Marking
20 Years of
Championing
Fair Play

IBAS Annual Report 2017-18
Twenty years ago there was no guarantee that a new adjudication service for betting would have enough support to establish itself. The Sporting Life had a betting dispute page, the Green Seal Service, which demonstrated a demand for an independent third party to determine the outcome of disputed bets. When that finished, the challenge was to persuade bookmakers to sign up to IBAS and agree to abide by its rulings. This was no easy task given that bookmakers weren’t regulated and there was no right of legal action against them.

It’s a testament to the belief of our founder, Chris O’Keeffe, that IBAS found its feet so quickly and has grown in its reach and resilience over the following two decades. From the start IBAS has benefitted from the involvement and association of people that consider it a service worth building, and that remains evident every day in the careful and impartial rulings that bear its name.

Over the last 12 months IBAS has created a new website; a new decisions database, and has a new board of directors. IBAS has become a member of the Ombudsman Association, which promotes effective complaint handling and whose principles are relied upon by the Gambling Commission in the standards required of IBAS and the other eight approved Alternative Dispute Resolution (ADR) providers.

IBAS now covers disputes involving online gambling, bingo, lotteries, gaming machines as well as betting and we have expanded the skills on our panel following an open recruitment exercise. But we remain fixed on our founding principle – independence. We decide disputes without any allegiance or relationship with the businesses with which we interact.

This may seem an obvious thing to say, particularly as the Ombudsman Association requires members to be visibly and demonstrably independent from those they investigate. However, if I have a complaint about a transaction in an adult gaming centre or casino it is likely I will have to bring my dispute to an ADR service operated by the relevant industry trade body. It appears contrary to the requirement to avoid the perception of a conflict of interest, that trade bodies are approved by the Gambling Commission to investigate gambling disputes on behalf of their member businesses. Perhaps the forthcoming review of ADR providers will allow the Gambling Commission to re-think this situation.

We strongly support the changes the Gambling Commission has introduced to the rules concerning the provision of ADR services by approved providers. I believe that IBAS is well placed to meet this challenge and assist the Gambling Commission in the pursuit of the licensing objectives.

It is my privilege to be Chairman of IBAS as it reaches its 20th anniversary, and to have taken over from Michael Messent who has given many years valuable service to IBAS.
Managing Director’s Report

Richard Hayler

At the 2017 Gambling Commission Raising Standards conference Richard Lloyd, former Executive Director of Which (now Chairman of Resolver), presented the findings of a 2016 Populus survey into comparative levels of trust between a selection of industries. Two groups were separately surveyed, the public and members of parliament. Both groups declared that they found gambling the least trustworthy industry of any of the ten listed.

‘Opticians’ were the most trusted, then ‘food and drink’, ‘airlines’, ‘radio stations’, ‘charities’, ‘pensions’, ‘newspapers and magazines’, ‘gas and electricity’ and ‘advertising’. Gambling fared worst of all, for both the public and MPs. 58% of 122 MPs and 67% of 2,026 public participants believed there should be more regulation for gambling.

That is a difficult outcome for the gambling industry to overlook and a challenging one for it to analyse. Much of the critical media coverage of the gambling industry, during 2017 focused on the Competition and Market Authority’s investigation into potentially unfair terms in gambling promotional offers. IBAS has provided the Gambling Commission and CMA with many examples of what our Adjudication Panel has considered to be unfair or potentially unfair practice in this area. However, as a bespectacled man and a regular customer of the apparently most and least trustworthy industries I could honestly say that the average free bet offer was any harder to navigate than a buy one get one free offer on new glasses. This simple sounding deal has often hidden more than its fair share of small print pitfalls by the time I have made my way to the optician’s till.

Negative coverage of the gambling industry has extended to several other notable areas. The Government’s review of tied odds betting terminals concluded in May 2018, with a determination that maximum stakes on betting shop machines should be reduced substantially, from £100 to £2 per game. Media coverage of this topic has stimulated closer scrutiny of the industry’s overall approach to responsible gambling. The Gambling Commission has introduced tougher penalties against gambling operators who have been found to have made insufficient checks on customers exhibiting signs of serious problem gambling, including where this has resulted in individuals fraudulently obtaining funds to support their addictions. The purpose of the Raising Standards Conference was to allow the Gambling Commission to report its concern that gambling operators had failed to heed regulatory advice to put consumers at the heart of all they do. Although presently outside IBAS’s remit, there has also been significant coverage on social media, picked up in some media outlets, about the closure and restriction of successful customers’ accounts.

