

Report of the Sports Betting Integrity Panel

February 2010

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Sports Betting Integrity Panel membership

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Darren Bailey	Football Association
Simon Barker	Professional Players Federation
Dave Boyle	Supporters Direct
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Secretariat

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Chair's Foreword

- 1 In summer 2009, the Minister for Sport, Gerry Sutcliffe, brought together a panel ("the Panel") of experts, including key people from the principal organisations involved – from the betting industry, the police, players, fans, Sports Governing Bodies ("SGBs"), the legal profession and the Gambling Commission ("the Commission") – to work under my chairmanship to look at a wide range of issues relating to sports betting integrity. We were asked to make recommendations on how the various bodies concerned could work together more effectively. Our main focus was the design and implementation of an integrated strategy to uphold integrity in sports and associated betting.
- 2 The Panel's terms of reference are set out at Appendix A. The principal objective was to produce an action plan which was practical, effective and proportionate and that had the support of those responsible for delivery. I must place on record my gratitude for the constructive way every member of the panel has engaged in an attempt to make this objective a reality. This was particularly remarkable given the complexity and, very often, the controversy surrounding the issues.
- 3 In recent years a number of sports (notably horse racing, cricket and tennis) have experienced problems associated with betting. In each case recommended solutions have included three key elements:
 - the adoption of robust rules and disciplinary procedures,
 - the implementation of a comprehensive education programme for all participants, and
 - the creation of an integrity unit which has the capability to gather and analyse intelligence.
- 4 It was decided that the Panel should focus on these elements. To use the expertise of its members most effectively, three working groups were formed and each group was asked to focus on one of these elements. The brief was to examine existing best practice and to recommend ways in which this could be implemented across a range of different sports.
- 5 Each working group reported back to the Panel on three separate occasions, which means that their work was thoroughly tested, debated and refined. This regular reporting also meant that there was a high level of coordination across the groups. Whilst not every Panel member agreed with every detail in the working group reports, there was a strong consensus that, taken as a whole, the groups' reports formed a well-reasoned and balanced set of recommendations.
- 6 Because each working group produced a final report which was comprehensive and detailed, I have decided to include these reports as chapters. They need, and deserve, to be read in full. I must pay tribute to the commitment of the working group members and to their willingness to focus on the common good.
- 7 One of the principal recommendations is the creation of a pan-sports integrity unit¹ whose role is to ensure the efficient handling of intelligence followed by an effective investigation process and, where appropriate, leading to disciplinary action under sports' rules or criminal prosecution. That such a unit will make a significant difference is a relatively easy conclusion to reach. The location of such a unit requires careful consideration because there are a number of alternatives. The Panel concluded that

¹ Now called Sports Betting Intelligence Unit.

the best location is the Gambling Commission because it has significant powers of enquiry, it is empowered to prosecute offences of cheating and void bets and betting operators are obliged to report suspicious betting activity to them under their licence conditions.

- 8 The Commission already has a significant intelligence and investigative capability and the Panel believes that a relatively modest addition of resources will enable the existing unit to meet the objectives. This is not, however, simply a matter of resources and the Commission will have to ensure that sports betting integrity remains a high priority.
- 9 The Panel's terms of reference excluded specific issues of funding. In many ways, this allowed the Panel to make progress by focusing on what needs to be done, rather than the thorny question of how much it will cost and who should pay. That question will however have to be addressed by those responsible, not least the Government, as part of implementation.
- 10 We spent some considerable time exploring the nature and scale of the risk posed to sports betting integrity by illegal betting activity and how that risk could be assessed. We did not reach a definitive position and felt it will need to be kept under constant review. Nevertheless we do believe that practical steps should be taken in the short and medium term to protect the integrity of sport. The recommendations set out in the body of this report make clear that there is a role for all partners to play: sports, the betting industry, the Gambling Commission and the police. Placing too great an emphasis on any single part of the chain is likely to compromise the effectiveness of the entire package of proposals; indeed it may take us backwards. Put simply, all the partners have a part to play; and none can afford to fail.
- 11 I am confident that with the right leadership, goodwill and resources, the recommendations set out will result in a significant bolstering of the defences against betting-related corruption in sport. And, at the very beginning of what we all hope and expect to be a glorious Decade of Sport, I am convinced that we owe it to the fans, the betting public and the global reputation of British sport, to continue to offer the safest sports betting environment in the world.

RICK PARRY, CHAIR
FEBRUARY 2010

Chapter 1: Recommendations for action

The Panel is making a coordinated package of recommendations to the Minister which we believe must be taken forward as a whole. A full description of the recommendations is set out in the three working group reports in chapters 2, 3 and 4. We do not believe that the response to the issues is likely to be fully effective if particular recommendations are taken in isolation. For ease of reference, set out below are certain of our key findings and recommendations by reference to their principal focus: Government, sport, the betting industry and the Gambling Commission (and other authorities).

Recommendations for government

- 1.1 That the definition of cheating in the Gambling Act 2005 (the Act) be reviewed and, if appropriate, given greater clarity.
- 1.2 That the extent of the powers available to the Gambling Commission either directly or in co-operation with others, for example the police, be reviewed with a view to ensuring they are sufficient to manage the regulatory risks involved.

Recommendations for sport

Integrity infrastructure

- 1.3 That the 10-Point Plan introduced in April 2006 should be replaced by a new Code of conduct on integrity in sports in relation to sports betting ("the Code") that includes minimum standards which all sports shall observe and cover in their rules on betting. A basis for such a code is set out in chapter 2.
- 1.4 That each individual Sports Governing Body (SGB)² make such amendments as may be necessary to their rules and regulations so as to at least satisfy the minimum standards contained in the Code (recognising that a "one size fits all" approach is unlikely to be appropriate), and within 12 months be able to demonstrate their compliance with the principles of the Code.
- 1.5 That each individual SGB has effective mechanisms in place to ensure compliance with its own rules, investigate potential breaches and impose sanctions.

Education

- 1.6 That it is imperative that sports provide regular education and communication programmes on sports betting integrity to all competitors and participants, which:
 - Involves both the SGB and Player Association in its development, and secures buy-in from key sports stakeholders, such as Leagues and clubs.
 - Utilises a range of communication methods, but most importantly involves face to face education of the rules in a way that competitors and participants will understand, ideally involving those the audience are likely to engage with such as the Player Association or ex-players.

² A body that is charged with the responsibility for the governance of a sport in the United Kingdom.

- Includes verification of competitors and participants' understanding of the information provided on betting in their sport and their attendance on the education/communication programme.

1.7 That, in recognition of the above, each SGB put in place a satisfactory education/communication programme for its competitors and participants on their sport's rules on betting and the preservation of integrity in their sport in relation to betting. Chapter 3 focuses on the education of competitors in accordance with the brief given to the working group. The Panel believes it is appropriate to widen the scope to include participants to ensure consistency with chapter 2.

Intelligence

1.8 That each SGB put in place mechanisms for recognising and capturing intelligence in relation to sports betting integrity and, as may be appropriate, communicating it to the Sports Betting Intelligence Unit (see recommendation 1.13) to be housed at the Gambling Commission. At the same time, ensuring the SGB has the capacity to respond appropriately to intelligence received from the unit and from betting operators³, including the capacity to handle and store sensitive information securely.

Leadership: the Sports Betting Group

1.9 That a Sports Betting Group of people drawn from sport should be formed which shall have responsibility for:

- communicating to SGBs why compliance with the Code is essential for the well-being of their sports
- making an assessment of the extent to which individual SGBs are in compliance with the Code
- providing assistance to those SGBs who require help in relation to the Code
- providing reports to DCMS at such intervals as may be required
- considering the effectiveness of the Code from time to time and make such recommendations to amend it as may be deemed necessary
- providing a dedicated whistle-blowing line or similarly clear communication channel for participants to report any illegal or unusual approach regarding betting in their sport
- providing advice, assistance and counselling for participants or competitors with gambling problems or addictions through relevant organisations.

Recommendations for the betting industry

The Gambling Commission and the betting industry have jointly supported two further initiatives to strengthen the integrity regime:

- 1.10 The Industry (through its trade associations) to consider the development of high level principles to aid convergence of reporting standards under licence condition 15.1 and
- 1.11 For operators to vary betting terms and conditions to make the contravention of sports or other professional or employer rules on betting a breach of the operator's own terms and conditions.

Although there will need to be further discussions between the betting industry and the Gambling Commission on these matters, the industry has agreed in principle that it should explore the workability and effectiveness of these suggested changes.

³ Traditional bookmakers, betting exchanges and spread betting organisations.

Recommendations for the Gambling Commission and other statutory authorities⁴

Sports Betting Intelligence Unit (SBIU)

- 1.12 That the principal focus of the Gambling Commission in this area should continue to be the investigation of crime in relation to betting, and that sports must retain sovereignty over, and responsibility for, investigation of disciplinary matters.
- 1.13 Notwithstanding that principle, that the current intelligence capability resident at the Commission should be enhanced to provide a facility to receive intelligence generated across all sources, not least sports, analyse it, make connections and identify patterns (see chapter 4). Such a Unit would, as it built up intelligence across sports and betting, be able to support SGBs and betting operators' own prevention and deterrent efforts by the provision of relevant pooled intelligence, as well as supporting the Gambling Commission's own law enforcement efforts, subject to the capability of the SGB in question (see recommendation 1.8) and statutory constraints on data protection and privacy.
- 1.14 That the SBIU should have the capability to monitor the betting activity of key nominals (individuals associated through intelligence with potential or actual betting corruption) in real time, once identified. The SBIU would not itself, however, engage in pre-emptive monitoring of general movements in the market; it would continue, as now, to harness the everyday risk management activity of the betting operators to achieve this aim.
- 1.15 That, to support and oversee the development of the SBIU and to be held accountable for its performance, a senior individual (at Director or Commissioner level) be appointed to take responsibility for the Commission's work in the area of sports betting integrity.

Improving the clarity of decision making

- 1.16 That, in any event, the Gambling Commission should work with the police and the Sports Betting Group to publish its decision making framework in the area of betting-related corruption. This would provide greater clarity of expectation over when a particular incident might be treated as a criminal investigation or a sports disciplinary matter; and the circumstances under which police co-operation or, indeed, a police lead would be appropriate.

Licence condition 15.1

- 1.17 That the operation of licence condition 15.1 (requirement to notify suspicious betting patterns) should be reviewed by the Gambling Commission, in consultation with the industry, the Sports Betting Group and other stakeholders with the objective of introducing a greater degree of consistency and transparency around the decisions to report under 15.1. The review should reflect the importance of betting operators and SGBs continuing to exchange information in real time as part of the day to day management of their businesses, and also the benefits of improving the flow of intelligence to the SBIU so that patterns may be identified and connections made.

