THE STARTING PRICE REGULATORY COMMISSION

ANNUAL REPORT 2025

APRIL 2025

CHAIRMAN'S STATEMENT

Welcome to the Starting Price Regulatory Commission's Annual Report for 2025

The landscape for the overall betting market on British horseracing continued to evolve during the year, because of changes in the nature of market competition and consumer preferences, and the impact of new technology and revised gambling regulation. These factors were likely reflected in Starting Price (SP) average overrounds per runner (OPR). In 2025, OPRs continued the increases seen at the end of 2024, and the averages were slightly higher than the pre-pandemic year of 2019, which was the previous high in recent times.

As in previous years, the Commission has directed significant attention to monitoring the Starting Price system, which last saw changes implemented in July 2024. The Commission is not responsible for setting prices, nor for regulating market prices (this is a matter for the state's competition authorities), but is responsible for ensuring the SP system remains robust and achieves its aim of accurately representing the prices generally available at the "off" of horse races in Great Britain. We currently use a selection of price feeds from nine available brands, though the Betfred feed had some technical issues from late summer through to the year end and was not available for selection.

Given changing conditions and the fact that the last major review of the SP methodology took place in late 2021, the Board embarked on gathering views and evidence from stakeholder groups across the racing and betting industries and other interested parties in late 2025. We have so far held sessions with representatives of betting operators and the British Horseracing Authority's Horserace Bettors Forum (HBF). The review process will continue in 2026 with any revisions to the methodology or operation being implemented later in that year.

In last year's report, we marked the retirement of Lord David Lipsey, who made an invaluable contribution to the SPRC over the years. The Commission Board was very sad to hear of his untimely passing this year. Our condolences go to his wife Margaret and the rest of his family.

Once again, I would like to close by expressing my thanks to the Commission members, Board attendees, our Technical Sub-Committee, and the entire operational team led by Nigel Burns for their work this year in ensuring the SP remains a robust and accurate reflection of market prices at the off of horse races in Great Britain.

Nick Rust
Chair, Starting Price
Regulatory Commission

1 Monitoring the Starting Price System

Monitoring and Auditing Arrangements

Throughout the year, the Commission monitored the SP operation to ensure the current operator, Podium Sport, implemented the SP system according to the rules set by the Commission Board, which are set out in Appendix C. The Board's monitoring and auditing aims to ensure the accuracy and reliability of returned SPs.

The main operational issues faced by the Podium Sports team during the year involved feed availability. Nine off-course bookmaker brand feeds are usually received live into the operational SP system, but there were occasional issues with Unibet sending price data which was a direct feed of the industry betting shows, rather than their own independent pricing (and therefore could not be included in the sample for those races) and a persistent issue with Betfred's feed from late summer linked to some major re-engineering of their sportsbook which had not been resolved by the end of the year.

Contingency Planning for Price Source Availability

The Commission Board and its operator, Podium Sports, work to ensure sufficient price source feeds are available at all times to provide a selection sample for each race which features prices from betting operators that together hold a substantial share of the market for UK customers betting on British horseracing. Intermittent issues such as those described in the previous paragraph are immediately picked up with the providers of price feeds to ensure problems are resolved and feeds maintained.

The Commission continues to look at ways to mitigate technical or other issues with price provider feeds, and has examined the potential for accessing prices through public sources if necessary, but the Board feels that this could only be used in emergency as direct feeds provide more robust and reliable information as to the prices being offered at the time of the off of races.

The Commission also continues to assess the market share for betting on British racing constituted by its price providers, and encourages other price source providers who meet our minimum criterion of 1.5% market share to provide feeds for inclusion in the SP system.

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2 Current Market Issues

SP Overround Trends and Market Dynamics

Average SP overrounds per runner (OPR) for the year (see Appendix B) continued the upward trend from the latter part of 2024. OPRs had been steadily reverting towards historical averages in the years since an abnormal low in 2020 which was likely created by an extremely competitive off-course market in the months after British racing recommenced behind closed doors following a suspension due to the covid-19 pandemic, and the elevated field sizes which arose from a glut of runners that had been denied a run for several months. However, the average for 2025 was actually slightly higher than the pre-pandemic year of 2019 which had been the previous high in recent years.

