of papers from us for the attention of Malcolm Sheehan re the Independent Review of BetIndex.

This email is by way of introduction as I will be your point of contact on this matter, and also to confirm that we intend to send the papers on Monday afternoon.

Regards

[REDACTED]
[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

From: [REDACTED]
To: [REDACTED]
Subject: BetIndex Question Responses
Date: 12 July 2021 17:06:00
Attachments: [REDACTED]

Good Afternoon,

Please find attached the Commission's responses to questions submitted by email on 2 and 5 July 2021. Please let me know if you have any queries, or if there are any problems with receiving the attachment.

Kind regards

[REDACTED]

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

Tel: [REDACTED]
Mob: [REDACTED]

www.gamblingcommission.gov.uk

Keep up to date with the latest news from the Gambling Commission on [Twitter](#) and on [LinkedIn](#).

From: [REDACTED]
To: [REDACTED]
Subject: RE: BetIndex Additional Documents request
Date: 12 July 2021 15:09:00

Dear [REDACTED]
Thank you for your prompt response. If possible we will send by Sharefile.
Kind Regards

[REDACTED]
Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

Tel: [REDACTED]
Mob: [REDACTED]

www.gamblingcommission.gov.uk

Keep up to date with the latest news from the Gambling Commission on [Twitter](#) and on [LinkedIn](#).

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Monday, July 12, 2021 3:04 PM

To: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@hendersonchambers.co.uk>

Subject: Re: BetIndex Additional Documents request

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],
Many thanks. We think the limit on email attachments is around 30-40 MB. If the email attachment is likely to be over that then perhaps best to send by sharefile as well.
Kind regards,

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Monday, 12 July 2021 at 14:57

To: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]
[REDACTED]@hendersonchambers.co.uk>

Subject: RE: BetIndex Additional Documents request

Good Afternoon,

We have a further bundle of question responses, which is likely to be smaller in size and therefore will not need to be sent using Sharefile. However, are you able to advise if there are any limits on the size of email attachments that you can receive?

Kind regards

[REDACTED]
Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

Tel: [REDACTED]
Mob: [REDACTED]

www.gamblingcommission.gov.uk

Keep up to date with the latest news from the Gambling Commission on [Twitter](#) and on [LinkedIn](#).

From: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Monday, July 12, 2021 2:45 PM

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: Re: BetIndex Additional Documents request

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Thanks for letting me know. I'll check the folder a little later.

Kind regards,

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Monday, 12 July 2021 at 14:43

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>, [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: BetIndex Additional Documents request

Thank you for your email. I have just checked and the documents are still being uploaded – there are a number of large multimedia files so please bear with us on this.
Kind regards

[REDACTED]

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

Tel: [REDACTED]
Mob: [REDACTED]

www.gamblingcommission.gov.uk

Keep up to date with the latest news from the Gambling Commission on [Twitter](#) and on [LinkedIn](#).

From: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Monday, July 12, 2021 2:38 PM

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: Re: BetIndex Additional Documents request

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Thanks very much. I have just received from [REDACTED] and logged into a share file folder but it appears to be blank.

Are the documents to be added subsequently?

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Monday, 12 July 2021 at 14:11

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>, [REDACTED]

[REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: BetIndex Additional Documents request

Good Afternoon,

Further to your email of 2 July, you will shortly receive a Sharefile link for a folder of four additional document bundles and the Compliance Assessment recordings requested.

If you have any queries, or if you do not receive a link, please do not hesitate to contact me.

Kind regards

[REDACTED]

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

Tel: [REDACTED]

Mob: [REDACTED]

www.gamblingcommission.gov.uk

Keep up to date with the latest news from the Gambling Commission on [Twitter](#) and on [LinkedIn](#).

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021
Date: 21 July 2021 13:16:00

Dear [REDACTED] r

Thank you for your email advising us that you plan to record the discussion tomorrow. We would be grateful if you could provide us with a copy of the recording.

Kind regards

[REDACTED]

From: [REDACTED]@hendersonchambers.co.uk>
Sent: Wednesday, July 21, 2021 12:50 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>
Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Further to my message below, this is just to let you know that we plan to record the discussion so that we have a record of what was said, in case we need to refer to any of it in the final report. We'll be happy to provide a copy of any recording on request.

Kind regards,

[REDACTED]

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>
Date: Wednesday, 21 July 2021 at 12:02
To: [REDACTED]@hendersonchambers.co.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Thank you, tomorrow at 14:30 is perfect.

Kind regards

[REDACTED]

From: [REDACTED]@hendersonchambers.co.uk>
Sent: Wednesday, July 21, 2021 11:59 AM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>
Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and

Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Many thanks for your emails. Could we say 14:30 tomorrow?

I will ask [REDACTED] (copied) to send out an invite with an MS teams link to [REDACTED].

Kind regards,

[REDACTED]

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Date: Wednesday, 21 July 2021 at 11:49

To: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

With regards to the meeting, I've been advised that in addition to [REDACTED] and [REDACTED], [REDACTED] will also join the call. When the call is confirmed, could you please include [REDACTED] on the invite?

[REDACTED] email address is [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

I look forward to hearing from you.

Many thanks. Kind regards.

[REDACTED]

From: [REDACTED]

Sent: Wednesday, July 21, 2021 10:10 AM

To: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Further to [REDACTED] email below, [REDACTED] and [REDACTED] have availability for a 90 minutes call anytime between 14:00-16:00 on Thursday 22nd July. If the timing is convenient, could you please send through an invite with MS Teams link to confirm.

Many thanks. Kind regards.

[REDACTED]

Gambling Commission
4th Floor
Victoria Square House
Victoria Square
Birmingham, B2 4BP

www.gamblingcommission.gov.uk

From: [REDACTED]@gamblingcommission.gov.uk>

Sent: Tuesday, July 20, 2021 7:52 PM

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Thank you for your below email and I note that you do not consider any context setting re the Gambling Act Review necessary.

I have copied in my colleague [REDACTED] who will find us 90 minutes to meet on Thursday afternoon. I may include a colleague who would then be well placed to cover off any points that might arise during my leave.

Also, I am genuinely contactable whilst away although any calls would need to be towards the end of the day. [REDACTED] please do not hesitate to make contact via [REDACTED] if I can assist with any aspects of the review post Friday.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Tuesday, July 20, 2021 5:16 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Many thanks for your email and apologies for the delay in responding. We have now worked our way through the additional documents and answers to questions. Many thanks again for the helpful way in which the additional documents were presented.