⁴The Gambling Commission, the Police, the Sports Betting Intelligence Unit and any other relevant statutory body involved in the investigation of sports betting offences.

Other Matters Arising

A number of Panel members felt the Terms of reference were too narrow and that consideration needed to be given to broader integrity issues in sport. Whilst acknowledging that such issues exist in certain sports, and that these sports may wish to give further consideration to such matters the conclusion was that the Panel should stick to its narrow remit.

The Panel recognises the jurisdiction issues from unregulated betting organisations abroad. It noted that DCMS had recently reviewed these issues and the Panel would hope that better regulation of those organisations can be achieved, particularly mechanisms for exchanging information.

The Panel discussed whether or not it should make a recommendation on the risks posed by certain types of bet and whether the matter needed closer regulation. Whilst the Panel felt that some bets might prove a greater threat to integrity different views were expressed by Panel members on the appropriateness of making a recommendation on these issues. It was noted that the Gambling Commission had published as part of its March 2009 position paper an assessment of the risks associated with such betting and had proposed a "caveat emptor" approach as being commensurate with the current actual level of risk. The Gambling Commission already has power to regulate on such matters and will wish to keep the matter under review.

Conclusion

The Panel believes that, taken as a whole, the recommendations to the Minister represent a practical and proportionate response to the threat to sports integrity by illegal and/or inappropriate betting activity and will make a difference.

However, it is also recognised that the situation is dynamic and will need to be kept under constant review. Should the recommendations be implemented, this review process will be built into the betting integrity framework through the SBIU and the Sports Betting Group.

The Panel believes that publicising these recommendations, and disseminating information on the practical steps taken thereafter, will greatly help to maintain public confidence in the way sports integrity in relation to betting activity is being protected.

Chapter 2: Working Group report on rules for participants

Membership of the Group

Chris Caisley

Paul Scotney

Darren Bailey

Simon Barker

James Holdaway (in his capacity as a member of the Secretariat)

Dates of Group meetings

The Group members met on 23 September 2009 and 12 October 2009.

Issues covered

The Group was tasked to consider and report on:

- Sports Governing Bodies' current rules on betting and the issue of consistency in those rules across sports
- The 10 Point Plan ("the Plan") and the extent to which it has been implemented by Sports Governing Bodies
- Disciplinary procedures in relation to betting offences.

Executive summary – the Group's recommendations

The Panel should agree upon and recommend to Government minimum standards which all sports shall observe and cover in their rules on betting.

It is the Panel's strong recommendation that the Government respects Sports Governing Bodies' autonomy and independence in the formulation of their own rules and regulations in relation to sports betting, thus recognising the specificity of individual sports and the different considerations which each sport needs to take into account.

That the Plan be replaced by a new Code of conduct on integrity in sports in relation to sports betting. A draft proposed Code of conduct ("the Code") is set out in Chapter 2a.

Once the Panel has determined the role and responsibilities of the Sports Betting Intelligence Unit (the Unit) the Code shall be suitably amended by the inclusion of such consequential provisions as may be necessary.

The Gambling Commission, Police, any other relevant statutory bodies and Betting Operators shall join in taking such steps as may be necessary to assist Sports Governing Bodies minimise the risk of damage to sports' integrity by inappropriate betting activity. This should include, but should not be limited to the following:

- A clearer explanation of cheating
- A reassessment of the two-year maximum sanction under the Gambling Act
- A review of investigative powers under the Gambling Act with a view to reinforcing the same
- A commitment to provide additional resourcing
- The appointment within the Gambling Commission of an executive with specific responsibility for sports betting
- The development of agreed criteria/thresholds for determining whether carriage of an investigation/case management should be undertaken by Sports Governing Bodies, the Gambling Commission or the Police
- A commitment to provide Sports Governing Bodies with enhanced information, intelligence, access to betting expertise and general assistance as part of a more proactive and expedited approach to tackling betting activity and/or betting practices on or associated with sport.

Following finalisation of the Code and the securing of the commitments set out above, agreement shall be procured from Sports Governing Bodies, the Gambling Commission, the Police, any other relevant statutory bodies and Betting Operators.

Sports Governing Bodies shall be allowed a period of 12 months within which to:

- make such amendments as may be necessary to their rules and regulations so as to at least satisfy the minimum standards contained in the Code
- put in place a satisfactory programme of education for its participants on their sport's rules on betting and the preservation of integrity in their sport in relation to betting
- be able to demonstrate that they have complied with the principles of the Code.

A Sports Betting Group, comprised of a small number of people with sports specific expertise, should have responsibility for:

- communicating to Sports Governing Bodies why compliance with the Code is essential for the well-being of their sports
- providing assistance to those Sports Governing Bodies who require help in relation to the Code
- submitting reports to DCMS at such intervals as may be required
- considering the effectiveness of the Code from time to time and making such recommendations to amend the Code as may be deemed necessary.

Background to the Group's recommendations

The Plan was introduced in April 2006. The Group considered the stated objectives of the Plan which were to:

- protect the integrity of betting on sport;
- safeguard participants and consumers; and
- develop relationships (with sporting regulators, betting operators, statutory organisations and Government Departments).

The wording of the 10 Points contained in the Plan was as follows:

- 1 The sports authority will seek to embody the principles underpinning this plan.
- 2 The sports authority will include provisions in their rules and regulations governing the behaviour of their participants in relation to betting.
- 3 In the context of betting, sports authorities will expect their participants to avoid any situation that may involve a conflict of interest with the sport and/or which may undermine the confidence of the public. Participants will not misuse privileged information.
- 4 The sports authority will not avoid taking necessary action when they suspect, or are aware of betting activity which threatens the integrity of sport and objectives of this code of Conduct.
- 5 The sports authority will co-operate with and, if appropriate, enter into information sharing agreements with the relevant statutory authorities in the context of sports betting (e.g. police / Customs / National Criminal Intelligence Service / and the Gambling Commission)
- 6 Further to the commitment to share intelligence under point 5 above, the sports authority will take responsibility for proactively passing appropriate information or knowledge of corrupt practices (a race / match-fixing scam, for example) to the relevant authorities (e.g. police / Customs and Excise).
- 7 Where bookmakers or betting operators seek to enter into information sharing agreements, the sports authority will endeavour to work with them.
- 8 The sports authority will share best practice in maintaining integrity in sports betting with other sporting authorities.
- 9 The sports authority will seek to ensure that their participants co-operate fully with any investigation conducted by them and will expect them to provide full disclosure of information in relation to any such investigation.
- 10 The sports authority will nominate a person / department with special responsibility for betting issues.

The Group considered the Plan and its effectiveness since its introduction. The extent to which Sports Governing Bodies have included in their rules and regulations provisions to govern their participants' behaviour in relation to betting varies greatly as between sports. Chapter 2b includes a resume of standard sports' betting offences and the extent to which the sports referred to therein have encapsulated those offences within their rules. It can be seen that whilst some sports have extensively legislated to protect integrity in relation to betting, others have done much less and some hardly anything at all. The Group therefore concluded that the Plan did not go far enough and that minimum standards in relation to betting offences needed to be put in place within an appropriate time frame. The Group felt that it was not practicable nor sensible for the Panel to effectively re-write Sports Governing Bodies' rules and regulations for them (because of the different considerations that apply between sports and so as not to interfere with Sports Governing Bodies' autonomy). However, the Group concluded that it was reasonable for Sports Governing Bodies to be expected to agree that certain minimum standards be covered in their rules in relation to betting within an appropriate time frame. Those standards are set out at Code 2 of the Code in chapter 2a.

It needs to be emphasised that the minimum standards are only the least which Sports Governing Bodies should provide for in their rules and regulations. It is open to any Governing Body to enhance, widen or extend its rules on betting in such manner as best suits the specificity of the sport under its control and its assessment of risk (*see Notes to Code 2*).

The Group considered the issue of information sharing as between Sports Governing Bodies and between Sports Governing Bodies, the Gambling Commission, the Police and Betting operators and it was agreed that co-operation in this area was essential. In relation to our work, the drafting of the Code and making it effective, it is essential that Sports Governing Bodies' rules are properly implemented and policed. Not all Sports Governing Bodies will have the resources or expertise to be able to properly investigate inappropriate betting activity affecting their sports, so the remit and responsibilities of the proposed Unit (see chapter 4) will obviously be an important consideration for all Sports Governing Bodies, but perhaps for some more than others.

The Group concluded that education is a priority on two counts:

- The need to educate some Sports Governing Bodies to explain why the issue of inappropriate betting activity is critical to all sports, not just those commonly regarded as the major sports
- The need to educate participants in their sport's rules on betting and the issues surrounding integrity in their sport in relation to betting.

The Group also concluded that it was important from a purely sports perspective (quite distinct from the rationale for the pan-sports integrity unit) that there be a reference point to which sports could turn for assistance, whether that be in relation to the implementation of minimum standards, education of their participants, (both generally and on specific points, e.g. what might constitute "inside information"), or on Sports Governing Bodies' obligations under the Code to share information.

The Group therefore concluded that the formation of a Sports Betting Group, comprised of people drawn from sport and with specific expertise, could assist Sports Governing Bodies to drive forward implementation of the Code across all sports. As a priority this Group could focus on those sports that have done the least to implement the Plan. Under this proposal the Sports Betting Group would take responsibility for driving forward the implementation of the Code from a sports viewpoint and would, for example, host informative seminars and workshops for all Sports Governing Bodies. It is hoped that through this process all Sports Governing Bodies would conclude that the issue of integrity in their sport in relation to betting is to be treated with the same importance as they treat other serious issues affecting their sport, e.g. doping.

Under this proposal the Sports Betting Group would report upwards to DCMS, make recommendations on the effectiveness of the Code and suggest any amendments to the code that may be required from time to time.

In drafting the Code the Group identified two specific issues in relation to definitions within the document. These are the important definitions of a "participant" and "inside information" i.e. who would be included as a "participant" (being a person to be legislated against in the Sports Governing Bodies' rules on betting and in the Code) and what exactly is meant by "inside information" in the same context?

- "Participant". We concluded that as this definition depended on the identification of the category of person to be legislated against it would necessarily differ from sport to sport. Therefore the Code does not define "participant" but makes it clear that Sports Governing Bodies need to ensure that their rules on betting are drafted widely enough to cover all relevant participants.
- "Inside information". What is regarded by Sports Governing Bodies to constitute "inside information" will also differ between sports. Some Sports Governing Bodies have put a great deal of effort into defining inside information and taken steps in their rules and their training to prevent its misuse in betting on their sport.
- The horseracing sector is one example where a definition has been included in the sport's rules after lengthy debate – the British Horseracing Authority (BHA) has also invested in specialist training materials to better educate its members. Many Sports Governing Bodies' rules actually restrict betting on the sport or event at all. However, some Sports Governing Bodies allow betting

on the sport in particular circumstances – for example where there is no direct participation in the event or the means to influence the outcome.

