

Tattersalls Committee Rules on Betting Composite Consultation Responses

Responses

Question 1

Do you consider that the original Rule 1 should be deleted?

Response

Unanimous: Yes

Question 2

Do you agree with the proposed re-wording of Rule 1?

Response

NAB: We believe the wording should include a statement setting out how the authority of Tattersalls committee is now derived ie from the requirements of the Gambling Commission included in licensing arrangements for on-course bookmakers.

AF: Agree the new rule with inclusion of reference to the Gambling Commission regulation that obliges adherence to the rules, namely 'Gambling Commission Licence Conditions and Codes of Practice, Chapter 3 Fair and Open Provisions'.

GM: No. I don't think bookmakers should be allowed to display a notice to the contrary.

RCA: The RCA is of the view that Rule 1 should confirm where the rules receive their Authority from, as this is currently unclear.

SIS: No – the sentence “All on-course bookmakers are obliged to adhere to these Rules unless they display a prominent notice to the contrary” is the Rule and the other two sentences are pre-amble. A consideration for Rule 1 may be “On-Course bookmakers who will not adhere to Rules on Betting (As authorised by Tattersalls' Committee) on any event upon which odds are offered must display a prominent notice to that effect”

Question 3

Do you have any other comments or observations on this section?

Response

SIS: What are the “published procedures” referred to with regard to the hearing of betting disputes?

Question 4

Do you agree with the proposed re-wording of Rule 2?

Response

NAB: Yes

AF: No. Tattersalls may create difficulties for themselves by defining a bet in a different way to s. 9 of the Gambling Act 2005. This states that the outcome of the bet may already be known to one of the parties, as they event may have already occurred. The legal definition of a bet is linked to powers elsewhere in the Act to tackle cheating and to void bets. Since in rule 3 the Committee want to recognise “all types of betting” it would be preferable to either adopt the legal definition or not have a definition at all.

RCA: The RCA agrees with the proposed re-wording of Rule 2, in line with further observations, as outlined below.

SIS: The concept of the Rule should be retained and the wording is acceptable.

Question 5

Do you have any other comments or observations on this section?

Response

AF: Contrary to what it says at 2.4 some on-course bookmakers have always offered limited ‘in-running’ opportunities, usually against a failing favourite.

RCA: It is the opinion of the RCA that, unless a result has already been given, there is always a ‘possibility to win’ as the outcome is still unknown – therefore, this Rule appears to be unnecessary. However, we have no objections to it continuing in the Tattersall’s Rules.

SIS: The implementation of the Rule will be challenging with “in running” betting: “In running” betting is predominantly an internet based activity from which significant advantage can be taken by people that are present at the event by exploiting technical latency issues with picture and data transmissions from the event to the public domain. A layer of a bet “in running” can be aware, for example, that a horse has “run out”, “fallen”, “unseated rider”, “taken the wrong course”, ie cannot win several seconds before a punter becomes aware from public sources; therefore in real time the punter can place a bet believing he has the opportunity to win but the layer may know otherwise.

JM: Every bet should have a chance of winning. The principal is being eroded, however, because of the time delay experienced when betting in-running. I would hope that the Committee could bring their influence to bear in an attempt to hopefully get operators to cut the time delays.

Question 6

Do you consider that the original Rule 3 should be deleted?

Response

Unanimous: Yes

Question 7

Do you agree with the proposed re-wording of Rule 3?

Response

NAB: We think there is a problem with this. The proposed wording of the rule does not seem to reflect the preamble written just before it.

If the intention of the Committee is to insist that every eventuality of outcome is made available by bookmaker to punter then the rule should clearly say so.

However, we do not believe that insisting on that situation would be desirable or practical. Taking the example of the potential problem you quote (a favourite to win by a particular distance) as you yourselves point out, it is only in hindsight that the bet cannot be a winner. There are many examples of this type of bet being offered in other sports without problem (e.g. “Rooney to score first and Man Utd to win”).

We believe that bookmakers should be entitled to make whatever offers they wish but should be required to make the terms of the offered bet abundantly clear (e.g. “favourite must win for bet to win”).

