

ADR Internal Statement of Compliance Annual and Quarterly Reporting

Reporting period – 1 October 2024 to 30 September 2025

Name of ADR Provider – ProMediate (UK) Limited

Background:

Type of ADR offered (e.g. mediation,	Mediation
adjudication, etc).	
Number of employees as ADR officials.	1
How are dispute outcomes reached (e.g. panel	Through independent mediator
decision, individual mediator, etc)?	
If outcome is reached by panel decision, please	N/A
explain who makes up the panel?	
How is the ADR funded?	By charging operators an annual fee and fee per
	case in theory.

As a competent authority for the gambling sector, we approve alternative dispute resolution (ADR) providers that wish to offer services to gambling consumers. Our role as competent authority includes making sure that ADR providers continue to meet the requirements of the ADR Regulations, alongside our role as gambling regulator to make sure that gambling is fair and open. The Gambling Commission expect ADR providers in the gambling industry to meet the requirements of the <u>ADR Regulations</u> and our additional standards.

Internal statement of compliance

Please demonstrate how your organisation and your ADR process complies with the requirements of the ADR Regulations and the Commission's standards for ADRs in the following areas:

-	Statement	Response

ADR Services offered by the body

Please demonstrate how you meet the requirements of the ADR Regulations Schedule 3, section 1. As part of your answer, explain how you ensure that stakeholders know why the scheme exists, what it does and what to expect from it (Ombudsman Association six principles of good governance, Clarity of Purpose).

ProMediate (UK) Limited provides an independent, impartial, and effective alternative dispute resolution (ADR) service for consumers and gambling operators, in compliance with the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 and approved by the Gambling Commission.

Our purpose is to help resolve disputes between consumers and licensed gambling operators fairly, transparently, and efficiently, without the need for court proceedings. We make it clear to all parties why our scheme exists, how it operates, and what outcomes can be expected.

We achieve this through:

Clear communication at the outset: Our initial correspondence to both the consumer and the operator explains our independent role, the scope of our powers, the process to be followed, and what each party can expect at each stage.

Accessible and transparent information:
Comprehensive details about our gambling ADR scheme — including our remit, procedures, timescales, and the limits of our authority — are prominently published on our website (www.promediate.co.uk).

Guidance for stakeholders: We provide tailored guidance notes and FAQs to ensure both consumers and operators understand the purpose of ADR, the benefits of participation, and the nature of our determinations.

Adherence to the Ombudsman Association's principles of good governance: In particular, we uphold Clarity of Purpose by ensuring that our objectives, independence, and procedures are communicated consistently and transparently to all stakeholders.

We review our website content, and process documentation to ensure they remain accurate, accessible, and compliant with regulatory and governance standards.

Through these measures, we ensure that all stakeholders are fully aware of the purpose of our ADR service, how it works, and what they can expect from engaging with it.

Access to the ADR body

Please demonstrate how you meet the requirements of the ADR Regulations Schedule 3, section 2. As part of your answer please explain how you consider the needs of vulnerable consumers (Commission standards, p24), and comply with other legislation such as GDPR.

ProMediate (UK) Limited ensures that its ADR services are readily accessible, inclusive, and compliant with both the ADR Regulations and wider consumer protection legislation, including the UK GDPR and the Equality Act 2010.

We recognise that some consumers may be vulnerable due to personal circumstances, disability, language barriers, or financial or emotional distress. Our approach is designed to remove barriers and provide fair access for all parties.

We ensure this through the following measures:

Multiple channels of communication: Consumers can contact us by telephone, email, online form, or post. We can also accommodate alternative formats where required (e.g. large print or assisted communication).

Tailored support for vulnerable consumers: Our mediator is trained to identify and respond sensitively to signs of vulnerability. We have attended training provided by the Chartered Trading Standards Institute (CTSI) on supporting vulnerable consumers, and our mediator has extensive experience dealing with individuals in distress or with specific support needs.

Clear information and guidance: We provide explanations of our process and outcomes, ensuring that consumers understand what will happen and what is expected of them throughout the ADR process.

Data protection and confidentiality: We comply fully with the UK GDPR and Data Protection Act 2018. We only collect data necessary for the resolution of each dispute, retain personal data for no longer than three months following case closure (unless required by law), and provide a clear Privacy Notice and details of our Data Controller on our website.

Website accessibility: Our website is designed to meet accessibility standards and is GDPR-compliant, ensuring that information about our ADR scheme can be easily accessed and understood by all users.

