2016 Category Breakdown
Of Retail Bet Settlement Disputes

- Horse Racing: 37.9%
- Football: 31.2%
- Greyhound Racing: 8.7%
- Numbers Betting: 4.3%
- Virtual Sport: 4.1%
- Fixed Odds Betting Terminals: 3.6%
- Other Sports: 13.2%

2016 Category Breakdown
Of Remote Bet Settlement Disputes

- Football: 48.6%
- Horse Racing: 13.8%
- Casino Games: 13.3%
- Tennis: 5.7%
- Cricket: 2.8%
- Boxing: 2.6%
- Other Sports: 13.2%
Chairman’s Statement

Michael Messent

The pace of growth and the changing regulatory climate has meant that it has been another busy and testing year for IBAS. Once again, Richard Hayler our Managing Director, the management team and the adjudication panel are all to be congratulated for coping so well.

The number of adjudication requests exceeded 7,000 for the first time with a big rise in complaints arising from internet gambling. In addition, many of the disputes are raising difficult issues and the law now requires IBAS to have regard to consumer protection legislation and guidelines when dealing with disputes, which adds another layer of complexity to the process.

I also thank my fellow Board members for their contributions during the year, with special thanks to Paul Bellringer, who retired as a Director in May 2016 after many years’ service. His background in the field of helping those with gambling addiction problems and acting as a consultant to the gambling industry on gambling issues made his advice especially valuable.

In order to meet the challenges we face, in 2016 the Company continued to develop its website, database and IT systems and look at all possible ways of improving the service provided to the public and to the operators. We also completed a review of our terms and conditions of business and our legal structure as a Company. Work on these and other matters will continue in 2017, but with our outstanding team I am confident that IBAS will continue to be the pre-eminent gambling dispute resolution service.
The volume of disputes reaching IBAS has grown substantially – up 44% from 2015 to 2016

Monthly Requests
For Adjudication (2014–2016)

Share of Decisions
Retail and Remote
Managing Director’s Report

Richard Hayler

Return of the Annual Report
As some will have noted, this is the first annual report of this nature that IBAS has produced for several years. In 2014, I recommended to the IBAS Board that funds allocated to produce formal reports, which were seldom downloaded from our website, be set aside to help fund the development of a new integrated disputes database and website.

That process is now close to completion and I hope that soon after this report is published the new IBAS website will be live. In time, we plan to use the website to allow consumers and gambling operators to monitor progress on their disputes, to submit evidence and arguments and store records of each dispute’s final outcome.

The new database has been designed to improve the efficiency of handling an ever-growing volume of requests for adjudication. It has also been built to simplify the process of creating statistical reports to cater for the welcome growing interest in our work.

There is good reason for increased public interest; the volume of disputes reaching IBAS has grown substantially. We received 7,189 requests for adjudication in 2016, compared to the 3,087 in my first year with the service in 2011. The scale of growth from 4,998 requests in 2015 (up 44%) was unforeseeable and has resulted in a backlog of cases that has taken some time to catch up, but each dispute merits its due consideration and so we have not rushed dispute handling in to meet our target timescales. We have recruited additional temporary and permanent Case Managers and we are set to return to our previous dispute turnaround times by the end of 2017.

Record Requests for Adjudication
The most frequent question I have been asked in the past twelve months is, “What has caused the increase in dispute volumes?”

A number of factors are involved. The most straightforward would be the volume of new entrants to the British online gambling market and growth in gambling yield in both the remote and non-remote sectors. Gambling adverts are increasingly prevalent on commercial television and radio and I have little doubt that more people are learning about betting and gaming online and by experience than previously when, perhaps, a friend or relative might take you into the bingo club, betting shop, racecourse or casino and show you the ropes.

Positively, information about how to pursue a gambling dispute is more readily available online than it has ever been before and is certainly more accessible than it was when the majority of disputes originated in betting shops. Less positively, not all of the information about gambling disputes that is available online is accurate – hence the need to make our website as open and accessible as possible – but that so many people are talking and sharing information about consumer rights is unquestionably encouraging. The quality of that information will inevitably improve over time.