- The Group decided that it would be impractical to ascribe a particular definition to what may constitute “inside information” without a full understanding of how that may in turn impact on each sport’s specific needs in seeking to preserve integrity. The Group was however very clearly of the view that every sport must have in place a sufficiently wide rule to guard against misuse of inside information. Separate provision for this has been made in the Code (see Code 3) in order to underline its importance.

Sanctions

The Group considered whether or not it would be practical to seek consistency across sports in relation to the sanctions for participants who were found to have contravened their sport’s rules on betting. There are major difficulties in trying to do this, not least because of the fact that not all sportspersons’ careers had the same or similar longevity (contrast the length of a golfer’s career compared to that of a footballer or rugby player). The impact and financial repercussions, loss of congenial employment, etc. caused by the same prescriptive ban or suspension may, as a consequence, be considerably different. There are presently few precedents across sports in terms of the sanctions imposed for betting offences, although the Group concluded that at some stage in the future it may be necessary for Sports Governing Bodies to revisit this issue.

For the present, the Group concluded that whilst the primary focus should be on the need to educate participants on the potential effect of breaching rules on betting, there was equally a need for Sports Governing Bodies to ensure that sanctions imposed were meaningful and sufficiently robust.

Chapter 2a: Code of conduct on integrity in sports in relation to betting

Introduction

This Code of conduct ("the Code") is intended to assist to protect the integrity of sports in relation to betting and adopts the various principles and actions recommended by the Sports Integrity Panel.

Reference in the Code to:

"Governing Body" means a body that is charged with the responsibility for the governance of a sport in the United Kingdom.

"Statutory Authorities" means The Gambling Commission, the Police, the pan-sports integrity unit and any other relevant statutory body involved in the investigation and/or prosecution of sports betting offences.

"Betting Operators" means traditional bookmakers, betting exchanges and spread betting organisations.

It is intended that the Code will:

- ensure that all Sports Governing Bodies address key areas concerning integrity in sports in relation to betting
- encourage each Sports Governing Body to adopt the principles of the Code within its rules, whilst at the same time reflecting the particular characteristics, attributes and specificity of its sport and the requirements of its international federation, if any, in any rule changes that have to be made from time to time
- facilitate consistency in the manner in which integrity in sport is preserved by the Sports Governing Bodies in their respective regulatory framework and practices
- bring about meaningful co-operation between Sports Governing Bodies, Statutory Authorities and Betting Operators with the aim of protecting integrity in sports in relation to betting.

The Code

1. Agreement

Sports Governing Bodies, Statutory Authorities and Betting Operators agree to act in accordance with the following provisions.

2. Rules on Betting

Integrity in sport is crucial to the success of a sport, to the enjoyment of participants and spectators and other interested stakeholders. Promoting and upholding integrity is one of the key functions of a Governing Body. Sport must be based on true and fair competition between participants playing within the rules to the best of their ability.

If betting activity in or around a sport takes place in such a way that the sport's integrity is compromised, or is perceived to have been compromised, then the sport may suffer significant reputational damage. Any doubts surrounding the integrity of a sport threatens its future participatory and commercial health and sustainability. Spectators, sponsors, broadcasters and grass roots participants may become disillusioned and turn away from the sport if it is, or is perceived to be, tainted by inappropriate betting activity.

As some Sports Governing Bodies have already recognised, the need to protect integrity in sport in relation to betting activity requires the development and implementation of a rigorous regulatory system and the enforcement of those regulations against any participants that are involved in activity which contravenes them.

In light of the above and in order to assist all Sports Governing Bodies to ensure that their respective rules on betting and connected activities cover the key risks associated with contemporary sports betting practices, Sports Governing Bodies shall incorporate in their rules and regulations provisions that cover the following prohibitions and obligations:

A participant (*see note 2 below*) shall:

- 2.1 not place or attempt to place a bet on a match, race or other event or competition in which he or his club participates in
- 2.2 not solicit or facilitate, or attempt to solicit or facilitate, another person to bet on a match, race or other event or competition in which he or his club participates in
- 2.3 not offer, or attempt to offer, a bribe in order to fix or contrive a result or the progress of a match, race or other event or competition in which he or his club participates in
- 2.4 not receive, or seek or attempt to receive, or seek a bribe in order to fix or contrive a result or the progress of a match, race or other event or competition in which he or his club participates in
- 2.5 report any approach or other activity which contravenes, or which may contravene, the sport's rules on betting, co-operate with any investigation and/or request for information including the provision of documentation (e.g. telephone/betting records to officials engaged in the investigation of suspected integrity issues in the sport in relation to betting)
- 2.6 perform to the best of his ability in any match, race or other event in which he participates in.

Notes to Code 2:

1. *These provisions:*

- *are deemed to be only minimum standards to be provided for by Sports Governing Bodies in their rules and regulations*
- *do not interfere with the autonomy of Sports Governing Bodies or their independence in the manner in which they draft and enforce their own rules and regulations to cover these areas*
- *may therefore be enhanced, widened or extended in their scope and/or effects by Sports Governing Bodies in such manner that is most appropriate to suit the specificity of their sport.*

2. *The Code does not seek to prescribe the definition of "participant" because the category of persons to which this applies will differ according to those persons which each Governing Body has a need to legislate against. However, each Governing Body needs to satisfy itself that the definition of "participant" within its rules is sufficiently wide-ranging to catch all relevant persons under its control.*

By way of examples only:

The Rugby Football League has defined a "participant" in its rules and regulations as:

"Clubs, Club Officials, Players, Licensed Agents and any other Party participating in any capacity in any events or other activities organised, convened or authorised by the RFL, whether or not such Party is a citizen or resident in the United Kingdom."

The Football Association has defined a "participant" in its rules and regulations as:

"an Affiliated Association, Authorised Agent, Competition, Club, Club Official, Licensed Agent, Player, Official, Match Official, Management Committee Member, Member or Employee of an affiliated Club and all such persons who are from time to time participating in any activity sanctioned either directly or indirectly by the Association."

3. Inside Information

Sports Governing Bodies shall ensure that they include in their rules and regulations a provision that a participant shall not use in relation to betting any inside information that is not publicly available and which has been obtained by virtue of the participant's position within the sport, and in this respect Sports Governing Bodies should within their rules clearly define what is meant by "inside information".

Notes to Code 3:

- 1. It is vital that every Governing Body ensures that their sports have in place robust rules to prevent the misuse of inside information. There is no generic definition in this Code of "inside information" as this will differ between each sport, but Sports Governing Bodies should ensure that their rules and regulations are sufficiently wide-ranging to cover all perceived eventualities.*

By way of example only, the British Horseracing Authority includes within its rules the following definition of "inside information":

"Inside Information is information about the likely participation or likely performance of a horse in a race which is known by an Owner, Trainer, Rider, Stable Employee or their Service Providers as a result of acting as such and is not Information in the Public Domain."

- 2. Whether information is in the "public domain" will be an issue for Sports Governing Bodies to consider when drafting their rules and regulations. An example of information which is not considered to be in the public domain is information that "...has not been published, is not on public record and is not easily accessible by an interested member of the public."*

4. Commitment to Enforce

Sports Governing Bodies will take appropriate action when they suspect or are aware that their rules on betting have been or are being contravened. This will include undertaking investigations and giving consideration to disciplinary action under the rules of the sport or, where appropriate, referral to the Gambling Commission for consideration of an investigation of the criminal offence of cheating (section 42 of the Gambling Act 2005).

5. Sanctions

Every Governing Body shall take steps to ensure that the sanctions laid down in their rules and regulations are enforced for breaches of rules on betting by participants, are proportionate and yet sufficiently robust.

Note to Code 5:

Whilst the education of participants on the integrity of sport in relation to betting (see Code 9 below) is a priority, the issue of sanctions is equally important. It is not at this stage intended to attempt to achieve cross-sport consistency in sanctions for betting offences, but the sanctions imposed will be monitored and reviewed from time to time.

6. Information sharing and co-operation

- 6.1 Sports Governing Bodies will co-operate with and enter into information sharing agreements with Statutory Authorities in respect of sports betting activities that threaten the integrity of sport.
- 6.2 Betting Operators will enter into information sharing agreements with Sports Governing Bodies on integrity issues and will embrace the provisions contained in licence condition 15.1 of the Gambling Commission licensing regulations.
- 6.3 Betting Operators will enter into information sharing agreements with Statutory Authorities on integrity issues and will embrace the provisions contained in licence condition 15.1 of the Gambling Commission licensing regulations.
- 6.4 Sports Governing Bodies shall liaise and work with the Sports Betting Group to implement the principles within the Code and provide such reasonable assistance as may be requested.

Note to Code 6.4:

The Sports Betting Group is comprised of sports experts whose role is to assist Sports Governing Bodies to drive forward implementation of the Code across all sports. The Group will report upwards to DCMS, make recommendations on the effectiveness of the Code and suggest any amendments to the code that may be required from time to time.

7. Protocols

In addition to information sharing agreements, Sports Governing Bodies and the Statutory Authorities will also consider appropriate protocols to cover case management and operational procedures in respect of sports integrity issues in relation to betting.

8. Best Practice

Sports Governing Bodies will co-operate with one another and the Sports Betting Group with a view to developing best practice to maintain integrity in sports in relation to sports betting issues.

9. Education

Sports Governing Bodies will provide education/awareness programmes on all integrity issues in sport in relation to betting (including the misuse of inside information for betting purposes).

10. Designated Person

Every Governing Body shall ensure that they appoint a person of sufficient seniority and expertise within their organisation who also has the authority to make decisions in the name of the Governing Body on sports betting issues and who will ensure compliance with this Code of conduct.

Chapter 2b: Key rules presently in operation

Placing a bet

ATP – Tennis. No person shall, directly or indirectly, wager or attempt to wager on the outcome or any other aspect of an event or any other tennis competition. [Note: “event” is any professional tennis match organised by any of the tennis federations].

GBGB – Greyhound Racing. No trainer, kennel employee, owner or other connected person shall bet on a greyhound under his control to lose a race or receive the proceeds from such an act. [Note: this does not extend to betting on other greyhounds/other races].

World Bowls Ltd – Bowls. No specific rule against betting by participants. [Note: there is a catch-all offence of “conduct likely to injure or discredit the reputation” of the sport].

BCF – Cycling. Betting is only permitted under conditions laid down by the Board.

RFU – Rugby Union. No person (including player and officials) may bet on a match or series of matches or the competition in which he or his club participates or with which he is associated.

RFL – Rugby League. No person may bet directly or indirectly on a match, competition or event in which he is participating or has any influence.

WPBSA – Snooker. A player shall not bet or lay bets on the result, score or any other aspect of any snooker match in which he is playing or cause any such bet to be placed or laid on his behalf.