AF: Yes with two minor amendments. I would change ‘British racecourses’ (second sentence) to British horse racecourses to be absolutely clear. Secondly, I would lose the last 10 words unless you change the wording of Rule 2 (see above).

RCA: The RCA agrees with the proposed re-wording of Rule 3.

SIS: “Unorthodox” should be reconsidered before inclusion in the wording – if a type of bet has become common enough to be governed by the Rules it is surely not “unorthodox”.

A recommendation for the wording could be:

Tattersalls’ Committee recognises all types of betting, (including but not limited to betting other than win or each way) and betting on sports or events other than horse racing. The Rules of Betting apply to all bets placed on British racecourses, unless otherwise stated by the bookmaker. Bookmakers offering such opportunities must display prominently the terms of such bets and ensure they comply with the provisions of Rule 2.

Question 8

Do you have any other comments or observations on this section?

Response

AF: Clearly the rules become more relevant to the current market if amended as proposed. I don't agree with the point at 2.9. Why should a bookmaker taking bets on the winning distance of the favourite offer odds on its defeat? Off-course bookmakers regularly offer match bets between selected horses in a field, without attempting to offer all of the match propositions available.

MS: I was just wondering what would happen to all types of bets if no horses were to finish a race? This is a strong possibility now with jockey's not able to remount if unseating

RCA: We have no further comments to add regarding the amendments to Rule 3.

Question 9

Do you consider that the minor amendments to Rule 4 are appropriate?

Response

NAB: Yes although D (i,iii, iii) could be made clearer.

AF: Yes

KW: Aaah Rule 4 !!...I think that possibly the 10 greatest mathematicians of all time could sit round a table for 10 years discussing Rule 4 deductions and still not be able to come up with a perfect solution. Rule 4, as it stands, works to a certain degree, however, there is one glaring anomaly, and that is with multiple withdrawals e.g, If two 16 to 1 chances are withdrawn, there is no deduction allowed, but from a percentage point of view this is the same as one 8 to 1 chance being withdrawn which allows a deduction of 10p in the pound. I believe that this anomaly does need addressing.

RCA: The RCA considers that the minor amendments to Rule 4, as described in the relevant section of the consultation document are appropriate.

SIS: The following circumstances should be considered as published in major off-course bookmaker rules regarding single Ante Post bets -

The selection will become void if:

A horse is prevented from running under Jockey Club (sic) Rule 1A.

If the horse has been withdrawn from the race, or was specifically excluded by the race conditions at the time the bet was accepted.

A bet was placed without taking a price.

Bets on the distance being void if either horse is disqualified, or the placings are reversed may not comply with "first past the post" offers which are now commonplace within the industry.

Rule 4D (ii) – replace "by the SP Returners" with "according to the criteria laid out in Press Association procedures for SP Validators".

Rule 4D (iii) delete SP returners

Question 10

Do you have any comments or suggestions in respect of Rule 4(c)?

Response

NAB: Yes: We believe the case for making changes to the scale of deductions under Rule 4 has been made and already accepted in principle by Tattersalls Committee on an earlier occasion.

We are also very aware that commercial considerations by the off-course industry, totally unrelated to any consideration of fairness or reasonableness of this Rule, resulted in the Committee's announced changes not being implemented.

We think that doing nothing about this situation is unacceptable. At a time when the Rules are being revised and updated there cannot be reason not to bring the scale of deductions into the 21st century. Not to do so would be an abrogation of responsibility. The authority of the Committee would be seriously compromised if it were to try to adhere to an outdated scale that is without any mathematical or moral justification and which would be wide open to almost any challenge.

The idea that the public would in some way be unfairly disadvantaged by a new, fair, scale is something that could and should be easily capable of being disproved. In this context it is worth highlighting that everyone's favourite people's champion, Betfair, use a scale of deductions outstandingly more penal than anything ever proposed for Rule 4. And they apply a deduction to the stake, which bookmakers do not.

We believe changes have to be made. The aim should be that the overround per runner becomes the same *after* application of the Rule 4 deduction as it was *before* the non-runner was announced. It should be perfectly possible for the Committee to produce a formula for achieving this, probably by relating the price of the withdrawn horse to the overall market and number of runners.