From an IBAS perspective, we would share a great deal of the Gambling Commission’s concern about aspects of industry practice, but the extent of public loss of trust in the industry is still surprising. In our experience, the vast majority of people placing bets or playing licensed games will get an experience that will meet their reasonable expectations. Of course, the odds dictate that the average participant in gambling will lose more than they win, but the minimal public level of trust that reportedly exists could suggest that a consumer enjoying a win might expect to have trouble even getting paid. In our experience, the overwhelming majority of gambling transactions are resolved amicably.

The CMA published its findings in early February 2018, and the Gambling Commission has undertaken to enforce new minimum standards for transparency and accessibility of key terms and conditions with effect from 1 April 2018. We have applied the same standards to our own adjudication process and we will continue to assist the CMA and Gambling Commission wherever we can in informing the development of applicable regulatory policy.

IBAS will not be complacent in this respect, but on a more reassuring note we have welcomed a reduction in the sometimes unfairly critical coverage that Alternative Dispute Resolution in the gambling sector received in 2016/17. The launch of our updated website may have helped in that respect. In the coming year, we must and shall do more to communicate information about IBAS works and what we have achieved both in adjudication and in our supporting work providing advice and information to regulators, operators and consumers. We are in the final stages of completing a new disputes database, which will make it easier for consumers and operators to monitor the progress of their disputes online. It will also be used to deliver live and accurate information about our dispute handling work for the IBAS website.

Since 2015, IBAS has been an approved Alternative Dispute Resolution (ADR) entity, approved by the Gambling Commission. Both IBAS and the Gambling Commission have made significant senior personnel changes in early 2018.

At the Gambling Commission, Chief Executive Sarah Harrison has been succeeded by Neil McArthur. Harrison had proven to be a popular CEO with consumer representatives and she did a great deal to advance the profile and perception of the regulator. From our perspective, it was unfortunate that Harrison was unable to find time to meet with us to discuss directly her views – expressed mainly in speeches and public presentations – on the role that ADR could play in improving consumer trust in the fairness of gambling.

We hope that there will be more opportunity for us to engage with her successor. In 20 years of dispute resolution in the licensed gambling sector, IBAS has considered over 60,000 complaints and dealt informally with tens of thousands of other queries and requests for advice and information. We believe that we are extremely well-placed to help significantly with the Gambling Commission’s quest to enhance industry standards, particularly in terms of providing advice and data to help.
direct resources to the most critical problem areas.

In August 2018, the CMA and Gambling Commission announced a second round of findings concerning potentially unfair terms in gambling, on this occasion explaining that they considered it potentially unfair practice for online gambling operators to offer jackpot prizes with the caveat that they could be paid in relatively small instalments over a significant period of time. We do not dispute the potential unfairness of this type of term, but in 20 years of work our adjudication panel has never been troubled by consumers affected in this respect.

Meanwhile, areas of more frequent frustration – non-transparent cut off times for valid racing bets in betting shops, lack of software to prevent the breach of caps on maximum stakes or winnings from being breached, unclear policies for handling bets where match-fixing is alleged, and several others would benefit much more, in our judgement, from regulatory assistance and intervention. We remain keen to assist however we can, for example, we have recently submitted a discussion paper to the Gambling Commission on the subject of consistent and transparent practice for handling what appear to be secondary online accounts of consumers who have previously opted to self-exclude from gambling.

At the November ‘17 Raising Standards conference, one delegate asked towards the end of the closing Q&A session whether the Commission should not be adding more detail to their advice on putting consumers at the heart of their work. The response, in essence, was that they did not want to define minimum standards of acceptability because they wanted their licence holders to not just meet but exceed the expectations of their customers.

That is quite an attractive answer, but it poses considerable difficulties for an ADR body adjudicating whether gambling companies have acted unfairly. We share and support the ambition of the Commission to see the gambling...
Managing Director’s Report

industry restore some of the missing trust that is starkly illustrated in the Populus survey, but without defined standards as starting points, we find that operators whose practices might be described as close to the line are always able to argue that their approach conforms to regulatory guidance. After all, if there is no published guidance, how can you argue against that claim? If in the end it is to be IBAS or other ADR services which effectively set the standards for reasonable, fair and open activity by our adjudication decisions, so be it, but we would much prefer to work in a more robust partnership with the Commission. There is an element of subjectivity and individuality in almost every dispute, but it would seem to us that ombudsmen and other ADR bodies in many sectors are judging cases against much clearer criteria defined by their appropriate industry regulator.

One of Sarah Harrison’s positive achievements at the Gambling Commission was the creation of a Consumer Policy department and the initiation of a review of ADR arrangements in the sector. Our response to the Commission’s consultation on this subject can be downloaded from the publications section of the IBAS website. We warmly welcome the Commission’s efforts to establish a uniform framework for complaints handling. We have encountered some problems with a small number of operators’ response times to our enquiries, a subject specifically dealt with in the consultation. We readily accept that there is room for improvement too in our own services, and we look forward to putting changes in place to take effect in the final quarter of 2018.