Information about consumer rights also appears to be more frequently disseminated by the traditional media. We have received more enquiries in the past twelve months than ever before from national newspapers and broadcasters. Sometimes we find ourselves correcting misunderstandings about our work or decisions reached by our adjudication
Rob Mabbett was 2016’s deserving winner. He had joined the betting industry from supermarket management, because his new role combined a love of sport with a natural flair for engaging customer service. The finalists and regional finalists in that competition all exhibit the same, as do many others I have met in bingo clubs, betting shops and other gambling businesses. But not all customer experiences are quite so positive. Anyone who regularly bets in betting shops is unlikely not to have dealt with employees who give you the distinct impression that they would prefer you to leave them in peace.

Customer service has a pivotal role to play in reducing dispute numbers. Some disputes are unavoidable without hindsight but others could have been headed off frustratingly easily at the time.

In many aspects of consumer life, while customer service opening hours have extended, our expectations on the standard of the service we are likely to receive has fallen. The telephone is answered quickly and the greeting uniformly friendly, but when we get down to the technical nitty gritty of the problem, any meaningful progress often grinds to a halt. Popular culture often portrays gambling as ‘red or black’ or ‘a fiver on the favourite’, but the gambling industry is deceptively technical. I recognise that the majority of customer contacts can be dealt with by following scripted approaches; a change of personal details, a requested game or event result, a forgotten password, a lost loyalty or membership card. However, where the query is more technical, we find that consumers of gambling products have relatively little patience; and not unexpectedly so. Betting and gaming is advertised as a dynamic, fast-moving experience and customers have a reasonable expectation that the customer service will match it.

I understand that after sales care, however you describe it, is rarely the top priority for any business and maybe even viewed by some as a necessary evil! But I have
little doubt that overall dispute volumes and numbers of consumer-favouring adjudications in particular would be reduced substantially if, industry-wide, customer service structures were reviewed to bring more people with significant experience as a customer themselves into decision making positions.

**Unfair Terms**

For IBAS, 2016 might be described as ‘the year of unfairness’.

Social media is capable of being all things to all men. During the course of the working day it can be a valuable tool to establish when a particular event actually happened, or when a bookmaker launched an offer or promotion. It can also be something of an irritant. The anonymity and accessibility of Twitter allows the practice of intentional misleading to flourish and I have long lost count of how many times my attention has been drawn to a claim made about an IBAS case that bears no resemblance to anything that ever passed through this office.

One particular myth that has done the rounds several times in 2016 is that IBAS allows bookmakers to enforce unfair terms. Of course, the unfairness or otherwise of a term is almost entirely subjective, even in the eyes of the law. The 2015 Consumer Rights Act and the accompanying advice to businesses on unfair terms published by the Competition and Markets Authority (CMA) runs through a series of subjective tests that might be applied to establish whether a term or rule is unfair. Ask ten different people what it means for a term to be ‘appropriately accessible’ or ‘prominent enough to reflect how surprising it might be to the average consumer’ and you will receive ten different answers. We have lived that precise experience in several, long, full meetings of Panel members.

Throughout my time at IBAS, our policy had been to disallow any term that was considered to be blatantly unfair. Where a term was applied that was potentially unfair, the Panel would typically ask either for the case to be shared with the company’s regulator, which we believed would be interested in the matter from the point of view of protecting fair and open gambling, or we would ask the consumer to do the same.

Towards the end of 2015 and with effect from the start of 2016, the Gambling Commission asked its approved ADR bodies, including IBAS, to make consideration of any potential unfairness of rules or terms part of every adjudication process. I believed and still do that this was a substantial request to make of an organisation of our size and resources. Although we aim to issue rulings that we believe would be upheld if considered by a court, we are not legal experts and have never claimed to be. We were concerned about the implications of informing gambling operators that their rules were unfair, in our opinion, and the likelihood that they would protest that their regulator had never taken exception to them.

