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Birmingham 7-9 March 2017

KCOOS (2017) 17

“Keep Crime Out Of Sport”

STUDY VISIT 4

FINAL REPORT





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## 1. Introduction

This was the fourth and final study visit planned for the project. Countries were selected based on objective application criteria including having participated at regional seminars. At this study visit to the UK National Platform organized by the UK Gambling Commission, representatives from Azerbaijan, Georgia and Latvia were exposed to the functioning of the platform as well as a national platform strategic meeting. In the UK, the focus has been particularly placed on betting, as this is a huge activity related to sport nationally.

## 2. Outline of countries' approaches

Georgia recently signed the convention. They are looking for a lot of information, including examples and errors to help them implement measures. There is currently no system in place and it is a little chaotic. Expectations: looking for knowledge and experience.

Latvia is looking to better understand the role of the criminal police in this issue

The CoE is looking for country information in order to learn how to assist you better.

The UK National platform functions in a particular manner, as the lead authority, the UK GC, is simultaneously a regulatory authority, dependent on the state for money laundering issues and also a law enforcement agency in its own right. This is not the case in most other countries. The UK GC also makes strong efforts to co-operate with the sport movement in order not to conflict and overlap with disciplinary procedures.

### UK GC

Sport, betting and individuals concerned in any situation of match-fixing are not necessarily all in the same country. Of all the reports managed, only 1/3 of events take place in the UK. So what do we do with information that related to others. The more national platforms that exist, the less this is an issue. Someone will likely have the information you are looking for and you will undoubtedly come across information that someone else is looking for.

Georgia: Georgia has set up a working group on study and development of issues for setting up the national platforms, including exchange of information nationally and internationally. There will be a risk assessment and analysis on the topics involving all of the CoE conventions in sport. There have been two meetings already and a third one is planned for March 2017. The first meeting referred to involvement of official authorities, notably MSC at national level and exchange of information. From summer 2017, the national platform will be running. The interagency working group will have: ministry of labour (doping issues), Georgian state security service, the ministry of sport of course, ministry of internal affairs, ministry of justice and ministry of foreign affairs. There are thematic expert groups: some syllabi

have been drafted on stewards. The expert group has also drafted the law on changes needed for future national legislation. The anti-corruption action plan was started a few months ago. 14 priorities were listed in the plan and the newest issue is a sports manipulation issue. This has progressed at governmental level. The political decision has been taken to ratify, now it is just a question of bureaucracy. In setting up the national platform in Georgia, there is a document of needs assessment defining the operational aspects of the national platform. The strategy on anti-corruption has been drafted and includes sport. It is a two year action plan.

Latvia: Latvia initiated a stakeholder meeting following their KCOOS Regional seminar. There is an amended sports criminal law 2016 that makes match-fixing a crime; with regard to all stakeholders in sport. Following the first informal meeting of stakeholders, they are looking how to develop.

Azerbaijan: Azerbaijan started legislation studies in August 2016 on the commitments regarding the CoE Convention. They studied sports law, criminal law and Code of administrative offences. In November and December, new legislation was adopted. This has passed through parliament and they have made changes in all three areas. There are now negotiations between related governmental bodies on establishing the national platform. The main idea is to organize this under law enforcement body, this is under discussion. In November 2016, the national anti-doping agency was established. In 2017, the national platform will be established. They are working on the ratification and hopefully this will be this year.

In Azerbaijan, betting and gambling have been separated. The first is chance and lottery. But gambling is illegal. The ministry of youth and sport is the licence provided. The chamber of control of the financial market is the governmental control organization in Azerbaijan. In Georgia, they have also separated it but it is all allowed. There is an option to report for betting in Georgia. They need information on how to regulate. In Georgia with gambling, they are looking how to regulate this. There is a law in Georgia each for gambling and for betting. In UK, this is all the same term. With regard to reporting in Georgia, the CoE convention strongly encourages this and therefore provides a good legal basis. The Ministry of Youth and Sports leads the research.

### 3. UK Gambling Commission presentation (annex)

#### Overview of the NP

UKGC is the lead agency. It was set up in 2006 to support the Gambling Act 2005. Section 42 talks about the offences to cheat (the main person or aiding and assisting). The UKGC can go far in investigations except for arrests. Keep crime out of gambling; fair and open gambling and the protection of the vulnerable are the main objectives. They are affiliated to the government but only funded by operators based in UK.

