

REVIEW OF COMPLIANCE WITH THE SPORTS BETTING GROUP CODE OF PRACTICE

Summary report

February 2017

Contents

Summary	3
The Sports Betting Group and the Code of Practice	4
The Sport and Sports Betting Integrity Action Plan	6
 Overview of compliance with the SBG Code of Practice Action 1: Establish rules, regulations and sanctions Action 2: Designate a contact person Action 3: Establish an integrity function Action 4: Introduce an education programme Action 5: Check competition contracts Action 6: Establish information sharing arrangements Action 7: Undertake a regular review 	7
Conclusion	12
Annex A: Summary of the SBG Code of Practice Annex B: Summary of compliance by sport Annex C: Overview of player-led betting integrity education	13 14 31

Summary

A key recommendation of the Report of the Sports Betting Integrity Panel (the Parry Report) in 2010 was the establishment of the Sports Betting Group (SBG) to provide leadership to the sports sector on betting integrity. As part of this role, the SBG has developed a Code of Practice setting out the key measures Sports Governing Bodies and others should take to protect sport from threats to integrity posed by betting corruption.

Pursuant to the actions set out in the Sport and Sports Betting Integrity Action Plan, the SBG undertook a review of the Code to ensure it remains fit for purpose and launched a new website designed to provide sports governing bodies and other stakeholders with access to key integrity resources.

Alongside this work, the SBG has reviewed the implementation of the Code across its membership to assess compliance but also to understand how different sports have applied the Code to their particular circumstances. This summary report provides an overview of the results and confirms that the Code has had a significant impact in driving improvement across the sector and in ensuring sports governing bodies have a consistent approach to managing the risks of sports betting corruption.

Overall, the review confirms that all governing body members of the Sports Betting Group surveyed have implemented the Code in full. In addition, it demonstrates how the flexibility built into the Code has enabled different sports governing bodies to develop integrity arrangements that best suit their particular sports while still adhering to a set of common principles.

Finally, while this report had been prepared for the Sports Betting Integrity Forum in support of the SBI Action Plan, it is being made available as a public document to highlight the work of the Sports Betting Group and the importance of the SBG Code of Practice and to assist other sports governing bodies in their efforts to address betting corruption.

Note: the information contained in this report was correct at the time of publication.

The Sports Betting Group and the Code of Practice

The Sports Betting Group

The Sports Betting Group (SBG) was established in 2010 following the Report of the Sports Betting Integrity Panel chaired by Rick Parry (the Parry Report). A key recommendation from the report was the creation of a Sports Betting Group to provide leadership to the sports sector on betting integrity matters and to share information and good practice.

The SBG comprises the following members drawn from governing bodies, player associations and competition organisers (as at February 2017):

British Horseracing Authority
British Curling
British Cycling
British Rowing
Darts Regulation Authority
England and Wales Cricket Board
The Football Association
Greyhound Board of Great Britain
Lawn Tennis Association
Premier League
Professional Players Federation
Rugby Football League
Rugby Football Union
World Professional Billiards and Snooker Association

The SBG is chaired by the Chief Executive of the <u>Sport and Recreation Alliance</u>. The Alliance also provides the secretariat and policy support to the group.

The Code of Practice

A key role of the SBG is to maintain a Code of Practice on sports betting integrity. The Code is designed to assist Sports Governing Bodies and others, such as competition organisers, to put in place measures to protect their sport from the risks of betting corruption.

Following a recent review, the SBG Code of Practice has been revised to reflect the most up-todate experience from across the sector and to provide specific examples illustrating how the Code can be applied in practice. The revised Code contains seven key actions:

- Action 1: Establish rules, regulations and sanctions
- Action 2: Designate a contact person
- Action 3: Establish an integrity function
- Action 4: Introduce an education programme
- Action 5: Check competition contracts
- Action 6: Establish information sharing arrangements
- Action 7: Undertake a regular review of integrity arrangements

A summary of the SBG Code of Practice including more information on each action can be found at Annex A. The full SBG Code of Practice can be found here.

Scope of the review

For the purposes of this report it should be noted that British Cycling, British Curling and British Rowing joined the SBG during 2016 and as such have not been assessed as part of this review.

However, it is anticipated that all three organisations will work to become compliant with the Code of Practice by the end of 2017.

Similarly, the Premier League, Professional Players Federation (PPF) and the Lawn Tennis Association have not been included in this review as they do not have primary responsibility for regulating and investigating betting integrity issues within their sport. However, further information on the role of the PPF and its members in delivering betting integrity education is provided under Action 4 and Annex C.

In the case of tennis, the Tennis Integrity Unit (TIU) is the global anti-corruption body for the sport with responsibility for enforcing betting integrity rules. More information on the work of the TIU, its structure and operation can be found here.

The Sports and Sports Betting Integrity Action Plan

<u>The Sport and Sports Betting Integrity Action Plan</u> (SBI Action Plan), first published in 2015, sets out the UK's national approach to tackling the risks associated with sports betting corruption.¹ The plan establishes how all stakeholders – including sports governing bodies and player associations, betting operators, the Gambling Commission and law enforcement – will work together to protect the integrity of sport and sports betting markets.

The 2015 SBI Action Plan contains ten key actions that are owned by one or more stakeholders. The following three actions are the responsibility of the Sports Betting Group:

- Review the adoption of the Sports Betting Group's Code of Practice to determine its effectiveness.
- Review the provision and effectiveness of education programmes in sport to deter and protect players and participants from betting corruption.
- Collaborate with relevant sports to share information, best practice and assist them to tackle match-fixing issues within their sport.

Alongside the work to revise the SBG Code of Practice and the SBG website, this report is designed to address the first two of these actions by providing a review of the implementation of the SBG Code of Practice by the member governing bodies of the SBG and, in addition, by providing a brief assessment of the provision and effectiveness of betting integrity education. Additional information on the latter is included under Action 4 further below and Annex C.

Further, this summary report builds upon the <u>Sports Betting Profiles</u> work already completed by the Sports Betting Integrity Forum and is intended to serve as a useful resource for other governing bodies seeking to implement the SBG Code of Practice by highlighting the approaches taken by different sports.

¹ The Sport and Sports Betting Integrity Action Plan: http://www.sbif.uk/images/Documents/FINAL-SBI-Action-Plan: http://www.sbif.uk/images/Documents/FINAL-SBI-Action-Plan-V2.0.pdf. Note that an updated 2017 edition of the plan was published in February 2017.

Overview of compliance with the SBG Code of Practice

Action 1: Establish rules, regulations and sanctions

In accordance with the SBG Code of Practice, SBG members have clearly-defined rules, regulations and sanctions in place with regard to betting corruption. In some sports, for example cricket, these rules are contained within a specific anti-corruption code while in others they are included within the governing body's broader disciplinary rules.

Based on the review undertaken, SBG governing bodies have rules covering the following key areas:

- Betting by participants;
- Corruption offences, including but not limited to competition manipulation (match-fixing and spot-fixing), bribery and reporting of corrupt activity;
- Misuse of inside information for betting purposes.

A number of SBG members – notably the England and Wales Cricket Board (ECB), The Football Association (The FA) and the Rugby Football Union (RFU) – have adopted a blanket, worldwide ban on betting by participants although this is not considered appropriate for other sports due to their specific circumstances. Nonetheless, at a minimum SBG members surveyed have rules that prevent participants from either betting or at least placing lay bets on events in which they are directly involved or over which they have significant influence.

SBG members' rules include explicit prohibitions on participants engaging in corrupt activity including match-fixing, spot-fixing and the misuse of inside information for betting purposes. Furthermore, all SBG members surveyed have rules in place which make it an offence for participants to fail to report corrupt activity and to fail to cooperate with an investigation into suspected rule breaches.