In fact, we have found relatively little objection to the rulings we have issued on this basis. The Commission’s move has been a success and although the process of considering the fairness of terms has inevitably lengthened the timescale of the average dispute process, those cases where there was potential unfairness have been closed considerably quicker than they would have been previously and virtually eliminated the possibility that a customer with an entirely valid complaint would never reach a definitive conclusion. The vast majority of operators’ rules have been considered fair by our Panel and that is no great surprise; it is a competitive industry and a betting operator seeking to repetitively enforce unfair terms would be unlikely to last long. The more challenging aspect of considering fairness has come in the context of offers and promotions, determining whether key terms have been made so inaccessible that they cannot

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**The more challenging aspect of considering fairness has come in the context of offers and promotions**
be enforceable. Again though, while some operators have questioned the right of the Panel to make such judgements, there have been no cases where we are aware of refusal to adhere to their adjudication. I have every reason to be grateful for the care taken by our panellists in adapting without fuss or complaint to this significant change in requirements.

**The Future for IBAS**

Gambling seems to be becoming ever more of a fixture of British day-to-day life – who would once have thought that Referendum night BBC television coverage would feature former First Minister Alex Salmond providing presenter David Dimbleby with half-hourly updates on the state of the ‘remain or leave’ betting exchange prices? Contemporaneously, consumer protection issues are also high on the media agenda, possibly because of shifting political trends, possibly because consumer stories generate relatively straightforward column inches for cash-strapped editors and time-pressured journalists.

It seems a recipe for success for IBAS, but we are far from complacent. Elsewhere in this document we include our initial response to the Gambling Commission’s March 2017 review of ADR services in the gambling sector, a document that I felt adopted a disappointing and unfairly critical starting point, but which raised valid shortcomings in the present set up and made a number of positive and workable recommendations to further minimise consumer dissatisfaction. The Gambling Commission, IBAS and others are also waiting at the time of writing to see what observations the CMA has made during its investigation into potentially unfair terms in the online gambling sector.

IBAS has met with CMA officials on several occasions, providing material to inform their investigation and to provide examples of situations that have given cause for concern to members of our adjudication panel. We have found each meeting to be constructive and thought provoking, particularly given the challenge we are facing ourselves adjudicating on matters of alleged unfairness.

We are aware that the CMA may publish observations not just about industry practices but the methods used to consider consumer complaints and disputes, particularly concerning allegations of unfairness. We await their conclusions with interest.

It is not impossible that the combination of the Commission’s concerns on ADR services and the CMA’s on unfair terms will lead some to believe or propose that a different approach should be taken to the consideration of gambling disputes.

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**Gambling seems to be becoming ever more of a fixture of British day-to-day life – who would once have thought that Referendum night BBC television coverage would feature former First Minister Alex Salmond providing presenter David Dimbleby with half-hourly updates on the state of the ‘remain or leave’ betting exchange prices?**

Unsurprisingly, I would take a great deal of persuading that it would be productive to tear up what we already have in place and build again from scratch. IBAS has imperfections, but also a wealth of relevant experience and knowledge (over 57,000 requests for adjudication) that would be difficult to replicate. Most importantly of all, those who meet our employees and adjudicators recognise individuals who are unmistakably driven to seek to protect the fairness of gambling; not to fight for the consumer, not to protect the operator; but to consider the arguments of both parties equally with the aim of a fair outcome.

I would like to extend my grateful thanks to everyone involved with IBAS in 2016. For those with a passion for betting and gaming there are more lucrative but few more rewarding sources of work. I look forward to reporting news of an improved and enhanced service this time next year.
Those who meet our employees and adjudicators recognise individuals who are unmistakably driven to seek to protect the fairness of gambling.
ADR Entity Reporting:
Annual Report to the Gambling Commission

Reporting Period: 1 October 2015 – 30 September 2016

A. Dispute Volumes

<table>
<thead>
<tr>
<th>Dispute Source</th>
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<tbody>
<tr>
<td>Domestic (UK customer &gt; UK operator)</td>
<td>6,486</td>
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<tr>
<td>Cross-Border (Overseas customer &gt; UK operator)</td>
<td>1,124</td>
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<table>
<thead>
<tr>
<th>Dispute Status</th>
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<tbody>
<tr>
<td>Completed</td>
<td>5,828</td>
</tr>
<tr>
<td>Refused / Discontinued</td>
<td>1,782</td>
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B. Types of Complaint