Andrew Fraser has been a long-term supporter and guiding influence on the development of IBAS. Before joining the Board in August 2014, he had been a pivotal member of the Adjudication Panel and a key member of the team which had overseen the transition of gambling regulation from the Gaming Board of Great Britain to the Gambling Commission. He is a passionate advocate of fair gambling and has ambitious plans to continue to growth of the service. I look forward to working with him and our new and existing directors in the years to come.

I would also like to take the opportunity to pay tribute to Michael Messent, whose wisdom, calmness, industry and legal know-how and unflattering support made it so easy for me to settle into the role of Managing Director, following the tragic and sudden loss of Chris O’Keeffe, who as IBAS’s first Chief Executive had persuaded him to first join the IBAS Board in 2008.

On retirement, he had presided over a majority of all IBAS Board Meetings staged since its foundation. Annual requests for adjudication rose from about 2,900 in 2008 to 7,159 in 2017. During that period over £4,000,000 was paid to consumers as a result of either rulings against gambling operators or case concessions following IBAS intervention. The nature of gambling dispute resolution changed significantly during that period, not least following the implementation of the 2005 Gambling Act, but the way that the service adapted to each necessary change is a fitting tribute to the success of his Chairmanship.

IBAS will turn 20 years old in October 2018. We have new leadership and an optimistic vision for continuing to provide a fair, trustworthy and authoritative dispute resolution service to the gambling industry and its customer base. We aim to assist the Gambling Commission with its difficult duties regulating a fast moving industry and to improve our own service standards, bringing them at very least into line with the leading Ombudsman services in other sectors.

I would like to thank all of those who help us to meet our objectives, in particular the hardworking and dedicated employees of the service and our tenacious, enquiring and knowledgeable panel of adjudicators.

During Michael Messent’s term of office, £4m was paid to consumers as a result of IBAS intervention.
### Comparative Annual Statistical Reporting

**Reporting Periods:** 1 October 2016 – 30 September 2017 vs. 1 October 2017 – 30 September 2018

#### A. Dispute Volumes

<table>
<thead>
<tr>
<th>Dispute Source</th>
<th>2016-17</th>
<th>2017-18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestic Consumers to Domestic Operators</td>
<td>5,817</td>
<td>5,186</td>
</tr>
<tr>
<td>Domestic Consumers to Overseas Operators</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Overseas Consumers to Domestic Operators: NB – legislation requires that statistical data below relates to domestic disputes only</td>
<td>1,369</td>
<td>7,823</td>
</tr>
</tbody>
</table>

#### B. Types of Complaint

<table>
<thead>
<tr>
<th>Grounds for Refusal</th>
<th>2016-17</th>
<th>2017-18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator’s Complaints Process Not Exhausted</td>
<td>412</td>
<td>172</td>
</tr>
<tr>
<td>Vexatious / Frivolous Dispute</td>
<td>168</td>
<td>144</td>
</tr>
<tr>
<td>Monetary Value Too Low / High</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dispute Outside 12 Month Time Limit</td>
<td>32</td>
<td>10</td>
</tr>
<tr>
<td>Too Complex / Requires Legal / Police Investigation</td>
<td>158</td>
<td>77</td>
</tr>
<tr>
<td>Regulatory Matter (e.g. self-exclusion)</td>
<td>356</td>
<td>431</td>
</tr>
<tr>
<td>Operator Not Registered with IBAS</td>
<td>285</td>
<td>67</td>
</tr>
<tr>
<td>Customer Communication Ceased</td>
<td>625</td>
<td>685</td>
</tr>
<tr>
<td>Operator Licence Revoked / Surrendered</td>
<td>16</td>
<td>5</td>
</tr>
</tbody>
</table>

#### C. Disputes Refused by IBAS

<table>
<thead>
<tr>
<th>Grounds for Discontinuation</th>
<th>2016-17</th>
<th>2017-18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Technical / Procedural Discontinuation</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Customer / Operator Communication Ceased</td>
<td>See Section E</td>
<td>See Section E</td>
</tr>
<tr>
<td>Operator Concession or Compromise Agreed</td>
<td>See Section J</td>
<td>See Section J</td>
</tr>
</tbody>
</table>

#### E. Average Dispute Completion Times

<table>
<thead>
<tr>
<th>Dispute Completion Time (days)*</th>
<th>2016-17</th>
<th>2017-18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestic Disputes</td>
<td>46</td>
<td>54</td>
</tr>
<tr>
<td>Cross-Border Disputes (UK citizen to non-UK operator)</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

* In accordance with ADR legislation, this is recorded as the time taken from the point at which the dispute file was completed to the point of an adjudication being published. It does not include time taken to gather evidence from both disputing parties.