Thank you for the suggestion of a meeting with yourself and [REDACTED] to discuss the GC's role as statutory advisor and the contribution to the Gambling Act review. The terms of reference for the Review state that it will be used to inform the review of the Gambling Act but it is not part of the review of the Gambling Act itself. In the circumstances we do not consider that a meeting to discuss the review of the Gambling Act will assist at this stage.

We are currently making progress with drafting the Review. We think that we are likely to be able to fulfil the terms of reference without a general need for meetings with Gambling Commission staff. We think, however, that it may be useful to meet with you virtually in order to discuss any outstanding queries we may have during the drafting process. You kindly gave us advance notification of your leave plans and, with this in mind, we suggest putting 90 minutes in

our respective diaries on either the afternoon of Thursday 22 or the morning of Friday 23rd if you have any availability then?

We would suggest that if you have availability then we could confirm topics and whether we need the whole 90 minutes nearer the time.

I look forward to hearing from you.

Kind regards,

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Thursday, 15 July 2021 at 20:31

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>, [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Noting we will wait to hear from you re any requests for meetings with Commission personnel. However, I did think you and/or Malcolm might find it helpful to meet with [REDACTED] and myself to allow us to set out the wider context of our role as statutory advisor to the Secretary of State and particularly our contribution in this respect to the government's review of the Gambling Act.

[REDACTED] is the [REDACTED] and leads in this area.

Do let me know if you consider such a meeting would be of assistance.

Kind regards

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Monday, July 12, 2021 5:46 PM

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Glad all has now arrived in order. I will await any further requests.

Kind regards

[REDACTED]

[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Monday, July 12, 2021 5:44 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Many thanks for your email below.

I can confirm receipt this afternoon of the bundles of additional documents and responses to questions.

We should be in a position to come back to you about any interviews with Commission personnel once we have had a chance to consider the additional documents and responses.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Monday, 12 July 2021 at 17:37

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

You should now have received a full response to your requests of Friday 2 July and the additional question posed on Monday 5 July.

I would be grateful if you would acknowledge receipt of the of the bundle of additional documents (c.1880 pages) and the separate bundle of responses to the 36 questions posed (c300 pages).

If we can provide any additional material, please do not hesitate to ask.

When you have had time to consider the documents and responses, I would be grateful for an indication as to whether you are likely to require any Commission personnel to provide oral evidence so that I can make appropriate arrangements.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)
Website: www.gamblingcommission.gov.uk

From: [REDACTED]
Sent: Friday, July 9, 2021 4:40 PM
To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>
Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]
With sincere apologies we have experienced a technical issue in compiling the bundle which may take some time to rectify. In the circumstances we will get the bundle of additional documents to you by midday on Monday and the responses to the questions by close of business on Monday.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)
Website: www.gamblingcommission.gov.uk

From: [REDACTED]
Sent: Friday, July 9, 2021 1:59 PM
To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>
Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]
I am sorry that you have had to chase this up and I can assure you we are prioritising this matter, noting the tight timeline you are working to.
We are planning on having the bundle of additional documents you have requested over you to you later today. You should be aware that these bundles are not dissimilar in size to the first set we provided should that help your planning. The responses to your additional questions will be provided on Monday.
Do you know at this stage if you are likely to require any Commission personnel to provide oral evidence?

[REDACTED]

Kind regards

[REDACTED]

[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Friday, July 9, 2021 12:16 PM

To: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Many thanks for your email on Monday confirming that you would revert with answers to the questions and documents at the earliest opportunity. Given the rather tight deadline to which we are operating (the first draft of the Report being due in 14 days' time on 23 July), I would be grateful if you could confirm whether we can expect to receive the Commission's response over the course of today.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Monday, 5 July 2021 at 10:39

To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Many thanks for your questions and document request, on which we will revert later this week at the earliest opportunity.

Kind regards

[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Friday, July 2, 2021 12:06 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

With thanks for the documents already provided to us, please find attached (1) a list of questions to be answered to the extent that the Gambling Commission is able and (2) a request for further documents to be provided if the Commission is able to do so. Each document has a brief preface providing some more context to the requests.

We found the presentation of the original tranche of documents very helpful, and would be assisted by the further documents requested being presented in the same way (i.e. with the hyperlinked index).

Please could the answers to the questions and the documents be provided as soon as the Gambling Commission can reasonably manage, given the timescales for the Review to be completed. I would be grateful if you could copy in our clerk [REDACTED] when providing any responses.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021
Date: 21 July 2021 13:16:00

Dear [REDACTED] r

Thank you for your email advising us that you plan to record the discussion tomorrow. We would be grateful if you could provide us with a copy of the recording.

Kind regards

[REDACTED]

From: [REDACTED]@hendersonchambers.co.uk>
Sent: Wednesday, July 21, 2021 12:50 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>
Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Further to my message below, this is just to let you know that we plan to record the discussion so that we have a record of what was said, in case we need to refer to any of it in the final report. We'll be happy to provide a copy of any recording on request.

Kind regards,

[REDACTED]

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>
Date: Wednesday, 21 July 2021 at 12:02
To: [REDACTED]@hendersonchambers.co.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Thank you, tomorrow at 14:30 is perfect.

Kind regards

[REDACTED]

From: [REDACTED]@hendersonchambers.co.uk>
Sent: Wednesday, July 21, 2021 11:59 AM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>
Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and

Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Many thanks for your emails. Could we say 14:30 tomorrow?

I will ask [REDACTED] (copied) to send out an invite with an MS teams link to [REDACTED].

Kind regards,

[REDACTED]

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Wednesday, 21 July 2021 at 11:49

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

With regards to the meeting, I've been advised that in addition to [REDACTED] and [REDACTED], [REDACTED] will also join the call. When the call is confirmed, could you please include [REDACTED] on the invite?

[REDACTED] email address is [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

I look forward to hearing from you.

Many thanks. Kind regards.

[REDACTED]

From: [REDACTED]

Sent: Wednesday, July 21, 2021 10:10 AM

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Further to [REDACTED] email below, [REDACTED] and [REDACTED] have availability for a 90 minutes call anytime between 14:00-16:00 on Thursday 22nd July. If the timing is convenient, could you please send through an invite with MS Teams link to confirm.

Many thanks. Kind regards.

[REDACTED]

Gambling Commission
4th Floor
Victoria Square House
Victoria Square
Birmingham, B2 4BP

www.gamblingcommission.gov.uk

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Sent: Tuesday, July 20, 2021 7:52 PM

To: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Thank you for your below email and I note that you do not consider any context setting re the Gambling Act Review necessary.

I have copied in my colleague [REDACTED] who will find us 90 minutes to meet on Thursday afternoon. I may include a colleague who would then be well placed to cover off any points that might arise during my leave.