In addition to these rules on betting and corrupt activity, some SBG members have adopted variations within their rules to cover specific integrity risks and/or to allow for greater flexibility in sanctioning. In particular, both the ECB and the British Horseracing Authority (BHA) have adopted specific rules regarding the use of mobile devices by participants. Similarly, both the BHA and the Greyhound Board of Great Britain (GBGB) have incorporated within their rules a broad provision covering conduct prejudicial to the wider integrity of the sport. This type of provision can be used to address conduct not otherwise captured in other rules and/or instances where the conduct represents a significant breach of one or more integrity-related rules.²

In terms of sanctions, all SBG governing bodies have clear penalties for betting offences which are set out in the relevant codes or disciplinary rules. The sanctions available will depend upon the precise nature of the offence and the severity of the rules breach.

Action 2: Designate a contact person

All SBG members reviewed have a single point of contact (SPOC) with responsibility for betting integrity matters. In most governing bodies the named contact is employed full-time on integrity matters although in some cases they are responsible for betting integrity as part of a broader portfolio of duties.

Details of SPOCs – both telephone and email – are provided to participants and wider stakeholders. The contact details for each SPOC are also made available on the Sports Betting

² As an example, GBGB does not have a specific rule outlawing the misuse of inside information for a betting purpose but instead deems any such activity to breach its wider rule against 'acting in a manner prejudicial to the integrity, proper conduct or good reputation of greyhound racing.'

<u>Group website</u> which acts as a central repository for contact information for betting integrity stakeholders including the Gambling Commission and betting operators. Making this information available publicly ensures that relevant stakeholders know who to contact in the event they become aware of information relating to a potential breach of sports rules.

Importantly, all SPOCs can be reached on a 24/7 basis which ensures that time-critical information can be received and acted upon immediately, including intervening before an event if necessary. This responsiveness is particularly important in the context of Licence Condition 15.1.2 which requires betting operators to pass information on suspicious betting to governing bodies as soon as possible.³

In addition to a single point of contact, the BHA, the Darts Regulation Authority (DRA), ECB, The FA, RFU and the World Professional Billiards and Snooker Association (WPBSA) provide dedicated, confidential reporting facilities through which participants can report securely any suspicious or corrupt activity within their sport.

Action 3: Establish an integrity function

All SBG members reviewed have either a dedicated integrity unit or access to relevant integrity expertise and resources to undertake investigations into breaches of their rules. Six SBG members have dedicated integrity units: the BHA, DRA, ECB, The FA, GBGB and WPBSA.

Common to each of these integrity units is full-time personnel and the capability to monitor betting markets (either internally or via a third party provider), gather and analyse intelligence and undertake investigations. A number of SBG members also utilise bespoke software to manage intelligence and, in the case of The FA, GBGB and BHA, their integrity units work in accordance with the National Intelligence Model (NIM), a well-established and recognised model applied by the law enforcement community.⁴

Both the Rugby Football League (RFL) and RFU do not have a dedicated integrity unit but they nonetheless do have access to integrity expertise through their existing legal departments and contracts with third party suppliers. Where appropriate, additional expertise is brought in on an 'as required' basis to assist in undertaking investigations.

The variation in approach to integrity functions reflects, to a large extent, the differences in risk profile across sports; typically those sports exposed to higher risk – for example as a result of larger betting markets or markets that pose particular integrity risks – tend to require more dedicated resource.

Action 4: Introduce an education programme

All SBG members reviewed have betting integrity education programmes in place. Given the risk profile of the sports covered by this review, these tend to be specific betting integrity education programmes designed to ensure participants are aware of and understand the relevant rules on betting and corrupt activity.

SBG members ensure that betting integrity education is delivered in a variety of formats. The most common is through annual face-to-face briefing sessions or workshops, often prior to the start of a new season, supplemented by online e-learning tutorials and mobile apps containing further integrity resources. In all sports reviewed, betting integrity education is delivered to key participant

³ Licence Conditions and Codes of Practice: http://www.gamblingcommission.gov.uk/PDF/LCCP/Preview-version-of-Licence-conditions-and-codes-of-practice-April-2017.pdf

⁴ National Intelligence Model: https://ict.police.uk/national-standards/intel/

groups, notably players but also officials, trainers etc. before they compete or are granted a licence to operate. In many sports, betting integrity education is also reinforced annually.

Online education tutorials are considered particularly effective in reaching a wide number of participants quickly and cost-effectively and their use can be monitored so as to track who has completed the training successfully. The DRA, ECB and WPBSA either currently or will shortly make it mandatory for participants to complete an online tutorial successfully in order to be registered to compete.

In addition, both the DRA, in partnership with the Professional Darts Players Association (PDPA), and WPBSA complete an induction programme for new players to the respective playing tours which includes an integrity component.

In many instances betting integrity education is either delivered by or in partnership with the relevant player association. This collaborative approach is a reflection of the fact that player associations have an important role in educating and advising their members on the risks of betting corruption, as well associated issues such as problem gambling.

A more detailed overview of some of the education initiatives undertaken by members of the Professional Players Federation (PPF) across a range of sports can be found at Annex C.

In terms of assessing the effectiveness of betting integrity education, while there has been limited formal research done to date the available evidence suggests that education is vital in raising awareness of sports rules and in ensuring participants are well-informed about the risks of becoming involved in betting corruption. For example:

In 2010, the PFA, supported by the PPF, funded independent research into players' knowledge of the rules in professional football and found that:

- 60% of professional footballers surveyed knew the rules on betting;
- 40% of professional footballers surveyed knew the rules on inside information.

In 2013, the Professional Footballers Association (PFA), supported by FIFPro the international footballers union, undertook further research into players' knowledge of the rules and found that:

- 93% of professional footballers surveyed knew the rules on betting;
- 82% of professional footballers surveyed knew the rules on inside information.

These figures were the highest of all the countries FIFPro surveyed as part of its "Don't Fix it" project and strongly suggest the education model delivered by The FA and PFA in England is effective.

More recently, in 2016, the RFL commissioned the University of Huddersfield to undertake some research into player welfare. Part of the research involved surveying full-time players to assess their experience of education and over 85% of respondents either agreed or strongly agreed that they understood the RFL rules on betting integrity.

In addition to player surveys there is good anecdotal evidence that education can raise awareness and increase the likelihood of participants reporting corrupt activity. For example, the prosecution of cricketer Mervyn Westfield by the ECB came as a result of information provided following an education briefing to Essex County Cricket Club. Similarly, recent experience at the Rugby World Cup 2015 showed that a comprehensive pre-tournament education programme helped to raise awareness of participant obligations in regard to betting integrity, including obligations to report potentially corrupt activity.⁵

⁵ Sports betting integrity at the 2015 Rugby World Cup: http://www.sbif.uk/images/Documents/Sports-Betting-Integrity-at-the-2015-Rugby-World-Cup-V5.pdf

Looking ahead it is anticipated that the increased use of online e-learning tutorials which enable detailed tracking of participants' progress will assist in building a more comprehensive evidence base on the effectiveness of education.

Action 5: Check competition contracts

All SBG members reviewed have in place arrangements to ensure participants involved in sanctioned competitions are bound by the relevant rules on betting integrity. For the most part this is achieved through the standard approach of ensuring that participants must be registered with or licensed by the governing body in order to compete or to operate e.g. as a trainer. On becoming registered or licensed, the participant agrees to be bound by the relevant sport's rules including rules on betting integrity.

In addition, there are some sports which have additional arrangements in place to address specific circumstances where the standard participation agreement might prove insufficient, for example where participants from overseas compete in domestic events or for specific major events. In particular, the BHA has an arrangement with other overseas racing authorities to recognise racing licenses issued in other jurisdictions. Through this arrangement, jockeys riding in the UK on an overseas licence are bound by the BHA's rules of racing, including its rules on betting integrity. Likewise, the ECB requires all overseas players competing in domestic First Class cricket to be contracted to a First Class County and registered with ECB. A condition of all ECB player registrations, including all overseas players, is that they must have completed the online anticorruption education tutorial before their registration is complete. This ensures all top-level overseas players are bound by the ECB Anti-Corruption Code.

For some major events, participants may also need to abide by any additional requirements put in place by the organiser. In rugby union for example, participants in the Six Nations, Rugby World Cup and European Professional Club Rugby competitions must sign specific agreements beforehand which include requirements to comply with relevant betting and anti-corruption rules.

