

## **Consultation on the use of a Legislative Reform Order to reform the administration of the Horserace Betting Levy**

### **Response from the Horse Trust, Princes Risborough HP27 0PP. Registered Charity 231748**

The Horse Trust is the second largest funder of equine veterinary science and education in the UK and has a wish to ensure efficiency, cooperation, collaboration and coherence in the administration of funding mechanisms, such that all funds are used to best possible effect and that those effects are considered in an open and transparent way allowing for the greatest impact in outcomes between the funding bodies.

At present, there is evidence of duplication which is not to best advantage of the equine industry.

#### **Do you agree that the proposals will remove or reduce burdens?**

The proposal to assign revenue collection to the Gambling Committee and administration of funds to a Racing Authority will reduce administrative burdens on stakeholders and financial outlay as compared to the previous process.

The composition and governance of the Racing Authority will be crucial in order to be able to improve accountability and transparency and introduce the capacity for public scrutiny. This governance of the Racing Authority should allow for open consultation with the veterinary profession and other equine research funding bodies to share information, minimise duplication and make best use of available funds for equine veterinary science and education on issues which are of concern to racing and the wider equine population as set out in the 1963 Act:

- the improvement of breeds of horses;
- the advancement or encouragement of veterinary science or veterinary education; and
- the improvement of horse racing.

#### **Do you have views regarding the expected benefits of the proposals as identified in Chapter 3 and 4 of this consultation document and addressed in the de minimis assessment?**

We accept the administrative and financial benefits as set out and that they will generate efficiency savings and reduce financial and administrative burdens on businesses affected by the Levy.

We appreciate that there will be transition costs both in the setting up of the Gambling Commission and the Racing Authority to perform these functions, as well as the winding up of HBLB and associated costs. However the long term financial benefit is demonstrated.

#### **Are there any non-legislative means that would satisfactorily remedy the issues which the proposals intend to address?**

We do not believe that there is a non-legislative solution to this matter.

### Are the proposals proportionate to the policy objectives?

Yes

**Do the proposals taken as a whole strike a fair balance between the public interest and any person adversely affected by it?**

There are significant overall operational efficiencies at a business level and therefore in the public interest The proposals represent a fair balance between this and those affected, in particular staff at the HBLB.

### Do the proposals remove any necessary protection?

The closure of HBLB will potentially remove corporate knowledge from the transfer of these undertakings. Otherwise, the Gambling Commission is also a NDPB and subject to the same regulatory oversight as HBLB was.

The Racing Authority will need to be operated according to an open process and we would wish to be assured that appropriate submission and assessment protocols for funding applications are in place. These should utilise the correct expertise and be focused on outputs, value and the ability of the applicant to deliver. Funding should be accessible and transparent and include cooperation with the wider equine industry to ensure efficiencies.

**Do the proposals prevent any person from continuing to exercise any right or freedom which he/she might reasonably expect to continue to exercise? If so, please provide details.**

We do not believe this to be the case.

Submitted by:

Age Group	Male (%)	Female (%)
18-24	~15	~15
25-34	~75	~75
35-44	~45	~45
45-54	~70	~70
55-64	~15	~15
65-74	~45	~45
75+	~15	~15
All	~45	~45