Also, I am genuinely contactable whilst away although any calls would need to be towards the end of the day. [REDACTED] please do not hesitate to make contact via [REDACTED] if I can assist with any aspects of the review post Friday.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Website: www.gamblingcommission.gov.uk

From: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Sent: Tuesday, July 20, 2021 5:16 PM

To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Cc: Daniel Kemp <[REDACTED]@hendersonchambers.co.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Many thanks for your email and apologies for the delay in responding. We have now worked our way through the additional documents and answers to questions. Many thanks again for the helpful way in which the additional documents were presented.

Thank you for the suggestion of a meeting with yourself and [REDACTED] to discuss the GC's role as statutory advisor and the contribution to the Gambling Act review. The terms of reference for the Review state that it will be used to inform the review of the Gambling Act but it is not part of the review of the Gambling Act itself. In the circumstances we do not consider that a meeting to discuss the review of the Gambling Act will assist at this stage.

We are currently making progress with drafting the Review. We think that we are likely to be able to fulfil the terms of reference without a general need for meetings with Gambling Commission staff. We think, however, that it may be useful to meet with you virtually in order to discuss any outstanding queries we may have during the drafting process. You kindly gave us advance notification of your leave plans and, with this in mind, we suggest putting 90 minutes in

our respective diaries on either the afternoon of Thursday 22 or the morning of Friday 23rd if you have any availability then?

We would suggest that if you have availability then we could confirm topics and whether we need the whole 90 minutes nearer the time.

I look forward to hearing from you.

Kind regards,

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Thursday, 15 July 2021 at 20:31

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>, [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Noting we will wait to hear from you re any requests for meetings with Commission personnel. However, I did think you and/or Malcolm might find it helpful to meet with [REDACTED] and myself to allow us to set out the wider context of our role as statutory advisor to the Secretary of State and particularly our contribution in this respect to the government's review of the Gambling Act.

[REDACTED] is the [REDACTED] and leads in this area.

Do let me know if you consider such a meeting would be of assistance.

Kind regards

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Monday, July 12, 2021 5:46 PM

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Glad all has now arrived in order. I will await any further requests.

Kind regards

[REDACTED]

[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Monday, July 12, 2021 5:44 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Many thanks for your email below.

I can confirm receipt this afternoon of the bundles of additional documents and responses to questions.

We should be in a position to come back to you about any interviews with Commission personnel once we have had a chance to consider the additional documents and responses.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Monday, 12 July 2021 at 17:37

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

You should now have received a full response to your requests of Friday 2 July and the additional question posed on Monday 5 July.

I would be grateful if you would acknowledge receipt of the of the bundle of additional documents (c.1880 pages) and the separate bundle of responses to the 36 questions posed (c300 pages).

If we can provide any additional material, please do not hesitate to ask.

When you have had time to consider the documents and responses, I would be grateful for an indication as to whether you are likely to require any Commission personnel to provide oral evidence so that I can make appropriate arrangements.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)
Website: www.gamblingcommission.gov.uk

From: [REDACTED]
Sent: Friday, July 9, 2021 4:40 PM
To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>
Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]
With sincere apologies we have experienced a technical issue in compiling the bundle which may take some time to rectify. In the circumstances we will get the bundle of additional documents to you by midday on Monday and the responses to the questions by close of business on Monday.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)
Website: www.gamblingcommission.gov.uk

From: [REDACTED]
Sent: Friday, July 9, 2021 1:59 PM
To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>
Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]
I am sorry that you have had to chase this up and I can assure you we are prioritising this matter, noting the tight timeline you are working to.
We are planning on having the bundle of additional documents you have requested over you to you later today. You should be aware that these bundles are not dissimilar in size to the first set we provided should that help your planning. The responses to your additional questions will be provided on Monday.
Do you know at this stage if you are likely to require any Commission personnel to provide oral evidence?

[REDACTED]

Kind regards

[REDACTED]

[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Friday, July 9, 2021 12:16 PM

To: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Many thanks for your email on Monday confirming that you would revert with answers to the questions and documents at the earliest opportunity. Given the rather tight deadline to which we are operating (the first draft of the Report being due in 14 days' time on 23 July), I would be grateful if you could confirm whether we can expect to receive the Commission's response over the course of today.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Monday, 5 July 2021 at 10:39

To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Many thanks for your questions and document request, on which we will revert later this week at the earliest opportunity.

Kind regards

[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Friday, July 2, 2021 12:06 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

With thanks for the documents already provided to us, please find attached (1) a list of questions to be answered to the extent that the Gambling Commission is able and (2) a request for further documents to be provided if the Commission is able to do so. Each document has a brief preface providing some more context to the requests.

We found the presentation of the original tranche of documents very helpful, and would be assisted by the further documents requested being presented in the same way (i.e. with the hyperlinked index).

Please could the answers to the questions and the documents be provided as soon as the Gambling Commission can reasonably manage, given the timescales for the Review to be completed. I would be grateful if you could copy in our clerk [REDACTED] when providing any responses.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021
Date: 26 July 2021 12:33:00

Dear Mr Sheehan
Many thanks for confirming receipt.
Kind regards
[REDACTED]

From: Malcolm Sheehan QC <[REDACTED]@hendersonchambers.co.uk>
Sent: Monday, July 26, 2021 12:32 PM
To: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@hendersonchambers.co.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@gamblingcommission.gov.uk>;
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>
Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021
CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]
Many thanks for your email and attachments. We appreciate the prompt response to our questions.
We will consider these and get back to you if we need any further help.
Kind regards,
Malcolm
Malcolm Sheehan QC

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.
VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.
NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>
Date: Monday, 26 July 2021 at 12:29
To: Malcolm Sheehan <[REDACTED]@hendersonchambers.co.uk>, [REDACTED]
[REDACTED]@hendersonchambers.co.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]@gamblingcommission.gov.uk>,
[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear Mr Sheehan
Further to your email below, please find attached our responses to the additional

questions along with supporting documents which relate to question 5.

██████████ and ██████████ are currently on annual leave, but if you require any further assistance please do not hesitate to contact ██████████ or ██████████ copying in ██████████ and ██████████

Kind regards

From: Malcolm Sheehan QC <██████████@hendersonchambers.co.uk>

Sent: Thursday, July 22, 2021 11:46 AM

To: ██████████@hendersonchambers.co.uk>; ██████████

██████████@gamblingcommission.gov.uk>

Cc: ██████████@hendersonchambers.co.uk>; ██████████

██████████@gamblingcommission.gov.uk>; ██████████@gamblingcommission.gov.uk>;

██████████@gamblingcommission.gov.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear ██████████

Further to ██████████ email below, please find attached a suggested list of topics for our discussion later.