<table>
<thead>
<tr>
<th>Dispute Type</th>
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<tbody>
<tr>
<td>Disputed Settlement Terms or Bet Instructions</td>
<td>1,528</td>
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<tr>
<td>Price Dispute</td>
<td>999</td>
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<tr>
<td>Late Bets</td>
<td>571</td>
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<tr>
<td>Customer Identity</td>
<td>657</td>
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<tr>
<td>Bonus or Promotional Offer Terms</td>
<td>2,014</td>
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<tr>
<td>Cash Out Mechanism</td>
<td>300</td>
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<tr>
<td>Game / Machine Malfunction</td>
<td>357</td>
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<tr>
<td>Alleged Cheating / Match-Fixing / Other Crime</td>
<td>257</td>
</tr>
<tr>
<td>Social Responsibility including Self-Exclusion</td>
<td>228</td>
</tr>
<tr>
<td>Banking / Financial Transactions</td>
<td>214</td>
</tr>
<tr>
<td>Customer Service Complaints</td>
<td>286</td>
</tr>
<tr>
<td>Others</td>
<td>200</td>
</tr>
</tbody>
</table>

C. Frequently Occurring Problems &

D. Recommendations to Competent Authority re: Dispute Avoidance

- We would recommend that disputes regarding remote casino bonuses, in particular, could be significantly reduced by requiring that website software does not permit any bets which breach the terms of the welcome bonus offer. This seems practically reasonable given that software is clearly able to limit bets from a risk-management perspective.
- We believe that disputes regarding bets placed after the start of a race (and after a betting operator’s nominated cut-off time) would be reduced – and a potential imbalance corrected – by requiring retail betting operators to display within the shop the cut-off time for valid bets, so customers could check without asking whether any unsuccessful bets were too late and due a refund.
- We predict that disputes regarding customer identity would be reduced if remote operators displayed clear, relevant, rules and/or policy messages (e.g. in pop up windows) during the account opening and card registration/deposit procedures.
- Many of the disputes regarding rules and promotional terms stem from unclear or confusing advertising. With the CAP/BCAP codes of gambling advertising already built into operators’ licence conditions and codes of practice, a reduction in disputes about unclear or misleading advertisements could be reduced through regulatory action against operators whose adverts breached those codes (e.g. in the opinion of the ASA).
E. Disputes Refused by IBAS

<table>
<thead>
<tr>
<th>Grounds for Refusal</th>
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</thead>
<tbody>
<tr>
<td>Operator Dispute Process not yet Exhausted</td>
<td>190</td>
</tr>
<tr>
<td>Grounds of Dispute Vexatious or Frivolous</td>
<td>207</td>
</tr>
<tr>
<td>Monetary Value too Low / High</td>
<td>0</td>
</tr>
<tr>
<td>Dispute Outside 12 Month Time Limit</td>
<td>19</td>
</tr>
<tr>
<td>Too Complex / Requires Legal / Police Investigation</td>
<td>47</td>
</tr>
<tr>
<td>Regulatory Matter (e.g. self-exclusion)</td>
<td>235</td>
</tr>
<tr>
<td>Operator not Registered with IBAS</td>
<td>388</td>
</tr>
</tbody>
</table>

F. Dispute Process Discontinuation

<table>
<thead>
<tr>
<th>Grounds for Discontinuation</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Dispute Withdrawn or Discontinued by Customer</td>
<td>677</td>
</tr>
<tr>
<td>Operator Closure/Deregistration</td>
<td>19</td>
</tr>
<tr>
<td>Operator Concession or Compromise Agreed</td>
<td></td>
</tr>
<tr>
<td></td>
<td>See Section J</td>
</tr>
</tbody>
</table>

G. Average Dispute Completion Times

<table>
<thead>
<tr>
<th>Dispute Completion Time (days)*</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestic Disputes</td>
<td>31</td>
</tr>
<tr>
<td>Cross-Border Disputes</td>
<td>37</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.

H. Rate of Compliance with ADR Decisions

Above 99.9%. One operator surrendered its operating licence during the reporting window having failed to adhere to two rulings in favour of consumers.