We are sure there would be a number of mathematical minds capable of resolving this, but one person worth seeking advice from would be Richard Hoiles who combines an accountancy qualification with professional horse racing expertise and independence from the betting industry. He has already looked at the problem and has some solutions.

AF: I expect you will get submissions from layers saying that particularly in small fields the deduction following removal of an odds-on entry is likely to cause distortion of the market, turning an overround into an overbroke. It might be possible to amend the rule to address this in limited circumstances. However, as it stands I fully support the deductions list within Rule 4c as it provides a high degree of certainty for the betting public and layers.

PA: There have been calls to change the scale of deductions to bring them up to date and therefore mean that they actually benefit the on and off course bookmakers. These calls were made within the Racing industry but not by the bookmakers themselves. The change to the scale of deductions was actually rejected by the majority of off course bookmakers, especially the larger firms, due to the knock on affect it would have on the technical systems and the knowledge that their “punters” do not like change.

The only thing that I think is lacking in the current Rule 4 (c) is there is no explanation of how a new market is formed.

RBA: Although now may not be an appropriate time to consider any amendments to Rule 4(c) the Committee should remain aware that this particular rule remains a constant source of debate and we request that a review at some later date would be appropriate.

GM: I think deductions should apply up to 18/1

RCA: We note that, in addition to the changes outlined in the body of the consultation document, Rules 4 (E) and (F) have been deleted, and believe that these should remain.

SIS: Bets other than win or each way (eg without the favourite) generally allow the bookmaker to apply deductions based on the odds they offer against the withdrawn horse at the time of withdrawal. Prices such as 8/5, 9/5, 12/5 and 16/5 are now more common but fall outside current Rule 4c parameters within the table of deductions. These prices are also common in foreign racing coverage and should, in my opinion, be accommodated within the table.

The reaction to 2007 recommended changes to deductions was mixed. Various factions of the industry held different views - there may be some consideration for a table of deductions for on course bookmakers whilst leaving the off course industry to define its own rules or modify the table to accommodate their concessions eg not applying 5p deductions. Similarly there may be some consideration for deductions in the event of multiple withdrawals of horses priced outside the deduction table EG 3 horses withdrawn at 16/1 takes 17.65% from the overround.

JM: I believe that rule 4 should be changed and I would like to see it following the 'Betfair' model which includes, I believe, the stake. I also feel there is a case for the cancellation of the 5p deduction, bearing in mind that it is not applied in many cases, and the 10p deduction would apply for withdrawals from 6/1 to **10/1**.

Question 11

Do you think that Rule 4(c) should remain under the auspices of Tattersalls Committee? If not, which body should be responsible for it?

Response

NAB: It is important that this vital and sensitive part of the rules of betting continues to be included within the Tattersalls remit. The Committee is regarded as independent, fair and

influential – precisely the reasons why such controversial matters as Rule 4 deductions should continue to be administered in this way.

AF: Yes. I can't think of another body who would take responsibility for the rule, certainly not the Gambling Commission.

PA: At present there is no viable alternative to Tattersalls Committee and until an independent body that could replace Tattersalls Committee is set up then Rule 4(c) should remain under the auspices of the Tattersalls Committee.

If an Independent body was set up it must include representatives from all areas of the Betting Industry, including on and off course bookmakers.

GM: Definitely to remain under the auspices of Tattersalls Committee and a strong backing from the Gambling Commission. I do not think it is right that Tattersalls Committee should come under the wing of AGT, which is a bookmaker funded entity.

RCA: The RCA has no objections to Tattersalls Committee retaining responsibility for Rule 4(c), and feels that this is a decision for the Bookmaker Associations.

SIS: The administration of deductions is generally managed by on course betting reporters (SIS and Turf TV) and Press Association SP Validators; all of whom, in some capacity, report to the SPRC. It has been suggested that this body consider the governance of the Rule, which is feasible. However it is unlikely that any alterations to the deductions would be a consideration that SPRC would undertake as their role is not to change the balance of commercial advantage between punter or bookmaker.

Question 12

Do you have any other comments or observations on this section?