In addition to ensuring participants are bound by the relevant betting integrity rules, a number of governing bodies such as the BHA, ECB and WPBSA also have arrangements in place to ensure that sanctions levied for betting integrity breaches are recognised by overseas federations.

Action 6: Establish information sharing arrangements

All SBG members reviewed are (or shortly will be) listed in Part 3 of Schedule 6 of the Gambling Act 2005.⁶ Alongside the Licence Conditions and Codes of Practice, Schedule 6 provides a crucial mechanism for accessing information on suspicious betting activity through both the Gambling Commission's Sports Betting Intelligence Unit (SBIU) and betting operators.⁷

In addition to these legislative and regulatory provisions, all SBG members reviewed have at least one Memorandum of Understanding (MoU) with a major betting operator although in a number of sports several MoUs are in place to give a reasonable degree of market coverage. Governing bodies including the ECB, GBGB, RFL, RFU and WPBSA also utilise third party betting monitoring services to monitor betting markets.

In terms of handling intelligence, all governing bodies reviewed have secure systems for receiving and storing intelligence and clear protocols in place governing access to sensitive information. As

-

⁶ Gambling Act 2005: http://www.legislation.gov.uk/ukpga/2005/19/contents. Note that the DRA is not currently listed on Part 3 of Schedule 6 but is expected to be included shortly following a recent consultation by the Department for Culture, Media and Sport (DCMS).

⁷ See note 3.

noted above under Action 3, most sports with a dedicated integrity unit utilise bespoke intelligence software designed specifically for this purpose.

In addition to information sharing arrangements with the Gambling Commission and betting operators, a number of SBG governing bodies also have the ability to source intelligence from a wide range of non-betting sources including social media and databases of company and individual records.

SBG members also collaborate with each other by sharing resources, such as analysts, and information and intelligence, for example by flagging instances where corrupters are known to be operating across a number of different sports.

Action 7: Undertake a regular review

All SBG members reviewed have in place mechanisms to ensure that integrity provision is reviewed regularly and at least annually. In most cases these annual reviews are operational in nature to ensure that the practical delivery of integrity functions – and supporting systems and processes – remains effective. In some cases these reviews have also included a refresh of integrity rules; for example the RFL engaged an independent consultant in 2013 to review its betting regulations to ensure they remained fit for purpose. Similarly, the Greyhound Regulatory Board – integrated within the GBGB but with independent status – undertakes a review of integrity procedures following any significant disciplinary case.

As an example of a more wide-ranging review, in 2015 the BHA initiated a comprehensive review of its integrity functions to ensure that its provision remained fit for purpose. The review considered all aspects of the BHA's integrity provision including its overall strategic approach, engagement with participants, fairness and intelligence and investigation. The review took evidence from a wide range of stakeholders and the BHA's proposals were tested by a Challenge Panel chaired by an independent chairman. The conclusions of the review were published in 2016 and the BHA is in the process of implementing a number of recommendations arising from the review.⁸

_

⁸ BHA Integrity Review: http://www.britishhorseracing.com/bha/integrity-review/

Conclusion

Overall this review demonstrates that all SBG governing bodies are compliant with the seven key actions set out in the SBG Code of Practice and in doing so take all reasonable and proportionate steps to protect the integrity of their sports from the risks posed by betting corruption. While implementing the actions set out in the Code does not guarantee a sport will be free from betting corruption, it is clear from this review that the establishment of the both Sports Betting Group and the SBG Code of Practice have driven significant improvements in the management of sports betting integrity since the Parry Report in 2010.

The review also demonstrates flexibility inherent in the SBG Code of Practice as reflected in the wide range of integrity arrangements in place across different sports. In this respect the Code is not prescriptive but is intended to be a guide to ensuring sports have appropriate, risk-based measures in place.

Finally, it is hoped that this review will prove a useful resource for other sports governing bodies seeking to implement the SBG Code of Practice and for wider stakeholders in the sector wishing to understand how UK sports governing bodies manage betting integrity risks.

Annex A: Summary of the SBG Code of Practice

ACTION 1 – ESTABLISH RULES, REGULATIONS AND SANCTIONS

Do you have rules, regulations and sanctions in place with regard to betting?



ACTION 2 - DESIGNATE A CONTACT PERSON

Is there a designated person in your organisation responsible for betting integrity issues?



ACTION 3 - ESTABLISH AN INTEGRITY FUNCTION

Do you have an integrity function in place or access to integrity functions to investigate and deal with any breaches of the rules?



ACTION 4 – INTRODUCE AN EDUCATION PROGRAMME

Do you have an education programme in place for participants?



ACTION 5 - CHECK COMPETITION CONTRACTS

Are competition contracts in place where appropriate?



ACTION 6 – ESTABLISH INFORMATION SHARING ARRANGEMENTS

Do you have information sharing agreements in place with betting operators as well as systems and procedures for securely handling sensitive data?



ACTION 7 – UNDERTAKE A REGULAR REVIEW

Do you undertake a regular review of your integrity arrangements to ensure lessons are learned and good practice is maintained?

Annex B: Summary of compliance by sport

Horseracing - British Horseracing Authority

Q1. Do you have rules, regulations and sanctions in place with regard to betting?

See the Rules of Racing.

Participants are contracted with the BHA through licensing and registration. They are bound to the below points:

- Trainers and Owners cannot place a lay bet on a horse trained or owned by them.
- Professional jockeys are prohibited from any betting on horseracing in any country.
- Amateur jockeys are prohibited from betting on races they are riding in.
- Stable staff cannot place a lay bet on horses trained by their employing trainer.
- Service providers to owners, trainers and riders cannot place a lay bet on horses trained, owned or ridden by the person to whom they provide the service.

The BHA specifically prohibits the communication of inside information in its rules currently as follows:

(A)36: 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 any of their service providers as a result of acting as such, and is not information in the public domain. A Person must not communicate Inside Information directly or indirectly to any other Person for any material reward, gift, favour or benefit in kind.

The BHA provides further definition and clarification of Inside Information in the public domain at Schedule (A)5 of their Rules.

Q2. Is there a designated person in your organisation responsible for betting integrity issues?

Paul Beeby, Head of Integrity Operations.

Q3. Do you have an integrity function or access to integrity functions to investigate and deal with any breaches of the rules?

The BHA deals with a wide range of investigations, including but not limited to cases of betting-related corruption. The team presently consists of various roles, and includes the following:

- Director of Integrity & Regulatory Operations
- Head of Integrity Operations
- Intelligence Development Principal
- Field Intelligence Officer
- Betting Analysts
- Intelligence Analysts
- Betting Investigators
- Investigating Officers
- Stable Inspecting Officers

The BHA's in-house specialists monitor betting markets (including via the use of betmonitors) and racing on a daily basis which is intelligence-led.

The BHA has a bespoke confidential and anonymous 24/7 reporting telephone line managed independently and branded as "Racestraight", along with an online form and an ability to receive information directly into the Intelligence unit by telephone and a dedicated e-mail address.

Q4. Do you have a betting integrity education programme in place for participants?

Prior to applications being determined, and during the currency of licences, individuals are required to undertake various training on Integrity, dependent on the application being made. This includes:

- Attendance at a seminar on integrity, led by the BHA integrity team;
- A visit to the individual by BHA Stable Inspecting Officers to brief individuals on integrity requirements;
- Completion of a questionnaire which includes questions relating to integrity;
- Inclusion of integrity provisions within the Guidance Notes of all applications to the BHA, which the individual is requested to read prior to signing a declaration to confirm their understanding and agreement.

Annually the BHA requires all Flat and National Hunt Jockeys to attend mandatory seminars focussed on integrity and regulatory matters. These are conducted on a code rotational basis every second year.

When the rules on inside information were introduced, the BHA held mandatory seminars for all licensed persons. Further, an online module was created which individuals were required to successfully complete. For several years subsequent to the introduction of these rules, all new applicants were required to undertake the module prior to an application being granted.