We review our accessibility procedures to ensure ongoing compliance with the Gambling

Commission's ADR Standards (p.24) and best practice in relation to vulnerable consumers.
Through these measures, ProMediate ensures that its ADR services are accessible, inclusive, and sensitive to the needs of all consumers, while maintaining robust data protection and governance standards.

Expertise

Please demonstrate how you meet the requirements of the ADR Regulations Schedule 3, section 3(a). As part of your answer, please document any training or qualifications that your ADR officials undertake, the frequency of this, and whether there are refresher sessions for officials, and any experience in dispute resolution that officials have.

ProMediate (UK) Limited ensures that its ADR official possesses the necessary expertise, independence, and professional competence to carry out his duties effectively and in accordance with the ADR Regulations.

Our ADR official is a qualified legal professional and accredited mediator with substantial experience in dispute resolution, including the gambling, consumer, and civil sectors.

Specifically:

Professional qualifications:

Our mediator brings extensive experience in civil, consumer, and regulatory law. He is also a Fellow of the Civil Mediation Council (CMC) and a Registered Mediator, demonstrating compliance with the CMC's professional standards and continuing competence requirements.

ADR and sector-specific expertise:

He has undertaken accredited mediator training and maintains up-to-date knowledge of the ADR Regulations, consumer law, and the gambling sector. We review developments in the gambling industry and follow guidance and updates issued by the Gambling Commission and CTSI. We are aware of plans to introduce ADR for social responsibility disputes.

Continuing professional development (CPD):

Our ADR official completes regular CPD activities in accordance with the Civil Mediation Council's requirements and the Chartered Trading Standards Institute (CTSI) standards for approved ADR bodies. This includes annual refresher sessions, mediation skills workshops, updates on consumer and gambling legislation, and ethics training. Details of annual CPD and training activities are included in our CTSI biennial report.

Experience in dispute resolution:

Our mediators has experience in handling consumer, contractual, and gambling-related disputes through both facilitative and evaluative ADR methods. He has been trained to manage complex cases, assess evidence impartially, and facilitate settlements efficiently while maintaining fairness and neutrality.

Through this combination of formal qualification, judicial and mediation experience, and ongoing professional development, ProMediate ensures that its ADR official is able to deliver expert, fair, and informed dispute resolution services in compliance with the ADR Regulations and Gambling Commission standards.

Independence

Please demonstrate how you meet the requirements of the ADR Regulations Schedule 3, section 3(b), (d), (e), (g) – (h). As part of your answer, please explain how you ensure and evidence the freedom of the office holder from interference in decision making (Ombudsman Association six principles of good governance, Independence), and how you are transparent about the way you are funded (Commission standards, p18).

ProMediate (UK) Limited is fully committed to maintaining the independence, impartiality, and integrity of its ADR official and decision-making processes, in accordance with the ADR Regulations, the Ombudsman Association's Principles of Good Governance, and the Gambling Commission's ADR Standards.

We ensure that our ADR official acts free from influence by any party, whether consumer, operator, or third party, and that all outcomes are based solely on the merits of the evidence and applicable law.

We achieve and evidence this independence through the following measures:

Structural independence:

ProMediate operates as an independent ADR body, with no ownership, control, or financial interest held by any gambling operator or trade association. Our ADR official is not employed by, nor does he act on behalf of, any party to the disputes they determine.

Operational impartiality:

Our ADR official must declare any potential conflict of interest before accepting a case. Where a conflict arises, the case would have to be passed to another independent mediator or ADR body to ensure impartiality.

Freedom from interference:

Decisions are made independently and are not subject to approval, amendment, or influence by any external party. Our procedures explicitly guarantee that case outcomes are determined solely by the appointed ADR official, in accordance with the European Code of Conduct for Mediators and the Ombudsman Association's Independence principle.

Transparency of funding:

Full details of ProMediate's funding model are provided to both parties at the outset of the ADR process. The scheme is funded through fixed operator subscription and case fees, ensuring financial sustainability without dependence on the outcome of individual cases. No party can influence the process or decision through funding

arrangements. Information about our funding and governance is also published on our website for transparency.

Professional integrity and oversight:

Our ADR official is subject to professional and ethical codes of conduct (including the Civil Mediation Council), providing an additional safeguard of impartiality and accountability.