I. Co-operation With Other ADR Entities (None at Present)

J. Dispute Outcome Statistics

<table>
<thead>
<tr>
<th>Dispute Conclusions</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ruling in Operator Favour</td>
<td>2,790</td>
</tr>
<tr>
<td>Dispute Conceded by Operator (either by admission of fault or goodwill gesture) or Compromise Offered and Agreed with Consumer</td>
<td>2,407</td>
</tr>
<tr>
<td>Ruling in Consumer Favour</td>
<td>631</td>
</tr>
</tbody>
</table>
IBAS Response to ‘Complaints Processes in the Gambling Industry’

A Review One Year after the Introduction of the Alternative Dispute Resolution (ADR) Scheme

IBAS Welcomes Publication of ADR Review
We welcome the ongoing interest of the Gambling Commission in consumer issues and in ADR services. Their report published in March 2017 raises a number of interesting questions which we look forward to play a significant role in helping to resolve.

Given the contribution currently made by IBAS to the gambling industry’s complaints and disputes procedures (paragraph 5.30 indicates that 93.6% of consumer disputes are handled by IBAS) we feel that it is important to respond to a number of the review’s observations. In due course we will provide a more detailed response, setting out how we believe ADR bodies, operators and the Gambling Commission can make meaningful improvements to the existing framework for complaints and disputes.

We agree with the report’s primary objectives and see no reason why these would not be shared by consumers and operators. We believe that every reasonable effort should be made to simplify complaints and disputes processes and that the industry, its ADR services and regulators should all strive to play a role in minimising avoidable consumer dissatisfaction.

We are looking forward to more meaningful engagement with GC in the future to improve customer standards in the industry.

Success of IBAS as an ADR Entity
While we recognise that the priority for the Commission was to use the report to highlight areas for potential improvement, we feel that the document published was, in its overall impression, unduly harsh on the services that are already being provided to consumers.

As the report explains that IBAS view the overwhelming majority of consumer disputes with gambling operators, readers would naturally associate some of the concerns or criticisms raised about existing ADR provision with IBAS more than any other approved ADR service.

We are disappointed that the report has focused so tightly on shortcomings in the system and offered little consideration of the positives that have been achieved. By way of balance, we are keen to highlight some of the successes of ADR in the gambling sector, illustrated from IBAS’s perspective.

• By way of background, IBAS was launched by journalists, recognising a need for such a service for consumers and not meeting any regulatory or legislative obligations to provide one.

• Public demand for the service has grown almost every year since our foundation in 1998.

IBAS: Initial Requests for Dispute Adjudication
1998–2016
• During the course of our existence, funds exceeding £4,750,000 (at 1st June 2017) have been paid to consumers as a result of disputes referred to the IBAS Panel. See below:

IBAS: Funds Paid to Consumers as a Result of Dispute
1998–2016

• The adherence rate of gambling operators to adverse adjudications is extremely high. With the exception of two operators that surrendered their licences, we are not aware of any operator licensed by the Commission which has refused to comply with the adjudications of the IBAS Panel in the past five years.

• Although we cannot verify figures because of lack of publication of County Court lists and findings, feedback from operators and consumers suggests that very few disputes considered by IBAS progress to a court hearing, perhaps 15–20 cases in the 2015/16 reporting period.

• IBAS has always offered its service free of charge to the consumer and with minimal overheads at an efficient, low cost per dispute to the industry. Based on information in the public domain, we calculated that in 2015 IBAS had delivered adjudications on disputes at an average cost of less than £200 per adjudication, compared to an average of over £500 on final determinations issued by the likes of Ombudsman Service Ltd and the Financial Ombudsman Service.

• Contrary to one of the review’s observations, we do provide information on dispute trends and have highlighted areas of concern to the Gambling Commission in various meetings and consultation responses. These include concerns relating to the transparency of cut-off times for valid shop bets on horse and greyhound races, the application of the palpable error rule, the transparency of rules relating to maximum payouts, particularly where technology could be used to warn consumers and, more recently, online casino software that could be developed to prevent stakes which contravene the terms of promotional offers and risk consumers finding that at a later stage that they risked their funds without any prospect of being able to withdraw a profit.

• We have also contributed to assist the Competition and Markets Authority (CMA) in its consideration of potentially unfair terms in the sector. As the report does observe, we arrange twice yearly meetings to share these types of concerns with gambling operators, highlighting areas that frequently generate disputes and suggesting steps to avoid them, or alternative terms that might deliver fairer outcomes.