ECB – Cricket. No person may bet, whether directly or indirectly, for reward, on any match, matches or series of matches or any aspect of any match, matches or series of matches.

The FA – Football. A Participant shall not, either directly or indirectly bet on the result, progress or conduct of a Match or Competition in which the Participant is participating or in which has any influence.

BHA – British Horseracing. Jockeys/valets are not allowed to bet or lay. Trainers/owners allowed to bet (not lay).

IAAF – Athletics. No bar.

Royal & Ancient/PGA – Golf. No bar.

Soliciting a bet

ATP – Tennis. No person shall directly or indirectly solicit or facilitate any other person to wager on the outcome or other aspect of any event or other tennis competition.

GBGB – Greyhound Racing. No trainer, kennel employee, owner or other connected person shall instruct another person to lose a race or receive the proceeds from such an act.

World Bowls Ltd – Bowls. No provision against soliciting.

BCF – Cycling. No provision against soliciting.

RFU – Rugby Union. No provision against soliciting.

RFL – Rugby League. No person shall solicit, induce, entice, instruct, persuade, facilitate or permit another person to bet on a match, competition or event in which he is participating or has any influence

WPBSA – Snooker. A Member shall not directly or indirectly solicit or attempt to solicit any person (whether a Member or not) to enter into any arrangement (whether or not in return for payment or any other form of remuneration or benefit).

ECB – Cricket. No person may induce or attempt to induce or encourage or attempt to encourage any person

The FA – Football. A Participant shall not bet, or instruct any person

BHA – British Horseracing. Prohibited – Rule D53.

IAAF – Athletics. Not covered.

Royal & Ancient/PGA – Golf. Not covered.

Contriving an event

Offering a bribe

ATP – Tennis. No person shall directly or indirectly provide any money, benefit or consideration to any other “covered person” with the intention of negatively influencing a player’s best efforts. No person shall provide money, etc. in return for inside information.

GBGB – Greyhound Racing. Not covered

World Bowls Ltd – Bowls. Not covered.

BCF – Cycling. Not covered.

RFU – Rugby Union. No person shall offer a bribe to fix or contrive a result or the progress or conduct of a match, competition or event.

RFL – Rugby League. No person shall provide a reward that could bring the sport into disrepute.

WPBSA – Snooker. A Member shall not directly agree or attempt to agree any arrangement.

ECB – Cricket. No person may induce or attempt to induce or encourage or attempt to encourage any person not to perform on his merits in any match or matches.

The FA – Football. There is no specific reference to this offence, however any such conduct would amount to improper conduct and would therefore be chargeable.

BHA – British Horseracing. Prohibited – Rule D45.

IAAF – Athletics. Not covered.

Royal & Ancient/PGA – Golf. Not covered.

Receiving a bribe

ATP – Tennis. No person shall directly or indirectly accept any money, benefit or consideration in order to negatively influence a player's best efforts. No person shall directly or indirectly accept any money, etc. for the provision of inside information.

GBGB – Greyhound Racing. Not covered

World Bowls Ltd – Bowls. Not covered

BCF – Cycling. Not covered.

RFU – Rugby Union. No person shall seek or accept a bribe in order to influence the outcome of any match, tour, tournament or series of matches.

RFL – Rugby League. No person shall seek or accept a bribe to fix or contrive a result or the progress or conduct of a match, competition or event. No person shall receive a reward that could bring the sport into disrepute. No person shall receive a reward in return for privileged information.

WPBSA – Snooker. A Member shall not accept or receive or offer to receive payment or any other form of remuneration or benefit.

ECB – Cricket. No person may perform or attempt to perform or arrange (any event) for which he expects to receive or has received any reward.

The FA – Football. There is no specific reference to this offence, however any such conduct would amount to improper conduct and would therefore be chargeable.

BHA – British Horseracing. Not riding a horse to obtain the best possible placing for personal reward.

IAAF – Athletics. Not mentioned.

Royal & Ancient/PGA – Golf. Not mentioned.

Misuse of privileged information

ATP – Tennis. Covered, as set out above, in relation to offering or accepting a bribe in return for privileged information, but not otherwise.

GBGB – Greyhound Racing. Not covered

World Bowls Ltd – Bowls. Not covered.

BCF – Cycling. Not covered.

RFU – Rugby Union. No person shall provide any privileged information which is not publicly available for or in connection with a bet.

RFL – Rugby League. No person shall use in relation to betting any privileged information obtained by virtue of his position within the sport.

WPBSA – Snooker. A Member shall not provide to any other person any information relating to snooker or billiards which that Member has by virtue of his or her position within the game and which is not publicly available, with the intention that it be used by the other person for or in relation to betting.

ECB – Cricket. No person may for reward provide, before or during any match, information to any person concerning the weather, the teams, the pitch, the state of the ground, tactics, the status of, or the outcome of any match (unless it is subject to the person's contract of employment.)

The FA – Football. A Participant shall not use, or provide to any other person any information relating to football which the Participant has by virtue of his or her position within the game and which is not publicly available for, or in relation to, betting.

BHA – British Horseracing. Cannot use information for reward.

IAAF – Athletics. Not mentioned.

Royal & Ancient/PGA – Golf. Not mentioned.

Failing to perform to one's merits

ATP – Tennis. A player shall use his best efforts during the match.

GBGB – Greyhound Racing. Not covered

World Bowls Ltd – Bowls. Not covered

BCF – Cycling. Not covered.

RFU – Rugby Union. Not covered.

RFL – Rugby League. It is an offence to fail to perform to one's merits in any match, competition or event.

WPBSA – Snooker. Each player shall perform to the best of his ability in each tournament in which he competes.

ECB – Cricket. No person may fail to perform on his merits for reward in any match or matches.

The FA – Football. There is no specific reference to this offence, however any such conduct could amount to improper conduct.

BHA – British Horseracing. Deliberately not riding a horse to obtain the best possible placing is an offence.

IAAF – Athletics. Not mentioned.

Royal & Ancient/PGA – Golf. Not mentioned.

Reporting obligations

ATP – Tennis. Covered widely by the imposition of an obligation to report any approaches received by the person concerned and the person's knowledge of incidents which may give rise to an offence by others.

GBGB – Greyhound Racing. Not covered

World Bowls Ltd – Bowls. Any information must be reported to the National Authority.

BCF – Cycling. Not covered.

RFU – Rugby Union. Imposes an obligation on all persons to report any approaches or other activity which contravenes the rules on betting

RFL – Rugby League. Imposes wide obligations on persons to report any approaches or contraventions of the rules on betting, to co-operate with any investigation and comply with any demands for information.

WPBSA – Snooker. To the Association via Company Secretary or Tournament Officials.

ECB – Cricket. Any information must be reported to the Board.

The FA – Football. Must be reported to The Association.

BHA – British Horseracing. Covered – Ongoing obligation under licence conditions.

IAAF – Athletics. Not mentioned.

Royal & Ancient/PGA – Golf. Not mentioned.

*The above information was gleaned from the various sports and although efforts were taken at the time to ensure the accuracy of the details, some may have changed/not reflect the full position.

Chapter 3: Working Group report on education of competitors

Membership

Simon Barker
Dave Boyle
Mike O’Kane

With assistance from:
James Holdaway (Gambling Commission)
Yogita Popat (British Horseracing Association)

Issues

The Group was asked to consider education of competitors.

Meetings

The Group met on 9 September and 12 October 2009.

Introduction

Following an initial scoping of the issues relevant to education of competitors in sport, at the first meeting of the Group we decided it was important to build a picture of what current practices were in place in professional sport and then identify any current gaps and best practice.

The Group focused on competitors (e.g. players, athletes or jockeys) but recognised that the recommendations are similarly applicable to owners, club and match officials, managers, coaches/trainers and support staff and can be adapted for each specific group.

To try to give a balanced picture the group conducted two surveys, one of Sports Governing Bodies (SGBs) and one of Player Associations, to understand the current communication of rules concerning betting and any education for competitors in support of those rules. The survey of Player Associations sought written responses and included the following questions:

- Please summarise the rules on betting in your sport. Do the rules cover inside information and to what extent is it clearly defined?
- To what extent do players understand betting regulations in your sport and can you back this up with any evidence?
- Which organisations, if any, provide sports betting integrity education for players in your sport? How do you rate this provision?
- Is there a dedicated budget for player education on sports betting integrity? If so, what is the budget and who provides the funding?

- Are players required or expected to supply bank statements and phone records to their governing body upon request? Do you support this?
- Have there been any examples in your sport where players have breached regulations on betting and what sanctions were handed out?
- How does your sport provide education and advice to players on problem gambling?

The survey of Sports Governing Bodies was conducted through telephone interviews. It included the following questions, but allowed for the answers to cover wider issues where appropriate:

- Are integrity issues in a wider sense than betting, e.g. doping, bullying, covered in your regulations?
- What are the specific details on betting integrity?
- Can we see the relevant regulations?
- How are these rules communicated to participants?
- Are participants educated and supported in this area?
- Is there any auditing about the extent to which plans or programmes have been implemented on the ground, or follow-up work on its success?
- Would you be prepared to share any such information?

Nine sports were surveyed and a small number of other sports were approached who did not take up the invitation. In some cases the group surveyed only a small number of the bodies who represent competitors, or govern the sport, at a domestic or international level. The survey focuses on high profile sports, mainly because it was more likely that most existing practice in this area is likely to be found amongst such sports. Some sports were specifically targeted because the group was already aware they had developed education programmes. The sports surveyed were:

- Athletics
- Cricket
- Football
- Golf
- Horseracing
- Rugby League
- Rugby Union
- Snooker
- Tennis

It is recognised by the Group that this is a relatively small sample of sports in the UK. However, the short lifespan of the Group and Panel meant that a more comprehensive survey would have been unrealistic. Those surveyed do cover a variety of sports, for example, team sports and individual sports, and those with a smaller and larger number of competitors. Given the sports covered, the Group considers it a suitably significant indicator of current practices.

We have not detailed the results of the survey as the purpose was for the group to understand existing practice, rather than to comprehensively document it. For that purpose an informal survey which enabled participants to be more open was more appropriate.

In short, the results of the survey showed that there are mechanisms in place to ensure competitors receive the rules and that there are some examples of further correspondence being provided to emphasise, explain or summarise the rules. Only a small number of sports have a specific programme to educate their participants either directly by the SGB or through the relevant Player Association. However, amongst those sports there is good practice that can be built upon. The results of these surveys underpinned the discussion of the second meeting of the Group and the recommendations that emanated from this discussion were formed directly from the information received from the survey.