#### F. Rate of Compliance with ADR Decisions

<table>
<thead>
<tr>
<th>Rate of Compliance</th>
<th>2016-17</th>
<th>2017-18</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>100%</td>
<td>&gt;99%</td>
</tr>
</tbody>
</table>

#### G. Cooperation With Other ADR Entities (None at Present)

IBAS has not formed any network of cooperation with any non-UK EU-based ADR entity.

#### H. Dispute Outcome Statistics

<table>
<thead>
<tr>
<th>Dispute Conclusions</th>
<th>2016-17</th>
<th>2017-18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ruling In Operator Favour</td>
<td>1,773</td>
<td>1,923</td>
</tr>
<tr>
<td>Consumer-satisfactory pre-ruling outcome achieved, e.g. by agreed settlement or concession</td>
<td>1,495</td>
<td>1,445</td>
</tr>
<tr>
<td>Ruling In Consumer Favour</td>
<td>499</td>
<td>227</td>
</tr>
</tbody>
</table>

**Notes**

- A new IBAS website was introduced in November 2017. One of its aims was to reduce the number of misdirected requests for adjudication, by providing more tools to assist potential disputants with advice and information about where their complaint should be directed. The site also reminds visitors of the importance of ensuring that a gambling operator’s internal complaints process is exhausted before approaching an Alternative Dispute Resolution service.

- The initial findings of the Competition and Markets Authority (CMA) investigation into unfair terms in the online gambling market were published in February 2018. This resulted in the publication of minimum standards for the advertising and promotion of ‘bonus’ offers. The initiative appears to have been successful, judged on significantly falling dispute numbers in this area. The statistics in the period from 1 March to 30 September suggest that in most cases operators have responded by improving the clarity of the key terms and conditions that govern these offers, rather than maintaining sometimes inadequate or unfair approaches which were the basis of a higher volume of rulings in consumers’ favour in 2016-17.

**Potential Crossover Points**

- Disputes classified as ‘Customer Communication Ceased’ could in many cases also have been classified as ‘Operator Dispute Process Not Yet Exhausted’, because in many of these cases we have not received a response when asking the consumer for the ‘deadlock’ reference code that should have been quoted to them when all reasonable efforts to resolve the matter with the company had failed.

- We consider it likely that many of the disputes where ‘Customer Communication Ceased’ or which were classified as ‘Operator Dispute Process Not Yet Exhausted’ will have resulted in ‘Consumer-satisfactory pre-ruling outcome achieved’. In our experience, consumers referred back to the operator with whom they are in dispute will often return to IBAS at the point that they have exhausted the operator’s internal complaints processes and remain dissatisfied. We would not double count in those circumstances.
Clearer Special Offers
On the whole, one-off special offers have been promoted with much greater clarity by the betting sector in the past twelve months. Even before the CMA’s findings were published a combination of adverse ASA decisions, unfavourable IBAS outcomes and urgings from the Gambling Commission have seen the general standard of promoting the key terms of special offers improve. Where ‘money back’ means a free bet of the equivalent stake value, or where enhanced odds will be paid not in cash but in betting vouchers, the terms have typically improved.

There continue to be disappointing exceptions. Even just around the corner from the IBAS office one betting shop displayed a poster saying without qualification that ‘special’ odds of 50/1 were available for Spain to beat Morocco in a 2018 World Cup match. An electronic screen explaining that the bet was limited to a £1 stake for new online account holders was displayed on rotation elsewhere in the shop, but anyone submitting a photo of the counter-side poster might have made a compelling case for payment without restriction; if, of course, the match had not finished as a 2-2 draw.

Enforcing CMA Standards
In February, the CMA published the first round of findings into its investigation into potential unfair terms in the online gambling industry. Most importantly for IBAS, it produced a helpful guide for gambling operators about what they considered to be necessary in order to give consumers a clear and reasonable understanding of how certain types of special offer worked – particularly in the context of online casino and sportsbook welcome bonuses.

The CMA explained that operators were required to promote any significant terms that were likely to affect a consumer’s decision-making process in the same space that the offer was promoted with any further related terms and conditions being no more than a single click away.

As we discussed with the CMA and Gambling Commission, ‘significance’ is open to some interpretation. Whichever term is the one that has prevented a customer from withdrawing winnings will be the one that they consider most significant, but it was particularly helpful that the CMA drew out some specific examples of the type of terms they would consider significant.