Response

GM: Yes, but one step at a time.

RCA: There are several references throughout Rule 4 to the Rules of Racing. The references should be updated, further to the publication of the new Rule Book, by the BHA on 7 September 2009.

Question 13

Do you agree that Rule 5 should remain largely unchanged?

Response

NAB: Yes

AF: Yes. The only slight addition to this could be to include 'subsequent alterations to the result by the racecourse judge', thinking of Jane Stickells and Lingfield.

RCA: The RCA is in agreement that Rule 5 should remain largely unchanged.

Question 14

Do you have any other comments or observations on this section?

Response

RCA: The references to the Rules of Racing should be updated, further to the publication of the new Rule Book, by the BHA on 7 September 2009.

SIS: There is potential for a racecourse judge to have called an incorrect result or distance which can be corrected after the announcement of the weigh-in. Some consideration of this may be appropriate.

Question 15

Do you agree that Rule 6 should remain unchanged?

Response

RCA: Although not mentioned in the consultation document, we note that there has been a change to Rule 6, as the wording "*Unless agreed by both parties it is not essential that both horses should start*" has been removed. The RCA believes that this wording should remain.

Otherwise, there is a unanimous 'yes'.

Question 16

Do you have any other comments or observations on this section?

Response

Unanimous: No.

Question 17

Do you agree that Rule 7 should remain largely unchanged?

Response

Unanimous: Yes

Question 18

Do you have any other comments or observations on this section?

Response

Question 19

Do you agree that Rule 8 should remain largely unchanged?

Response

NAB: Yes

AF: No. All bookmakers are required by Gambling Commission regulations for on-course bookmakers to produce betting slips that identify the selection. This renders the first sentence redundant as any odds laid without mention of the horse is clearly in contravention of the law (The relevant code of practice is a social responsibility provision and therefore has the force of law). The second sentence can stand alone.

RCA: The RCA is in agreement that Rule 8 should remain largely unchanged

SIS: My understanding is a bookmaker must issue a detailed receipt on acceptance of a bet; if so, the first part of Rule 8 is obsolete.

Question 20

Do you have any other comments or observations on this section?

Response

AF: The rule appears to refer to two different events. The above proposal will also reduce confusion.

PA: I think it should be made clearer what “state of the odds at the time it was made” actually means and how the state of odds at the time is determined.

SIS: Sentence 2 may be modified as follows – “Bets made after a race that a horse will or will not be disqualified will stand even if no objection be made or no Stewards’ Enquiry is held.”

Question 21

Do you think that the introduction of an ‘obvious error’ Rule is appropriate?

Response

NAB: Yes

AF: I agree with the complete deletion of the previous Rule 9. I consider that it would be appropriate for the introduction of an obvious error rule though I think this should be part of the bookmaker's own rules rather than here. Obvious error rules are exclusion clauses that are now subject to the 'reasonableness test' under contract law. To survive legal scrutiny they must be carefully worded to cover the liability to be removed and applied accurately. In a recent case the judge sought to weigh the obvious error rule against the bookmaker's duty of care to customers in setting up the market, (Cawkwell -v- Betfair 2009).

Tattersalls are a third party to this process and if they don't wish to be joined to legal actions on disputed wagers they should leave this to bookmakers own rules. To introduce this rule would be akin to off-course bookmakers (who have a bewildering variety of obvious error rules) having to rely on the ABB for their contract terms. In addition IBAS recommend that bookmakers settle at the best industry price from their rivals in the market. In my opinion these are commercial and legal choices best left to bookmakers.

RCA: The RCA agrees that the introduction of an 'Obvious Error' rule is appropriate, but feels that 'Obvious Error' should be clearly defined within the Rules. In particular, whilst we agree with the proposed wording in relation to prices and terms we would question how the wording is appropriate with regard to stake, as it is unclear how 'obvious error' can be claimed in relation to stakes and how any disputes could be resolved when betting with on-course bookmakers as there is no written element to the bet and transactions are in cash. We would propose that the Rules clearly specify that if the bookmaker can prove that there has been an 'obvious error', for example with an audio recording of the transaction, then the Rule applies, but that otherwise the liability lies with the bookmaker.