The Commission board is satisfied from its monitoring and auditing that the increasing SP OPRs in 2025 are a reflection of the reality of the market for betting on British racing rather than as a result of any policy or operational impacts of the SP system. There is plenty of public commentary as to why bookmaker theoretical margins on horseracing may have been increasing over late 2024 and throughout 2025, but the Commission's role is not to regulate the market but rather to produce SPs which are an accurate reflection of the market for betting on British horseracing at the time of the off of each race.

As part of its considerations for the future of the SP, the Commission board is keen to develop the system so that more information can be published in real time as to which individual price sources are selected in the SP for each race, and what prices were offered at the off for each source. Whilst our policy is clear, and all that information is recorded and retained and can be reviewed by the Commission board, the Board believes it would be helpful to publish the data in real time in the same way final SPs are published via media channels immediately after the off of a race. Feasibility, including cost implications, will be considered as part of the Board's thinking on the future of the SP in 2026.

3 Operational Matters

Engagement with Stakeholders

The Commission continued efforts to strengthen engagement with both consumers and industry stakeholders. In late 2025, the board embarked on discussions with various representatives of stakeholder groups to help inform its thinking on the future of the SP system. The board maintains links with DCMS and the Gambling Commission.

APPENDIX

A The Starting Price Regulatory Commission An Outline

1 Purpose

The Starting Price Regulatory Commission (SPRC) is an independent body responsible for the integrity and accuracy of the starting price (SP). The SP is used in the settlement of a significant proportion of bets on British horse racing struck with licensed bookmakers in betting shops or through their websites. The role of the Commission is to ensure that the returned price accurately reflects the price available to bettors at the 'off' of each race.

The SPRC does not set individual prices, overrounds or margins, nor does it set targets for what they should meet. Indeed, its members would not wish to do so and substitute their judgement for that of the marketplace. The SPRC's responsibility is simply and straightforwardly to set the parameters by which the SP is calculated and to ensure, so far as within its power, that bookmakers and the SP validators – and the technology that they use to monitor market movements – are operating within the framework it has specified.

2 Background

Starting Prices have been returned using the on-course market since the 18th century. With the growth of markets for betting off-course, it became essential that the SPs accurately reflected the on-course market and that they were seen to be independent of the bookmakers who accepted off-course bets. Governance therefore is of the greatest importance. The Starting Price Liaison Committee of 1994 was turned into the SP Executive in 1999, before the creation of the current body, the SPRC, in 2004.

The SPRC was created as a result of a study commissioned by the SP Executive, a group of representatives from the Mirror Group (then the owners of the Racing Post), SIS and the Press Association. The aim was to provide an opportunity for independent scrutiny of the processes used to return the SP, particularly to deal with questions about the accuracy and integrity of individual starting prices from off-course bookmakers, bettors and other interested parties, a role that the SPRC has fulfilled ever since.

The first set of operating rules for the SP was issued in 1998, and then updated in the following year. Following a review of the SP by Arthur Andersen, an accountancy firm, in 2000, further revisions were made. There were additional revisions in 2006. Prior to the emergency arrangements adopted as a result of the pandemic in June 2020, the most recent set of Operating Rules and Procedures was issued following a review by the Commission in 2011. The current revision -approved by the Commission and applied from 1st May 2022 - was revised further in July 2024

3 Composition

The Commission currently consists of four independent Non-Executive Directors. From 6th April 2021 the SPRC has been chaired by Nick Rust, former Chief Executive at the British Horseracing Authority. His fellow directors are Richard Hayler, Managing Director of the Independent Betting Adjudication Service (IBAS), Mike O'Kane, a former Horserace Betting Levy Board member, and Bruce Millington, former editor of the Racing Post.

The SPRC's work is funded by contributions from the bodies which control racecourse data rights. The SPRC's directors are all independent of bookmakers and would be obliged to declare if any conflict of interest arose.

The Commission meets at regular intervals throughout the year with executives of the racecourse data controllers in attendance. Ad hoc meetings are called as required to consider specific issues arising of interest to the SPRC.

The Commission's legal advisers are currently CMS.

4 Company Status

The Commission is a non-profit organisation operating on a cost recovery basis. The fees for its operations are funded by British racing's media rights shareholders: Racecourse Media Group (RMG), The Racing Partnership (TRP) and Satellite Information Services (SIS).

B Starting Price Overrounds per Runner January 2014–December 2025

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
January	1.80	1.67	1.73	1.73	1.73	1.80	1.82	1.68	1.71	1.79	1.85	**1.86**
February	1.77	1.70	1.74	1.78	1.78	1.82	1.69	1.69	1.75	1.77	1.77	**1.83**
March	1.74	1.71	1.70	1.68	1.76	1.89	1.75^	1.67	1.75	1.81	1.74	**1.83**
April	1.67	1.65	1.68	1.70	1.72	1.86	**	1.65	1.72	1.79	1.67	**1.81**
May	1.68	1.66	1.68	1.71	1.75	1.86	**	1.66	1.74	1.83	1.67	**1.9**
June	1.77	1.75	1.70	1.76	1.82	1.99	1.47*	1.66	1.76	1.84	1.62	**1.9**
July	1.74	1.80	1.72	1.77	1.89	1.94	1.62*	1.68	1.81	1.85	1.65	**1.86**
August	1.78	1.81	1.76	1.75	1.89	1.99	1.63*	1.68	1.78	1.81	1.67	**1.92**
September	1.63	1.69	1.73	1.68	1.85	1.88	1.64*	1.70	1.75	1.80	1.68	**1.94**
October	1.59	1.66	1.67	1.64	1.76	1.68	1.67*	1.68	1.73	1.81	1.72	**2.00**
November	1.72	1.69	1.77	1.72	1.74	1.73	1.67*	1.71	1.76	1.84	1.78	**1.99**
December	1.72	1.73	1.69	1.75	1.80	1.88	1.66*	1.71	1.78	1.84	1.81	**2.05**
Average	1.72	1.71	1.71	1.72	1.79	1.86	1.66	1.68	1.75	1.82	1.72	**1.91**

Annual average for 2025 is 1.91

2020: ^Partial Month. *Behind Closed Doors – Racing took place with no public attendance and therefore no on-course bookmakers. **No Racing - Source: Racing Post

C Rules for Determining the Starting Price (SP)

Reflecting changes approved in July 2024

Since 1 May 2022, the SP has been based on the betting shows of a sample of betting operators operating in Great Britain who constitute a significant share of the overall market and meet the SPRC's qualifying criteria as a price source.

The SPRC will monitor the effectiveness of this process on an ongoing basis. Regular meetings of the SPRC's Technical Sub-Committee will review whether the process can be refined or improved to better reflect the off-course betting market and return the fairest possible SP.

Price Source Provider Qualifying Criteria

Bookmakers considered for inclusion in the SP sample must fulfil the following criteria:

- Prices must be available to customers in Great Britain.
- Prices must be offered with each-way terms.
- Any participating bookmaker must undertake to provide a robust connection to Podium Sport's API to facilitate data delivery.
- Each bookmaker must provide an independently priced feed and not recycle Podium's live show price.
- Where more than one participating bookmaker is in the same ownership group a maximum of one feed per group will be considered, unless there is compelling evidence prices are independently controlled and competing.
- Any price source provider must reasonably be expected to constitute a minimum of 1.5% of the total betting market for British horse racing. The SPRC will assess whether any new price source meets the minimum criterion using publicly available data.

Principles of the Starting Price (SP) Procedure

The starting price for each horse is the market price at the off, offered by selected bookmakers in a sample whose each-way terms for a given race most closely reflect the each-way terms offered to customers in the betting rules of a majority of off-course bookmakers. These rules are referred to below as "customary terms".

For each horse in a race the prices on offer by all bookmakers in the sample are ordered into a list from longest to shortest. The list is then divided into two equal halves and the SP is the shortest odds available in the half containing the longest odds. The SP or a longer price will have been offered by at least half the bookmakers in the sample.

Selecting a Sample

There is no maximum sample size. The sample will be as large as possible in accordance with the procedure below. The sample will be an even number wherever practically possible in accordance with established procedures.

a) Where all suitable bookmakers are betting to customary each-way terms

The SP validator will have discretion to include as many bookmakers in the sample as possible, in accordance with the procedure detailed above.

b) Where a majority of suitable bookmakers are betting either to customary each way terms, an enhanced fraction, one additional place or offering a concession (such as cash-back)

Where some bookmakers are betting to non-customary each way terms, the sample will prioritise those betting to customary terms. The sample can then be topped up as far as possible with any bookmakers offering an enhanced fraction, a single additional place, or a concession, at the SP Validator's discretion.

c) Where a majority of suitable bookmakers are offering more than one additional place, or a concession such as cash-back

In instances where the majority of suitable bookmakers are offering each-way terms which are enhanced by more than one place, or are offering a concession (cash-back), the sample will be determined by calculating the median number of places being offered by those selected bookmakers, eligible to be sampled, and sampling the prices of every bookmaker offering that same number of places as the median, or fewer. The inclusion of any bookmaker offering an alternative concession will be at the discretion of the SP Validator.

For example, if 10 bookmakers are eligible for inclusion in the sample and their each way terms for a 40 runner handicap were:

1/4 – four places *	1/5 – six places *
1/5 – five places *	1/5 – six places *
1/5 – five places *	1/5 – six places *
1/4 – five places *	1/5 – seven places
1/5 – six places *	1/5 – eight places

*Sampled Selection

The median offering would be 1/5 odds, 6 places. Any bookmaker betting to those terms would be included in the sample, as would those offering 1/5 five places, 1/4 five place and 1/4 four places.

If in an even numbered sample of bookmakers, there is a discrepancy at the median point between the terms offered by the two bookmakers either side of the median point, the sample should include both of those bookmakers and every other sampled bookmaker betting to these or less generous each way terms, for example:

1/4 – four places *	1/5 – six places *
1/5 – five places *	1/5 – six places *
1/5 – five places *	1/5 – seven places
1/4 – five places *	1/5 – seven places
1/4 – five places *	1/5 – eight places

*Sampled Selection

The median offering would be 1/5 odds, six places. Any bookmaker betting to those terms would be included in the sample, as would those offering 1/4 five places, 1/5 five places and1/4 four places.

It is not envisaged that any bookmaker can or will offer each way terms less favourable than those detailed in their betting rules. The SPRC is not aware of any bookmaker which offers horse race betting and applies each way terms less favourable than those detailed below ('customary terms').

No SP will be returned if for any reason a sample of prices from 3 bookmakers cannot be achieved.

5. Any bookmaker whose feed of prices appears to the SP validator to precisely mirror the PA's live show feed (i.e. which appears to be 'recycling' the composite live price feed) will be excluded from the sample.

Customary Each-Way Terms

Race type and number of runners	Fraction of win odds	Places
All races with fewer than 5 runners	N/A	-
All races with 5,6,7 runners	1/4	1,2
All races with 8+ runners except those below	1/5	1,2,3
Handicaps, Nursery and Rated Stakes Handicaps		
Races of 12-15 runners	1/4	1,2,3
Races of 16+ runners	1/4	1,2,3,4

Emergency Procedures/ System Failures

SP Validators adhered to the above procedures. However, the regulations also stated: "In exceptional circumstances and where there is a need for flexibility to return an SP, the SP Validator must, if time permits, contact Podium management/Senior SP Validator to confirm their action which will meet criteria that enables transparency and upholds the integrity of returning an SP in all instances. In these circumstances it is permissible for SP Validators to use discretion and those details to be forwarded in writing to Podium management.

Monitoring

The purpose of these rules is to ensure that the SP remains robust and is impartial to both punter and bookmaker. It follows from the sample selection rules that the sample may alter in successive races at the same meeting.

D Glossary

Gambling Commission

Police the regulatory aspect which forms part of a licence condition for bookmakers.

Podium Sports (Part of PA Media)

Manages and employs the validation team

RMG

Racecourse Media Group. Betting shop service providing pictures and data sources to the betting industry.