Trainers in particular are required to display relevant guidance on inside information at their established premises.

Within the declaration signed by applicants, the BHA reserves the right to require a participant to undertake further training if considered necessary.

Following a recent review of the BHA's functions in this area, its integrity education programmes for all categories of participant will be refreshed in 2017.

Q5. Are competition contracts in place where appropriate?

All participants agree to be bound by the Rules of Racing as part of their licence (e.g. jockeys and trainers) or registration (e.g. owners and stable employees) applications. Overseas participants are also bound through the race entry process. There are also arrangements through the International Federation of Horseracing Authorities for the reciprocation of penalties between jurisdictions.

Q6. Do you have information sharing agreements in place with betting operators as well as systems and procedures for securely handling intelligence and other sensitive data?

The BHA works to the National Intelligence Model (NIM). The NIM provides a framework for focussing, prioritising and driving the appropriate allocation of business resources around the integrity function.

The BHA has taken elements of NIM to drive its own business and integrity model. This is compatible with other enforcement agencies that use NIM.

The BHA has a contemporary software package tailored for the storage of intelligence and information. This software is a widely accepted, credible and an effective intelligence system which is used by the Metropolitan Police and other provincial police forces, as well as other sports regulatory bodies.

Another element of the NIM which the BHA uses is Tactical and Strategic Tasking and Coordination. This is an important aspect allowing the business to focus and prioritise valuable resources.

The BHA use an analytical software package. for mapping intelligence and information to produce analytical products, such as example timelines of phone billings, betting data and computer sharing.

The BHA relies upon betting operators complying with Licence Condition 15.1 of the Gambling Commission's Licence Conditions and Code of Practice, regarding reporting any suspicion of offences. The BHA also has Memoranda of Understanding (MoU) with a number of betting operators.

The BHA has an Information Sharing Agreement with the Gambling Commission. However, the exchange of information is also facilitated by virtue of Schedule 6 of the Gambling Act 2005, within which the BHA is listed as a Sport Governing Body.

	On a case-by-case basis the BHA can implement Information Sharing Agreements with law enforcement agencies where necessary. The BHA has recently been accepted into the Government Agencies Intelligence Network (GAIN) which is a multiagency group that brings together intelligence and investigation resources to participate in enforcement action and tackle organised crime
	by working together in a formal relationship using an information exchange.
Q7. Do you	After each significant case, relevant departments of the BHA gather to discuss
undertake regular reviews of your	improvements that may be made to their systems and processes, in particular their rules and the way they gather and utilise intelligence, evidence and manage and present
integrity	cases.
arrangements to	
ensure lessons are	The BHA announced a comprehensive integrity review in 2015 which was completed in
learned and good	Spring 2016. The implementation of the review recommendations is currently underway.
practice is maintained?	

Darts – Darts Regulation Authority (DRA)

-	
Q1. Do you have	See the <u>DRA Rule Book</u> .
rules, regulations and sanctions in place with regard to betting?	The DRA has a whole section in the DRA Rules that incorporates offences such as betting on the sport by players or through others. There are comprehensive rules to prohibit match manipulation for betting purposes with severe penalties up to a life-time ban from the sport.
	The DRA has in place clear rules prohibiting the misuse of inside information. In particular, the following constitutes a breach of the rules:
	To use for betting purposes, or to provide to any other person for such purposes, any information relating to the Tour and/or any Tournament or Match that the Member possesses by virtue of his position within the sport and that is not in the public domain or readily accessible by the public.
	To provide information to any person for reward, before or during the Tour and/or any Tournament, regarding the competitors in a Tournament or Match, the conditions, tactical considerations or any other aspect of the Tournament or Match, unless such information is already in or will come into the public domain without delay or is readily accessible by the public.
	The DRA Members Rules make it a breach of the rules if a player does not co-operate with a disciplinary enquiry. Players are required to surrender electronic devices for examination and provide access to any available material relevant to the enquiry.
Q2. Is there a	Nigel Mawer, Head of Integrity
designated person in your	
organisation	
responsible for betting	
integrity issues?	
Q3. Do you have	The DRA is a not for profit limited company that works independently from but in
an integrity	partnership with the Professional Darts Corporation (PDC).
function or access to integrity	The integrity function is carried out by the Head of Integrity in conjunction with associates
functions to	where necessary. Confidential contact lines are provided through Quest.
investigate and deal with any	
breaches of the	
rules?	
Q4. Do you have a betting integrity education	Induction days are held annually for new entrants to the professional tour. This includes a presentation on corruption issues and case studies. This is a condition of playing on the professional tour.
programme in place for participants?	One-to-one meetings are held between the Head of Integrity and players at tournaments. The DRA Board Members regularly attend Tour Events worldwide.
	The DRA are working with the Professional Darts Players Association (PDPA) to deliver an e-learning programme for roll out later in 2017. It will be a condition for all players to complete this to play in PDC Events.
Q5. Are competition contracts in place	All professional players are contracted to the PDC who operate the Professional Darts Tour. The PDC Players Contract stipulates that players are bound by the DRA Rules.
where appropriate?	In addition to this it is a condition of entry to PDC Events that players are bound by the DRA Rules.
	The DRA requires all Managers/Agents of players to register. They are bound by the DRA Rules as a condition of registration, which includes the betting rules. As part of the registration process they must pass a designated fit and proper person test.

Q6. Do you have information	The DRA has MoUs in place to share information and works closely with various betting companies and other bodies including BetFair, Betway, Coral, Bet365, ESSA, and the
sharing agreements in	Association of British Bookmakers (ABB). Information is also shared with other sports governing bodies including the BHA, ECB and others.
place with betting operators as well	Information is also shared between the Gambling Commission and the DRA and the
as systems and procedures for	DRA is due to be added to Schedule 6 of the Gambling Act 2005.
securely handling	All intelligence is kept within the Integrity Unit. Intelligence and casework relating to
intelligence and other sensitive	betting integrity is kept on "CLUE" a case management and intelligence storage system that provides a secure remote server with back up processes. This system is widely
data?	used by Law Enforcement and some other sports governing bodies.
Q7. Do you undertake regular	The DRA's integrity systems are under constant review. The DRA Rules are currently under review with revisions to be published in March 2017.
reviews of your	under review with revisions to be published in March 2017.
integrity arrangements to	
ensure lessons are	
learned and good practice is	
maintained?	

Cricket – England and Wales Cricket Board (ECB)

Q1. Do you have	See ECB Anti-Corruption Code for Participants.
rules, regulations and sanctions in place with regard to betting?	The offences under the ECB Anti-Corruption Code, which includes betting, are contained at Article 2 and can be summarised as:
to zotang.	Article 2.1 – Any corruption offences for betting purposes, including manipulating the outcome of a match, manipulating any part of any match, bribery, deliberately underperforming.
	Article 2.2 – Directly or indirectly betting on any aspect of any match.
	Article 2.3 – Using or disclosing Inside Information to any person for a betting purpose
	Article 2.4 – Failing to cooperate with any investigation into Corrupt Conduct, including (without good cause) failing to provide information when required, failing to provide a witness statement, failing to attend a disciplinary hearing to give evidence.
	Article 2.5 – Giving, offering, receiving gifts or benefits to facilitate a breach of the ECB Anti-Corruption Code.
	Article 2.5 – Failing to disclose, without unnecessary delay, full details of any incident that might be evidence of Corrupt Conduct.
	The sanctions for any of the above offences are contained at Article 6. The range of permissible periods of ineligibility (bans) for breaches of these articles are:
	Article 2.1, a ban of between 5 years and lifetime. Article 2.2, a ban of between 1 year and 5 years. Article 2.3, a ban of between zero and 5 years. Article 2.4, a ban of between zero and 5 years. Article 2.5, a ban of between zero and 5 years.
Q2. Is there a designated person in your organisation responsible for	Chris Watts, ECB Anti-Corruption Manager.
betting integrity issues?	
Q3. Do you have an integrity function or access to integrity functions to	The ECB's anti-corruption strategy is developed and agreed by the ACCESS Group. The ACCESS Group is made up of a number of key individuals with varied expertise. The Group sets the direction and priorities for the delivery of education; disruption; partnerships; information gathering; and interventions.
investigate and deal with any breaches of the	A confidential ACCESS Board considers and authorises the progress and impact of all investigations and prosecutions.
rules?	Operational delivery of the anti-corruption strategy is the responsibility of the ECB Anti-Corruption Manager who is supported by an Integrity Analyst and 5 part-time contracted staff during the cricket season. The ECB Anti-Corruption Manager is a former Metropolitan Police Service senior ranking detectives with significant investigative experience. The Anti-Corruption Manager reports directly to the ECB CEO.