Through these safeguards, ProMediate guarantees that all ADR activities are conducted independently, transparently, and free from improper influence, providing confidence to both consumers and operators in the fairness of the process.

Impartiality

Please demonstrate how you meet the requirements of the ADR Regulations Schedule 3. section 3(c), (e), (f), and section 4. As part of your answer, please explain how you ensure straightforward dealing and completeness, based on honesty, selflessness and objectivity and ensuring high standards of probity and propriety (Ombudsman Association six principles of good governance, Integrity). Please also explain how your conflicts of interest procedure meets the requirements of the ADR Regulations, Schedule 3, section 4. This should include how you ensure that parties to a dispute fully understand the process where a conflict arises, and how you ensure that any ADR officials who work part-time in another capacity are not conflicted by their non-ADR duties (Commission standards p19).

ProMediate (UK) Limited ensures that its one ADR official acts with complete impartiality, honesty, and objectivity, maintaining the highest standards of probity and propriety in line with the ADR Regulations, Gambling Commission Standards, and the Ombudsman Association's Integrity principle.

Our procedures are designed to guarantee that disputes are handled fairly, transparently, and free from any actual or perceived bias.

We achieve this through the following measures:

Commitment to integrity and objectivity:

Our ADR official and mediator operates in accordance with the European Code of Conduct for Mediators and is bound by professional ethical standards, including honesty, selflessness, and objectivity. Every case is assessed solely on its merits, evidence, and applicable law.

Conflict of interest checks:

A conflict check is carried out at the point a dispute is received. This includes a review of whether ProMediate or any ADR official has had prior dealings with either party or any related entity.

If a potential or actual conflict is identified, the ADR official must immediately declare it.

The parties are then notified promptly and in writing, and either (a) a different, independent ADR official is appointed, or (b) if impartiality cannot be assured, the parties are referred to an alternative approved ADR provider.

Transparency in the event of conflict:

We ensure that both consumers and operators fully understand the process and implications where a conflict arises. They are informed of their right to object to the continued involvement of any ADR official if they believe impartiality may be compromised.

Part-time and external work safeguards:

Our ADR officials do not hold any employment or consultancy roles that would give rise to a conflict of interest with the gambling sector or any party to

a dispute. Where an ADR official undertakes work in another capacity (e.g. judicial, legal, or mediation roles), these are carefully assessed and recorded to confirm that no overlap or dependency exists that could undermine impartiality.

Governance and oversight:

ProMediate's independence and impartiality policies are subject to regular review as part of our CTSI audit

Through these measures, ProMediate ensures that all ADR activities are conducted with integrity, impartiality, and transparency, providing confidence that decisions are made fairly, independently, and free from any improper influence.

Effectiveness

Please demonstrate how you meet the requirements of the ADR Regulations Schedule 3, section 6. As part of your answer, please explain how you ensure that the scheme achieves its outcomes efficiently and represents good value for money (Ombudsman Association six principles of good governance, Effectiveness). You should also demonstrate how you meet the decision/outcome quality standards (Commission standards, p19), and the process you have put in place for an audit/review of dispute outcomes, service standards and service quality (Commission standards, p18).

ProMediate (UK) Limited ensures that its ADR service operates efficiently, proportionately, and to consistently high standards of quality, in accordance with the ADR Regulations, the Gambling Commission's ADR standards, and the Ombudsman Association's principle of Effectiveness.

Our objective is to deliver timely, fair, and practical outcomes that resolve disputes between consumers and gambling operators quickly and cost-effectively, without unnecessary complexity or cost to either party.

We achieve this through the following measures:

Timeliness and efficiency:

We aim to resolve gambling disputes within 28 days of notification, significantly ahead of the 90-day maximum period prescribed by the ADR Regulations.

Each case is reviewed regularly by the ADR official to maintain momentum and prevent delay.

Value for money:

ProMediate provides a cost-effective ADR solution, charging operators approximately £50 per dispute, representing excellent value compared with the cost and delay of litigation. Consumers are not charged any fee. Our efficiency, independence, and low administrative overheads ensure that the scheme represents good value for all stakeholders.

Outcome quality and consistency:

Even though we act primarily as mediators rather than adjudicators, we apply robust quality standards to ensure fairness, consistency, and clarity in all outcomes..

Through these measures, ProMediate ensures that its gambling ADR scheme remains efficient, proportionate, and demonstrably effective, delivering outcomes that are timely, fair, and represent excellent value for money, while maintaining full compliance with the ADR Regulations and Gambling Commission expectations.