The UK has a very established gambling industry. The GA 2005 changed the way gambling took place. The gross gambling yield is approximately 12,5 billion pounds in 2014/2015. There is a shift to online gambling, but there are 8809 betting shops in GB. Horse racing and football are the main sport in the shops. 34 billion pounds is the estimated value of sport in Britain per year, therefore from a commercial point of view as well as for safety, it is important to protect and control gambling.

#### Background

The NP emerged organically. In 2010, the sports minister was forward thinking and thought that Britain should have a betting integrity strategy. So a sporting integrity panel was created: from a number of key stakeholders. Several meetings took place and a number of recommendations took place. One was for the Sport Betting Intelligence Unit (SBIU). The SBIU is sort of the steering group self-funded by members for the NP. The Convention was the next stage. And then they had the NP.

Licence conditions and codes of practice underpins all gambling in UK. Licence condition 15.1 obligates all operators to report to SBIU on all activity taking place around the UK. The amount of information that can be requested is wide – account information, IP address, geographical clusters of bets, etc.

The Gambling Act came into force in 2007. The use of the word 'cheat' in the act is to leave it sufficiently wide. This way the 'fix' is not necessarily the physical act, but also the information in order to have the fix. This is similar to conspiracy and aiding and abetting. The Gambling Act 2005 brought all forms of betting and gambling together. The national lottery was then established under a separate legislation and the UK GC leads this. The objectives:

- Keep crime out of gambling
- Protect the vulnerable and children
- Ensure that it is fair

The national action plan sits within the national anti-corruption plan (sports betting and match-fixing). The department for culture, media and sport leads the sport part, to which the UK GC is linked to as a non-departmental public body. Statutorily it works with the department of sport but it is independent. In addition to core objectives, their responsibility is to advice government with matters related to gambling.

Online betting is a larger market than offline betting. There needs to be continual development of tactics and investigative techniques in this domain.

The number of betting shops in UK is possibly going to decline. With regard to illegal betting shops, they will prosecute, having worked with local police. The number is quite small in the last 5 years, because the penalties are well targeted: not necessarily long imprisonment, but tax penalties and money laundering charges.

### Britain's betting integrity journey

- 2007 to 2017
- The Parry report in 2010 indicated that as a framework for action, the intelligence capability was crucial; in order to understand the threat that was being posed. As the UK GC already had an intelligence unit, it was chosen as the home for this. The LEA had no insight previously into betting markets, which are sophisticated and complex. The SBIU was created. Then a national action plan was required. It is chaired between the sport and the operators on an alternating basis.
- Challenges:
  - o LEA not a priority
  - o Sport no problem
  - o Sport blamed operators who offered those bets. The operators said sport had corrupt people.
  - o Actually exchanging information:
    - Sensitive data
    - Legal reasons
    - Lack of wanting to share negative information by sport
- A lot of effort is needed by the lead organization in order to encourage stakeholders to work together.

Convincing actors on MSC:

- National reputation.

It is normal that mistakes have been made.

### Change

Before 2014, one could offer gambling services located in whitelisted jurisdictions (many offshore for tax reasons) to offer bets. In GB if there was a case from an operator in Gibraltar, they had to go through the country to get necessary information. It depended on good relations. At the end of 2014, legislation changed. If one offered services in the UK, they had to get a licence. From 10 betting operators it grew to approximately 42. UKGC relies strongly on cooperation and communication.

## How the platform works in practice

The SBIU is at the heart. The betting operators, law enforcement and sport governing bodies are around this. The SBIU oversees this. The biggest challenge : the SBIU was set up in 2011 which was called the tripartite forum (operators, regulatory authority and sport). Since a couple of years ago, they have also included officially the police in strategy. Betting integrity was not on their list of priorities but since 2012 they were invited to join and this has been a big step forward. For police, they are involved at regional (NPCC) and national level (NCA and Police Scotland). In the beginning, sport movement and operators had a mistrusting relationship.

Get the right people involved, establish the connections and contacts: these are very important aspects.

### Achievements

In 2011, UKGC had to set up a task force for the sites for Olympic Games: the joint assessment unit was set up, working with IOC and the police. It was their first 'national platform' model. A similar setup was used for the rugby world cup in 2015. A lot of promotion nationally and internationally was carried out to ensure a coordinated approach.

### The Sports Betting Integrity Betting Action Plan

It was published in 2015 and there are a series of recommendations. A report will be produced in order to be publically accountable.

### The Triage process

If there is a case where they suspect criminality, they will get sport and law enforcement together as soon as possible to discuss what can be done in the best way possible.

