

Sport and Sports Betting Integrity Action Plan 2017

Britain's approach to address risks to the integrity
of sport and sports betting



Sport and sports betting integrity action plan

Introduction

1. The Sport and Sports Betting Integrity Action Plan (SBI Action Plan) outlines Britain's approach to address risks to the integrity of sport and sports betting and to protect our national and international reputation for being a safe place to enjoy both. The corrupt manipulation of sport events and related betting markets is often referred to as match-fixing¹.
2. Initially published in September 2015, a report on the progress of priority actions from the first plan was published in January 2017. This second edition builds on that progress, continuing the collaborative approach across sport, betting operators, law enforcement and government to prevent and deter to protect against sports betting related corruption. It has also been amended to include relevant updates and new priorities.
3. The SBI Action Plan sets out the expected focus of agencies, sports governing bodies (SGBs), player associations, betting operators and government in delivering timely and effective actions to identify and control risks associated with match-fixing and sports betting integrity. The plan builds upon the progress made since the publication of the [Report of the Sports Betting Integrity Panel](#) in January 2010 that provided the initial roadmap for action. The plan also progressed Action 31 of the UK Anti-Corruption Plan, published in October 2014². A progress update on the UK Anti-Corruption Plan was published in May 2016.³
4. The SBI Plan also reflects the objectives and approach of the Council of Europe's Convention⁴ on the Manipulation of Sports Competitions, recognising the need to;
 - a. identify and coordinate the actions of key partners; and
 - b. collect, assess and exchange information to support the collective and individual partner's efforts.

This is done through the Sports Betting Integrity Forum (SBIF) and the Sports Betting Intelligence Unit (SBIU) and is known collectively as the UK's national platform. More information on the SBIF and SBIU can be found in Part 1 of the SBI Plan.

5. The Gambling Commission (the Commission) acts as the lead agency for the UK approach to combatting the sports betting integrity risk. Working with DCMS and relevant international bodies, the Commission ensures that the SBI Plan is coordinated with UK government sports/integrity policy.

What is meant by the manipulation of sports events or match-fixing?

6. It is the corrupt manipulation of a sporting event by those participating, officiating, organising or coaching, with the intention of producing a result or occurrence which

¹ [The Council of Europe's Convention on the Manipulation of Sports Competitions](#) defines manipulation of sports competitions as "an intentional arrangement, act or omission aimed at improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for others"

² [UK Anti-Corruption Plan](#)

⁴ [The Council of Europe's Convention on the Manipulation of Sports Competitions](#)

benefits the corrupter and/or their associates. The benefit may be a financial reward related to the deception of operators or other bettors through sports betting.

7. Match-fixing corruption can also result in benefit to individuals or teams by gaining advantage in tournaments, leagues and/or competitions. Such actions may not necessarily involve betting and could be a breach of sports codes or regulations, if relevant clauses and/or conditions are in place.

Why is prevention so important?

8. Sport and sports betting rely upon high standards of integrity. Match-fixing and related betting corruption undermines the ethos, reputation and commercial viability of sports and betting businesses. It can have an impact on the social, political and economic benefits derived from sports and sports betting. It tarnishes the reputation of all athletes and has impact upon Britain's reputation as a safe environment within which to host sporting events and conduct gambling related business.

The Sports betting integrity action plan: Overview and purpose

9. The purpose of the SBI Action Plan is to put in place a framework of actions to:
 - a. Prevent sporting events and licensed sporting betting markets from being corrupted.
 - b. Deterring persons from organising corrupt sports events to manipulate betting markets
10. We do not believe that we have an endemic problem in Britain, although we have continued to experience instances of sports integrity betting-related corruption. We believe the threat is on-going and we need to both prevent and be prepared to act purposefully when it is revealed.
11. The SBI Action Plan recognises the need for key stakeholders to plan for and act within their areas of responsibility, support others where appropriate and work in unison as part of the broader national platform that is the basis of our strategic approach. A crucial aspect of this approach is to continue to develop a culture of co-operation and co-ordinated actions which is reflected in the approach of the Sports Betting Integrity Forum (SBIF), which has responsibility for delivery of the SBI Action Plan.
12. The SBI Action Plan also reflects the continual need to be vigilant and recognise that Britain is not immune from external influences. Our successes to date in identifying and responding to the threats reflects the learning and experience gained from individual cases and the benefits arising from information sharing and collaborations between sports, licensed betting operators and agencies in Britain and abroad. There can be no complacency; those responsible for corrupting the integrity of sports and sports betting are resilient and resourceful and efforts need to be sustained.
13. The threat to Britain has international dimensions because of the global nature of sport, betting and communications. Match-fixing can involve serious organised crime networks operating at national and international level using sophisticated technologies and organisational structures. Consistent with the Serious and

Organised Crime Strategy⁵, prevention in combination with disruption and deterrence plays a key role in our approach.

