



Sport and Sports Betting Integrity Action Plan 2020

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 (the Plan) outlines Britain's approach to managing the risks to betting integrity. It sets out how we aim to protect our national and international reputation for being a safe place to enjoy both sport and sports betting. The corrupt manipulation of sporting events and related betting markets is often referred to as match-fixing¹.
2. The first Plan was published in September 2015 and is the foundation of Britain's strategy to protect betting integrity. In line with our commitment to an annual review, revised versions have been published annually along with progress reports.
3. The strategy outlines the expected focus of agencies, sport governing bodies (SGBs), player associations, betting operators and government in delivering timely and effective actions to identify and control risks associated with event manipulation and sports betting integrity.
4. It builds on 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 strategy 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
5. The 2020 edition builds on our work to date, continuing the collaborative approach to prevent and protect against event manipulation and sports betting related corruption. It also includes relevant updates and new priorities.
6. We also reflect the objectives and approach of the Council of Europe's Convention⁴ on the Manipulation of Sports Competitions (known as the Macolin Convention). Britain signed the Macolin Convention (the Convention) on 6 December 2018⁵.
7. Article 13 of the Convention sets out what is expected from signatories in terms of establishing a national platform. The key operating principles of a national platform are to:
 - a. Coordinate the fight against the manipulation of sports competitions;
 - b. Identify and coordinate the actions of key partners; and
 - c. Collect, assess and exchange information to support the collective and individual partner's efforts.

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](#)

⁵ [Britain signs the Macolin Convention](#)



8. The Sports Betting Integrity Forum (SBIF) and the Sports Betting Intelligence Unit (SBIU) make up Britain's national platform. More information on the SBIF and SBIU can be found in Part 1 of the Plan.
9. The Convention is now ratified and became international law in 2019. Britain will consider ratification of the Convention once our relationship with the European Union is better understood.
10. The Gambling Commission (the Commission) acts as the lead agency for the Britain and the UK's approach to combatting the sports betting integrity risk. Working with DCMS and relevant national and international bodies, the Commission ensures that the Plan is coordinated with UK government sports integrity policies and strategies. This includes "Sporting Future: A new strategy for an active nation"⁶ published in 2015.
11. We will also contribute to delivery Goal 4 of the Government's Anti-Corruption Strategy⁷, which aims to promote "greater integrity in domestic and international sport.

What is meant by the manipulation of sports events?

12. It is the corrupt manipulation of a sporting event by those involved, for example participants, officials, organiser, coaches etc, with the intention of producing a result or occurrence which benefits the corrupter(s) and/or their associates. The benefit may be a financial reward related to the deception of operators or other bettors through gambling. The manipulation could affect the outcome of an event or an element within an event.
13. Manipulation in sport can also result in benefit to individuals or teams by gaining advantage in events (e.g. matches, races, tournaments, leagues etc). Such actions may not necessarily involve betting but could be a breach of sports codes or regulations, providing the relevant clauses and/or conditions are in place.

Why is prevention and protection so important?

14. Sport and sports betting rely upon high standards of integrity. Event manipulation, integrity issues and related betting corruption undermines the ethos, reputation and commercial viability of sports and the betting industry. It can have an impact on the social, political and economic benefits derived from sports and sports betting. It can potentially tarnish the reputation of all athletes and impact upon Britain's reputation as a safe environment within which to host sporting events and conduct gambling related business.

The sports and sports betting integrity action plan: overview and purpose

15. The purpose of the Plan is to put in place a framework of actions to:
 - a. Prevent sporting events and licensed sporting betting markets from being corrupted.

⁶ [Sporting Future: A new strategy for an active nation](#)

⁷ [United Kingdom Anti-Corruption Strategy 2017 - 2022](#)