• From the start of 2016, the Gambling Commission asked ADR entities to take responsibility for considering and adjudicating on the fairness of gambling operators’ terms. Previously, if members of our adjudication panel had identified a rule or term that they considered unfair they would typically ask for the dispute or the term to be referred to the operator’s regulatory authority. Taking on responsibility for adjudicating on the fairness of terms – including how those terms were advertised – was a significant and technically challenging task, involving a series of training exercises, presentations from lawyers and requiring legal advice. We felt that this was a significant expansion to our remit and one that we were given limited time and assistance to prepare for. In the circumstances, we felt that IBAS had successfully embraced the challenge and were disappointed that the review made only limited mention of this.

ADR Review – IBAS Concerns
There are a number of helpful and positive observations and recommendations contained in the review and we intend to produce a more detailed response at a later date, setting out how we believe these can be best progressed, but we also have a number of immediate concerns about how the review represented the first year of Commission-approved alternative dispute resolution in the sector:

• We were disappointed that IBAS was not visited or asked for observations on any specific aspect of the wider disputes and complaints picture as part of the review. We were also disappointed that despite frequent meetings between IBAS and Gambling Commission officials ever since the Commission was established, a number of the concerns of the
Commission about ADR and dispute handling were raised for the first time in this review.

- The report featured a concerning statistic about falling levels of public trust in the licensed gambling industry. We felt that it was unfairly implied that the complaints and disputes procedures in the industry were a contributing factor, when there was no apparent evidence to identify how many of the respondents had ever used a complaints or disputes process. In other words, the possibility that ADR was, in fact, helping to reduce or limit any public loss of trust in the industry was seemingly not considered.

- We agree that the Commission is right to put consumer interests at the heart of its work. While the desire to protect fairness for consumers was the very reason for the foundation of IBAS, we also recognise that there are two sides to every story. In reflecting on ever-growing volumes of complaints and disputes, we feel that the report missed an important opportunity to explore the role of general consumer complaining trends and other aspects of consumers behaviour in the growth of dispute numbers.

- We felt that the review failed to set this growth in dispute and complaints volumes in context with the general growth in complaints in other sectors, such as energy, finance, transport and telecommunications.

- The review reflects on the Commission’s role in improving the clarity and transparency of the disputes and complaints processes, but perhaps should extend to examining the importance of providing clear further regulatory direction to operators – which is equally visible to consumers – on various specific aspects of the way that licensed operators conduct their business.

- We agree that ADR has an important role to play in improving standards of fairness and customer service, but we are concerned that too great an emphasis is placed on ADR bodies ‘driving’ those improvements; there is a vital role too for the Gambling Commission, both in using its regulatory powers to enforce improvements and in issuing clear, prescriptive regulatory advice to consumers and operators, wherever possible, to highlight practices that it considers unfair or unreasonable.

- We believe that some disputes and complaints could be avoided if it was clearly set out that a particular aspect of the conduct of a gambling business (e.g. with respect to self-exclusion schemes or staking restrictions) was in accordance with defined acceptable practice standards set out by the Gambling Commission. This way ADR services and the Gambling Commission can be seen to be driving change together rather than the burden being placed more heavily on ADR.

- We believe that licensed gambling operators provide a service which in some respects is hard to compare to other retail or leisure activities. Betting, in particular, has a uniquely adversarial element. We recognise that many people gamble for purely recreational reasons but for other participants, the returns from betting or systematic gambling account for a significant proportion of their regular income. There are few other commercial contractual arrangements entered into where both parties’ ultimate objective is to enrich themselves at the other’s expense. That alone means maintaining satisfaction from both parties, including in any dispute process, is quite a challenge. ADR bodies should not be deterred from striving to make the process as effective and transparent as it can be but, to some extent at least, we believe there is a limit to how successful both the industry and ADR bodies providing services to the industry can be at achieving widespread consumer satisfaction.
Interview with Bingo Association Chairman

Miles Baron

In late 2015, the Bingo Association applied and was accepted to be registered with IBAS. We now provide an approved ADR service to all of the Association’s member clubs.

Q: What was your job prior to joining the Bingo Association?
Sales and Marketing Director, Mecca Bingo.

Q: How long have you been with the Bingo Association?
3 years 6 months.

Q: How many members does the Bingo Association have and how many ‘bricks and mortar’ sites do your members have between them?
Last year we had 501 premises in membership from over 59 operating companies. In 2016 we expect that to grow to nearly 600 premises from 65 operating companies. There are approximately 745 licensed bingo premises in GB.