Summary of existing practice

(a) Rules

Of those surveyed, eight of the nine sports had some form of rules relating to betting, and seven of the nine had rules relating to inside information. It was still deemed relevant to continue to survey the sport without rules to understand whether the issues were recognised and whether any wider programmes were in place. More detailed information on rules is available in chapter 2.

(b) Delivery

In some club sports, SGBs have opted to delegate to clubs the responsibility for providing the rules to competitors and other SGBs provide the information directly to the competitor's home addresses. In some sports, the approach varies between domestic and international competitors, and for some direct delivery is the only feasible option.

Some sports required competitors to acknowledge that they had received the rules or kept records of when and where those rules had been sent.

(c) Supporting information

In some sports further written information is provided to competitors to support the basic rules. However, different sports approached this in different ways. For example, the survey provided some examples of additional or accompanying correspondence emphasising the importance of the rules and the seriousness with which any transgression would be viewed. The survey also provided evidence of the rules being explained in more detail and in terms the competitor may better understand and an example of the relevant rules being summarised (alongside other rules) into a document the competitor may be more likely to read or refer to than the full rules document.

(d) Face to face communication

Although not providing an education programme as such, some SGBs or Player Associations provide face to face communication to further explain the rules. In some cases this focused on an explanation of issues beyond the basic rules and sanctions to include a wider context, such as examples of illegal betting, wider repercussions for their life and the sport, and the ways in which they could be drawn into problems, whereas others focused purely on rules and sanctions. However, where such contact was not as part of a specific programme it tended to be on an ad hoc basis, for example a club asking for a talk on the topic or an organisation reacting to a relevant event and therefore not all competitors in a sport received face to face communication.

Another approach taken was to touch on betting as part of wider integrity issues. There were examples of this being done for all competitors and on the ad hoc basis referred to above.

In one case, this face to face communication was facilitated by the SGB providing training to club representatives to then provide the training to competitors and participants, rather than the SGB or Player Association providing it themselves.

Very few of these types of arrangements appeared to be accompanied by any kind of review to ensure that the messages had been understood.

(e) Education programmes

A very limited number of those surveyed provided what could be considered a comprehensive education programme around betting, building on the mechanisms already discussed. Within these

programmes a variety of communication methods were utilised including dedicated face to face training, seminars and online training accompanied by supporting documents. In such cases the programmes involved repeated contact with the competitors, rather than a one-off process.

In some cases this education was completed with a test, either formal or informal, to ensure that the competitors had understood what had been explained.

In one case this level of service was provided just to competitors once they reached international level, not below this level.

There is a wide recognition from those sports that provide education or face to face contact that the training needs to be by individuals likely to be respected or understood by the audience, e.g. Player Associations, ex-players or respected and trusted people in the sport.

(f) Audit

Outside of the few formal education programmes there is relatively little in place currently to verify that all competitors have received the intended face to face communication. There was an example from the education of anti-doping in one sport where evidence that a club had provided the appropriate training had to be sent to the SGB. A further example involved players signing to acknowledge that they accepted the rules, of which betting was a part, before the start of a competition.

Unsurprisingly, some responses indicated that in those sports without an education programme there was limited understanding of the rules on betting and any written acknowledgement of receiving the rules was deemed as just a paper exercise.

Issues considered

(a) Context

The Group considered whether it was appropriate to separate education in respect of betting from wider integrity issues in sport, for example anti-doping. Given the focus of the Panel, it was considered appropriate to focus on what was needed on betting regardless of whether other integrity issues were addressed. However, the Group recognised that it could be easier to deliver education on betting where there was already an existing framework for educating competitors and participants.

The Group considered whether it was appropriate to have the same requirements in place for all sports, given that the level of betting varied significantly between them and therefore the risk of a betting integrity incident. The group considered it was not appropriate to propose anything too onerous that was disproportionate for those with relatively little betting taking place on their sport. However, it was felt necessary to have a sufficient level of education for relevant participants in all sports. Discussions suggested that the level of betting on a sport is broadly related to the amount of television coverage it receives and the ease of access to bet. The level of coverage a sport receives could change substantially, and the betting increase accordingly, and it would be better for a framework of education to be in place before that occurs, even if further work is needed subsequently.

The Group discussed whether the same requirements should apply to sports with larger resources as to those with smaller resources. Similarly, it was considered how a single set of recommendations could apply to a sport with relatively few participants and one with a huge number. The recommendations that are made are conscious of this type of variation and are broad enough for education arrangements to be tailored accordingly.

An issue already noted is that there are sometimes a number of Governing Bodies (or Player Associations) within a single sport, for example covering international competition, elite domestic competition and other competition. Additionally, there are additional stakeholders, such as clubs, that also need to be engaged. The Group considered it important that all relevant groups within a sport bought into the need for education.

(b) Education and communication

The Group agreed that underpinning any education programme there needed to be clear rules, including clarity on key terms such as 'participants' and 'inside information'. The recommendations to ensure that appropriate rules are in place and the rationale for the approach taken are set out in chapter 2.

Having considered the existing good practice, not just from the comprehensive education programmes but also from those sports that have taken some action, the Panel considered that effective programmes needed to use various communication methods to be effective. This could include explanatory notes, online training, posters, cards and brochures and, most importantly, the need for face to face education. These communication methods need to be appropriately tailored for the intended recipients as these could be at youth or senior professional level.

Based on the experiences reported through the survey the group considered that such face to face education needs to be conducted by someone the audience is likely to engage with. Examples of such groups would include Player Associations, ex-players or respected and trusted people in the sport.

The Group considered at what level this engagement is necessary. Some existing practice sees competitors only receive a significant level of education once they compete at international level. The Group considered that education should be provided to all competitors from youth to professional and at domestic and international level but can also include other participants.

On the basis of existing practice the Panel considered that education should be an ongoing, regular process and not just a one-off event at a fixed point in an individual's involvement in the sport. That need not involve the same level of training each time and could take the form of a refresher course.

The Group also discussed whether the word 'education' was appropriate and whether it was more appropriate, as we were mostly dealing with adults, to call it a communication programme.

(c) Reviewing and maintaining success

The Group considered how the success of education/communication programmes could be reviewed. It could potentially be related to the number of breaches resulting in action. However, one result of such education could be that more incidents are identified that previously might not have been.

The Group considered it important for those delivering programmes to review success at a more specific level. At a basic level this could involve verifying that competitors received the rules. More sophisticated review mechanisms would involve verifying that all appropriate competitors had received the programme and reviewing the understanding of those competitors either as part of the training or at a later date. Currently there is some evidence of this, but the Group considered the latter two aspects should be a standard part of all programmes.

In considering the mixed success of the 10 Point Plan (discussed in the other chapters) the Group considered how progress could be maintained in respect of educating and communicating to competitors. The Group considered that there should be a deadline by which the recommendations in respect of education/communication should be implemented. The Group considered that 12 months should be a realistic timeframe to enable implementation. Furthermore the Group considered that the Sports Betting Group, discussed in chapter 2, should oversee and support the implementation.

In addition, the Group considered that there is potential for a generic, sports-wide communication programme that could easily be adapted for each sport. This would be something for the Sports Betting Group to consider in due course. The Sports Betting Group would also be in a position to provide advice and support for smaller SGBs and monitor the effectiveness and success of their education/communication programmes.

(d) Other issues

In the course of the surveys and the Group's discussions, two other issues were considered.

First, based on existing best practice, the Group considered that there should be provision of a dedicated whistle-blowing line or clear communication channel for any participant or competitor to report any illegal or unusual approach regarding betting in their sport. Competitors or participants should know who to contact to report such an approach and that without such a clear mechanism for reporting issues the benefit of any education/communication programme could be compromised.

Secondly, it was recognised that some sportspeople have identified themselves as having problems with gambling. The group considered that advice, assistance and counselling for participants or competitors with gambling problems or addictions should be provided by SGBs, Player Associations or employers through Gamcare, Sporting Chance, or other such organisations. This can be provided to participants or competitors through a dedicated helpline or clear communication channel.

Recommendations

- It is imperative that SGBs have clear rules in relation to betting and insider information in their sport and for those rules to be communicated in an effective manner which is clearly understood by participants or competitors.
- SGBs and Player Associations in each sport should work together in the development of the communication programme; however there is a need to secure buy-in from all the sports' key stakeholders such as Leagues and Clubs to the importance of the communication process.
- The implementation of these recommendations on education needs to be monitored with a joint progress report prepared by the SGB and Player Association in each sport within 12 months of this publication. This should be overseen by the proposed Sports Betting Group.
- The basis of an effective communication programme should be to provide face to face education to all participants or competitors at both youth and professional level to fully explain the rules in a way they will understand and to provide examples of what is a breach of the rules.
- Various communication methods need to be included in the communication programme most importantly face to face education but also explanatory notes, online training, posters, cards and brochures.
- The communication programmes should be tailored for the audience and delivered by those the audience is likely to engage with, such as Player Associations, ex-players or respected and trusted people in the sport.
- There is potential for a generic, sports-wide communication programme that could easily be adapted for each sport. Any possible Sports Betting Group could provide advice and support for smaller SGBs.
- The communication programme should be undertaken at clubs where participants train in team sports or, in the case of individual participants, undertaken at regional forums or in exceptional circumstances remotely or online.

- The communication programme should be undertaken on a regular basis (annually or bi-annually) and the message should be proportionate and fit for purpose to the level of knowledge and understanding of the participant or competitor. Both youth players and senior professionals need to receive education, though the content should be tailored accordingly.
- Verification of participants' or competitors' understanding of the communication programme should be evidenced through informal tests at the end of the programme, and they should acknowledge the undertaking of the communication programme by signing a register for purely auditing purposes.
- There should be provision of a dedicated whistle-blowing line or clear communication channel for any participant or competitor to report any illegal or unusual approach regarding betting in their sport.
- Advice, assistance and counselling for participants or competitors with gambling problems or addictions should be provided by SBGs or Player Associations or employers through Gamcare, Sporting Chance or other such organisations. This can be provided to participants or competitors through a dedicated helpline or clear communication channel.

Chapter 4: Working Group report on pan-sports integrity unit and protocols

Group Membership

Ben Gunn
Nic Coward
Mark Davies
Ian Seabridge
Bill South
Nick Tofiluk

Issues

The Group was asked to consider and report on:

- Best Practice in Effective Intelligence Gathering and Investigations;
- Pan-sports integrity unit;
- Protocols between Sports Governing Bodies, Betting Operators, Gambling Commission and the Police.

Note: Although there was much agreement between all members of the group, the recommendations did not receive unanimous support; in particular, strong reservations on the concept of a pan-sports integrity unit located at the Gambling Commission were expressed by the Commission representative on a range of grounds. Subsequent discussion to define the scope of the unit has resulted in the proposal for a Sports Betting Intelligence Unit presented in the main body of the report.

