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Consultation on proposed amendments to the Licence Conditions and Codes of Practice (LCCP) for all operators in relation to the prevention of crime associated with gambling – Submission by the Sports Betting Group

The Sports Betting Group

The Sports Betting Group (SBG) brings together the governing bodies of the major sports and player associations to consider threats to the integrity of sporting competition and to promote best practice in tackling sports betting corruption. The SBG was formed in 2010 following the report of the Sports Betting Integrity Panel chaired by Rick Parry. We work closely with others who have an interest in preserving sports betting integrity, including the Gambling Commission and betting operators through the Sports Betting Integrity Forum. Further information on the SBG can be found at: www.sportsbettinggroup.org.

The Sports Betting Group welcomes the opportunity to respond to the consultation. Protecting the integrity of sport and sports betting is a key priority for sports governing bodies and player associations. The LCCP play a critical role in achieving this objective by ensuring licensed betting operators have clear and unambiguous obligations in relation to sports betting corruption.

Comments on the proposed amendments

We have the following comments on specific proposals:

- **Provision of information to the Commission about gambling-related crime.** We are disappointed that the Commission has not consulted on changes to Licence Condition 15.1.2 regarding the provision of information on suspicious betting activity to Sports Governing Bodies (SGBs). We have previously written to the Commission to express our view that Licence Condition 15.1.2 should be amended at the earliest opportunity to make clear that operators should report suspicious information directly to SGBs as soon as possible. We understand that further changes to the LCCP will be consulted upon in due course to fit with the expected adoption by the UK of the Council of Europe Convention on the Manipulation of Sporting Competitions and that, in the meantime, guidance on the application of Licence Condition 15.1.2 will be circulated to operators. While both these developments are welcome, we nonetheless we believe the current consultation is a missed opportunity to clarify the reporting requirements for the following reasons:
 - Sports betting corruption very often involves criminal wrongdoing. In this context, the proposed changes to Licence Condition 15.1.2 put forward by SBG fall squarely within the scope of the consultation to ensure that the LCCP keep crime out of gambling.
 - Clarifying the reporting requirements would leave no room for doubt or interpretation. The consultation document makes clear that some operators interpret the obligation to report differently. For example, it appears that operators do not always report more low-level cheating at gambling (a section 42 offence) to the Commission despite the clear requirement

to do so. It is therefore possible that similar practice may occur in relation to providing suspicious betting information to sports governing bodies and which is also required under Licence Condition 15.1.2.

- Changes to the LCCP are not contingent upon adoption of the Council of Europe Convention. There is no defined timescale within which the UK must adopt the Council of Europe Convention, nor indeed is there any obligation on the UK to adopt the Convention at all. In this context, holding off amending Licence Condition 15.1.2 to align with the expected adoption of the Convention is an unnecessary delay.
- **Responsible placement of digital adverts.** While the Sports Betting Group's primary focus is on protecting the integrity of sport, many of the group's members (and those of the Sport and Recreation Alliance more widely) are rights holders and therefore have a keen interest in measures to tackle copyright infringement. Copyright infringement is a serious issue: it undermines the commercial viability of sports rights and which, in turn, affects the amount of revenue from broadcasting rights sales channelled to support grassroots sport provision. In this context, we welcome the Commission's proposal to make licensees responsible for ensuring their brands are not associated with copyright-infringing websites. We believe this would be best dealt with through the introduction of a Social Responsibility code provision for licensees to take all reasonable measures to ensure digital adverts do not appear on copyright-infringing websites. This would ensure the issue is given the appropriate level of priority by licensees.
- **Misuse of insider information by industry personnel.** We strongly support the proposal by the Commission to ensure that operators have employment terms and conditions governing the conduct of staff such that they report suspicious betting to their employer and are prohibited from placing bets based on suspicious information. Similarly, we strongly support the proposal that operators should ensure that a condition of their accepting bets is that customers are not in breach of any rules on betting established by a sports governing body or professional body. In both cases we agree with the proposed ordinary code provisions set out in the consultation document.

**Sports Betting Group
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