Apologies for the delay in sending these through. I have been encountering internet issues.

To the extent that you need more time to discuss any of the suggested topics there will, of course, be the opportunity for the GC to follow up in writing.

We look forward to discussing matters further with you at 2.30.

Kind regards,

Malcolm

Malcolm Sheehan QC

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: ██████████@hendersonchambers.co.uk>

Date: Thursday, 22 July 2021 at 09:11

To: ██████████@gamblingcommission.gov.uk>

Cc: ██████████@hendersonchambers.co.uk>, ██████████

██████████@gamblingcommission.gov.uk>, ██████████

██████████@gamblingcommission.gov.uk>, ██████████

██████████@gamblingcommission.gov.uk>, Malcolm Sheehan

<██████████@hendersonchambers.co.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear ██████████

Many thanks for your email.

I am in court this morning, but Malcolm Sheehan QC will revert with a list of topics during the course of this morning.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Thursday, 22 July 2021 at 08:53

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>, [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>, [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>, [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Do you have a note of topics you will want to cover during our call this afternoon?

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Tuesday, July 20, 2021 7:52 PM

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Thank you for your below email and I note that you do not consider any context setting re the Gambling Act Review necessary.

I have copied in my colleague [REDACTED] who will find us 90 minutes to meet on Thursday afternoon. I may include a colleague who would then be well placed to cover off any points that might arise during my leave.

Also, I am genuinely contactable whilst away although any calls would need to be towards the end of the day. [REDACTED] please do not hesitate to make contact via [REDACTED] if I can assist with any aspects of the review post Friday.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@gamblingcommission.gov.uk
Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Tuesday, July 20, 2021 5:16 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Many thanks for your email and apologies for the delay in responding. We have now worked our way through the additional documents and answers to questions. Many thanks again for the helpful way in which the additional documents were presented.

Thank you for the suggestion of a meeting with yourself and [REDACTED] to discuss the GC's role as statutory advisor and the contribution to the Gambling Act review. The terms of reference for the Review state that it will be used to inform the review of the Gambling Act but it is not part of the review of the Gambling Act itself. In the circumstances we do not consider that a meeting to discuss the review of the Gambling Act will assist at this stage.

We are currently making progress with drafting the Review. We think that we are likely to be able to fulfil the terms of reference without a general need for meetings with Gambling Commission staff. We think, however, that it may be useful to meet with you virtually in order to discuss any outstanding queries we may have during the drafting process. You kindly gave us advance notification of your leave plans and, with this in mind, we suggest putting 90 minutes in our respective diaries on either the afternoon of Thursday 22 or the morning of Friday 23rd if you have any availability then?

We would suggest that if you have availability then we could confirm topics and whether we need the whole 90 minutes nearer the time.

I look forward to hearing from you.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Thursday, 15 July 2021 at 20:31

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Noting we will wait to hear from you re any requests for meetings with Commission personnel. However, I did think you and/or Malcolm might find it helpful to meet with [REDACTED] and myself to allow us to set out the wider context of our role as statutory advisor to the Secretary of State and particularly our contribution in this respect to the government's review of the Gambling Act.

[REDACTED] is the [REDACTED] and leads in this area.

Do let me know if you consider such a meeting would be of assistance.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Monday, July 12, 2021 5:46 PM

To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Glad all has now arrived in order. I will await any further requests.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Monday, July 12, 2021 5:44 PM

To: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Many thanks for your email below.

I can confirm receipt this afternoon of the bundles of additional documents and responses to questions.

We should be in a position to come back to you about any interviews with Commission personnel once we have had a chance to consider the additional documents and responses.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Monday, 12 July 2021 at 17:37

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

You should now have received a full response to your requests of Friday 2 July and the additional question posed on Monday 5 July.

I would be grateful if you would acknowledge receipt of the of the bundle of additional documents (c.1880 pages) and the separate bundle of responses to the 36 questions posed (c300 pages).

If we can provide any additional material, please do not hesitate to ask.

When you have had time to consider the documents and responses, I would be grateful for an indication as to whether you are likely to require any Commission personnel to provide oral evidence so that I can make appropriate arrangements.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Friday, July 9, 2021 4:40 PM

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

With sincere apologies we have experienced a technical issue in compiling the bundle which may take some time to rectify. In the circumstances we will get the bundle of additional documents to you by midday on Monday and the responses to the questions by close of business on Monday.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk
Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Friday, July 9, 2021 1:59 PM

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

I am sorry that you have had to chase this up and I can assure you we are prioritising this matter, noting the tight timeline you are working to.

We are planning on having the bundle of additional documents you have requested over you to you later today. You should be aware that these bundles are not dissimilar in size to the first set we provided should that help your planning. The responses to your additional questions will be provided on Monday.

Do you know at this stage if you are likely to require any Commission personnel to provide oral evidence?

[REDACTED]

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Friday, July 9, 2021 12:16 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Many thanks for your email on Monday confirming that you would revert with answers to the questions and documents at the earliest opportunity. Given the rather tight deadline to which we are operating (the first draft of the Report being due in 14 days' time on 23 July), I would be grateful if you could confirm whether we can expect to receive the Commission's response over the course of today.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Date: Monday, 5 July 2021 at 10:39

To: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Many thanks for your questions and document request, on which we will revert later this week at the earliest opportunity.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Friday, July 2, 2021 12:06 PM

To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Subject: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

With thanks for the documents already provided to us, please find attached (1) a list of questions to be answered to the extent that the Gambling Commission is able and (2) a request for further documents to be provided if the Commission is able to do so. Each document has a brief preface providing some more context to the requests.

We found the presentation of the original tranche of documents very helpful, and would be assisted by the further documents requested being presented in the same way (i.e. with the hyperlinked index).

Please could the answers to the questions and the documents be provided as soon as the Gambling Commission can reasonably manage, given the timescales for the Review to be completed. I would be grateful if you could copy in our clerk [REDACTED] when providing any responses.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021
Date: 28 July 2021 19:34:18

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Thank you for providing the requested information so quickly, that's very helpful indeed.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Wednesday, 28 July 2021 at 18:24

To: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

In answer to your two questions:

Q1

1. Following the Compliance assessment of February/March 2020, we sent Bet Index a Findings Letter (see item 8, page 147 onwards in Bundle 3 of the documents we sent in June 2020). In the letter we set out the failings identified in relation to LC 7.1. (Fair and transparent terms and practices) and asked Bet Index to "take steps to ensure that your product and its presentation to consumers does not contravene LC 7.1.1". This is consistent with our outcomes-focussed approach where we emphasise the desired outcome rather than the method of achieving it.
2. In its response to that letter dated 7 May 2020 (see item 34, pages 348 and 349 of Bundle 3 of the documents we sent in June 2020), Bet Index advised us that it had "added further wording to make clear that the product is a betting product. We have updated our landing page and include a banner throughout the platform which is presented prominently". You will find a screen shot of the banner on page 348 of Bundle 3. The wording used is "This is a betting product and should not be viewed as an investment vehicle".