Introduction

Any anti-corruption programme to enhance the integrity of sports betting should include a "Regulatory Strategy" which should embrace consideration of a range of issues including the creation of a unit to manage the handling of intelligence, facilitate investigations into suspected breaches of sporting regulations, as well as providing templates for protocols/memoranda of understanding between Sports Governing Bodies, the Gambling Commission, Association of Chief Police Officers (ACPO) and the betting industry.

A "Regulatory Strategy" should be founded on an assessment of the threat posed to the integrity of sport by corrupt betting activity. That assessment should take into account the breadth and depth of the threat, including both the national and international dimension. The threat assessment will assist in determining the nature of the strategic approach and will help to indicate the sort of structure, governance and operational controls required. It should also seek to clarify the nature and impact of the assessed threat (e.g. reputational/economic/other damage). This will vary from threats having a lower impact which can be dealt with as disciplinary matters by sporting authorities under their own

sports rules to threats having a high impact which involved corruption/cheating and will be matters for the Gambling Commission/Police to deal with under the criminal law (section 42 of the Gambling Act 2005).

The principal objective of an anti-corruption programme should be to maintain and enhance the integrity of sport, particularly in respect of betting thereon. The threat assessment will outline the strategic intelligence requirement. Good practice currently available indicates that efficient handling of intelligence, followed by an effective investigative process leading to disciplinary action under sports' rules or, where appropriate, a prosecution under the criminal law, provides a model for the deterrence and detection of corrupt activities by those involved in a sport and others.

Guiding factors

Best practice in effective intelligence gathering and investigations

Intelligence

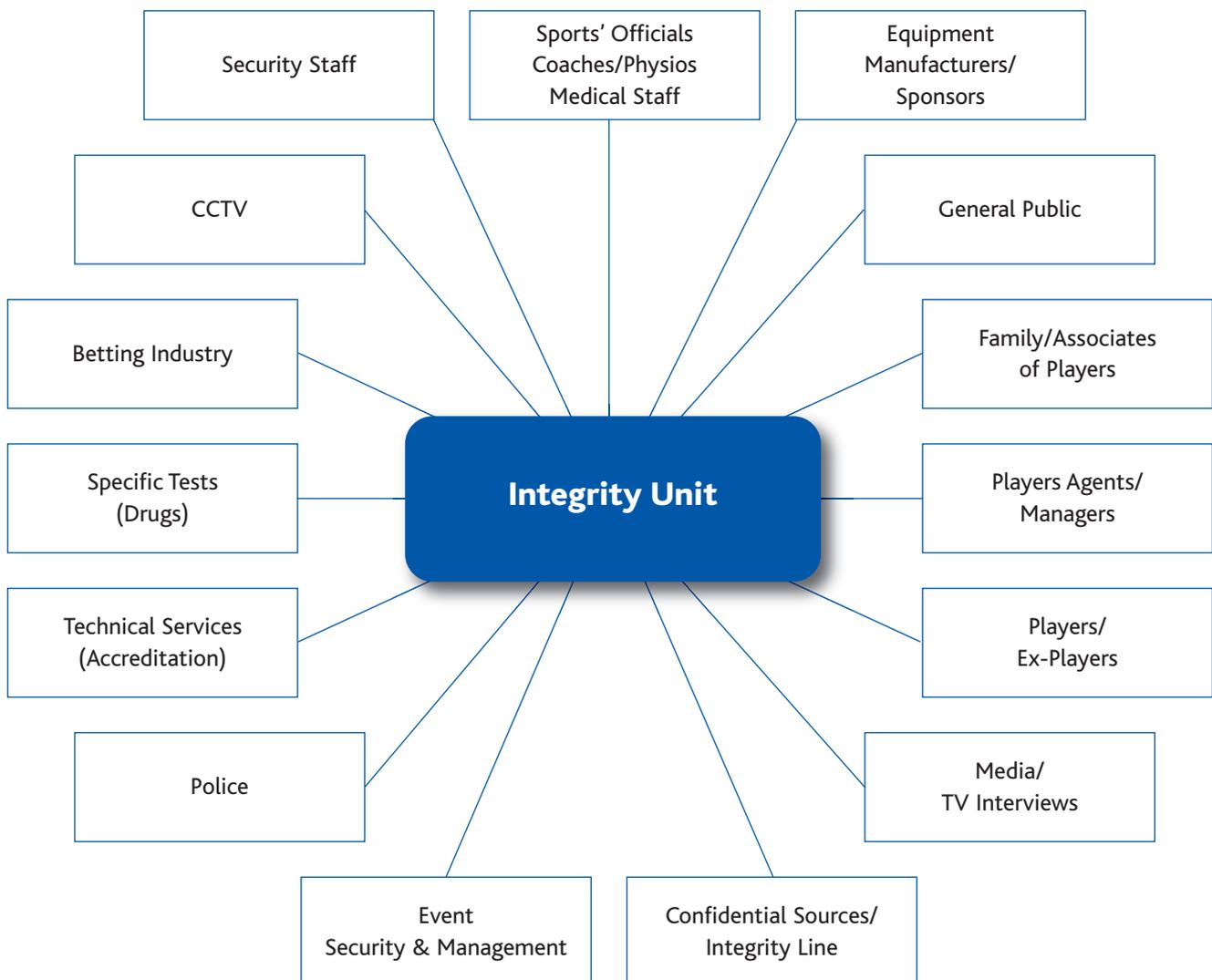
Intelligence is the "life blood" of any Anti-Corruption Programme. All intelligence is information but all information is not necessarily intelligence; it needs assessment and analysis before it can become graded intelligence. Good practice currently available indicates that such analysis is best achieved using the 5x5 model (viz ACPO's National Intelligence Model).

The experience of some sports, particularly cricket and horseracing and latterly tennis, has demonstrated that the gathering, analysis and dissemination of intelligence with a view to identifying patterns of activity and a formalised targeting policy are crucial to successfully combating threats to integrity. Painstaking analysis of many suspect matches/events, cross-referencing common elements/personnel, may be necessary before a potentially corrupt target (player, players' support staff, related or other person) may be identified. As Professor Forrest notes in the University of Salford Report February 2008, "Forensic statistics would aim to gauge the scale of the problem by uncovering relationships that might be evident from consideration of thousands of contests and their betting markets, even though no individual incident was so exceptional as to justify cancelling all transactions."

Currently, sports facing these problems which do not have an effective integrity unit, either tend to pursue intelligence gathering/investigations in an unco-ordinated and somewhat haphazard fashion, usually on a case-by-case basis or seek the assistance of a sport which does have an operational intelligence unit or, in isolated cases, the problem is just ignored. Good practice adopted by those sports which do have an integrity unit, has indicated that a co-ordinated and focused process of intelligence gathering, analysis and dissemination by identifying patterns of suspicious activity, targeting potential offenders and ultimately providing evidence to bring disciplinary charges, is the most effective way of combating corrupt betting activity. Investigations which concentrate on individual suspect events face daunting problems of gathering sufficient probative evidence to support disciplinary offences under the rules of a sport. Targeted intelligence created from analysis of patterns of activity is most likely to enable an investigation to gather evidence to the required standard of proof (balance of probabilities) necessary to prosecute disciplinary offences.

As stated, the handling and management of intelligence is crucial to the success of an integrity unit. Information/intelligence concerning potentially corrupt sporting activity comes from a wide variety of sources as shown at Figure 1 (not exclusive).

Figure 1: POTENTIAL INTELLIGENCE SOURCES



Crucial to the success of the Unit will be a “fit for purpose” computerised system but the minimum constituent elements should include:

- searchable features on names, nicknames, locations, vehicles, telephone numbers, etc
- the storage of digital images
- an integral destruction/weeding process
- electronic grading
- remote access with firewall protection
- an investigation database for the management of enquiries
- archive facilities
- a briefing facility
- an interface with other databases within other sports
- a database for confidential sources (strict access controls)
- evidential disclosure.

And any other factor identified by a user requirement which would need to be drawn up and tailored to the requirements of a pan-sports integrity unit.

An integral destruction/weeding process is needed to ensure compliance with the Data Protection Act.

All intelligence should protect the source and be properly graded. Remote access with appropriate security controls is another feature of an IT database and would help facilitate international liaison. The source material needs to be protected using the principles and guidelines of storing intelligence.

Investigation

Intelligence should not be seen as an end in itself. The purpose of gathering, analysing and disseminating intelligence should be firmly focused on the twin aims of "prevention" and "detection"; these should be viewed as two sides of the same coin.

In pursuing a "prevention strategy" under an anti-corruption programme, it will be necessary to prosecute diligently all cases brought for breaches of the Regulations/Codes of Conduct of a particular sport or for the criminal offence of cheating. The experience of other sports is that there is no greater deterrence than the example of those who do wrong being caught and punished.

The effective use of intelligence is a necessity in achieving successful prosecutions, either for disciplinary breaches or, in liaison with police, for criminal offences.

An integrity unit, ideally, must have an integral investigative ability in addition to its intelligence gathering capability. The intelligence function will produce targeted packages which will need investigation. The personnel to undertake those investigations, if not integral to the Unit, may be bought in on an ad hoc basis from other sources, e.g. other sporting regulators or persons with an investigative background. Such investigators ideally should have a police or other enforcement agency background, preferably with knowledge of sporting regulation and betting.

It is important to note that the investigations undertaken by, or on behalf of, a sport are *disciplinary* cases. Such investigations into suspect sporting events, particularly connected with betting activity, can blur the edges between breaches of sporting regulations/codes of practice and corrupt activity involving suspected cheating at betting which is a criminal offence under section 42 of the Gambling Act. The investigation of such criminal offences is the responsibility of the Gambling Commission/Police, although the mere fact that suspicious activity may amount to a criminal offence of cheating, does not preclude an investigation under a sports body's rules. Who does what, when and why in such cases, needs to be clarified by a Protocol/MoU between the Gambling Commission/Police/Sporting Body (see later).

Experience in GB has shown that police do not generally regard the investigation of "sporting crime" as a priority. In reality, the appetite for police involvement in such matters is more likely to occur as a result of police already having an interest in a target for other (non-sporting) criminal activity. The Gambling Commission in Great Britain has power to investigate cheating offences but it has made it clear that it expects Sporting Regulators in Great Britain to have the principal responsibility for dealing with sportsmen and women under the various Sporting Regulations. Protocols for handling such matters between sporting authorities/the Gambling Commission/ACPO are being developed to clarify the process by which such issues should be handled (see later). When a suspected corrupt activity involving sports betting takes place, experience has shown that it is prudent for personnel with experience/expertise of the sport involved to offer assistance to the Gambling Commission/police in appropriate investigations.

In respect of those matters, it is important for early consideration to be given to whether the suspected breach of betting integrity on a sporting event should be pursued purely as a disciplinary case under the rules of the sport concerned or whether criminal offences may be involved (see later). The protocols mentioned above and later should clarify the process in such matters. The relevant thresholds and criteria for determining which entity has carriage of an investigation and/or the disciplinary process should be as clear as possible.