Q: Do you believe that the Bingo Association will involve itself with on-line gambling?
The Bingo Association is retail only, split between Licensed Bingo Clubs, Holiday Parks, Bingo Extra high street venues (Arcades) and even snooker clubs! We don’t anticipate getting involved in remote gambling at this time.

Q: What issues do you have to deal with on a day to day basis?
Not as many as you might expect, we have a broad strategy and related objectives so most day to day activity is following and executing those plans however there is always the occasional ‘curve ball’ usually around regulation that requires us to react quickly.

Q: What is the most common dispute that the bingo sites have to deal with?
Without doubt the biggest area of dispute within Bingo Clubs is a missed claim. It is the responsibility of the customer to stop the game, and on the odd occasions where they don’t, customers are still convinced that they have. Fortunately these days with CCTV and audio recordings of most sessions these are easier to arbitrate.

Q: Why did you consider changing your dispute process?
The decision of the Bingo Association to partner with IBAS is as a direct result of the introduction of changes to the LCCP following the implementation of the Alternative Dispute Resolution (ADR) Directive and the BA feels from a point of consistency that the bingo industry should sit with one ADR provider.

Q: How did you hear of IBAS?
IBAS was known to us previously as providing independent adjudication to the betting sector. Following the changes that came into force last year, we were pleased to see that IBAS had extended their remit to cover bingo disputes.
Financial Statements

2016

As at 31 December 2016

Directors’ Responsibilities Statement
The directors are responsible for preparing the directors’ report and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the company and the profit or loss of the company for that period.

In preparing these financial statements, the directors are required to:

• select suitable accounting policies and then apply them consistently;
• make judgments and accounting estimates that are reasonable and prudent;
• prepare the financial statements on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the company’s transactions and disclose with reasonable accuracy at any time the financial position of the company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

Statement of Financial Position

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<thead>
<tr>
<th>Note</th>
<th>£</th>
<th>£</th>
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<td>£293</td>
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<tr>
<td>Tangible assets</td>
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<td>Current assets</td>
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<td>211,441</td>
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<td>Debtors</td>
<td></td>
<td>8,762</td>
<td></td>
</tr>
<tr>
<td>Cash at bank and in hand</td>
<td></td>
<td>220,203</td>
<td>268,516</td>
</tr>
<tr>
<td>Creditors: amounts falling due within one year</td>
<td>9</td>
<td>78,887</td>
<td>127,793</td>
</tr>
<tr>
<td>Net current assets</td>
<td></td>
<td>141,316</td>
<td>140,723</td>
</tr>
<tr>
<td>Total assets less current liabilities</td>
<td></td>
<td>141,609</td>
<td>140,723</td>
</tr>
<tr>
<td>Net assets</td>
<td></td>
<td>141,609</td>
<td>140,723</td>
</tr>
<tr>
<td>Capital and reserves</td>
<td></td>
<td>141,609</td>
<td>140,723</td>
</tr>
<tr>
<td>Profit and loss account</td>
<td></td>
<td>141,609</td>
<td>140,723</td>
</tr>
<tr>
<td>Members funds</td>
<td></td>
<td>141,609</td>
<td>140,723</td>
</tr>
</tbody>
</table>
Notes to the Financial Statement

7. Tangible assets

<table>
<thead>
<tr>
<th></th>
<th>Plant and machinery</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>£</td>
<td>£</td>
</tr>
<tr>
<td>Cost</td>
<td></td>
<td></td>
</tr>
<tr>
<td>At 1 January 2016</td>
<td>22,305</td>
<td>22,305</td>
</tr>
<tr>
<td>Additions</td>
<td>320</td>
<td>320</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>At 31 December 2016</td>
<td>22,625</td>
<td>22,625</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Depreciation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>At 1 January 2016</td>
<td>22,305</td>
<td>22,305</td>
</tr>
<tr>
<td>Charge for the year</td>
<td>27</td>
<td>27</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>At 31 December 2016</td>
<td>22,332</td>
<td>22,332</td>
</tr>
<tr>
<td>CARRYING AMOUNT</td>
<td></td>
<td></td>
</tr>
<tr>
<td>At 31 December 2016</td>
<td>293</td>
<td>293</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>At 31 December 2016</td>
<td>–</td>
<td>–</td>
</tr>
</tbody>
</table>