Q2

1. We are not aware of an entity called Football Index Limited.

I hope this provides what you need and please don't hesitate to contact me if you need anything else.

Best wishes,

[REDACTED]
The Gambling Commission
Victoria Square House
Victoria Square
Birmingham
B2 4BP

Tel: [REDACTED]

Mobile: [REDACTED]

www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Wednesday, July 28, 2021 3:15 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@gamblingcommission.gov.uk>;

[REDACTED]@gamblingcommission.gov.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED] (and copied to others more widely as we know that [REDACTED] is on annual leave),
Please could you assist us with two quick queries if possible:

1. There was mention during our call of the Commission requiring BetIndex to add a banner to the Football Index website making clear that the product involved gambling not financial trading. Please could you identify when that requirement was imposed and what the precise terms were (and if it is in materials already provided to us, give us a reference).
2. It has come to our attention that a new entity called Football Index Limited was incorporated on 19 May 2020 (company number 12609841). Please could you let us know whether you were/are aware of this entity and, if so, its significance (if any).

A quick response would be appreciated if at all possible in light of the timescales for a report.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: Malcolm Sheehan QC <[REDACTED]@hendersonchambers.co.uk>

Date: Thursday, 22 July 2021 at 11:45

To: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]@gamblingcommission.gov.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED],

Further to [REDACTED] email below, please find attached a suggested list of topics for our discussion later.

Apologies for the delay in sending these through. I have been encountering internet issues. To the extent that you need more time to discuss any of the suggested topics there will, of course, be the opportunity for the GC to follow up in writing.

We look forward to discussing matters further with you at 2.30.

Kind regards,

Malcolm

Malcolm Sheehan QC

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@hendersonchambers.co.uk>

Date: Thursday, 22 July 2021 at 09:11

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>, Malcolm Sheehan

<[REDACTED]@hendersonchambers.co.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Many thanks for your email.

I am in court this morning, but Malcolm Sheehan QC will revert with a list of topics during the course of this morning.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Thursday, 22 July 2021 at 08:53

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Do you have a note of topics you will want to cover during our call this afternoon?

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@gamblingcommission.gov.uk
Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Tuesday, July 20, 2021 7:52 PM

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Thank you for your below email and I note that you do not consider any context setting re the Gambling Act Review necessary.

I have copied in my colleague [REDACTED] who will find us 90 minutes to meet on Thursday afternoon. I may include a colleague who would then be well placed to cover off any points that might arise during my leave.

Also, I am genuinely contactable whilst away although any calls would need to be towards the end of the day. [REDACTED] so please do not hesitate to make contact via [REDACTED] if I can assist with any aspects of the review post Friday.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@gamblingcommission.gov.uk
Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Tuesday, July 20, 2021 5:16 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]
[REDACTED]

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Many thanks for your email and apologies for the delay in responding. We have now worked our way through the additional documents and answers to questions. Many thanks again for the helpful way in which the additional documents were presented.

Thank you for the suggestion of a meeting with yourself and [REDACTED] to discuss the GC's role as statutory advisor and the contribution to the Gambling Act review. The terms of reference for the Review state that it will be used to inform the review of the Gambling Act but it is not part of the review of the Gambling Act itself. In the circumstances we do not consider that a meeting to discuss the review of the Gambling Act will assist at this stage.

We are currently making progress with drafting the Review. We think that we are likely to be able to fulfil the terms of reference without a general need for meetings with Gambling Commission staff. We think, however, that it may be useful to meet with you virtually in order to discuss any outstanding queries we may have during the drafting process. You kindly gave us advance notification of your leave plans and, with this in mind, we suggest putting 90 minutes in our respective diaries on either the afternoon of Thursday 22 or the morning of Friday 23rd if you have any availability then?

We would suggest that if you have availability then we could confirm topics and whether we need the whole 90 minutes nearer the time.

I look forward to hearing from you.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Thursday, 15 July 2021 at 20:31

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED] >

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Noting we will wait to hear from you re any requests for meetings with Commission personnel. However, I did think you and/or Malcolm might find it helpful to meet with [REDACTED] and myself to allow us to set out the wider context of our role as statutory advisor to the Secretary of State and particularly our contribution in this respect to the government's review of the Gambling Act. [REDACTED] is [REDACTED] and leads in this area.

Do let me know if you consider such a meeting would be of assistance.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]
Email: [REDACTED]@gamblingcommission.gov.uk
Website: www.gamblingcommission.gov.uk

From: [REDACTED]
Sent: Monday, July 12, 2021 5:46 PM
To: [REDACTED]@hendersonchambers.co.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]
Glad all has now arrived in order. I will await any further requests.
Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@gamblingcommission.gov.uk
Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>
Sent: Monday, July 12, 2021 5:44 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>
Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]
Many thanks for your email below.
I can confirm receipt this afternoon of the bundles of additional documents and responses to questions.
We should be in a position to come back to you about any interviews with Commission personnel once we have had a chance to consider the additional documents and responses.
Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.
VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.
NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>
Date: Monday, 12 July 2021 at 17:37
To: [REDACTED]@hendersonchambers.co.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

You should now have received a full response to your requests of Friday 2 July and the additional question posed on Monday 5 July.

I would be grateful if you would acknowledge receipt of the of the bundle of additional documents (c.1880 pages) and the separate bundle of responses to the 36 questions posed (c300 pages).

If we can provide any additional material, please do not hesitate to ask.