- b. Deterring the manipulation of sports events to gain an unfair advantage on betting markets
16. We believe that Britain does not have an endemic integrity problem, although we do encounter instances of sports integrity issues and corruption of betting markets. We believe the threat is on-going and we need to both prevent and be prepared to act when it is revealed.
 17. The Plan recognises the need for key stakeholders to plan for and act within their areas of responsibility, support others where appropriate and collaborate as part of the broader national platform; this is the basis of Britain's strategic approach. A crucial aspect of this is to continue to develop a culture of co-operation and co-ordinated actions, which is reflected in the terms of reference of the SBIF, which has responsibility for delivery of the Plan's key priority actions.
 18. The 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.
 19. Our success also builds on the benefits arising from information sharing and collaborations between sports, licensed betting operators and agencies in Britain and with overseas jurisdictions and international bodies. We will continue to develop our understanding of emerging threats by undertaking focussed, collaborative risk assessments. Any specific outputs from these assessments will be incorporated into the work of the Forum.
 20. There can be no complacency; those responsible for corrupting the integrity of sports and sports betting are resilient and resourceful and our efforts need to be sustained.
 21. The threat to Britain has international dimensions because of the global nature of sport, betting and communications. Event manipulation can involve serious organised crime networks operating at national and international level using sophisticated technologies and organisational structures. Consistent with the "Pursue, Prepare, Protect and Prevent" delivery framework as outlined in the Serious and Organised Crime Strategy⁸ prevention in combination with disruption and deterrence plays a key role in our approach.
 22. Through the Commission we will continue to engage with the Council of Europe, working with the Macolin Convention's Secretariat. This will ensure Britain's interests are represented in activities that support the implementation of the Convention in Europe and beyond. We will also continue to work with the Group of Copenhagen⁹ and relevant Working Groups to help enable the sharing of intelligence, information and expertise across jurisdictions.
 23. Event manipulation is also on occasions local in nature and opportunistic. There is a need to identify and manage both. Whilst these instances may involve relatively small sums of money such actions still have the potential to undermine the reputation of the sport, sports betting and the wider reputation of athletes.

⁸ [Serious and Organised Crime Strategy 2018](#)

⁹ [Network of National Platforms \(Group of Copenhagen\)](#)



24. 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. We will work to address illegal gambling at home supporting the Commission's strategic objective to prevent gambling being a source of crime or disorder and ensuring it is fair and open. We will also work towards a better understanding of the impacts of international grey and black markets.
25. The threat of event manipulation and match-fixing presents an unceasing challenge for the leadership and culture of sports and to sports betting; there is a clear need 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.
26. The longer term challenges remain; we need to enhance our understanding to address the complex nature of the risks and issues connected to event manipulation. We will also continue to take collaborative action to combat the associated criminality, corruption and money laundering in sports and sports betting to protect Britain's reputation and influence.
27. The Forum also recognises the need to balance effective investigation and disciplinary processes against respect for fundamental human rights including privacy and a fair hearing.
28. In the next section, part 1 gives an overview of what the Plan aims to achieve. Part 2 outlines the specific actions that will be undertaken by key stakeholders in 2020.



Part 1- Sports and sports betting integrity action plan

A - The strategic approach

- I. Activity will be taken at a national level by government, the Commission and other agencies, by SGBs, by Player and Membership Associations and betting operators and organisations with the objectives of:
 - Sustaining the SBIF to develop and deliver the Plan through both individual activities and coordinated responses to joint issues.
 - Working to develop risk assessments to support prevention and deterrence activities by the key partners.
 - Taking action at partner levels, focusing upon developing preventative measures within sport and betting operators' organisations to raise awareness of the threats, promoting a culture of resistance.
 - Providing channels to enable those that wish to provide information the opportunity to do so securely.
 - Being information led and having robust exchange arrangements that operate between public authorities and private organisations, including working with Government towards solutions to address any impacts of Brexit that may threaten Britain's ability to protect against betting integrity risks.
 - Promoting sports and betting operators' governance arrangements and cultures that support risk management strategies.
 - Encouraging the implementation of effective Education Programmes, sharing and promoting good practice across all stakeholder groups.
 - 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. Specifically, this will involve working with and supporting the development of the Council of Europe's Group of Copenhagen. We will also aim to be part of the Convention Follow Up Committee once the UK has ratified the Macolin Convention.

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 strategic approach.
 - Support and develop the activities at an organisational and national level to deliver the 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). [The Terms of Reference for the SBIF can be found on their website](#)

C – Sport (including Sports Governing Bodies and Player Associations and working in collaboration with 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, SGBs and Player Associations will;
- 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
 - 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 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 relevant and appropriate 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 to match-fixing and corruption issues.
- Have clear processes for reporting, information gathering, exchange and investigation, which will include clear reporting mechanisms for integrity 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 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 to the Commission's SBIU and where appropriate provide the relevant SGBs in accordance with the provisions of Licence Conditions 15.1¹⁰
 - 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 event manipulation 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 ensures that licensed sports betting operators will contribute to preventing sports betting from being a source of or associated with event manipulation or corruption. The Commission will support the 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 suspicious or irregular 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 .

The Commission is the UK's lead agency and in working closely with DCMS in the development and delivery of the Plan will;

- Provide the secretariat for Sports Betting Integrity Forum and support engagement with and between members

¹⁰ [Licence Conditions and Codes of Practice](#)



- 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/ plan 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.
- Investigate potential criminal activity and where appropriate take relevant action to use their powers to bring prosecutions under the Gambling Act 2005.

F - The Sports Betting Intelligence Unit (SBIU)

- XI. The SBIU contributes to the Commission's strategic priorities. It does this by supporting and facilitating collaboration across operators and other agencies concerned with raising standards in relation to sports betting integrity. It also strives to foster national and international standards where it is clearly in the interests of British consumers to do so. SBIU, supported by the SBIF, will act as the hub of the national platform.
- XII. The SBIU's focus is 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 Great Britain, and/ or
 - involves parties¹¹ based within Great Britain, and/ or
 - actively occurred under a Gambling Commission licence .
- XIII. The SBIU will develop intelligence to inform investigative decision making on the prosecution or disruption of criminal offences or regulatory action under the Gambling Act.
- XIV. Ensure that information to assist the prevention or mitigation of match-fixing risk is appropriately collected, assessed and where relevant 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

¹¹ Examples of 'Parties' could include participants as defined by a sports governing body, employees of a betting operator, employees of a TV or telecoms company etc



detering 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 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 betting integrity points of contact in the Crown Prosecution Service (CPS) and the Procurator Fiscal (Scotland) to maintain management arrangements to support investigation and prosecution of sports betting integrity cases.

H - Government

- XXI. The Department for Culture Media and Sport (DCMS) is the lead government department for delivery of the 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.
 - Ensure that the appropriate level of prioritisation is given to sports betting corruption matters raised by the National Platform.
 - DCMS, in collaboration with the Commission, will support, as appropriate, the implementation by overseas Governments and relevant international bodies of regulatory measures to prevent sports and sports betting corruption, and to promote 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 event manipulation are reflected.
 - Monitoring and reporting on progress on the relevant priorities within the Home Office Anti-Corruption Strategy
 - Take the lead in meeting the commitment for Britain ratify the Macolin Convention.



Part 2- Sports Betting Integrity Priority Actions 2020		Lead
1.	<p>Sharing Knowledge and Good Practice</p> <p>a. Subject to funding, host workshop(s) and refresh the SBIF website to promote good practice and promote sharing of knowledge and Information across stakeholder groups.</p> <p>b. Promote good practice and sharing of knowledge across the betting industry with a focus on small and medium sized operators</p>	<p>a. Lorraine Pearman – Gambling Commission</p> <p>b. Elizabeth Robson – Sky Betting and Gaming</p>
2.	<p>Links with Law Enforcement and Prosecutors</p> <p>Strengthen link with all Britain’s Law Enforcement Agencies and enhance cooperation between the national platform and Prosecutors</p>	Lorraine Pearman – Gambling Commission and Paul Risby NCA
3.	<p>Whistleblowing and Reporting Mechanisms</p> <p>Review the national approach to whistleblowing and reporting mechanisms. To include what processes and guidelines are currently exist, assess effectiveness of the supporting processes including protection for those disclosing information and identify good practice.</p>	<p>Phil Suddick – Tennis Integrity Unit</p> <p>Duncan Gibson – Greyhound Board of Great Britain</p>
4.	<p>Risk Assessment</p> <p>Support the Council of Europe’s Risk Assessment Working Group by undertaking and assessment of betting integrity across Britain’s national platform</p>	Lorraine Pearman – Gambling Commission
5.	<p>Sport Education Programmes: To include:</p> <p>a. Research methods to evaluate education programmes to identify the most effective techniques to help prevent and deter against involvement in betting integrity issues.</p> <p>b. Review the reach of education programmes to ensure focus across all tiers of sport</p>	<p>a. Hayley Green – England and Wales Cricket Board</p> <p>b. Leigh Thompson – Sport and Recreation Alliance/</p>
6.	<p>Black and Grey Markets</p> <p>Commission research on black and grey markets to understand the impacts on British sport and sports betting, with a view to developing a strategy to manage the risks to betting integrity.</p>	<p>Eric Konings – Kindred</p> <p>Chris Watts – British Horseracing Authority</p>
7.	<p>Protecting Integrity after Brexit</p>	Lorraine Pearman - The Gambling Commission



	Following Brexit, work with Government and Forum Members to assess new opportunities or identify emergent risks to Britain's ability to protect itself against betting integrity issues.	
8.	Evidential Data Collection Collate and compare existing data collection/extraction policies from sport and other relevant sources to identify potential common standards and good practice	Simon Taylor – Professional Players Federation