SIS: Yes.

Question 22

Do you agree with the proposed wording?

Response

NAB: No. We do not see the need for the words "at least". The rule should be that the bet is settled at the correct stake, price or terms.

RCA: The RCA has no objections to the proposed wording for this Rule.

SIS: Yes.

Question 23

Do you have any other comments or observations on this section?

Response

NAB: Yes. We agree that the previous Rule 9 is superfluous.

SIS: What process will be used to determine the “correct prevailing price” and will this be published within the Rules?

Question 24

Do you agree that Rule 10 should remain unchanged?

Response

Unanimous: Yes

Question 25

Do you have any other comments or observations on this section?

Response

Question 26

Do you agree that the original Rule 11 should be deleted?

Response

Unanimous: Yes

RCA: Whilst the RCA agrees that it is the responsibility of the bookmaker to determine the terms for bets, and for customers to ensure they make themselves aware of the terms, it is felt that, for the benefit of the customer, such terms should be clearly stated and understandable. Therefore, we recommend that Rule 11 should remain, but that the wording should be amended to state that the terms regarding the period when bets apply should be made clear.

Question 27

Do you think it is appropriate for the Rules on Betting to list the standard place terms and to underline the impact of non-runners and withdrawals?

Response

NAB: Yes. We believe it is highly desirable. We are conscious that place terms on-course continue to attract controversy and we welcome the prospect of standard terms being introduced within the rules of betting.

But we think this requires careful thought regarding what those terms actually are. They must be realistic, fair and viable so that our Association, and the others, can promote working to those terms.

We do, however, also think it should remain proper for a bookmaker to offer terms outside “standard” as long as those terms are clearly and prominently displayed.

AF: Yes. I consider that the place terms represent a key element of the customer service that Tattersalls are able to provide. The recent debate in the press about one sixth or lower fractions for a place is in part due to the requirement for bookmakers to advertise their place terms prominently.

PA: Yes but rather than use the term “standard” it should be “customary”.

RCA: The RCA firmly agrees that the standard place terms should be included within these Rules.

Question 28

Do you have any other comments or observations on this section?

Response

NAB: Yes. The place terms now regarded as “standard” have not always been such. For instance we have colleagues who remember when it was common that no fourth place was paid at all. There have also been various historical instances of restrictions on place betting when the favourite is odds-on.

We think the terms suggested in this proposal as “standard” should reflect present commercial reality, one obvious instance being the betting on 16+ runner handicaps. The odds commonly being offered in the win market in such races are today so generous that betting to a quarter the first four is frequently not possible without the place book being overbroke. In such circumstances it is unrealistic and undesirable to have a “standard” that is not commercially feasible.

We suggest that as a minimum the “standard” terms be altered to one fifth the odds first four up to 24 runners, but keeping a quarter the odds in larger fields.

It is also equally obvious that it is not possible for bookmakers to bet to a fifth the first three in many 8-runner non-handicaps where the favourite is a very short price. In many of these instances, place fractions of a sixth or less still do not restore the market’s commercial viability. We welcome any input as to how this might be addressed within a framework of standard terms.

One final thought is that if the Rule 4 deductions are amended to a true mathematical formula as we suggest, and if the place fractions are also viable, it may be possible that in the event of a late non-runner bookmakers could continue to pay the advertised number of places – something that the present situation does not allow. We would welcome further discussion on this.

AF: The place terms have endured for a long time and set a standard to which bookmakers should constantly be encouraged to meet.

GM: I am disgusted at the behaviour of some of my colleagues re. Each-way betting terms and I think that these should be statutory under Tattersalls rules. I appreciate the difficulties with 1-2-3-4 in handicaps, but how can we criticise the racecourses when our own members are alienating the betting public with disgraceful e/w terms

KW: The three words...'unless otherwise stated' concerning place terms,are at this instant in time causing more arguments between bookmakers and customers and amongst bookmakers than I have witnessed at any time on the race-course.To be totally blunt,many unscrupulous bookmakers are using these three words to justify ripping the public off. One sixth,one seventh and even one eighth the odds a place are becoming quite common to see,and it is only because each-way terms are no longer compulsory.