When you have had time to consider the documents and responses, I would be grateful for an indication as to whether you are likely to require any Commission personnel to provide oral evidence so that I can make appropriate arrangements.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Friday, July 9, 2021 4:40 PM

To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

With sincere apologies we have experienced a technical issue in compiling the bundle which may take some time to rectify. In the circumstances we will get the bundle of additional documents to you by midday on Monday and the responses to the questions by close of business on Monday.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Friday, July 9, 2021 1:59 PM

To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

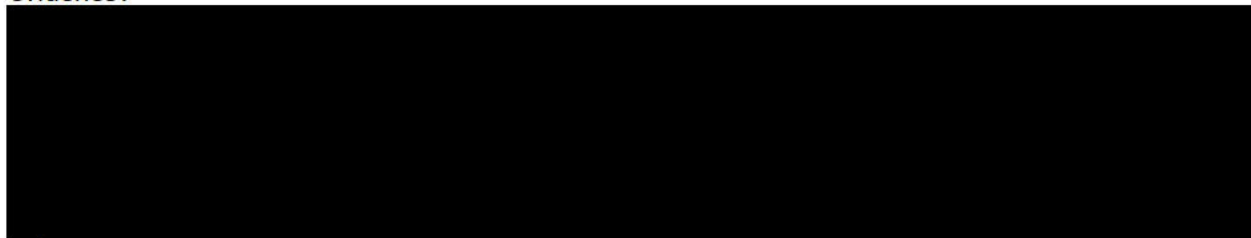
Dear [REDACTED]

I am sorry that you have had to chase this up and I can assure you we are prioritising this matter, noting the tight timeline you are working to.

We are planning on having the bundle of additional documents you have requested over you to

you later today. You should be aware that these bundles are not dissimilar in size to the first set we provided should that help your planning. The responses to your additional questions will be provided on Monday.

Do you know at this stage if you are likely to require any Commission personnel to provide oral evidence?



Kind regards



GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Friday, July 9, 2021 12:16 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Many thanks for your email on Monday confirming that you would revert with answers to the questions and documents at the earliest opportunity. Given the rather tight deadline to which we are operating (the first draft of the Report being due in 14 days' time on 23 July), I would be grateful if you could confirm whether we can expect to receive the Commission's response over the course of today.

Kind regards,



Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Monday, 5 July 2021 at 10:39

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Many thanks for your questions and document request, on which we will revert later this week at the earliest opportunity.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Friday, July 2, 2021 12:06 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

With thanks for the documents already provided to us, please find attached (1) a list of questions to be answered to the extent that the Gambling Commission is able and (2) a request for further documents to be provided if the Commission is able to do so. Each document has a brief preface providing some more context to the requests.

We found the presentation of the original tranche of documents very helpful, and would be assisted by the further documents requested being presented in the same way (i.e. with the hyperlinked index).

Please could the answers to the questions and the documents be provided as soon as the Gambling Commission can reasonably manage, given the timescales for the Review to be completed. I would be grateful if you could copy in our clerk [REDACTED] when providing any responses.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021
Date: 28 July 2021 15:40:21

Hi [REDACTED]
Thanks for the email. If you can leave this with me I will try to get back to you this pm otherwise first thing tomorrow.

Best wishes,

[REDACTED]
The Gambling Commission
Victoria Square House
Victoria Square
Birmingham
B2 4BP

Tel: [REDACTED]
Mobile: [REDACTED]
www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>
Sent: Wednesday, July 28, 2021 3:15 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@gamblingcommission.gov.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED] (and copied to others more widely as we know that [REDACTED] is on annual leave),
Please could you assist us with two quick queries if possible:

1. There was mention during our call of the Commission requiring BetIndex to add a banner to the Football Index website making clear that the product involved gambling not financial trading. Please could you identify when that requirement was imposed and what the precise terms were (and if it is in materials already provided to us, give us a reference).
2. It has come to our attention that a new entity called Football Index Limited was incorporated on 19 May 2020 (company number 12609841). Please could you let us know whether you were/are aware of this entity and, if so, its significance (if any).

A quick response would be appreciated if at all possible in light of the timescales for a report.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: Malcolm Sheehan QC [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Date: Thursday, 22 July 2021 at 11:45

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>, [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>, [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>, [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>, [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Further to [REDACTED] email below, please find attached a suggested list of topics for our discussion later.

Apologies for the delay in sending these through. I have been encountering internet issues.

To the extent that you need more time to discuss any of the suggested topics there will, of course, be the opportunity for the GC to follow up in writing.

We look forward to discussing matters further with you at 2.30.

Kind regards,

Malcolm

Malcolm Sheehan QC

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Date: Thursday, 22 July 2021 at 09:11

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>, [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>, [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>, [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>, Malcolm Sheehan

[REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED],

Many thanks for your email.

I am in court this morning, but Malcolm Sheehan QC will revert with a list of topics during the course of this morning.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Thursday, 22 July 2021 at 08:53

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Do you have a note of topics you will want to cover during our call this afternoon?

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Tuesday, July 20, 2021 7:52 PM

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Thank you for your below email and I note that you do not consider any context setting re the Gambling Act Review necessary.

I have copied in my colleague [REDACTED] who will find us 90 minutes to meet on Thursday afternoon. I may include a colleague who would then be well placed to cover off any points that might arise during my leave.

Also, I am genuinely contactable whilst away although any calls would need to be towards the end of the day. [REDACTED] so please do not hesitate to make contact via [REDACTED] if I can assist with any aspects of the review post Friday.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Tuesday, July 20, 2021 5:16 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>; [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Many thanks for your email and apologies for the delay in responding. We have now worked our way through the additional documents and answers to questions. Many thanks again for the helpful way in which the additional documents were presented.

Thank you for the suggestion of a meeting with yourself and [REDACTED] to discuss the GC's role as statutory advisor and the contribution to the Gambling Act review. The terms of reference for the Review state that it will be used to inform the review of the Gambling Act but it is not part of the review of the Gambling Act itself. In the circumstances we do not consider that a meeting to discuss the review of the Gambling Act will assist at this stage.

We are currently making progress with drafting the Review. We think that we are likely to be able to fulfil the terms of reference without a general need for meetings with Gambling Commission staff. We think, however, that it may be useful to meet with you virtually in order to discuss any outstanding queries we may have during the drafting process. You kindly gave us advance notification of your leave plans and, with this in mind, we suggest putting 90 minutes in our respective diaries on either the afternoon of Thursday 22 or the morning of Friday 23rd if you have any availability then?

We would suggest that if you have availability then we could confirm topics and whether we need the whole 90 minutes nearer the time.

I look forward to hearing from you.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Thursday, 15 July 2021 at 20:31

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Noting we will wait to hear from you re any requests for meetings with Commission personnel. However, I did think you and/or Malcolm might find it helpful to meet with [REDACTED] and myself to allow us to set out the wider context of our role as statutory advisor to the Secretary of State and particularly our contribution in this respect to the government's review of the Gambling Act.

[REDACTED] is [REDACTED] and leads in this area.

Do let me know if you consider such a meeting would be of assistance.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Monday, July 12, 2021 5:46 PM

To: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Glad all has now arrived in order. I will await any further requests.