8. Debtors

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2015</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>£</td>
<td>£</td>
</tr>
<tr>
<td>Trade debtors</td>
<td>152,325</td>
<td>108,253</td>
</tr>
<tr>
<td>Prepayments and accrued income</td>
<td>18,861</td>
<td>–</td>
</tr>
<tr>
<td>Corporation tax repayable</td>
<td>674</td>
<td>–</td>
</tr>
<tr>
<td>Other debtors</td>
<td>39,581</td>
<td>43,087</td>
</tr>
<tr>
<td></td>
<td>211,441</td>
<td>151,340</td>
</tr>
</tbody>
</table>

9. Creditors: amounts falling due within one year

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2015</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>£</td>
<td>£</td>
</tr>
<tr>
<td>Trade creditors</td>
<td>5,755</td>
<td>37,452</td>
</tr>
<tr>
<td>Amounts owed to related undertakings</td>
<td>16,280</td>
<td>6,904</td>
</tr>
<tr>
<td>Accruals and deferred income</td>
<td>19,030</td>
<td>39,663</td>
</tr>
<tr>
<td>Corporation tax</td>
<td>–</td>
<td>6,923</td>
</tr>
<tr>
<td>Social security and other taxes</td>
<td>29,145</td>
<td>36,851</td>
</tr>
<tr>
<td>Other creditors</td>
<td>8,677</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>78,887</td>
<td>127,793</td>
</tr>
</tbody>
</table>

10. Operating leases

The total future minimum lease payments under non-cancellable operating leases are as follows:

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2015</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>£</td>
<td>£</td>
</tr>
<tr>
<td>Not later than 1 year</td>
<td>111,107</td>
<td>118,973</td>
</tr>
</tbody>
</table>
The IBAS Process

How we manage a dispute

- Telephone call to IBAS office
  - Manual Dispute Manager input
  - Target: 10-12 weeks
  - Email sent to IBAS Admin and customer
- Website form submission
  - Auto Dispute Manager input

Case received. Unique case number created
- Case Manager assigned
- Initial assessment: is case valid?
  - Yes: Evidence requested from customer
    - Target: 10-12 weeks
  - No: More information required
    - Target: 4-6 weeks

Case assigned to Adjudication Panel
- Customer advised case is outside of IBAS remit
  - CASE CLOSED
- Target: 6-8 weeks

Further details requested from customer
- Target: 10-12 weeks
- Evidence requested from Operator
- Evidence requested from Operator
- Loop process until Panel satisfied

Panel final deliberations
- Target: 2-3 weeks
- Panel ruling awaited
- Target: 1-2 weeks
- Customer notified
- CASE COMPLETED
The IBAS Team

IBAS Limited
(Independent Betting Adjudication Service)
PO Box 62639, London, EC3P 3AS
Telephone: 020 7347 5883
Fax: 020 7347 5882
Email: ibasteam@ibas-uk.co.uk

IBAS Board of Directors
Chairman
Michael Messent

Directors
Paul Bellinger OBE (Retired 30 April 2016)
David Bradshaw
Andrew Chevis
Andrew Fraser
Richard Hayler

Company Secretary
London Registrars Limited

Adjudication Panel
Sean Boyce
John Cobb
Robert Fenton
Keith Harris
Adrian Hunt
Tim Moore
Kevin Pullein
Mike Roberts
George White
Sam Willock

IBAS Staff
John Barton (Administrator)
Danny Cracknell (Adjudication Manager)
Richard Hayler (Managing Director)
Sharon Powell (Administration & Projects Manager)
Paul Roffe (Case Manager)
John Samuels (Reviews Manager)
James Taylor (Case Manager)

Auditors
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146 New London Road
Chelmsford
Essex
CM2 0AW

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Botleigh Grange Business Park
Hedge End
Southampton
SO30 2AF
INDEPENDENT
ADJUDICATION:
ATHLETICS
BINGO
BOXING
CASINO GAMES
CRICKET
CYCLING
DARTS
FIXED ODDS FOOTBALL
FOOTBALL POOLS
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