Fairness

Please demonstrate how you meet the requirements of the ADR Regulations Schedule 3, sections 7-10. As part of your answer, explain how you ensure that your dispute process takes account of the balance of power within a dispute, particularly around sharing evidence with parties to a dispute (Commission standards p18).

ProMediate (UK) Limited ensures that its ADR process is conducted with fairness, equality, and transparency, in line with the ADR Regulations and the Gambling Commission's standards. We recognise that, in gambling disputes, consumers are often in a weaker position relative to operators, and we take active steps to redress that imbalance throughout the process.

We achieve fairness in the following ways:

Equality of treatment:

Both consumers and gambling operators are given an equal opportunity to present their position, submit evidence, and respond to the other party's submissions. The Mediator ensures that each side is treated with respect and that their perspectives are fully heard and understood before any outcome is reached.

Balancing power and information:

We acknowledge the potential imbalance of power between an individual consumer and a licensed operator. To promote fairness and informed participation, any evidence or documentation provided by the operator is shared with the consumer, even though this goes beyond standard mediation practice. This ensures transparency, enables meaningful engagement, and builds confidence in the integrity of the process.

Transparency in communication:

We communicate clearly and in plain language, explaining each stage of the process, the mediator's role, and what the parties can expect. We ensure both parties understand their rights, the limits of the mediator's role, and the possible outcomes.

Procedural fairness:

The mediator manages the process to ensure that neither party dominates and that both have equal time and opportunity to put forward their views. Mediators intervene where necessary to maintain civility, balance, and focus on constructive resolution.

Access to evidence and reasons:

Where the process involves written statements or evidence, all materials relevant to the dispute are made available to both sides, and the mediator provides a clear explanation of the resolution reached or the reasons why settlement was not possible.

Compliance with ADR Regulations sections 7–10:

Section 7: Both parties are given a reasonable opportunity to express their views and provide information before any outcome is proposed.

Section 8: The process is fair, accessible, and based on objective consideration of the facts and evidence.

Section 9: Consumers are informed that participation in ADR is voluntary and that they may withdraw at any stage.

Section 10: Operators are reminded of their duty to cooperate fully with the ADR process and provide all relevant information promptly.

Through these measures, ProMediate ensures that its gambling ADR scheme is conducted with fairness, equality, and integrity, giving both parties confidence that the process is balanced, transparent, and compliant with the requirements of the ADR Regulations and the Gambling Commission's expectations.

Legality

Please demonstrate how your process meets the requirements of the ADR Regulations, Schedule 3, section 11.

ProMediate (UK) Limited ensures that all aspects of its ADR process are fully compliant with the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 and with all applicable UK consumer-protection and gambling legislation.

Our gambling ADR scheme is a voluntary, nonbinding, and consensual mediation process designed to help parties reach an agreed outcome, rather than to impose a decision. We ensure legality through the following measures:

Consensual process:

The mediator facilitates communication between the consumer and the gambling operator to help them reach a mutually acceptable settlement. Any outcome is reached by consent, not by imposition, in accordance with the voluntary nature of ADR recognised in the Regulations.

Compliance with statutory framework:

Our procedures are drafted and operated in accordance with the ADR Regulations 2015, the Consumer Rights Act 2015, and the Gambling Act 2005, ensuring that all parties' statutory rights and obligations are respected throughout the process.

Preservation of legal rights:

Consumers and operators are clearly informed, at the outset, that participation in our ADR process does not affect their legal right to pursue a claim through the courts if a settlement is not reached. This ensures that parties' access to justice is preserved in full compliance with Schedule 3, section 11.

Fair contractual framework:

Any agreement reached through mediation is recorded in writing, in clear terms, and only becomes binding once both parties voluntarily consent to it. The mediator does not act as an adjudicator, make binding determinations, or impose remedies

Through these measures, ProMediate ensures that its ADR process operates lawfully, transparently, and within the statutory framework, providing a voluntary and consensual route to

General

Please tell us about any changes you have made to the delivery of your dispute resolution process since your last report. What has been the impact of the changes?

If you would like to share any additional information or comments (beyond that required by your ADR Regulations-specified annual report) then please comment below.

resolving disputes while fully safeguarding the legal rights of all parties.

There have been no material changes to the delivery or structure of ProMediate's gambling ADR process since our last report.