SIS

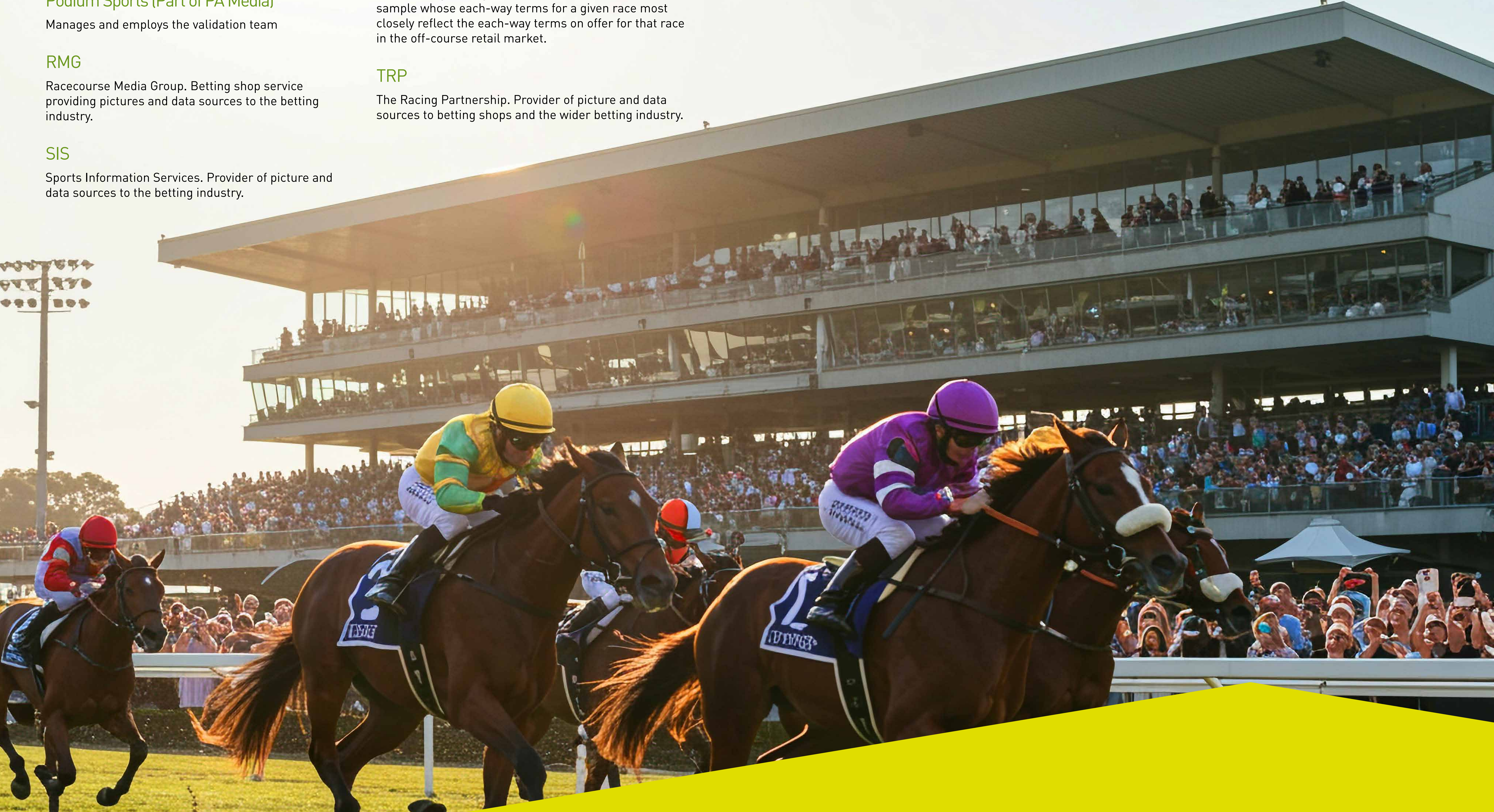
Sports Information Services. Provider of picture and data sources to the betting industry.

SP

The starting price for each horse is the market price at the off generally available to good money with bookmakers that make up a substantial part of the horse racing betting market in Great Britain, in a sample whose each-way terms for a given race most closely reflect the each-way terms on offer for that race in the off-course retail market.

TRP

The Racing Partnership. Provider of picture and data sources to betting shops and the wider betting industry.



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