In a time of recession,it is ever more difficult to attract customers to come racing.However,when a racecourse is prepared to invest in promotions and marketing to increase attendances,it is in everyone's best interests to work together to ensure that these paying customers have an enjoyable experience and return time and time again.I believe that racecourses and on-course bookmakers should be working together,hand in hand,to ensure success

For someone to come racing for the first time,or any time,and discover that on-course bookmakers are offering worse place terms than they could get in the betting-shop at the end of the street is a recipe for disaster.

I believe that on-course place terms should be mandatory.If an individual bookmaker does not like this,he always has the option to bet Win Only,and,myself,and the vast percentage of my colleagues think that these mandatory place terms should be set out in the Tattersalls Committee Rules on Betting.

GL: On racecourses there is an increasing tendency for on course bookmakers to offer each way odds far below the recommendation in small print below the main board 1/7th the odds is unacceptable in sixteen runner + handicaps. The rule should state that at least lettering of 75mm giving terms should be displayed in a set position without obstruction.

Why not include stakes races above fifteen runners also?

Bookmakers not abiding by the minimum terms should be charged double the pitch fee, those giving more should be given choice picks of pitch - lets get more people going racing!

JM: I am personally strongly of the opinion that the on-course each-way terms should shadow the terms offered off-course. However I understand the arguments in favour of a reduction but feel that it is the win odds that are too short and this, of course, relates directly to the place odds. I feel that if each-way odds are to be allowed to vary as at present, bookmakers must be required to show their terms much larger and clearer than at present required which may go some way to deter the cheats who bring bookmaking into disrepute.

Question 29

Do you agree that Rule 12 should remain unchanged?

Response

NAB: Yes

AF: Yes, with the removal of ‘Starter’s Orders’.

PA: No as the term “starter’s orders” is no longer valid and new definition should be discussed.

RCA: The RCA agrees that Rule 12 should remain unchanged, with the exception of the removal of references to ‘Starters Orders’ which is obsolete.

SIS: In principle yes; however for the avoidance of confusion I recommend deleting “to all bets” in reference to the application of Rule 4C. A new market from which no deductions are made may apply up to the off of the re-run race.

Question 30

Do you have any other comments or observations on this section?

Response

RCA: The final section of Rule 12 has been removed and included under Rule 13 in the Proposed Rules on Betting. The RCA is of the view that this provision should remain under Rule 12.

Question 31

Do you agree with the proposed re-wording of Rule 13?

Response

NAB: Yes

AF: Yes, other than the reference to Rule 9 (see above).

RCA: The RCA has no objections to the proposed re-wording of Rule 13 as outlined in the consultation document, but believes that the wording previously included under Rule 12 should be returned to that Rule (see response to Question 30, above).

SIS: Yes (assuming the 2nd paragraph in Appendix B is actually intended for Rule 12.)

Question 32

Do you have any other comments or observations on this section?

Response

Question 33

Do you agree that Rule 14 should remain unchanged?

Response

NAB: Yes

AF: It's probably fine, but I'm not sure if it refers to race bets, or bets on the photo. Could it be made a little clearer?

RCA: The RCA agrees that Rule 14 should remain unchanged.

Question 34

Do you have any other comments or observations on this section?

Response

PA: It is not clear by the current wording what this rule actually relates too. Is it a bet on the outcome of a photo finish?

Question 35

Do you agree that Rule 15 should be deleted?

Response

NAB: Yes

AF: The original rule gives extraordinary powers to the Committee to investigate and deal with cheating and ignore all preceding rules if they so choose, by creating a new rule if they choose. Fraud etc is now covered by s.42 of the Gambling Act 2005 and Gambling Commission powers, and so Rule 15 should be deleted.

RCA: The RCA has no objections to the deletion of Rule 15.

Question 36

Do you have any other comments or observations on this section?

Response

AF: I don't think Rule 15 is covered by the newly proposed Rule 1 as suggested. One is the power to take actions and the other a definition.

Question 37

Do you agree that co-opted persons should sit on the Committee that discusses and approves amendments to the Rules?