14. Match-fixing is also on occasions local in nature and opportunistic. There is a need to identify and manage both and whilst the localised instances may involve relatively small sums of money such actions still have the potential to undermine the reputation of the sport and sports betting and the reputation of the majority of athletes.
15. We know that illegal or unregulated betting makes the detection of sports betting corruption much harder to identify and address. We will continue to promote the benefits of effective regulation, and work to address illegal gambling at home and abroad, supporting the Gambling Commission's strategic objective to keep crime out of gambling.
16. The threat of match-fixing presents an unceasing challenge for the leadership and culture of sports, and sports betting to identify and implement concrete actions to prevent and deter those seeking to corrupt. This requires longer term commitment to the development of competencies and approaches.
17. The longer term challenges remain for public authorities and government in tackling match-fixing to understand the complex nature of the issues and effective approaches to combat the associated criminality, corruption and money laundering, working closely with others. It requires government to align sports, sports betting and criminal justice policies focused upon tackling corruption in sports and sports betting and the protection of Britain's reputation and influence.
18. Part 1 gives an overview of what the SBI Action Plan aims to achieve. Part 2 outlines the specific actions that will be undertaken by key stakeholders in 2017.

⁵ [Serious and Organised Crime Strategy October 2013](#)

Part 1- Sports betting integrity action plan

A - The strategic approach

- I. Activity will be taken at a national level by government, Gambling Commission and other agencies, by SGBs, by Player Associations and betting operators and organisations with the objectives of:
 - Sustaining the SBIF to develop and deliver the SBI Action Plan through both individual activities and coordinated responses to joint issues.
 - Working to develop a strategic risk assessment methodology to support prevention and deterrence activities by the key partners.
 - Taking action at partner levels, focusing upon developing preventative measures within sports and betting operators' organisations to raise awareness of the threats, promote a culture of resistance.
 - Providing channels to enable those that wish to provide information to do so securely.
 - Being information led and having effective exchange arrangements that operate between public authorities and private organisations.
 - Promoting sports and betting operators' governance arrangements and cultures that produce effective risk management strategies.
 - Establishing complementary and effective disciplinary frameworks within SGBs and betting operators, that are capable of being enacted concurrently with gambling regulation and criminal justice action.
 - Contributing to and learning from international developments and operational collaborations.
 - Coordinating national policy development in international contexts.

B - The Sports Betting Integrity Forum

- II. The Forum will;
 - Have oversight of members' and partners' individual and collective actions in developing and implementing Britain's SBI Action Plan.
 - Support and develop the activities at an organisational and national level to deliver the SBI Action Plan.
 - Debate issues and identify potential solutions
 - Progress issues of common concern through sub groups reporting to the Forum.
- III. The Forum will comprise senior representatives of the key partners and have a rotating chair. The secretariat is the responsibility of the Gambling Commission (the Commission).

C – Sport (including Sports Governing Bodies and Player Associations working under the auspices of the [Sports Betting Group](#))

- IV. Good leadership and governance are recognised as essential conditions for addressing the challenges to integrity that match-fixing creates. Recognising there is no single model, Sports Governing Bodies and Player Associations will, under the auspices of the Sports Betting Group, work to;
 - ensure that the principles of democracy, inclusiveness, transparency and accountability in decision-making are embodied within their sport,

- develop an understanding of the threats to the integrity of their sport that they face,
- develop effective risk management arrangements
- be seen to maintain the integrity of their sport and
- Work with each other to develop best practices to be shared amongst all sports

V. Education and other preventative measures play a key part in tackling threats to integrity. They form an essential part of the roles played by SGBs, Player Associations and sports bodies, their effectiveness being linked with clear rules, fair and proportionate sanctions and good governance.

Sport's National Governing Bodies and Player Associations will, under the auspices of the Sports Betting Group, work to;

- Develop and deliver educational programmes to raise awareness and knowledge of athletes, coaches, officials and those in governance roles as to the threats posed by those that would corrupt the integrity of sport from within or outside the sport.
- Encourage sports leaders and elite athletes to act as role models in their sport and support players in having a voice in the development and delivery of education and deterrence strategies
- Ensure that their codes of conduct, betting rules and contractual provisions establish clear frameworks to enable sanctions to be applied.
- Take steps to ensure all participants are aware of their responsibilities outlined in codes of conduct, betting rules and contractual provisions and the implications of potential breaches
- Establish the policies and capabilities that enable them to identify and respond match-fixing to corruption issues,
- Have clear processes for reporting, information gathering, exchange and investigation, which will include clear reporting mechanisms for sport related issues.
- Ensure that commercial arrangements with gambling operators or others do not create a conflict of interest with regards to the prevention and deterrence of sports betting corruption. Where commercial arrangements exist with sports betting operators, sport will ensure these are with appropriately licensed operators with adequate monitoring and reporting mechanisms of suspicious betting.

D - Licensed sports betting operators

- VI. Licensed betting operators have obligations under the Gambling Act 2005 to ensure that sports betting is not associated with or used to support crime.
- VII. This action plan recognises that licensed betting operators will have effective risk management arrangements that, in addition to their individual regulatory obligations, contribute to the collective effort.
- VIII. As such, licensed betting operators will work to:
- Prevent sports betting being associated with crime and/or corruption.
 - Provide information on irregular betting and/or suspicious sports events quickly to the Gambling Commission's SBIU and where possible provide the relevant

SGBs with sufficient information to conduct an effective investigation in accordance with the provisions of Licence Condition 15.1⁶

- Include specific rules and provisions within their customer terms and conditions that highlight that personal information may be shared with regulators or relevant sports body where there are suspicions of involvement in match-fixing or breach of sports regulations.
- Raise the awareness of match-fixing and the misuse of insider information with their employees, and implement contractual rules with sanctions for employees acting inappropriately.
- Ensure that commercial arrangements with sports do not create a conflict of interest with regards to the prevention and identification of sports betting corruption.

E - The Gambling Commission

- IX. The Commission will take steps to ensure that the regulatory system secures the part that licensed sports betting operators play in preventing sports betting from being a source of, or associated with match-fixing or corruption. The Commission will support the SBI Action Plan by ensuring that;
- Only operators suitable in terms of their integrity and competence will be licensed as sports betting operators and remain so.
 - Operators identifying possible match-fixing/corrupt activity report this promptly to the Commission and where appropriate to SGBs.
- X. The Commission will be responsible for the development and operation of the Sports Betting Intelligence Unit (SBIU), the confidential reporting facility and the Crimestoppers facility.
- XI. The Commission is the UK's lead agency and in working closely with DCMS in the development and delivery of the SBI Action Plan will;
- Provide the secretariat for Sports Betting Integrity Forum, its workstreams and engagement with and between members
 - Maintain and facilitate the information sharing protocol and extend to other sports who have not yet signed up, as and when appropriate.
 - Maintain and administer the communications portal to facilitate communications between SBIF partners.
 - Engage with government and agencies (including UK Anti-Doping) both at home and abroad to ensure that betting integrity/match-fixing plans are aligned to relevant national and international strategies
 - Where appropriate, support SGBs and Player Associations in the development of education programmes and promote the role of the SBIU.
 - Engage with relevant international bodies, regulators, SGBs and organisations to influence and ensure alignment with international sports betting integrity related policy and operational procedures.
 - Work with Government to implement the Investigatory Powers Act
 - Investigate potential criminal activity and where appropriate take relevant action to use their powers to bring prosecutions under the Gambling Act 2005.

⁶ [Licence Conditions and Codes of Practice February 2015](#)

- Work with Government to ensure that the EU General Data Protection Regulation and UK Data Protection legislation does not have a detrimental impact upon the capability of the SBIF to address corrupt sport and betting threats.

F - The Sports Betting Intelligence Unit (SBIU)

The Gambling Commission's SBIU, supported by the SBIF, will act as the national platform. It will in accordance with British law, inter alia:

- XII. focus on collecting and analysing information and intelligence relating to potentially criminal activity related to sports betting integrity where that activity;
 - Relates to a sporting event that occurred in GB and/or
 - Involves parties within GB and/or
 - Involves a Commission licensed operator.
- XIII. Produce intelligence to assist investigations that can support the prosecution or disruption of criminal offences or regulatory action under the Gambling Act 2005 or any other applicable laws.
- XIV. Ensure that information to assist the prevention or mitigation of match-fixing risk is appropriately collected, assessed and efficiently communicated to:
 - SGBs, law enforcement, agencies and licensed operators,
 - Non British parties, (e.g. international law enforcement agencies, regulators and sports organisations,) to assist preventative or deterrent action.
- XV. Support operational coordination with partners to ensure an early and effective response to emergent issues.

G - Law Enforcement

- XVI. Law Enforcement (LE), here comprising of the National Police Chiefs' Council (NPCC), Police Scotland (PS) and the National Crime Agency (NCA), plays a key role in deterring match-fixing and supporting others' efforts in doing so. LE recognises that match-fixing may involve organised criminality at local, national and international levels.
- XVII. The focus of LE activity will be upon the investigation of serious and organised criminal activity. LE will share information with others where it is appropriate to do so.
- XVIII. LE and the Gambling Commission will sustain secure information-sharing arrangements and will contribute to each other's efforts through tasking processes.
- XIX. LE representatives will be members of the Sports Betting Integrity Forum (SBIF) and will participate in arrangements, coordinated through the SBIU, to ensure a timely response to emerging issues identified by relevant partners.
- XX. LE will engage with the Crown Prosecution Service (CPS) and the Procurator Fiscal (Scotland) to develop effective management arrangements for investigation and prosecution of sports betting integrity cases.

XXI. The CPS and Procurator Fiscal will each identify designated single points of contact responsible for sports betting corruption matters.

H - Government

- XXII. The Department for Culture Media and Sport (DCMS) is the lead government department for the SBI Action Plan. DCMS will;
- Co-ordinate actions that require cross-government involvement relating to national anti-corruption measures.
 - Keep under review the UK's legislative arrangements to prevent sports betting corruption.
 - The Government is committed to signing the Council of Europe's Convention on the Manipulation of Sports Competitions, as set out in the 2015 publication "Sporting Future: A New Strategy for an Active Nation"⁷
 - Ensure that the appropriate level of prioritisation is given to sports betting corruption matters by the Gambling Commission and all relevant law enforcement bodies and agencies.
 - DCMS, in collaboration with the Commission, will support, as appropriate, the implementation by overseas Governments and relevant international bodies of effective regulatory measures to prevent sports and sports betting corruption, and to promote effective coordination on a cross-border basis.
 - Engage with European and international institutions on the development of sport and betting policy initiatives to ensure that Britain's interests in addressing threats to sports betting integrity and match-fixing are reflected.

⁷ [Sporting Future: A New Strategy for an Active Nation](#)

Part 2- Sports Betting Integrity Action Plan 2017

Ref	Objective and Action	Lead/ supported by	Timescale
1	Continue the review of the terms of reference of the Sports Betting Intelligence Unit to ensure delivery of most effective, risk based approach to support to partners	Gambling Commission Lead: Nick Tofiluk	By December 2017
2	Support workshops to promote good practice and promote sharing of knowledge and information across all stakeholder groups. Areas to be covered to include; sharing information, standardising presentation of evidence and misuse of inside information.	Sports Betting Integrity Forum Lead: Lorraine Pearman	By December 2017
3	Finalise funding of the SBIF to support effective delivery of the Sports and Sports Betting Integrity Action Plan in line with responsibilities of the Home Office Anti-Corruption plan	Department for Culture Media and Sport Lead: Hitesh Patel & David Hughes	By July 2017
4.	Ensure that DCMS in implementing the General Data Protection Regulation (GDPR) into UK legislation are aware of the need to ensure the effective delivery of Britain's betting integrity strategy and in particular the exchange of information between national platforms.	Sports Betting Integrity Forum Lead: Alys Lewis and Nick Tofiluk	Ongoing
5.	Ensure collective clarity of the measures that will enable sharing of information between SBIF members and, as representatives of their organisations, promote understanding of the legal provisions and protocols to share information.	Sports Betting Integrity Forum Lead: Alys Lewis	By December 2017
6.	Undertake assessment of the major threats to sport and sports betting to enable focussed activity on key priority areas that support Britain's National Platform.	Sports Betting Integrity Forum Lead: Gambling Commission	By December 2017
7	Work with the Council of Europe's Convention Secretariat and Follow-Up Committee to ensure Britain's interests are represented in activities that support the implantation of the Convention on the Manipulation of Sports Competitions	Gambling Commission Lead Nick Tofiluk	Ongoing
8	Sports Governing Bodies to undertake a best practice review of rules and regulations on betting to ensure sports regulatory frameworks remain fit for purpose	Sports Betting Group	By December 2017
9	Expand the reach and support provided by the Sports Betting Group to sports governing bodies to reflect the expectations set out in the 2016 Code for Sports Governance. This support should include assistance in developing education for the widest range of participants i.e. not solely confined to athletes/players	Sports Betting Group	By December 2017
10	Develop a strategy for engaging with small and medium betting operators to raise awareness and share good practice in order to protect the integrity of sports betting and their interests.	Betting Operators: Lead TBC	By December 2017