Q4. Do you have a betting integrity education programme in place for participants?	All registered players, including overseas players who are contracted to a First Class County, are required to undertake and complete an online educational tutorial. Compliance with the tutorial is delivered and monitored remotely. A player will not be registered to play until this tutorial is completed. Compliance with the ECB Anti-Corruption Code for Participants is a condition of each player's ECB registration and annual undertaking. This requirement applies to centrally contracted England Women players and all Women players who are registered to play in the Women's Cricket Super League. All 18 First Class playing squads and all Women's Super League teams are visited and briefed each year by the ECB's Anti-Corruption Unit on emerging issues, one of those issues being the threat of corruption to cricket. Annual presentations are delivered to many stakeholder groups about the threat of corruption and reporting mechanisms.
Q5. Are competition contracts in place where appropriate?	All players, men and women, who play in any domestic First Class competitions within the ECB's jurisdiction must be registered with the ECB and contracted to a First Class County. All England players, men and women, are centrally contracted with the ECB.
Q6. Do you have information sharing agreements in place with betting operators as well as systems and procedures for securely handling intelligence and other sensitive data?	ECB has bespoke information sharing agreements with individual betting operators and also has signed an information sharing agreement with Sports Betting Integrity Forum (SBIF) partners. ECB has contracted Sportradar to provide bet monitoring services of higher risk matches and to provide regular and timely reporting. ECB uses i2 for the secure retention and analysis of intelligence. The i2 system (iBase) is hosted on a remote server for security reasons. The iBase system is managed primarily by the Integrity Analyst and the only personnel with access rights are the two full-time anti-corruption staff members. Information is also shared between the Gambling Commission and the ECB under Schedule 6, Gambling Act 2005. Additionally, information is shared with other cricket jurisdictions under the authority of the ECB Anti-Corruption Code for Participants.
Q7. Do you undertake regular reviews of your integrity arrangements to ensure lessons are learned and good practice is maintained?	An operational review is conducted every 6 months by the ACCESS Group where the two full-time anti-corruption staff members are held to account for their performance delivery.

Football – The Football Association (The FA)

Q1. Do you have	See The FA Betting Rules.
rules, regulations and sanctions in place with regard to betting?	Participants are prohibited from betting (either directly or indirectly) on any football match, competition or event anywhere in the world. Betting on any under-18 match is also prohibited at whatever level the Participant is operating. A "Participant" also refers to any Match Official, referee coach or referee assessor.
	The FA has a specific rule governing the definition and use of inside information:
	Rule 8 (2) (d) Where a Participant provides to any other person any information relating to football which the Participant has obtained by virtue of his or her position within the game and which is not publicly available at that time, the Participant shall be in breach of this Rule where any of that information is used by that other person for or in relation to betting.
	(2) (e) It shall be a defence to a charge brought pursuant to sub-paragraph E8(2)(d) if a Participant can establish, on the balance of probability, that the Participant provided any such information in circumstances where he did not know, and could not reasonably have known, that the information provided would be used by the other person for or in relation to betting.
	Under its Rules, The FA has the power to require Participants to attend for interview and to provide (or procure provision of) all documentation, records etc. as is required by The FA in the course of its inquiries. Failure to do so is considered a breach of FA Rules and may result in disciplinary charges.
	The FA requires all Participants to report any misconduct and specifically Rule E14 requires any Participant to report any approach relating to betting on football or match-fixing.
Q2. Is there a designated person in your organisation responsible for betting integrity issues?	Jenni Kennedy, Head of Integrity.
Q3. Do you have an integrity function or access to integrity functions to investigate and deal with any	The FA has an Integrity Department which comprises 26 members of staff, of which 6 are dedicated to investigations and intelligence analysis. The department is also supported by a Regulatory Legal Advice team, comprising a number of barristers with specific sports regulatory experience. The FA uses a specialist bet monitoring company to provide comprehensive details of any matches their systems may have identified as suspicious.
breaches of the rules?	any materior their eyeteme may have lacinimed as suspicious.
Q4. Do you have a betting integrity education programme	All professional clubs are visited at the start of the season, either by The FA, PFA or a combination thereof.
in place for participants?	Written material – including a guide to the rules for players – is also issued annually. The FA website provides a number of resources on integrity matters for Participants, including a number of educational films released to coincide with the complete prohibition on betting on football. The FA also produces a Players Essentials App which includes advice on integrity related matters including betting.
	The FA seeks feedback on its education programmes from its stakeholder groups. In addition, The FA is seeking to review its integrity education provision including how its effectiveness can be monitored.

Q5. Are competition	See answer to Q1. See also <u>Premier League Handbook</u> , <u>FIFA Disciplinary Code</u> and <u>UEFA Disciplinary Regulations</u> .
contracts in place where	
appropriate?	
Q6. Do you have information sharing agreements in place with betting operators as well as systems and procedures for securely handling intelligence and other sensitive	The FA is now utilising a bespoke sports integrity intelligence management system. This system, currently used in Major League Baseball and Australian Rules Football, enables detailed grading (in accordance with the National Intelligence Model) and analysis to be carried out of intelligence and for it to be developed to assist investigations. The FA's intelligence comes from a wide variety of sources including its own reporting line and email account, its customer service line, UEFA/FIFA, operators and experts within the betting industry itself, the Gambling Commission and state agencies. An Integrity Analyst has responsibility for maintaining this information and there are strict access protocols in place.
data?	The FA has an MoU with Betfair and other betting companies in addition to direct links with a number of on- and off-shore betting operators which can assist in the conducting of an investigation.
	Information is shared regularly between the Gambling Commission and The FA under Schedule 6, Gambling Act 2005. Additionally, information is also shared with law enforcement authorities, in particular the National Crime Agency, either directly or through the Gambling Commission.
	The Head of Integrity also represents The FA on a European basis as a UEFA-appointed Integrity Officer, and will share information with her counterparts across the continent as appropriate.
Q7. Do you undertake regular reviews of your integrity	The FA's Head of Integrity sits on the Sports Betting Integrity Forum (SBIF) and SBG and accordingly ensures that specific changes of the nature identified above are fed back into the operations of the Integrity Unit.
arrangements to ensure lessons are learned and good practice is maintained?	A regular rules review process is also undertaken to ensure that operational practice and learnings are reflected in the approach to integrity matters.