Our procedures continue to be available to operate effectively and in full compliance with the ADR Regulations, Gambling Commission Standards, and CTSI requirements.

We continue to be available to

- Provide an independent, impartial, and efficient ADR service;
- Ensure timely resolution of disputes, typically within 28 days;
- Maintain transparent communication with all parties; and

While no structural or procedural changes have been necessary there has been a lack of uptake. We remain committed to continuous improvement through ongoing monitoring, feedback analysis, and CPD to ensure that our ADR service continues to meet best-practice standards

Additional comments:

We continue to promote awareness of ADR as an effective, fair, and accessible alternative to litigation for gambling consumers. We are willing to consider partaking in a social responsibility ADR scheme but our preference would be for an ombudsman to be established.

We have to accept that it is difficult to prove effectiveness of mediation in this sector owing to minimal uptake. There has not been a lot of uptake. It may be that arbitration ombudsman approach is more attractive in gambling cases.

ProMediate is a mediation service provider. Where we have conducted mediation outside the ADR schemes for cases of a higher value and using Zoom or in person, which fall outside the ADR schemes we operate, settlement has been achieved. This supports the conclusion that a time limited low value cost scheme has its limitations.

Quarterly reporting periods end 31 December, 31 March, 30 June, and 30 September. Annual reporting periods end 30 September.

Please submit your reports to ComplianceAction@gamblingcommission.gov.uk by the end of the calendar month which follows the end of the reporting period.

Annual report information must be displayed on your website by 1 November each year, as per the ADR Regulations.

ADR provider quarterly/ annual reporting

ADR provider	ProMediate
Reporting Period	1 October 2024 to 30 September 2025
Quarterly return only*	

^{*}if Nil Return, then please submit your quarterly return now.

a) No. of domestic & cross border disputes received		Domestic	0	
			Cross Border	0
b) No. of each type of complaint Please list the actual number of each type of complaint you received.		0		
c) Total number of disputes the provider refused to deal with % share of the grounds set out in para 13 Schedule 3 of the ADR Regulations	We have not refused to deal with any disputes	Consumer not contacted trader first	0%	
			Dispute is frivolous/vexatious	0%
			Dispute is being/has been considered by another ADR provider/court	0%
			Value is outside the provider's monetary thresholds	0%
		complaint not submitted within time period	0%	
		dealing with the dispute would impair the effective operation of the body	0%	
			not the relevant gambling sector	0%
		GC regulatory matter only (not a dispute)	0%	
			Discontinued for non- operational reasons (e.g., party withdrew)	0%

d)	% of ADR procedures discontinued	0%	reasons for discontinuation if	N/A	
	for operations reasons		known		
e)	Average time taken to resolve disputes	in days	Domestic	N/A	
			Cross Border	N/A	
f)	f) No. of disputes completed in period			0 within	
				scheme	
g)	g) % completed disputes ruled in operator's favour				0%
h)	h) % completed disputes ruled in favour of the consumer				0%
i)) % completed disputes settled by the operator during the ADR process				0%
j)) average length of time taken to receive complaint file from operator (days)		N/A		

Items (f) to (j) are part of the Commission's additional standards and not a requirement of the ADR Regulations.

For annual report only - note that all fields relating to the annual report must be displayed on your website by 1 November each year.

k)	a description of any systematic or significant problems that occur frequently and lead to disputes between consumers and traders of which the ADR entity has become aware due to its operations as an ADR entity.	We have not identified any. We do receive enquiries about gambling operators who we do not deal with. This suggests that the operators are not notifying the consumer who their ADR provider is or providing clear information as to the procedure to follow in the event of a complaint.
I)	any recommendations the ADR entity may have as to how the problems referred to in paragraph (c) could be avoided or resolved in future, in order to raise traders' standards and to facilitate the exchange of information and best practices	N/A
m)	the rate of compliance, if known, with the outcomes of the alternative dispute resolution procedures.	N/A
n)	the co-operation, if any, of the ADR entity within any network of ADR entities which facilitates the resolution of cross-border disputes.	N/A

o) please list all operators where you currently provide dispute resolution services.	The following bodies agreed to be members. Not included in this list are bodies which were members before 2022.
	Kitsilano Sports Entertainment Limited Limelight Amusements Ltd Higham Sports and Social Club JPS Gaming and Leisure Ltd John Fowler Holidays Ltd Cloud 9 Sports Summit Leisure t/a Shaws Amusements British Racecourse Bookmakers Association