Kind regards

[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Monday, July 12, 2021 5:44 PM

To: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Many thanks for your email below.

I can confirm receipt this afternoon of the bundles of additional documents and responses to questions.

We should be in a position to come back to you about any interviews with Commission personnel once we have had a chance to consider the additional documents and responses.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Monday, 12 July 2021 at 17:37

To: [REDACTED] [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

You should now have received a full response to your requests of Friday 2 July and the additional question posed on Monday 5 July.

I would be grateful if you would acknowledge receipt of the of the bundle of additional documents (c.1880 pages) and the separate bundle of responses to the 36 questions posed (c300 pages).

If we can provide any additional material, please do not hesitate to ask.

When you have had time to consider the documents and responses, I would be grateful for an indication as to whether you are likely to require any Commission personnel to provide oral evidence so that I can make appropriate arrangements.

Kind regards

[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Friday, July 9, 2021 4:40 PM

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

With sincere apologies we have experienced a technical issue in compiling the bundle which may take some time to rectify. In the circumstances we will get the bundle of additional documents to you by midday on Monday and the responses to the questions by close of business on Monday.

Kind regards

[REDACTED]
[REDACTED]

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]@gamblingcommission.gov.uk

Website: www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Friday, July 9, 2021 1:59 PM

To: [REDACTED]@hendersonchambers.co.uk>

Cc: [REDACTED]@hendersonchambers.co.uk>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and

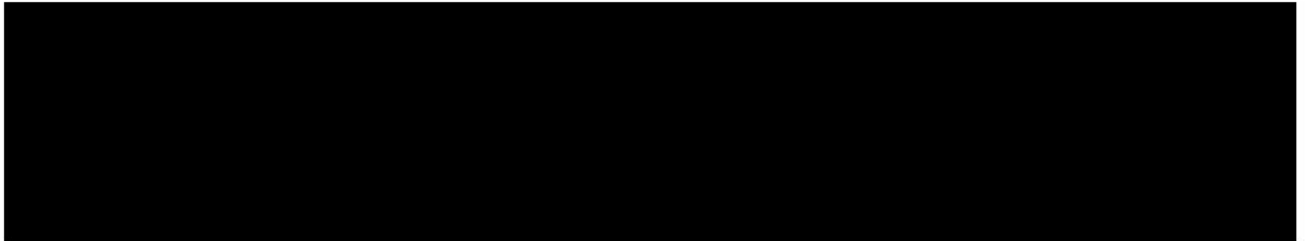
Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED] r

I am sorry that you have had to chase this up and I can assure you we are prioritising this matter, noting the tight timeline you are working to.

We are planning on having the bundle of additional documents you have requested over you to you later today. You should be aware that these bundles are not dissimilar in size to the first set we provided should that help your planning. The responses to your additional questions will be provided on Monday.

Do you know at this stage if you are likely to require any Commission personnel to provide oral evidence?



Kind regards



GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)

Website: www.gamblingcommission.gov.uk

From: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Friday, July 9, 2021 12:16 PM

To: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] [@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: Re: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Many thanks for your email on Monday confirming that you would revert with answers to the questions and documents at the earliest opportunity. Given the rather tight deadline to which we are operating (the first draft of the Report being due in 14 days' time on 23 July), I would be grateful if you could confirm whether we can expect to receive the Commission's response over the course of today.

Kind regards,



Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Date: Monday, 5 July 2021 at 10:39

To: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: RE: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

Dear [REDACTED]

Many thanks for your questions and document request, on which we will revert later this week at the earliest opportunity.

Kind regards

GAMBLING COMMISSION

Tel: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Website: www.gamblingcommission.gov.uk

From: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Sent: Friday, July 2, 2021 12:06 PM

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@hendersonchambers.co.uk](mailto:[REDACTED]@hendersonchambers.co.uk)>

Subject: Independent Review of the Regulation of BetIndex Limited - List of Questions and Request for further documents from the Gambling Commission on 2 July 2021

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

With thanks for the documents already provided to us, please find attached (1) a list of questions to be answered to the extent that the Gambling Commission is able and (2) a request for further documents to be provided if the Commission is able to do so. Each document has a brief preface providing some more context to the requests.

We found the presentation of the original tranche of documents very helpful, and would be assisted by the further documents requested being presented in the same way (i.e. with the hyperlinked index).

Please could the answers to the questions and the documents be provided as soon as the Gambling Commission can reasonably manage, given the timescales for the Review to be completed. I would be grateful if you could copy in our [REDACTED] when providing any responses.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: BetIndex Report - Gambling Commission draft for maxwellisation
Date: 09 August 2021 12:59:15

Dear [REDACTED]
Many thanks for your email, I can confirm safe receipt.
We will revert with any comments later this week.
Kind regards

From: [REDACTED]@hendersonchambers.co.uk>
Sent: Monday, August 9, 2021 12:34 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@hendersonchambers.co.uk>
Subject: BetIndex Report - Gambling Commission draft for maxwellisation
CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED] (and copied to [REDACTED] and [REDACTED] as we are aware that [REDACTED] is on annual leave),
Please find attached a letter from Malcolm Sheehan QC and sections of the draft Report for the
Gambling Commission's consideration for the purposes set out in the letter.
I would be grateful if you could acknowledge receipt.
Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.
VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.
NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: BetIndex Report - Gambling Commission draft for maxwellisation
Date: 11 August 2021 15:15:07

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED],

Thank you for your email. We will consider and revert in due course.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Wednesday, 11 August 2021 at 14:30

To: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@gamblingcommission.gov.uk>, [REDACTED]
[REDACTED]@hendersonchambers.co.uk>

Subject: RE: BetIndex Report - Gambling Commission draft for maxwellisation

Dear [REDACTED]

Just a short note to confirm that we are happy for Chapter 5 of the Report to be shared with the FCA, subject to the following caveat:

- In a number of places throughout the report it refers to a Gambling Commission [REDACTED] [REDACTED]. As we currently only have one person with that job title it would be fairly easy for that individual to be identified via internet search. Whilst the report does not appear to be criticising the individual, given the recent [REDACTED] we would be concerned with any individual from the Commission being identifiable. Could we substitute [REDACTED] for either 'Commission employee' or 'member of the Insights function'?

We will reply with any further specific comments on the draft report by your deadline on next Friday.

Kind regards

[REDACTED]

From: [REDACTED]@hendersonchambers.co.uk>

Sent: Monday, August 9, 2021 12:34 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@hendersonchambers.co.uk>

Subject: BetIndex Report - Gambling Commission draft for maxwellisation

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED] (and copied to [REDACTED] and [REDACTED] as we are aware that [REDACTED] is on annual leave),

Please find attached a letter from Malcolm Sheehan QC and sections of the draft Report for the Gambling Commission's consideration for the purposes set out in the letter.