Greyhound Racing – Greyhound Board of Great Britain (GBGB)

Q1. Do you have See Rules of Racing. rules, regulations and sanctions in It is incumbent upon any licence holder, owner and certain licensed officials to adhere place with regard to rules 182 - 184B (betting) which covers the following situations: to betting? No betting to take place on any Trial; No licensed official shall make any bets on any Race at any Racecourse to which he/ she is licensed; A Trainer must not lay any greyhound under his/her care or control with a betting exchange: A person Licensed by the GBGB must not lay any greyhound with a betting exchange, under the care or control of the Trainer for whom he/she is Licensed, whilst so Licensed and for a period of 21 days after ceasing to be; An Owner not to lay any Greyhound he/she owns with a betting exchange: Any other person, who has provided a service or services connected with a Trainer's business of training Greyhounds and within 21 Days of his/her having done so, to lay any Greyhound with a betting exchange under the care or control of the Trainer in question; and To lose a race with a Betting Organisation or to instruct any person on his/her behalf to do so or to receive the whole or any part of the proceeds of such an GBGB does not have a specific rule relating to the misuse of inside information, however, any misuse of such information will be deemed a breach of rule 152 (acting in a manner prejudicial to the integrity, proper conduct or good reputation of greyhound racing as regulated by GBGB). Q2. Is there a Duncan Gibson, Manager, Welfare and Integrity. designated person in your organisation responsible for betting integrity issues? The integrity function of the GRB is undertaken by Integrity and Welfare Services which Q3. Do you have an integrity deals with a variety of investigations into breaches of Rules of Racing, including any function or access betting related corruption. Welfare and Integrity Services is headed by the Director of to integrity Regulation and overseen by the Manager of Welfare & Integrity Services. The integrity functions to unit includes: investigate and deal with any Intelligence Officer breaches of the Race and Betting Analyst rules? Senior Stipendiary Steward Stipendiary Stewards Sampling Officers Welfare & Integrity Co-ordinators Live race feed is available via streaming from Satellite Information Services Ltd (SiS) and this is linked to live betting monitoring using both Betfair's Betmon monitoring tool and live betting feeds. Race and betting analysis is both intelligence-led and random,

and is linked with the drug testing strategy in force at that time.

GBGB operate a reporting line and online reporting facility in which users may provide the integrity unit with confidential information relating to alleged breaches of its rules.

Licences are issued on condition that each applicant has read and agrees to abide by the GBGB Rules of Racing, and any conditions of licence that may apply. Applicants for training licences are interviewed by a GBGB official as part of the initial inspection process and are examined on their knowledge of the Rules of Racing, including integrity issues. All trainers are regularly inspected by GBGB for compliance with its Rules of Racing and accompanying regulations in force at that time. Trainers will be briefed on relevant rule changes or on trainer notices relating to welfare and the integrity of greyhound racing. GBGB publish a fortnightly Calendar, which is sent to all trainers, licensed veterinarians and officials, which includes industry and regulatory updates and advice to trainers and licence holders. The Calendar is also available on the GBGB website. The registered owner of a greyhound must consent to be bound by the GBGB Rules of Racing when registering a greyhound to race. GBGB also issue notices to be displayed in the paddock area at each racecourse.
See answer to Q1.
Intelligence is graded using a 5x5x5 method based on the National Intelligence Model (NIM). Data is stored electronically within a bespoke intelligence module developed by Konica Minolta and Nintex which includes the necessary functions of a search engine, intelligent scanning, workflow process and case file management. Access to documentation is graded in terms of staff seniority and case involvement. GBGB works closely with the Gambling Commission's Sports Betting Integrity Unit and betting operators under the terms of Licence Condition 15.1. The exchange of information between regulatory body and the Gambling Commission is facilitated by Schedule 6 of the Gambling Act 2005. GBGB has in place a Memorandum of Understanding with Betfair and monitors greyhound markets via the use of Betmon. Under the terms and conditions of its Privacy Policy, and pursuant to the relevant sections of the Data Protection Act 2003, GBGB will share information with other third parties such as law enforcement agencies and other regulatory bodies in the course of discharging its regulatory duties.
An operational review is undertaken quarterly through various committees to ensure certain integrity processes are being followed and are fit for current operational requirements. A review of procedures by the GRB will follow any significant disciplinary case. An annual review of the systems and processes is undertaken by the disciplinary authority of the GRB.

Rugby League – Rugby Football League (RFL)

Q1. Do you have	See the RFL Betting Code of Conduct.
rules, regulations and sanctions in place with regard to betting?	Players and player support personnel as defined in the RFL Betting Code of Conduct ('the Code') are not permitted to bet on any Rugby League activity under the jurisdiction of the RFL. This includes games and other markets in all professional competitions, not just the division or competition in which they are participating.
	The Code also covers encouraging others to enter into a bet for a (covered) Person's direct or indirect benefit and to ensuring the occurrence of a particular incident in a Match, Competition or Event, which occurrence is to the Person's knowledge the subject of a Bet.
	Misuse of inside Information for a betting purpose is included in the Code. The following offences identified in the Code are of most relevance:
	E5.3.1.3.1 Using in relation to Betting, or providing to any other person for use in relation to Betting, any information relating to any Match, Competition or Event(s) that the Person has in his possession by virtue of his position within the sport and that is not in the public domain or readily accessible by the public.
	E5.3.1.3.2 Providing information to any person for reward, before or during any Match, Competition or Event, regarding the competitors in the event, the conditions, tactical considerations or any other aspect of the event, unless such information is already in or will come into the public domain.
	Recommended sanctions for breaches of the Code are set out in the RFL's Off Field Sentencing Guidelines however are unlimited.
	Participants are also not permitted to have any commercial arrangement with any company or other undertaking that promotes, brokers, arranges or conducts any form of betting activity in relation to Rugby League matches as defined.
Q2. Is there a designated person in your	Graeme Sarjeant, Head of Legal.
organisation responsible for betting integrity issues?	
Q3. Do you have an integrity function or access to integrity functions to investigate and	Education processes and strategy for betting integrity are developed by the RFL Operations Department with assistance from the Legal & Compliance Department. Any betting integrity matters that arise will be referred to the RFL's Legal & Compliance Department which consist of qualified legal professionals. These may be referred via the Gambling Commission or by alerts from the RFL's own intelligence sources.
deal with any breaches of the rules?	The RFL has wide investigatory powers included within its Operational Rules. Any investigation is handled by one or more of a number of independent compliance investigators. These individuals have varied expertise gained predominately either through police, forensic accounting or private investigatory work. The RFL Legal and Compliance Department assists and liaises with the Gambling Commission, individual bookmakers etc. where appropriate to do so.
	Any case referred for adjudication is heard by an independent panel chaired by an acting or retired High Court or Circuit Judge.

Q4. Do you have a betting integrity education programme in place for participants?	The RFL delivers player training itself rather than it being delivered by a Players' Association. All Super League, Championship and League 1 club have received workshop-based training either in 2014 or 2015 and this was repeated in 2016. This education is delivered by recently retired former full-time professional players. Each year the workshop is also delivered to all new professional players at their RFL Central Day. All Match Officials and Match Commissioners have also attended educational workshops. The RFL is also looking to develop on online tool to support this education. Further education is provided via Bet Monitoring Partner Sportsradar
Q5. Are competition contracts in place where appropriate?	Participants will also be subject to any rules of any non-RFL competition in which they play i.e. Internationals.
Q6. Do you have information sharing agreements in place with betting operators as well as systems and procedures for securely handling intelligence and other sensitive data?	All compliance investigations are carried out using established systems and procedures developed by the RFL Legal and Compliance Unit. Files are only accessible by a limited number of authorised personnel. The RFL has various information sharing MoUs with major bookmakers. Information is shared between the Gambling Commission and the RFL under Schedule 6, Gambling Act 2005. Social media channels are actively monitored for evidence of betting activity and all RFL Match Commissioners consider potential betting integrity issues when attending games on behalf of the RFL.
Q7. Do you undertake regular reviews of your integrity arrangements to ensure lessons are learned and good practice is maintained?	An operational review is conducted annually by the Operations and Legal & Compliance Departments. Any necessary amends to the relevant regulations will be made after this review. The RFL also had its betting integrity regulations, including the Code, reviewed by an external consultant in 2013 to confirm their relevance and fitness for purpose.