A Year in Adjudication 2017/18

SSBTs – Room for Improvement
One of the sources of frequent confusion and frustration in sports betting is where companies operating under the same brand in the online and retail sectors offer different odds for the same propositions in different channels. In almost all cases, the IBAS Panel has accepted that it is reasonable for companies to apply different prices in different trading mediums, observing that many companies across a range of retail sectors price online differently to their High Street branches.

An arrangement that is harder to accept is the difference between prices available to betting shop customers over the counter and on the increasingly popular self-service betting terminals (SSBTs) that can be found in many outlets.

The SSBTs bring a range of new and otherwise impractical to monitor in-play sports betting markets to retail betting customers, but the price discrepancies and differences in the rules or settlement terms of some markets are understandably confusing. Savvy bettors can use these differences to their advantage, taking the best of the odds available at the counter or on the machine, but we find too many disputes arising from people who have researched odds on the machines and then written them on a betting slip, expecting to receive these prices on a bet that is processed through the till.

In our view, these price discrepancies need to be highlighted more clearly than they have been. It is unreasonable to say that an explanation would have been found by clicking on the ‘rules’ tab of the machine. Warnings that prices and settlement terms may be different need to be prominently displayed on the machine homepages or better still, highlighted on signage adjacent to where the machines are located.

2018 FIFA World Cup
Major summer international football tournaments have surpassed any other sporting events in their short-term impact on levels of betting interest. World Cup betting is popular with regular punters and newcomers alike. We were pleased to see the industry taking steps to prepare for the 2018 World Cup by designing clearer screen layouts and coupons to highlight various rules that might affect, confuse or surprise inexperienced bettors.

That seems to have been largely effective, despite England – whose matches inevitably create more interest here than others – being involved in two games.
which progressed to extra time or penalties. Radio 4 broadcast a You and Yours programme that argued bookmakers were not doing enough to highlight the fundamental rules but based on our experience this perennial problem – though not eradicated – has clearly been tackled.

Dangerously Subjective
The World Cup was the culmination of a football season that saw the emergence of a popular but dangerous trend towards bets which are settled on various statistical records concerning individual players’ performances in each match.

Betting on the number of tackles made, the number of shots (on or off-target), the number of completed passes and the like are all dangerous in their reliance upon the subjective judgement of the person charged with maintaining the appropriate records. Some shots on target are clearly and indisputably that, but different data providers apply conflicting settlement criteria; and if the rules say that a shot blocked outside the 6 yard box does not count as a shot, will IBAS be expected to determine whether the block was on, inside or outside the 6 yard line?

In one respect bookmakers are acting appropriately, putting the determination of market outcomes in the hands of third party data providers who reach – and in most cases publish – their conclusions independently. However, with so many objective, fact-based potential subjects of betting markets, we remain cautious about the wisdom of betting on what might frequently amount to a potential difference of opinion.

Compensation Considered
Before the Gambling Commission’s recently published ‘Standards and Guidance for ADR Providers’ recommended that ADR providers in the gambling sector should consider making compensatory awards to consumers in certain circumstances, we had already developed an internal working document that explored the same subject. We also made a number of compensatory awards during the course of the year 2017-18.

In one case, an online casino removed payments made to a customer who won a slots game jackpot on their website. The casino satisfied the IBAS Panel that the customer had materially breached the terms of their site by opening and controlling more than one account and accepting and using more than one bonus offer specifically targeted at new account holders. However, despite confiscating the customer’s prize and refunding only the cash deposits made from the multiple accounts, the website continued to use the customer’s name and jackpot win as a homepage marketing tool and left it on the site for some six months after payment of her prize was refused.

In that case, the website had advertised that the named customer had won £20,000. IBAS awarded the customer £500 in compensation for having her circumstances unfairly misrepresented as a means to attract new custom. Setting the parameters for a fair approach to compensation in gambling transactions will be difficult and any payments awarded will always be proportionate to the circumstances. Any awards will typically reflect material failings or service shortcomings on the part of the operator.

Clearing Up Cash-Out
We continue to receive a substantial quantity of complaints from individuals who are unhappy that they have been unable to use a betting website’s facility to cash-out a live bet. Cash out is system that sometimes offers bettors a sum of money in exchange for an as-yet undetermined or part determined outcome. Online bookmakers have promoted the tool with only minimal reference to the many limitations that can apply to it. The ASA ruled that one advert promoting the ability to cash out ‘at any time’ should be withdrawn and not broadcast again.

The most common difficulty is where a bet concerns a range of Saturday afternoon or midweek evening football fixtures. Cash out offers are generated automatically based on the current odds on offer for the teams that are involved in the bet. That means that any temporary suspension in match betting concerning any team that is part of a multiple bet will suspend the cash out facility for that particular bet – a fact that is seldom explained to frustrated bettors.