Disciplinary investigations by sporting authorities can be complex and lengthy. Experience of handling anti-corruption issues utilising a twin strategy of "prevention" and "detection" has indicated that as an essential precursor to such matters, clear regulations/rules/codes of practice need to be drawn up by each sport on which betting takes place (see chapter 2). Such rules, etc, should clearly indicate, inter alia, whether sportsmen/women and officials may engage in betting on their own sport (and other sports) and, if so, in what circumstances that may be permitted. As a continuum to such regulations/rules, there needs to be a compliance regime to monitor the effectiveness of such regulations and an enforcement capacity to ensure effective action/sanction is taken if such regulations are breached.

Some sports (e.g. horseracing, cricket, tennis, football) have created their own integrity units to progress and deal with such matters.

Experience gained in investigations on suspected corrupt betting practices on sport, has indicated the need for a clear "investigative strategy". Such investigations tend to involve five principal elements:

- preparatory analysis of all information/intelligence (including betting data)
- interviewing witnesses, etc
- interviewing suspects
- analysis and co-ordination of evidence
- preparation of criminal/disciplinary charges.

Bearing in mind the potential international dimension of possible corrupt activity on sports betting, jurisdictional issues need to be carefully considered as well as potential language/interpreter requirements.

Sporting authorities, unlike statutory regulators (the Gambling Commission) or the police, have limited powers of investigation, particularly when investigations involve persons outside of the sport who are not licensed/regulated by it. These issues need to be carefully considered in any "investigative strategy" but experience of dealing with such matters has shown that many of the problems created by limited investigative powers can be overcome by utilising an effective "intelligence strategy", followed by a co-ordinated and focused investigation.

It is important to note that whilst the principal function of an investigation is to gather probative evidence to enable the prosecution of those involved in suspected corrupt sports betting activity, this outcome may not always be achievable. Within any investigative strategy, it is also valid to gain sufficient information/evidence to disrupt suspected corrupt activity, even if it is not possible to prosecute anyone. Also, another important aspect of carrying out a full investigation may be to exonerate a sport/individual(s) who have been accused of suspected corrupt activity.

Relationship between intelligence gathering, investigation and evidence gathering

Where information/intelligence becomes available about a suspected breach of sports integrity connected with betting, or where there may be some doubt as to the specific connection with betting, the Gambling Commission will make an early assessment of the case, liaising, as necessary, with the betting industry and the relevant Sports Governing Body. If the Commission assesses that the intelligence analysis and emerging evidence indicates that a full investigation under section 42 is prudent, then it will inform the sporting authority that the Commission will be responsible for the further investigation and conduct of the case. The extent to which such notification may include any specific details of the case will depend upon the necessary confidentiality issues referred to earlier. However, it is important to recognise that the expertise/experience of a particular sporting body may well add value to a section 42 investigation by the Commission and those issues can be identified in

developed Memoranda of Understanding between the Commission and sporting bodies. Such arrangements should recognise expressly that the knowledge of a sport possessed by those involved in its day to day operations, as well as experience of dealing with the sport's participants are valuable in any investigation involving the sport concerned.

If the Commission decides that the circumstances of the case do not merit a full section 42 investigation, then it will refer the matter back to the sporting authority to be dealt with, as appropriate, by the relevant Sports Governing Body. It is envisaged that, in such cases, the Commission will hand over its investigation to date to the sporting body to facilitate any subsequent development of that investigation by the sports body, with a view to preferring any disciplinary charge(s) for a hearing before its disciplinary tribunal. This process will ensure that the sovereignty of a sports body over its own sportsmen and women who break its rules will be maintained.

In respect of its role in the investigation of section 42 offences, the Gambling Commission will also take an early view on the possible complexity of any case. If, on its initial analysis of information/intelligence it concludes that the case may require additional Police powers of investigation (e.g. covert surveillance/interception of communications), then it will liaise with Police to discuss the way forward. These matters, again, can be clarified in respect of the "who does what, when and why" process by a Memorandum of Understanding to be developed between the Gambling Commission and ACPO.

In connection with these matters, it is also important to understand the relationship between intelligence, investigation and evidence gathering both for a sports disciplinary offence or a criminal offence of cheating. Trying to draw specific demarcations on this continuum or whether a case may be purely a sports discipline matter or a potential criminal cheat is not easy.

When an initial suspicion is raised either from information/intelligence received from sources or from the bookies/exchanges, the precise nature/seriousness of the case may be unclear. That may remain so unless/until the case is developed by piecing together all the pieces of the jigsaw, which may include other similar incidents involving the same participant(s) or other matters which go together to build up a pattern of suspicion. In turn, that may require further intelligence work to target a person(s), including both sportsmen/women and outside corruptors, building up the evidential trail, before a decision can be taken on any criminal charges for a section 42 offence. This is not an easy process – it can be lengthy, complex and costly and is way beyond the capacity of all but a very few sports (in essence the BHA).

At some stage in that process, it may become clear that the circumstances do not merit a criminal enquiry and the matter can best be dealt by referring it back to a Sports Body to deal with its own sportsmen and women as it sees fit under its own disciplinary process. Breaking down the various elements of the operational process within a new pan-sports integrity unit, sited within the Gambling Commission, will mean that the Commission becomes the real time 'playmaker' in dealing with the receipt and analysis of information/intelligence on all suspicious incidents in any way connected with betting integrity, the development of the case and gathering of evidence, to the point where a decision has to be made on how best to deal with it, (i) as a criminal investigation under section 42 Gambling Commission or Police only) or (ii) to refer back to a sport to deal with under its own discipline rules. All sports governing bodies should have the capacity to deal with simple disciplinary cases affecting their own sportsmen/women but if they cannot even do that, that they might seek the assistance of another sporting body to help them in the preparation of case papers for their own disciplinary process.

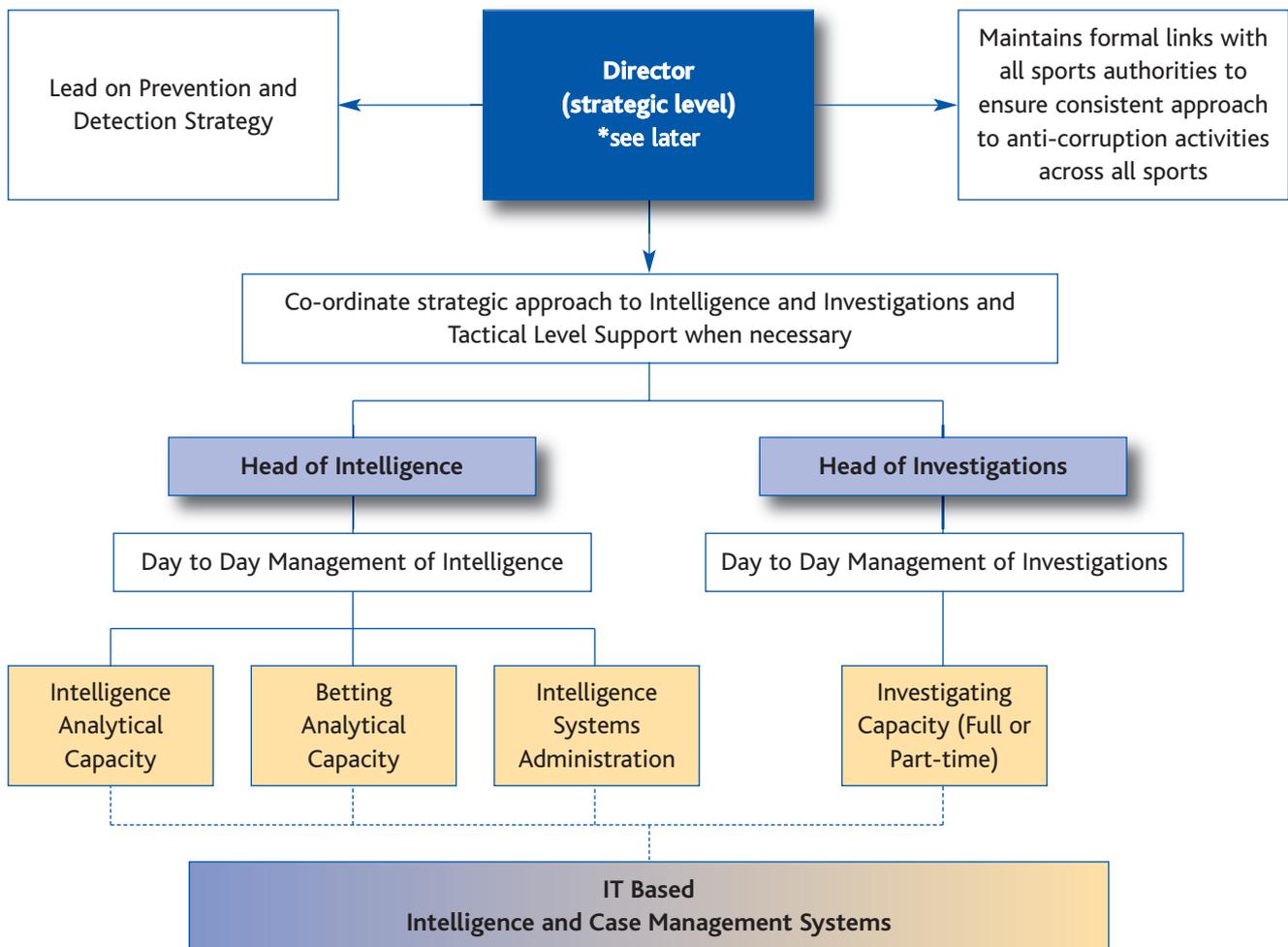
Pan-Sports Integrity Unit

In pursuance of an anti-corruption programme for sports betting, experience has indicated that the creation of an effective integrity unit is crucial.

A pan-sports integrity unit comprising both intelligence and investigative functions

A model for the structure and staffing of such a unit is shown at Figure 2.

Figure 2



Job descriptions for the various posts shown in Figure 2 are available. It is important to note that an essential element of this model is a facility to analyse betting patterns on a sport. Such personnel must have a sound knowledge of betting and preferably an appreciation of the wider aspects of intelligence analysis.

Location/Governance of a pan-sports integrity unit

In considering the location and governance of a pan-sports integrity unit, the Panel took into account the following options:

- (i) locate a new unit within the Gambling Commission;
- (ii) build in such a facility to a current sporting integrity unit (e.g. BHA);

- (iii) site a new pan-sports integrity unit in a location independent of current statutory/sporting regulatory bodies;
- (iv) locate it within some other sporting body (e.g. UK Sport).

