

The British Racecourse Bookmakers' Association

President

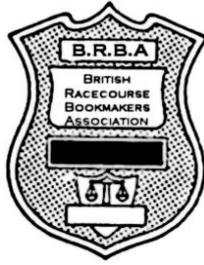
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7th August 2020

Dear Sir,

I am contacting you in my capacity as the President of the British Racecourse Bookmakers Association (BRBA). The BRBA is by far the largest of the trade associations representing on-course bookmakers in the UK.

I have been requested by a growing number of the Association's members to bring to your attention the problems they have experienced over several years at the hands of UK banks in opening a bank account, or maintaining an existing account with a bank. As legitimate business people many BRBA members believe they are being unfairly treated by the banking industry and that this treatment is affecting their ability to operate effectively, efficiently, securely and professionally.

The gambling industry is highly regulated, the Gambling Commission (an executive non-departmental public body of the Government of the UK) is responsible for regulating gambling and supervising gaming law in Great Britain. To operate as on-course bookmakers individuals must hold a licence issued by the Gambling Commission and the conditions of obtaining a licence are the same for all operators, large or small. Having obtained a licence on-course bookmakers are then subject to ongoing scrutiny by the Gambling Commission and are required to demonstrate that they have a range of policies in place to ensure that they are operating within the requirements of the Gambling Act. These policies include social responsibility and anti-money laundering policies.

In addition to the scrutiny of the Gambling Commission the activities of on-course bookmakers are subject to further regulation as they are also issued with a licence by each of the racecourses at which they operate. These licences set out the terms and conditions under which a bookmaker must conduct business whilst at a racecourse. Furthermore, the activities of on-course bookmakers, on a day-to-day basis, are then overseen by an organisation currently operating in the name of Administration of Gambling on Tracks Ltd (AGT). On-course bookmakers are subject to an authorisation process each year by the AGT and are required

to demonstrate that they satisfy the licencing conditions laid down by racecourses. Whilst at racecourses the activities of all bookmakers in attendance are monitored by the AGT and bookmakers work closely with all the organisations who regulate on-course betting in an effort to promote standards aimed at ensuring betting is open, fair and free from criminal activity.

Gambling within the UK is legal and our members operate within the law within an industry which, as outlined above, is highly regulated, employs over 46,000 people and contributes over £15 billion annually to the UK economy. However, on-course bookmakers are continually finding that they are being refused bank accounts or that accounts are being closed for no other reason than they are associated with the gambling industry. This approach is indicative of double standards as banks seem only too willing to accommodate the banking needs of the large retail and online bookmaking firms who obviously operate within the very same industry.

There is no evidence to suggest that on-course bookmakers pose a threat to the standards required by a bank of its business customers. However, the treatment of the on-course bookmaker sector by banks is impacting on their ability to conduct business and amounts to nothing other than unsubstantiated discrimination.

I now respectfully ask that you investigate the matter of the treatment of on-course bookmakers by the banking industry in the hope that we can establish a working relationship with the banks that will afford the opportunity for on-course bookmakers to conduct their businesses on an equal footing with other businesses. I look forward in due course to receiving a response regarding the points I have raised on behalf of members of the BRBA.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Chris Hudson".

Christopher Hudson

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