Response

NAB: Yes

AF: Yes I think this is the sensible way to proceed to complete the review process successfully.

RBA: We agree that it would be helpful if the Committee co-opt an independent to its rank, thereby widening the process and demonstrating transparency.

RCA: The RCA agrees that it would be appropriate for co-opted persons with relevant knowledge and experience to sit on the Committee to discuss and approve amendments to the Rules, but recommends that criteria be developed to identify suitable candidates. In light of the status of the Rules as the accepted industry standard rules on betting, the RCA would recommend that these co-opted persons be punter and bookmaker representatives.

These Rules should be subject to regular review, even if it is concluded that no amendments are required, and a statement of how and when these reviews will take place should be included.

Question 38

Do you have any suggestions for persons or organisations, including yourself, who should be represented?

Response

NAB: We suggest that Richard Hoiles be asked if he would be prepared to give some advice over Rule 4 deductions. It may also make some sense to invite Paul Kealy the betting editor of the Racing Post to take part *alongside* a representative voice from the betting ring, such as NAB president Keith Johnson.

AF: I would be happy to assist, and I could, following approval, represent IBAS. I would also recommend Barry Faulkener at the ABB.

PA: The Press Association should be involved as we are the Starting Price Operators and as such the Rules on Betting are very relevant to our day to day working and as such I would like to nominate myself to sit on the committee.

GM: Yes I think I could help the committee, with my 38 years of experience. I don't think serving committee or chairmen of Associations should be asked, as they might have a conflict of interest with their members.

RBA: The RBA is fortunate to have within its membership Martin Densham and John White, both members of Tattersalls Committee, with their knowledge and background

within the industry we feel that they would be pivotal in assisting the Committee with this review.

GL: myself plus a forum from the racing post

RCA: The RCA has no recommendations for specific individuals who should be represented on the Committee, but would propose that both bookmakers and punters should be represented. We would suggest that there should be clear criteria for how the Committee is constituted as well as the current recruitment/appointment policy.

SIS: On behalf of SIS I am willing to sit on the Committee to discuss and approve the amended Rules.

I have worked in the betting industry since 1977 and with SIS since it was set up in 1987. In my current role as Head of Data within the organisation I am occasionally called upon to offer explanations of betting rules and procedures following enquiries from both punters and bookmakers. In particular SIS often manage the implementation of Rule 4C.

I represent SIS as a Betting Operator at SPRC meetings and have offered submissions on each review of the Starting Price in recent years.

Although SIS is not directly involved either as a layer or a backer, my responses, as an interested observer, are based on the collective experiences of our racecourse reporters over many years.

Question 39

Do you think a workshop would be desirable or useful?

Response

NAB: No. We do not believe this would be necessary.

AF: I found these useful at the Gambling Commission when areas of contention were exposed. They do require expert chairmanship to reach workable conclusions.

PA: Yes and yes.

GM: Yes

GL:Yes

RCA: We do not believe a workshop regarding the changes to the Rules would be necessary, as the alterations to the rules appear clear.

SIS: I believe it is unlikely that a workshop will be necessary to complete the process of amendments.

Question 40

Do you have any comments or observations on the draft timetable?

Response

AF: May be slightly ambitious.

RCA: We would propose that the draft timetable be amended, so that the revised Rules on Betting are published in advance of 27 March 2010, to become effective on this date, as this is the start of the 2010 Flat Turf season, and the Industry tends to use this date as a point from which to implement changes or new initiatives.

SIS: SPRC have scheduled a meeting during w/c 1st March. (Wednesday 3rd March 2010).

Miscellaneous

RCA: Please note that all responses are given subject to the recommendations given at Questions 37 and 40, which are:

- Both bookmaker and punter representatives be included on the Committee going forward
- This review provides an ideal opportunity for the Committee to undertake a more wide ranging review in order to modernise the Rules. In particular, we would recommend that the Committee consider the inclusion of decimalisation.
- We would recommend that the Committee undertake to further review the rules, with particular reference to Rule 4, and rewrite them in plain English. Whilst the Rules as they are currently written may be understandable to regular punters, it is essential that they are also understandable to first time racegoers.