I would be grateful if you could acknowledge receipt.

Kind regards,



Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: BetIndex Report - draft Chapter 6 for maxwellisation
Date: 14 August 2021 21:20:39
Attachments: [REDACTED]

CAUTION: This email is from an external source - be careful of attachments and links

Dear Mr [REDACTED]

Many thanks for your email dated 11 August. Please find attached a letter from the Review in response, and chapter 6 of the draft Report.

Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Wednesday, 11 August 2021 at 14:30

To: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@gamblingcommission.gov.uk>, [REDACTED]
[REDACTED]@hendersonchambers.co.uk>

Subject: RE: BetIndex Report - Gambling Commission draft for maxwellisation

Dear [REDACTED]

Just a short note to confirm that we are happy for Chapter 5 of the Report to be shared with the FCA, subject to the following caveat:

- In a number of places throughout the report it refers to a Gambling Commission [REDACTED] [REDACTED]. As we currently only have one person with that job title it would be fairly easy for that individual to be identified via internet search. Whilst the report does not appear to be criticising the individual, given the recent [REDACTED] we would be concerned with any individual from the Commission being identifiable. Could we substitute [REDACTED] for either 'Commission employee' or 'member of the Insights function'?

We will reply with any further specific comments on the draft report by your deadline on next Friday.

Kind regards

From: [REDACTED]s@hendersonchambers.co.uk>

Sent: Monday, August 9, 2021 12:34 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@hendersonchambers.co.uk>

Subject: BetIndex Report - Gambling Commission draft for maxwellisation

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED] (and copied to [REDACTED] and [REDACTED] as we are aware that [REDACTED] is on annual leave),
Please find attached a letter from Malcolm Sheehan QC and sections of the draft Report for the Gambling Commission's consideration for the purposes set out in the letter.

I would be grateful if you could acknowledge receipt.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: BetIndex - response to draft report
Date: 20 August 2021 10:43:29

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]
Thank you. Receipt acknowledged.
Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk> on behalf of [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>
Date: Friday, 20 August 2021 at 10:41
To: Malcolm Sheehan QC <[REDACTED]@hendersonchambers.co.uk>
Cc: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]@gamblingcommission.gov.uk>
Subject: BetIndex - response to draft report

Dear Malcolm
On behalf of [REDACTED] and [REDACTED], please find attached a copy of the response to the draft report of the review and covering letter.

Best wishes

[REDACTED]
[REDACTED]
[REDACTED]
The Gambling Commission
Victoria Square House
Victoria Square
Birmingham
B2 4BP

Tel: [REDACTED]

Mobile: [REDACTED]

www.gamblingcommission.gov.uk

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: BetIndex Report -
Date: 15 September 2021 17:50:00

Dear [REDACTED]
Many thanks for the below.
Kind regards

[REDACTED]
GAMBLING COMMISSION

Tel: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]@gamblingcommission.gov.uk
Website: www.gamblingcommission.gov.uk

From: [REDACTED]@hendersonchambers.co.uk>
Sent: Wednesday, September 15, 2021 5:35 PM
To: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@hendersonchambers.co.uk>
Subject: BetIndex Report -

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]
Please find below a link to a recording of the interview conducted by the Review with the Gambling Commission on 22 July.

[REDACTED]
I understand that you should be able to download the recording from the link. Do please let me know if there are any difficulties.
Kind regards,

[REDACTED]
Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED]@gamblingcommission.gov.uk>

Date: Tuesday, 17 August 2021 at 08:54

To: [REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@gamblingcommission.gov.uk>, [REDACTED]

[REDACTED]@hendersonchambers.co.uk>

Subject: RE: BetIndex Report - Gambling Commission draft for maxwellisation

Dear [REDACTED]
Many thanks for your email. Yes, it would be helpful to have a copy of that recording.

Kind regards

From: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Sent: Monday, August 16, 2021 6:19 PM

To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]

[REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]

[REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Subject: Re: BetIndex Report - Gambling Commission draft for maxwellisation

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED] and [REDACTED]

As you'll recall we recorded the interview conducted with the Gambling Commission on 22 July. If you'd like a copy (as I think you previously indicated you would) then I can arrange for a link to be provided to you.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Date: Wednesday, 11 August 2021 at 14:30

To: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>, [REDACTED]

[REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>, [REDACTED]

[REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Subject: RE: BetIndex Report - Gambling Commission draft for maxwellisation

Dear [REDACTED]

Just a short note to confirm that we are happy for Chapter 5 of the Report to be shared with the FCA, subject to the following caveat:

- In a number of places throughout the report it refers to a Gambling Commission [REDACTED] [REDACTED]. As we currently only have one person with that job title it would be fairly easy for that individual to be identified via internet search. Whilst the report does not appear to be criticising the individual, given the recent [REDACTED] we would be concerned with any individual from the Commission being identifiable. Could we substitute [REDACTED] for either 'Commission employee' or 'member of the Insights function'?

We will reply with any further specific comments on the draft report by your deadline on next Friday.

Kind regards

From: [REDACTED] <[REDACTED]@hendersonchambers.co.uk>

Sent: Monday, August 9, 2021 12:34 PM

To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@hendersonchambers.co.uk>
Subject: BetIndex Report - Gambling Commission draft for maxwellisation

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED] (and copied to [REDACTED] and [REDACTED] as we are aware that [REDACTED] is on annual leave),
Please find attached a letter from Malcolm Sheehan QC and sections of the draft Report for the
Gambling Commission's consideration for the purposes set out in the letter.

I would be grateful if you could acknowledge receipt.

Kind regards,

[REDACTED]

Independent Review of the Regulation of BetIndex Limited

CONFIDENTIALITY - This e-mail and its attachments are intended solely for the addressee, are strictly confidential and may also be legally privileged. If you are not the addressee please do not read, print, re-transmit, store or act in reliance on this e-mail or any attachments. Instead, please e-mail it back to the sender and then immediately permanently delete it and its attachments.

VIRUS WARNING - Reasonable steps have been taken to ensure that this e-mail and its attachments are free of viruses but you must take your own precautions in that regard. In the event of any technical difficulty with this e-mail please telephone the sender on ++44(0)20 7583 9020.

NO RESPONSIBILITY IS TAKEN FOR THE CONTENT OF ANY WEBSITE PAGES TO WHICH THIS EMAIL MAY PROVIDE LINKS.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: