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## **Convention on the Manipulation of Sports Competitions**

### **Group of Copenhagen – Network of National Platforms**

#### **Data base – country fact sheet**

#### **UNITED KINGDOM**

#### **1. Administrative issues / State of progress**

##### ***State of Progress***

- ❖ Operational. Comprises the [Sports Betting Intelligence Unit \(SBIU\)](#) which was formed in 2010 and the [Sports betting Integrity Forum \(SBIF\)](#) which was formed in 2012.

##### ***Legal Status***

- ❖ No basis in law. Actions deliverable through the [UK Anti-Corruption Plan<sup>1</sup>](#) and [Sports and Sport Betting Integrity Plan \(The Plan\)](#): The Sports Betting Integrity Forum (SBIF) is responsible for delivery of The Plan.
- ❖ Betting Operators are obliged to report suspicious activity to the SBIU, as part of the [License Conditions and Codes](#) (condition 15.1) if it relates to or they suspect may relate to the commission of an offence under the Gambling Act (2005), may lead the Commission to take action to void a bet or is a breach of a Sports Governing Bodies betting rules.

##### ***Responsible Secretariat***

- ❖ The **SBIU** is part of the wider [Commission Betting Integrity Programme](#).
- ❖ The Commission is an independent non-departmental public body (NDPB) sponsored by the [Department for Digital, Culture, Media and Sport](#) (DCMS). The Commission's work is funded by fees set by DCMS and paid by the organisations and individuals we license
- ❖ The secretariat of the **SBIF** is undertaken by the [Gambling Commission](#).

##### ***Contact persons***

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##### ***Organizational form and composition of NP (bodies/entities)***

- ❖ The Sports Betting Intelligence Unit (SBIU) is a unit within the Gambling Commission which manages reports of betting-related corruption. It is at the heart of Britain's approach to dealing with suspected cases of sports betting integrity. It receives reports and develops intelligence about potentially corrupt betting activity from a range of sources including betting operators, sports governing bodies, law enforcement, the public and the media.

<sup>1</sup> [Progress Updates on the UK Anti-Corruption Plan](#)

The SBIU will share, where appropriate, specific intelligence or information with other partners (for example, betting operators, sports governing bodies, overseas regulators, and so on) both nationally and internationally. For example, it may share information with a sport to inform a sport based investigation. SBIU also supports police investigations in cases where criminality is suspected.

- ❖ The SBIF brings together representatives from sports governing bodies, betting operators, sport and betting trade associations, law enforcement and gambling regulation. It supports and coordinates partners' individual and collective efforts to deliver Britain's strategy for protecting the integrity of sport and sports betting. It also has links to the [Crown Prosecution Service](#). A list of members can be found on the [SBIF Website](#).

## **2. Structure / Operational Aspects**

### ***Priorities / functions of the NP***

- ❖ **SBIU**: Information /intelligence collection and risk assessment;
- ❖ **SBIU**: Operational investigation support for criminal and sports investigators.
- ❖ **SBIU/SBIF**: Establishing and operating information exchange arrangements with public and private sector bodies (national and international)
- ❖ **SBIU**: Major events support for managing betting integrity related issues
- ❖ **SBIF**: Deliver national Sports and Sports Betting Integrity Action Plan.
- ❖ **SBIU/SBIF**: Share best practice, offer support and develop/implement Britain's betting integrity strategy.

### ***Objectives***

- ❖ **SBIU** -Collect Information from partners to develop intelligence to assess risk and support operational actions. Operates Confidential Reporting facilities;
- ❖ **SBIU as part of the Commission's Betting Integrity Programme**; Work with national and international stakeholders to identify the threats and develop and implement strategies to mitigate the risks of corruption to sport and sports betting and keep crime out of gambling
- ❖ **SBIF** - Deliver and develop UK Sports and Sports Betting Action Plan that contain the actions that partners are undertaking to prevent and deter match fixing.

### ***Operational procedures***

- ❖ **SBIU** - operational continually within business hours. Policy and procedural documents to support the Unit are publically available on the Commission's website.
- ❖ **SBIF** meets quarterly with additional bilateral meetings to progress priority actions and resolve issues that arise on an ad hoc basis.
- ❖ **SBIF** - Communications between members using secure web based portal;
- ❖ **SBIF** has public facing web site.

### ***Implementation***

- ❖ Fully operational at this time.

### ***Funding of the NP (estimated yearly budget, sources)***

- ❖ **SBIU** is funded by the Gambling Commission, which is funded by license fees.
- ❖ **SBIF** funded primarily by partners. Some government contribution to supporting communication portal and website.
- ❖ Funding proposal for government support for **SBIF** has been submitted.

## ***Other points***

### **3. Development Process**

#### ***Origin of the initiative***

- ❖ The SBIU was set up as part of the recommendations in the [2010 Report of the Sports Betting Integrity Panel](#) (commonly known as The Parry Report). Initially consisted of two intelligence officers. Additional staff (Programme Lead, Programme Support and Researcher recruited over time as workload and responsibilities increased)
- ❖ The SBIF was set up in 2012. Its predecessor, the Tripartite Forum was established in 2011. Its purpose was to coordinate is to support and coordinate partners' individual and collective efforts to protect against the risks to sports betting integrity. Membership comprised of betting operators, the Commission and representatives from sport. Law enforcement was invited to join in 2014, and this was when the forum became the SBIF.

#### ***Leading actors involved in the development process***

- ❖ The Panel that delivered the Parry Report in 2010 comprised of experts from the betting industry, the police, players, fans, Sports Governing Bodies (SGB), the legal profession and the Gambling Commission. One of the recommendations of the Report was to set up the SBIU and it was agreed this would fall under the responsibility of the Commission.
- ❖ The Commission were responsible for setting up the Tripartite Forum as the coordinating strategy group. Along with the Commission, the original membership comprised of representatives from betting operators (Ladbrokes, William Hill, Coral and the Association of British Bookmakers) Sport (The Football Association, British Horseracing Authority, Professional Players Federation, Greyhound Board of Great Britain). Membership increased over time as more organisations were invited to join, when key actors were identified e.g. major sports or operators. Law Enforcement completed the membership in 2014 and the Forum was formally relaunched as the SBIF.

#### ***Work carried out to mobilise actors? How many meetings necessary / agendas?***

- ❖ Meetings are held approximately every quarter.
- ❖ Agendas are proposed by the secretariat and initially amended and agreed by the co-Chairs. Agendas are circulated two weeks prior to each meeting. Members are invited to propose additional items, either prior to the meeting or under AOB.
- ❖ All agreed actions are recorded on an Action Log, assigned to individuals. The secretariat actively pursues these with individual members as appropriate in between meetings and the assigned individual is responsible for reporting progress.
- ❖ Where appropriate, sub-groups are established to progress actions/projects, with a lead appointed who has responsibility for delivery and progress reporting.

#### ***Process in defining priorities and objectives (assessments, analysis, documents produced / published)***

- ❖ The **SBIU** are accountable to the Gambling Commission and therefore responsible for delivery of Commission key objectives. However, they are at the heart of the national platform and undertake the coordination responsibility. A review of the SBIU is currently being undertaken. The **SBIU** undertakes its own planning and risk assessment process. Supporting process and policy documents are made public on the Commission's website.
- ❖ The **SBIF** agreed the content of the Sports and Sports Betting Action Plan, which was published in September 2014.
- ❖ The Plan sets out key actions for the operational year. Progress is reported and made public annually (second progress report due January 2018) at which point priorities for the following year will be discussed, agreed and published.
- ❖ Additional projects are identified and agreed as appropriate at quarterly meetings and responsibility allocated to an individual or sub group (for example, hosting of cross sport/industry practitioners workshop)

- ❖ The SBIF has a website through which the Plan is published. The site also contains a range of good practice products, including information on education programmes, reports, news items etc
- ❖ The SBIF has also produced a set of risk profiles for each SBIF sport which is available on the website. This is currently being updated. Each member is responsible for their own risk assessments.

***Previous situation (domestic law in application, difficulties in proceeding)***

- ❖ Without the NP model in place it would be difficult to successfully collaborate across all stakeholder groups.
- ❖ In particular, identifying the right point of contact in each organisations
- ❖ Would likely be duplication of effort – or lack of effort if responsibilities not clear
- ❖ Collective actions towards a national strategy would be very difficult
- ❖ Lack of understanding of the overall risks to sport and to betting and lack of cohesive action to mitigate the risks.
- ❖ Limitations around sharing good practice
- ❖ Mistrust of agendas of other stakeholders which could impact on willingness to share information

***Challenges in defining tasks and responsibilities / Reasons for inclusion or exclusion of main actors\* (and inclusion/exclusion of representatives)***

- ❖ Had to quickly define and communicate the potential benefits for the different actors when establishing the Forum. Was initially some degree of mistrust within the membership and tendency to consider weaknesses in the system were the responsibility of other actors. This however was resolved over time and members recognise the importance of collaboration.
- ❖ Important to have an overall strategy and plan that sets out key priorities and deliverables – and hold members to account. Need to avoid having a ‘talking shop’ which adds little value.
- ❖ Also key to obtain buy in from Government and key ministers
- ❖ UK brought in new members over time so that all the major sports and trade bodies were represented. Similarly, new members from across the betting industry were invited to join so those with the majority of the UK market were represented. Remote Gambling Authority invited to join to (at the time) represent remote operators
- ❖ Sharing information has been a key challenge. Data protection is at times applied in different ways across stakeholder groups, have been misunderstandings about what SBIU can/cannot share, security issues around transfer of data have had to be addressed. We have made some progress but this is probably one of the biggest challenges to the NP, both domestically and internationally. We are currently preparing for the introduction of the EU’s new data protection framework, General Data Protection Regulation that will come into force in May 2108.
- ❖ Difficulties in identifying appropriate law enforcement representation. On an operational level, betting integrity was understandably not one of the key priorities for police. However, law enforcement engagement is much improved. On a local level, the Deputy Police Chief Constable with the Gambling portfolio is now a member of the Forum. This means actions can be communicated to local forces across the country. Also setting up a data base of local contacts which is invaluable when dealing with cases where criminality is suspected. Nationally, the establishment of National Crime Agency also brought benefits, including point of contact who has responsibility for betting integrity issues. Police Scotland complete the law enforcement membership
- ❖ Forum is co-chaired by one representative from Sport and one from the operators. Secretariat undertaken by the Commission. This arrangement avoids one stakeholder group driving priorities that are more pertinent to their own agent
- ❖ Membership of the Forum is now closed i.e. no new members to join as the group is now at its limit and would become unmanageable if new organisations were to join
- ❖ Funding for the SBIF is still an issue, albeit currently manageable. The UK currently funds the SBIF via members contributions – however this can restrict activity (for example, hosting workshops and conferences to share best practice can only be held intermittently due to budget constraints, website has only basic functionality). Funding options are being explored with DCMS.