Rugby Union – Rugby Football Union (RFU)

the the RFU's rules on inside information, betting and match-fixing are set out in RFU regulation 17. These provisions mirror and reinforce the provision of World Rugby regulation 6. In a support personnel and other numbered people from betting directly or indirectly on any rugby anywhere in the world. The restrictions and obligations are set out in Regulations as well as in staff policies, and match official codes of conduct and third party contracts. In a super and match official codes of conduct and third party contracts. In a super and support personnel and other numbered personnel
egulation 17. These provisions mirror and reinforce the provision of World Rugby egulation 6. Ingby Union imposes a blanket ban on all players, player support personnel and other nected people from betting directly or indirectly on any rugby anywhere in the world. The restrictions and obligations are set out in Regulations as well as in staff policies, ager and match official codes of conduct and third party contracts. In ERFU's integrity function officer. The Regulations as well as in staff policies, ager and match official codes of conduct and third party contracts. The Regulation is the set of the Legal and Governance expartment. As the nominated Anti-Corruption officer, Alys Lewis is responsible for egrity matters and the Legal and Governance Director and the Head of Discipline are volved in any relevant issues. The Regulation is the professional Rugby Integrity Group to oversee and manage implementation of the agreed anti-corruption strategy. The Professional Rugby
e restrictions and obligations are set out in Regulations as well as in staff policies, ayer and match official codes of conduct and third party contracts. Yes Lewis, Anti-Corruption Officer. The RFU's integrity function falls under the remit of the Legal and Governance apartment. As the nominated Anti-Corruption Officer, Alys Lewis is responsible for egrity matters and the Legal and Governance Director and the Head of Discipline are volved in any relevant issues. The RFU has put in place a Professional Rugby Integrity Group to oversee and manage implementation of the agreed anti-corruption strategy. The Professional Rugby integrity Group to Professional Rugby Integrity Corruption Rugby Integrity Rugby Integrity Corruption Rugby Integrity Rugby Integrity Rugby Integrity Rugby Integrity Rugb
e RFU's integrity function falls under the remit of the Legal and Governance expartment. As the nominated Anti-Corruption Officer, Alys Lewis is responsible for egrity matters and the Legal and Governance Director and the Head of Discipline are volved in any relevant issues. e RFU has put in place a Professional Rugby Integrity Group to oversee and manage implementation of the agreed anti-corruption strategy. The Professional Rugby
e RFU's integrity function falls under the remit of the Legal and Governance epartment. As the nominated Anti-Corruption Officer, Alys Lewis is responsible for egrity matters and the Legal and Governance Director and the Head of Discipline are volved in any relevant issues. e RFU has put in place a Professional Rugby Integrity Group to oversee and manage implementation of the agreed anti-corruption strategy. The Professional Rugby
epartment. As the nominated Anti-Corruption Officer, Alys Lewis is responsible for egrity matters and the Legal and Governance Director and the Head of Discipline are volved in any relevant issues. e RFU has put in place a Professional Rugby Integrity Group to oversee and manage implementation of the agreed anti-corruption strategy. The Professional Rugby
epartment. As the nominated Anti-Corruption Officer, Alys Lewis is responsible for egrity matters and the Legal and Governance Director and the Head of Discipline are volved in any relevant issues. e RFU has put in place a Professional Rugby Integrity Group to oversee and manage implementation of the agreed anti-corruption strategy. The Professional Rugby
epartment. As the nominated Anti-Corruption Officer, Alys Lewis is responsible for egrity matters and the Legal and Governance Director and the Head of Discipline are volved in any relevant issues. e RFU has put in place a Professional Rugby Integrity Group to oversee and manage implementation of the agreed anti-corruption strategy. The Professional Rugby
epartment. As the nominated Anti-Corruption Officer, Alys Lewis is responsible for egrity matters and the Legal and Governance Director and the Head of Discipline are volved in any relevant issues. e RFU has put in place a Professional Rugby Integrity Group to oversee and manage implementation of the agreed anti-corruption strategy. The Professional Rugby
epartment. As the nominated Anti-Corruption Officer, Alys Lewis is responsible for egrity matters and the Legal and Governance Director and the Head of Discipline are volved in any relevant issues. e RFU has put in place a Professional Rugby Integrity Group to oversee and manage implementation of the agreed anti-corruption strategy. The Professional Rugby
e implementation of the agreed anti-corruption strategy. The Professional Rugby
egrity Group compromises representatives from the RFU, Premiership Rugby, the ampionship clubs and the Rugby Players Association and has been functioning for a mber of years.
terms of investigative capability, such capabilities are already in place in relation to gulatory breaches, although not bespoke to corruption breaches.
emiership players and the England squads have been educated on anti-corruption for a last few years, including face-to-face education as well as completion of an online odule. The RFU, Premiership, Championship and RPA also communicate regularly the clubs, players, staff and officials by circulating digital communications to all dividuals covered by the regulations to remind them of the rules and their obligations. In mmunications on the anti-corruption regulations have been circulated to players, albs, rugby stakeholders, match officials, disciplinary personnel, staff, board and uncil members.
ere is a plan to put in place a bespoke betting integrity education programme so that ucation is extended to the championship clubs and the semi-professional clubs, as all as improving existing education programmes.
irrently, the RFU does not impose any specific sanctions for non-completion of such ining/education programmes although this is being looked at.
orld Rugby provides education to players and team management in advance of the orld Sevens competitions and the World Cups.
esentations have also been made to RFU staff, and the professional referees on anti- rruption regulations, monitoring and reporting.
e answer to Q1. See also World Rugby Anti-Corruption Regulations.
ur i

Q6. Do you have information	The RFU has a system in place to log any reported intelligence. The single point of contact for logging intelligence is the nominated Anti-Corruption Officer and the RFU has
sharing	a dedicated anti-corruption hotline number and email address.
agreements in	
place with betting	The RFU has a number of MoUs in place with betting operators and also engages a third
operators as well	party monitoring company to monitor betting patterns of all matches under the jurisdiction
as systems and	of the RFU. World Rugby and Six Nations also have similar arrangements in place.
procedures for	
securely handling	There are also information sharing provisions in the RFU regulations and World Rugby
intelligence and other sensitive	regulations to enable the RFU to share information with other unions, tournament
data?	organisers and regulatory bodies.
uata :	
Q7. Do you	The RFU has a detailed rugby integrity strategy in place underpinned by the key focus
undertake regular	areas identified by the Parry report. The strategy contains a series of
reviews of your	recommendations/action points, some of which have been actioned already and others
integrity	that will be implemented over the coming seasons.
arrangements to	
ensure lessons are	This strategy, together with the regulations and procedures, are reviewed on an ongoing
learned and good	basis and work is continuously being carried out in this area.
practice is	

maintained?

The RFU continues to liaise with other sports and specialists in this area and is constantly adding to and updating the recommendations in its strategy.

Snooker and billiards – World Professional Billiards and Snooker Association (WPBSA)

Q1. Do you have rules, regulations	See the WPBSA Members' Rules and Regulations.
and sanctions in place with regard to betting?	WPBSA has a whole section in the WPBSA Members Rules (Section 2 – Betting Rules) which incorporates offences such as betting on the sport by players or through others. There are comprehensive rules to prohibit match manipulation for betting purposes with severe penalties up to a life-time ban from the sport.
	Sanctions imposed on players are upheld across the world by all recognised governing bodies of cue sports including pool.
	WPBSA have in place clear rules prohibiting the misuse of inside information. In particular, the following is a breach of the rules:
	To use for betting purposes, or to provide to any other person for such purposes, any information relating to the Tour and/or any Tournament or Match that the Member possesses by virtue of his position within the sport and that is not in the public domain or readily accessible by the public.
	To provide information to any person for reward, before or during the Tour and/or any Tournament, regarding the competitors in a Tournament or Match, the conditions, tactical considerations or any other aspect of the Tournament or Match, unless such information is already in or will come into the public domain without delay or is readily accessible by the public.
	The WPBSA Members Rules make it a breach of the rules if a player does not co- operate with a disciplinary enquiry. Players are required to surrender electronic devices for examination and provide access to any available material relevant to the enquiry.
Q2. Is there a designated person in your organisation responsible for betting integrity issues?	Nigel Mawer, Head of Integrity
Q3. Do you have an integrity function or access	The Head of Integrity is the Vice Chairman of the WPBSA and has full autonomy from the WPBSA Board and commercial arm to deal with integrity issues.
to integrity functions to investigate and deal with any breaches of the rules?	The WPBSA works in partnership with Quest who provide confidential contact lines. Investigations are conducted by the Head of Integrity using partners and associates. dependent upon the case.
Q4. Do you have a betting integrity education	Induction days are held annually for new entrants to the professional tour. This includes a presentation on corruption issues and snooker case studies. This is a condition of playing on the professional tour.
programme in place for participants?	One-to-one meetings are held between the Head of Integrity and players at tournaments.
	Presentations are also conducted in Chinese to the Chinese professional and amateur players, referees and coaches in China.
	Work is being conducted with the Thai snooker federation to provide support re: anti- corruption through rules and disciplinary support.
	A new e-learning package is being developed with Sport Radar that will start in May 2017. This will be a condition of competing on the professional tour.

Q5. Are competition contracts in place where appropriate?	See answer to Q1. All players are contracted to World Snooker Limited (WSL) who operate the World Snooker Tour. The WSL Players Contract stipulates that players are bound by the WPBSA Members Rules. It is a condition of being a WSL Tour Card Holder that players are members of the WPBSA. In addition to this, amateur players who occasionally play in WSL Events sign an Amateur Players Contract which binds them to the WPBSA Rules. This is extended to Billiards Players playing in WBL events, women snooker players playing in WLBS events and disabled players who play in WDBS Events. It is a condition of entry to these events that players are bound by the WPBSA Rules.
Q6. Do you have information sharing agreements in place with betting operators as well as systems and procedures for securely handling intelligence and other sensitive data?	WPBSA have a contract with RAID software to monitor social networking and forums. WPBSA has MoUs in place to share information and works closely with various betting companies and other bodies including BetFair, Betway, Coral, Bet365, ESSA, and the Association of British Bookmakers (ABB.) Information is also shared with other sports governing bodies including the BHA, ECB and others. Information is also shared between the Gambling Commission and the WPBSA under Schedule 6, Gambling Act 2005. The WPBSA uses "CLUE" as a case management system that provides a secure remote server with back up processes. This this is a case management and intelligence handling software. This system is widely used by Law Enforcement and some other sports governing bodies.
Q7. Do you undertake regular reviews of your integrity arrangements to ensure lessons are learned and good practice is maintained?	WPBSA integrity systems are under constant review. The Members and Disciplinary Rules were last reviewed in January 2017 leading to revisions.

Annex C: Overview of player-led betting integrity education

The role of the Professional Players Federation (PPF)

The PPF brings together the different player associations in the United Kingdom and has taken an active role in promoting sports betting education for athletes since 2010. This has included the sharing of information, providing funding and running tutor training events as well as direct advice and producing video messages for players. The groundbreaking partnership between the PPF and a number of the leading betting companies Betfair, Bet365 and Betway (and previously with Ladbrokes and the Remote Gambling Association) providing funding and advice towards player education is a great example of cooperation and a collective approach in this area.

Cricket

The Professional Cricketers Association (PCA) started to provide domestic player education on match fixing in 2010 through face-to-face squad visits. The PCA was also one of the first player associations to develop a successful online learning module for players on sports betting integrity and match fixing. This work was funded by the Professional Players Federation (PPF) out of its partnership with some of the leading betting operators.

The online tutorial which is now mandatory for all players and is managed by the PCA. Only when the PCA confirms that a player has completed the tutorial does the ECB process his registration.

The PCA additionally runs anti-corruption education sessions with all County squads at preseason; with the County Academy squads; and at its annual Rookie Camp for new professionals. These means that in excess of 500 players receive face-to-face education each year.

The well-regarded Mervyn Westfield video in which he details how he became involved in match fixing and the tragic consequences for him personally was developed by the PCA and is a powerful tool to educate senior and academy players. In addition, the PCA recently funded Mervyn to go to South Africa to deliver education sessions to cricketers there.

The PCA has developed other video resources, including testimony from Darren Stevens on the duty to report anything suspicious as well as education modules fronted by Marcus Trescothick. Included in the education modules are warnings about the link between addiction and corruption given that those with gambling problems or other addictions are susceptible to corrupt approaches and/or blackmail.

Football

Every season, The PFA and The FA deliver presentations to the squads of professional football clubs. The presentations address integrity issues and allow for open dialogue with the players on betting and match-fixing matters. The PFA estimate that approximately 3,000 players receive this education each year.

The PFA staff piloted and helped to develop the INTERPOL/FIFA tutor training programme and have undergone a number of tutor training events run in association with the PPF by Betfair and also the Gambling Commission.

In addition, The PFA and The FA work with Premier League Learning, League Football Education and the Sporting Chance clinic to deliver education sessions to every scholar aged between 16-18 years of age at all 92 Premier League and Football League clubs. It is estimated that there are around 1,700 academy players reached each year.

More recently an education programme on betting integrity and match-fixing has been designed by The FA, The PFA and the Premier League to deliver to U-23 players at Premier League clubs.

This education programme includes a betting integrity education video which involves former footballer Fabrice Muamba discovering the security measures in place at Ladbrokes, and a video about former footballer Moses Swaibu who was convicted of match-fixing and how this had a profound effect on his personal and professional life.

Information on betting integrity and match fixing is found on both The FA's and PFA's website and articles on the subject are regularly found in The PFA magazine that is sent to all PFA members. Also regular messages are sent via SMS, email and social media to PFA members advising and directing them to articles on the subject.

In Scotland, PFA Scotland developed an on-line learning module based upon the successful PCA programme. However due to the programme not being a compulsory requirement for players it was felt that its impact was limited.

PFA Scotland continues to deliver face-to-face education on sports betting issues at its regular team visits to the 42 Scottish professional football clubs each season. In excess of 1,000 senior players will therefore receive match fixing education each year delivered by PFA Scotland.

Rugby Union

The Rugby Players Association (RPA) first delivered face-to-face betting integrity and anticorruption education to all of its members in 2011. With funding from the PPF, it then developed an online education module in 2012 which was rolled out to its members in the following seasons. This was supported by face-to-face education seminars with all Premiership squads and the England 7s and Women's squads this current season in the run up to the Rugby World Cup.

Match fixing education is normally covered every year in the regular talks delivered by the RPA to senior squads. This means that in excess of 500 players each year receive some form of match-fixing education.

The RPA also educate new academy players (either online or face-to-face) on betting integrity each season.

Golf

In 2015 the European Tour developed an online learning resource on match-fixing and sports betting integrity, with funding from the PPF, aimed at all Tour players. This went live in 2016 and it is a requirement for all Tour players to go through the online education.

This is followed up with further sessions as part of general player meetings during the year, the first of which was Abu Dhabi in January 2016. In addition the education is supported through one-to-one meetings between the Tour's player relations team and the players.

During 2016, the European Tour has started and will continue communication (including the sharing of its integrity policies and educational material) with the other major professional golf Tours around the world as well as the two governing bodies of the sport and the administrators of golf's four Major Championships. The aim is to encourage adoption of similar policies by these key stakeholders to achieve consistency for elite players, many of whom now participate around the world in events administered by a number of these different bodies. Ultimately it is hoped this could lead to one global policy for golf at the elite level and the development and joint funding of global educational programmes and a global integrity unit for the game.

The PGA has also attended tutor training on match-fixing delivered by EU Athletes and delivers face-to-face education on sports betting integrity to the 500 members of the Europro Tour at the start of each year.

Snooker

The World Professional Billiards and Snooker Association (WPBSA) has an e-learning resource on sports betting integrity that was developed with financial support from the PPF. As of May 2017, it will be a requirement for all new players entering the senior professional game to complete the on-line education module on match-fixing and sports betting.

As is best practice, the online module is supported by regular briefings on sports betting integrity from the WPBSA at tournaments and qualifying competitions.

Gambling Addiction

It is now widely accepted that there is a potential link between problem gambling and an increased risk of becoming involved in match fixing or sports betting integrity issues. As the umbrella body for the professional player associations, the PPF has carried out research in 2014 which found that professional sportsmen were three times more likely to be classified as problem gamblers than their peers outside of sport.

Most of the professional player associations provide significant education and support on the issue of problem gambling for their members and, more recently, the PPF has been working with the Responsible Gambling Trust to review and improve problem gambling education for sportsmen and women.