The pros and cons of the four options were carefully considered by the Panel, taking into account, inter alia, governance/accountability and cost. Indicative costing for a pan-sports integrity unit (based upon the staffing of the current BHA unit) can be made available, although they have not been included in this paper.

The consensus view of the Panel was that the Commission is the right location because:

- it has significant powers of inquiry and prosecution;
- it already has an intelligence and investigatory function to fulfil its own obligations under section 42 of the Gambling Act;
- adding capability and capacity to meet the requirements defined in Chapter 4 need not be expensive;
- conversely establishing a separate Unit will necessarily result in duplication of resource and activity which is difficult to justify on any rational basis;
- lines of communication between Sports Governing Bodies, operators the Commission and the Police will be shortened with the Unit sitting at the centre and taking the lead.

The Panel, however, recognises that whilst this is an incremental step in resource terms, it represents a fundamental shift in policy for the Commission and clear evidence of will is required. It is recognised that careful consideration needs to be given by the Commission to addressing any possible constitutional/policy issues, as well as defining new operational procedures, that siting a pan-sports integrity unit within it may create.

In the interests of transparency, clarity and accountability, the Panel considered whether the Commission's licensing objectives should be amended to make it explicitly clear of the higher priority to be given to sports betting integrity. Given the potential need for legislative changes to achieve that the Panel does not consider that such an amendment would be appropriate. However, there does need to be a clear acknowledgement of the new priority for sports betting integrity and, as stated, the Panel recommends the appointment of a Commissioner with a portfolio responsibility for sports betting integrity issues to ensure that the necessary changes in personnel and focus happen.

The successful implementation of such a unit will require the support and confidence of its potential customers (all sports upon which betting takes place). The work of the Panel's other groups will help to chime in the various factors implicit in such matters, including an agreed cross-sport support for the new Code of conduct (see chapter 2) which envisages greater coordination amongst sporting bodies to tackle sports related betting corruption.

For a unit sited within the Gambling Commission, consideration could be given for that role to be undertaken by the Director of Regulation at the Gambling Commission but with the oversight of a designated Commissioner for Sports Betting Integrity as proposed in chapter 2.

Consideration will also need to be given to the status/needs of those sports which currently have an effective Integrity Unit and how those sports would chime in with a newly created pan-sports integrity unit.

Protocols/Memoranda of Understanding/Partnership Agreements

The DCMS 10 Point Plan which gained wide support from many sports at the Twickenham Conference in April 2006 provided, at points 5 and 6, that sporting authorities would cooperate and, if appropriate, enter into information-sharing agreements (protocols/MoUs) with relevant statutory authorities (e.g. Police/HMRC/Gambling Commission) in the context of sports betting. Furthermore, there was a commitment for sports authorities to take responsibility for proactively passing appropriate information or knowledge of corrupt practice (a race/match fixing scam for example) to the relevant authorities (e.g. Police/Customs).

Nothing in such arrangements would override a Sports Authority's duty or ability to comply with existing legal requirements (e.g. Data Protection Act 1998 or the Human Rights Act 1998).

Since the 10 Point Plan was agreed, the following information sharing agreements have been implemented:

- (i) between the Gambling Commission and ACPO;
- (ii) between the Gambling Commission and BHA and other sports;
- (iii) a partnership agreement is being considered between the Gambling Commission, City of London Police (ACPO), the CPS and the BHA.

Those agreements/memoranda are designed to facilitate information sharing between the various bodies on sporting integrity issues, particularly when betting is involved. The memoranda are not legally binding documents and create no legally enforceable duties or obligations on the signatories. They are specifically intended to create a more efficient and collaborative working relationship and to develop clear lines of communication to the mutual benefit of all parties to the agreements.

As mentioned, the MoUs/Protocols/Information Sharing Agreements that are currently in being do not create any legal duties or obligations on the signatories but a potential difficulty may arise if information gathered/received for one purpose (e.g. a criminal investigation) then needs to be passed to someone else for another purpose (e.g. disciplinary processes). Legal advice needs to be taken, according to the circumstances, in appropriate cases.

Some help is given by the Gambling Act, section 30 and Schedule 6 thereof, which creates a statutory provision for the sharing of information between the Gambling Commission and those persons/bodies listed in Schedule 6 for the purpose of those persons/bodies carrying out their functions. Section 30 also provides that those persons/bodies listed in Schedule 6 Parts 1 and 2 (which include the Police) may also pass to the Commission information which that person/body has received in the exercise of its functions. That statutory provision is included to cater for potential restrictions in the Data Protection Act, etc.

Any information sharing arrangements may also be exacerbated if the international dimension on these matters is taken into account.

Specifically, the memorandum at (iii) above is being drawn up with the experience and lessons learned from the City of London Police prosecution of several persons suspected of corrupt betting activity on horseracing (R -v- Rodgers and others), the trial on which collapsed at the Old Bailey in December 2007. There would appear to be two principal types of Memorandum/Protocol:

- a purely information sharing agreement;
- an agreement covering both information sharing and case management/ operational procedures.

The former will enhance the pan-sports "intelligence" approach to betting integrity issues; the latter will help to clarify who does "what", "when" and "why" should a breach of integrity involve a criminal prosecution under section 42 of the Gambling Act by the Gambling Commission or Police.

The memorandum at (iii) above is intended to facilitate:

- (a) the exchange of intelligence, evidence and other such information that is necessary in relation to corrupt sports betting activity;
- (b) case management and operation procedures;
- (c) the collaboration of resources and powers to enable effective prosecution of individuals who violate the integrity of sports betting;
- (d) the appropriate course of action (either by the BHA's own rules or the criminal law or both).

Principal elements of such agreements/protocols which can form a template for further memoranda between sporting bodies and the statutory agencies are:

- a clear statement of the nature/purpose of the agreement (e.g. legal status);
- a clear description of the nature and role of a signatory to the memorandum;
- essential elements for the exchange of information/intelligence;
- information sharing processes/procedures;
- case management processes/procedures;
- collaboration on resources/expertise;
- data protection/human rights issues;
- consultation processes;
- any other relevant issue agreed between the signatories to the agreement.

Lessons learned from the aforementioned case of R -v- Rodgers and others in relation to MoUs/protocols are covered in the follow-up reviews of the case conducted by Commander Rice (CoLP) and Dame Elizabeth Neville on behalf of the BHA. It is recognised that specific expertise/experience of practitioners in a particular sport is a valuable asset to assist any criminal investigation undertaken by the Gambling Commission or Police in respect of cheating at sports betting (section 42 of the Gambling Act 2005). A clear understanding of a sport, its rules, activities and participants, as well as a good knowledge of betting practices is an important element of any successful prosecution connected with sports betting integrity.

The Gambling Commission has power under the Gambling Act (section 303) to designate "Enforcement Officers", including non-employees of the Commission, to carry out investigations under the Act and that provision could be used to co-opt expertise from a particular sport, if required, or it could agree voluntary co-operation arrangements under an MoU/Protocol.

The principles on information sharing enshrined in the proposed Code of conduct (see chapter 2) which supersedes the DCMS 10 Point Plan remain valid. The Code provides a spur to move forward on such issues in a pan-sports approach rather than the somewhat haphazard current arrangements adopted by many sporting bodies.

Recommendations

- (a) A pan-sports integrity unit should be formed by expanding the unit already located within the Gambling Commission. This unit will have responsibility for:
- (i) gathering information/intelligence from a variety of sources, including betting operators, Sports Governing Bodies and other statutory authorities;
 - (ii) monitoring emerging suspicious betting activity;
 - (iii) developing intelligence on betting related crime and breaches of sporting rules in connection with betting and, as appropriate, progressing the same to investigation;
 - (iv) deciding in consultation with the Sports Governing Body concerned whether a case is more appropriate for criminal action or Sports Governing Body disciplinary action (breach of a sports rule) or no further action
 - (v) providing information, as appropriate, to Sports Governing Bodies to assist them in pursuing sports disciplinary action.
- (b) The enhancement of protocols/memoranda of understanding between the Gambling Commission, Police, Sports Governing Bodies and betting organisations to facilitate (i) the exchange of information, as appropriate, and (ii) the clarification of operational case management processes/procedures in connection with the integrity of sports betting.
- (c) The appointment of a Commissioner within the Gambling Commission with specific responsibility for sports betting integrity issues.

Appendix A: Terms of reference

The vast majority of sports betting is legal and fair, and enhances the enjoyment of sport for many fans. But betting also provides an opportunity and an incentive for corrupting sport through the use of unfair or illegal betting practices. These may range from the inappropriate and unfair use of inside information, to corruptly interfering with the outcome of a sporting event.

The Government is concerned that, although considerable progress has been made in recent years by sports governing bodies, the betting industry and the Gambling Commission, the possible threat to the integrity of sport remains an ever present and complex problem requiring multi-agency solutions. If the UK is to maintain its reputation as a jurisdiction where fair play is the guiding principle for both sport and betting, it is vital that the risks of corruption arising from all sources are reduced as far as possible.

The sports themselves – governing bodies, clubs and players, the betting industry and enforcement authorities – principally the Gambling Commission and the police – all play important roles. The Government is determined to ensure that everything possible is done to maintain the integrity and reputation of sport.

To help co-ordinate the work of those parties, and to facilitate collaboration between them, the Minister for Sport is bringing together a Panel of experts, including key people from the principal organisations involved, to work under the chairmanship of Rick Parry to look at these issues and make recommendations on how the various bodies concerned can work together more effectively. The Panel's main focus will be the design and implementation of an integrated strategy to uphold integrity in sports and associated betting.

The panel will take full account of work already done and continuing in this field, notably by the Gambling Commission, and by the parliamentary inquiry into the integrity of sports betting, chaired by Lord Faulkner of Worcester in 2005.

We expect that the Panel's remit will examine all practical measures to further the overall objective of reducing the risk of corruption in British sport, with the following seen as issues of priority:

- The true scale of the current and potential risk, including how suspicious betting patterns are identified and assessed (in markets within and outside the UK);
- The extent to which effective rules are in place and enforced to help governing bodies manage the risks to protect their own sports; and the effectiveness of the support to help individual sports participants and officials understand the risks to which they may be exposed and how to protect themselves;
- A co-ordinated strategic approach to management of cases across all parties at national and international levels, including sports governing bodies, the Gambling Commission and the police, setting out the decision-making processes involved;

- A consideration of the adequacy of powers and resources available to the various organisations concerned and the suitability of the present terms and conditions under which bets are offered and information shared between the various parties. Account will need to be taken of the cross-jurisdictional nature of many of the issues, and the need to design a response that is proportionate to the true level of risk; and
- The state of public confidence in the integrity of British sport and associated betting and the role of communications in maintaining and developing it.

Objective of the panel

Within six months, to recommend to the Minister a practical, effective and proportionate plan of action that has the support of those responsible for delivery.

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