A Year in Adjudication
A Year in Adjudication

This results in numerous misplaced but not illogical allegations that a bookmaker has intentionally removed the cash out facility to deny them the chance to accept a favourable offer, inevitably, moments before a goal is scored that turns the bet from a likely winner to a probable loser.

Cash out is a popular industry invention that suits bookmakers financially. More time and energy should be devoted to helping customers understand the reasons why it may not be available to them to limit the potential damage to trust that is otherwise often done.

Video Evidence
For a number of years, we have been presented with allegations and supporting evidence that some images supplied in response to KYC (know your customer) checks have been digitally altered.

A new phenomenon in 2017/18 has been the use of video editing software to create evidence to support claims that the times certain events occurred in certain sporting events were not as recorded either by the official event website, third party data providers or other trusted sources in the public domain. We have seen apparently persuasive evidence that graphics on footage of cricket matches and clocks on footage of football matches that we have later established have been manipulated to support claims that bookmakers have mis-settled particular markets.

The vast majority of images and video clips submitted to support claims remain reliable, valuable and submitted in good faith, but we are increasing cautious about the value of this type of evidence when seeking to reach informed, accurate decisions.

Misleading Data
As the number of in-play betting markets expands, the small number of disputes which hinge on the accuracy of the data displayed on bookmakers’ websites has begun to grow.

In our opinion, terms and conditions which disclaim any responsibility on the betting operator’s part for betting decisions made by their customers on the strength of this data are far from watertight. Realistically, the presence of the data is clearly designed to encourage in-play bets to be placed. It is counterintuitive to say that customers are unwise to rely on it.

This is particularly relevant when the event in question could be described as relatively obscure. That would lead us to ask where else the customer would be expected to find reliable, alternative information about the current state of play of a junior league, local basketball competition in a foreign country. We believe that operators should either direct their customers to independent sources of data or take a more pragmatic view when customers complain that they placed bets on the basis of unreliable information.

Alleged Suspicious Bets
We hope that during the course of the next 12 months progress can be made with regulators in evaluating the best way for IBAS to deal with disputes that involve delayed payment of winning bets to customers because the subject of their bet is under investigation for potential match-fixing offences.

In many of these cases it is apparent that suspicions about the integrity of the match have emerged over a period of time where a notable range of similar bets might be placed with a range of online and retail bookmakers from accounts located in a relatively small geographical area, say. We accept that these kinds of situations justify investigation and would not have been easily detectable when the first bets began to be struck. However, other cries of foul-play are harder to justify.

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This is particularly relevant when the event in question could be described as relatively obscure. That would lead us to ask where else the customer would be expected to find reliable, alternative information about the current state of play of a junior league, local basketball competition in a foreign country. We believe that operators should either direct their customers to independent sources of data or take a more pragmatic view when customers complain that they placed bets on the basis of unreliable information.

Alleged Suspicious Bets
We hope that during the course of the next 12 months progress can be made with regulators in evaluating the best way for IBAS to deal with disputes that involve delayed payment of winning bets to customers because the subject of their bet is under investigation for potential match-fixing offences.

In many of these cases it is apparent that suspicions about the integrity of the match have emerged over a period of time where a notable range of similar bets might be placed with a range of online and retail bookmakers from accounts located in a relatively small geographical area, say. We accept that these kinds of situations justify investigation and would not have been easily detectable when the first bets began to be struck. However, other cries of foul-play are harder to justify.

For a number of years, we have been presented with allegations and supporting evidence that some images supplied in response to KYC checks have been digitally altered.

A new phenomenon in 2017/18 has been the use of video editing software to create evidence to support claims that the times certain events occurred in certain sporting events were not as recorded either by the official event website, third party data providers or other trusted sources in the public domain. We have seen apparently persuasive evidence that graphics on footage of cricket matches and clocks on footage of football matches that we have later established have been manipulated to support claims that bookmakers have mis-settled particular markets.

The vast majority of images and video clips submitted to support claims remain reliable, valuable and submitted in good faith, but we are increasing cautious about the value of this type of evidence when seeking to reach informed, accurate decisions.

Misleading Data
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IBAS has been providing alternative dispute resolution (ADR) services to the gambling industry and its customers for 20 years and is by far the largest gambling ADR in the UK.

IBAS is empowered by the Gambling Commission to fulfill its role and works closely with the Commission reporting on emerging trends and specific issues which need attention. IBAS liaises with industry operators to adjudicate on disputes brought to its attention by gambling customers. ADR is a low cost and less complex alternative to legal action and most disputes can be resolved by IBAS without customers having to take that costly and stressful next step.

In February 2018 Tim Miller at the GC tweeted that the CEO was calling for “a single independent gambling ombudsman scheme to give consumers assurance that their voices will be heard and their complaints taken seriously”.

IBAS has recently registered with the Ombudsman Association and aims to step up to the role being called for by the Commission.

IBAS exists to champion fair play. We call on gambling operators to ensure that they offer fair terms and that the conditions of play are communicated clearly and without ambiguity. Customers have a right to enjoy their gambling as a pleasurable leisure pursuit and to feel secure in the knowledge that the rules are clear and that they will not be cheated. IBAS will intervene at the customer’s request should any dispute remain unresolved.

A Safety Net for Gamblers on the Edge

In championing fair play and clear communication IBAS is in a unique position to identify the gambling transactions which most frequently cause issues for gambling customers and practices which may create more difficulties for potential problem gamblers. IBAS can offer advice on measures to support Socially Responsible Gambling to protect those individuals who are vulnerable and who might be engaging in risky behaviour or out of control gambling.

Whilst many people enjoy gambling as a fun way to spend leisure time and money there are some for whom it can become a major problem. No-one really knows how many people are addicted or who might benefit from treatment. GambleAware estimates the number of problem gamblers at 430,000 and those getting treatment at only 2%. The full last gambling prevalence survey carried out by the Gambling Commission in 2010 indicated that 0.7% adults (1.3% men and 0.2% of women) were problem gamblers. Combined data in 2015 from the Health Surveys for England and Scotland and a Wales Omnibus indicated prevalence at 0.8% (1.5% men and 0.2% women). Men were more likely than women to be classified as a problem gambler. It is highly likely that these figures are understated.

Problem gambling was more prevalent among people who had participated in a number of gambling activities in the past year (prevalence was 11.9% for those who participated in seven or more activities compared to 0.3% of those who had taken part in just one gambling activity in the last year).

There are many different reasons why some people might develop problems with gambling and anyone is potentially vulnerable given the “right” set of circumstances. Gambling can be a form of escape from life’s difficulties – zoning out, at least for a short while, from emotional and practical problems. Loneliness, bereavement, lack of self-esteem or social isolation can provide the backdrop to developing a gambling problem. Gambling gives people an easy way to spend time in the company of others and maybe win some money. Whether it’s online, in a bingo hall or an arcade, in the bookmakers or at the races people can feel part of a community and it helps to fill a void. Figures suggest that people with a gambling addiction are around twice as likely to suffer from depression. Of course gambling is, for those who enjoy it, exciting and the adrenaline rush can become addictive especially if there are problems in someone’s life that are soothed by gambling. Gambling is the problem gambler’s way of coping and unless the underlying causes are tackled giving up gambling may be replaced by other addictive behaviour such as drugs or alcohol.

Money is only the first of the list of problems faced by a problem gambler:

- Breakdown of relationships with families, children and partners, and friends.
- Loss of employment – whether they are so hooked on gambling that they can’t focus on work or because they steal from their employer to fund their gambling habit.
- Physical and mental health issues – anxiety, depression, poor physical health caused by personal neglect such as not eating properly or not sleeping.
- Criminality – one of the biggest financial costs to society. Is that many problem gamblers end up in the criminal justice system because they steal or commit fraud to fund their habit or they damage property out of rage and frustration.

The Gambling Commission regulates the gambling industry and expects companies to adopt terms and conditions which safeguard the consumer from harmful play. Responsible gambling messages are promoted wherever gambling is made available and gambling operators provide links on their websites to sources of information and treatment. There are leaflets and posters in bookmakers and casinos.

The key agencies which provide support in the UK are:
- BeGambleAware: begambleaware.org
- GamCare: gamcare.org.uk
- Gordon Moody Association: gordonmoody.org.uk
- National Problem Gambling Clinic: cnwl.nhs.uk/cnwl-national-problem-gambling-clinic

The impact of problem gambling is devastating and far reaching. When people reach the stage where they are severely addicted to gambling and need treatment they have lost almost everything. If they don’t seek treatment they can actually lose everything including their lives – suicide, and thoughts of suicide, amongst problem gamblers is very high.

The good news is that a problem gambler can find help to change their behaviour though he or she must first acknowledge that they have a problem and want to overcome it. There are self-help tools available such as self-exclusion, blocking software, getting the support of family and friends and attending GA meetings (gamblersanonymousmous.org.uk).

The Gambling Commission regulates the gambling industry and expects
### Statement of Comprehensive Income

<table>
<thead>
<tr>
<th></th>
<th>2017</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turnover</td>
<td>909,450</td>
<td>711,051</td>
</tr>
<tr>
<td>Gross profit</td>
<td>909,450</td>
<td>711,051</td>
</tr>
<tr>
<td>Administrative expenses</td>
<td>800,241</td>
<td>712,529</td>
</tr>
<tr>
<td>Operating profit/(loss)</td>
<td>109,209</td>
<td>(1,478)</td>
</tr>
<tr>
<td>Profit/(loss) before taxation</td>
<td>109,209</td>
<td>(1,478)</td>
</tr>
<tr>
<td>Tax on profit/(loss)</td>
<td>21,715</td>
<td>(2,364)</td>
</tr>
<tr>
<td>Profit for the financial year and total comprehensive income</td>
<td>87,494</td>
<td>886</td>
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</tbody>
</table>

All the activities of the company are from continuing operations.

### Statement of Financial Position

#### Year ended 31 December

<table>
<thead>
<tr>
<th></th>
<th>2017</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Note</td>
<td>£</td>
<td>£</td>
</tr>
<tr>
<td>Fixed assets</td>
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<td>£</td>
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<tr>
<td>Tangible assets</td>
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<td>213</td>
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<tr>
<td>Total</td>
<td>22,625</td>
<td>22,625</td>
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<tr>
<td>Depreciation</td>
<td>22,332</td>
<td>80</td>
</tr>
<tr>
<td>At 31 December</td>
<td>22,412</td>
<td>22,412</td>
</tr>
<tr>
<td>Carrying amount</td>
<td>22,412</td>
<td></td>
</tr>
<tr>
<td>Trade debtors</td>
<td>274,062</td>
<td>27,896</td>
</tr>
<tr>
<td>Prepayments and accrued income</td>
<td>31,975</td>
<td>18,861</td>
</tr>
<tr>
<td>Corporation tax repayable</td>
<td>47,689</td>
<td>674</td>
</tr>
<tr>
<td>Other creditors</td>
<td>31,975</td>
<td>29,145</td>
</tr>
<tr>
<td>333,933</td>
<td>211,441</td>
<td></td>
</tr>
</tbody>
</table>
| Notes to the Financial Statements

1. Tangible assets

<table>
<thead>
<tr>
<th></th>
<th>Equipment £</th>
<th>Total £</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost At 1 January 2017 and 31 December 2017</td>
<td>22,625</td>
<td>22,625</td>
</tr>
<tr>
<td>Depreciation At 1 January 2017</td>
<td>22,332</td>
<td>22,332</td>
</tr>
<tr>
<td>Change for the year</td>
<td>80</td>
<td>80</td>
</tr>
<tr>
<td>At 31 December 2017</td>
<td>22,412</td>
<td>22,412</td>
</tr>
<tr>
<td>Carrying amount At 31 December</td>
<td>213</td>
<td>213</td>
</tr>
<tr>
<td>At 31 December 2016</td>
<td>203</td>
<td>393</td>
</tr>
<tr>
<td>2. Debtors</td>
<td>£</td>
<td>£</td>
</tr>
<tr>
<td>Trade debtors At 1 January 2017</td>
<td>274,062</td>
<td>152,325</td>
</tr>
<tr>
<td>Prepayments and accrued income</td>
<td>27,896</td>
<td>18,861</td>
</tr>
<tr>
<td>Corporation tax repayable</td>
<td>47,689</td>
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</tr>
<tr>
<td>333,933</td>
<td>211,441</td>
<td></td>
</tr>
</tbody>
</table>

3. Creditors: amounts falling due within one year

<table>
<thead>
<tr>
<th></th>
<th>2017</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Note</td>
<td>£</td>
<td>£</td>
</tr>
<tr>
<td>Trade creditors</td>
<td>43,735</td>
<td>5,755</td>
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<tr>
<td>Amounts owed to related undertakings</td>
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<td>16,282</td>
</tr>
<tr>
<td>Accruals and deferred income</td>
<td>51,009</td>
<td>19,030</td>
</tr>
<tr>
<td>Corporation tax</td>
<td>21,719</td>
<td>21,719</td>
</tr>
<tr>
<td>Social security and other taxes</td>
<td>47,689</td>
<td>29,145</td>
</tr>
<tr>
<td>Other creditors</td>
<td>213</td>
<td>8,677</td>
</tr>
<tr>
<td>164,365</td>
<td>78,867</td>
<td></td>
</tr>
</tbody>
</table>
INDEPENDENT ADJUDICATION:

ATHLETICS
BINGO
BOXING
CASINO GAMES
CRICKET
CYCLING
DARTS
ESPORTS
EXCHANGE BETTING
FOOTBALL
GAMING MACHINES
GOLF
GREYHOUND RACING
HORSE RACING
LOTTERIES
MOTOR RACING
NOVELTY BETTING
NUMBERS BETTING
ON-COURSE BETTING
POOL BETTING
RUGBY
SNOOKER
TENNIS
US SPORTS
VIRTUAL SPORTS