Coordination and cooperation is crucial. Who does what and when and the contact is crucial. The SBIF has its own website to encourage contacts.

4. How the platform works in practice: Focus on the Sports Betting Integrity Unit Sports Betting Integrity Unit in detail

### Misuse of information spectrum

There is a policy on this topic. This starts from the art of betting (people who invest time to make an informed bet) towards manipulation of events, passing by awareness of criminality and restricted information. This is comparable to the French colour code system.

There is currently no specific match-fixing offence, but for now it is effective enough.

### Reports to SBIU

In 2010, over a 100 reports were received. In 2014, every report was recorded separately. Due to the change of legislation at the end of 2014, in 2015, approximately 300 reports were introduced. Most reports are in tennis and then football. Horseracing comes in a far third. Snooker, basketball and greyhound racing complete the top six reported sports. In basketball there is no single point of contact and this is crucial. The NP can encourage establishing a contact.

### SBIU Decision-making process

Reports come into the SBIU – 70-80% are from betting operators. The rest are from sport movement, police, other jurisdictions, confidential reporting line, media. The reports are then logged onto case sheets and intelligence packages are developed (visiting operators, checking social media, etc.). A case assessment will be conducted whether to progress further or not. If so, it will go to the incident management group who will task the investigations team. If it is a breach of sports rules, they will pass the case to the sport body and offer assistance. MoUs are encouraged between sport movement and betting operators. Therefore either a UKGC investigation (cheating offence) otherwise the police. UKGC has the power to void a bet as well. If the bet has been unfairly placed, the bet can be void or suspended/not paid out.

### Other policies

- Misuse of inside information (explained above)
- Protecting betting integrity: what is expected of partners
- In-play betting paper: supported in UK. It is a fast-growing market.

### Framework for identifying unusual or suspicious betting patterns

Betting operators have a list of about 28 criteria factors to report to UKGC. An accumulation of factors can trigger suspicious activity. This was well-received by the gambling industry; developed by the RGA and ABB.

### Schedule Six

A list of sport bodies with whom exchange of information is more possible (similar to France's sports list and as mentioned in the convention). There should be robust betting rules in place.

### Challenges

- Getting sport on board has been difficult, but with awareness-raising, this has slowly been tackled. The reputation of sport is at stake here.
- Information exchange is still the biggest challenge. All information is bound by the Data Protection Act.
- Nature of reports: the Group of Copenhagen will be crucial for encouraging transnational communication.





## Education

Each sport looks after their own programmes; player associations (mostly football) also do this. There is funding through UK Sport, but it is more for elite sports.

## Illegal betting

- Compliance officers from UKGC travel to ensure compliance within casinos, pubs, etc.
- These officers have powers to investigate this.
- Academic work on Asian markets impacting European markets is ongoing as it is a difficult area to handle.
- The UKGC is looking to work with the eastern markets (in this case, Filipino) in order to collaborate.

## Closing points on the UK National Platform

- The UK NP has a way of being held accountable (Integrity Action Plan). This is a strong suggestion for NPs to assess effectiveness.
- UKGC has the power to void a bet as well. If the bet has been unfairly placed, the bet can be void or suspended/not paid out.
- There is considerable exchange between disciplinary and criminal procedure entities to ensure the best organism is working on a given case without losing time or overstepping.
- Education-sharing between 'richer' sports towards less financially sound sports. Involving those convicted of match-fixing in education and awareness-raising is a possibility, as happens in various sports in the UK. Start at grassroots level.

## Future

- Formalising links with law enforcement: being seconded into law enforcement, for example.
- Updating the criteria of reporting by betting operators
- Updating the terms of reference
- Risk assessment in early 2017 on focusing priorities

5. Case studies - Learning from experience about the necessity of having all relevant stakeholders involved.

The betting integrity triage process: if something is received where there is a suspicion of illegality; a meeting between SGB, police and if necessary the betting operator takes place and actions to be taken by police and sport will be decided. SBIU co-ordinates the process. Naming points of contact is an important aspect of the process. This helps when there are many divisions (regionally, locally, lander, federal, etc.). Each actor has its decision-making body.

- Recognize the problem
- Activate contacts
- Proceed by steps: the need for all actors, from the sport to the prosecutors
- Allow for understanding of the process and the issues involved

Questions:

What is the procedure from the crime to the investigation?

Is it a case by case basis? Can it be standardized? How to know what is enough information for each actor, for example the police?

How do licenced operators follow about the personalities and such in terms of conflicts of interest?

How to monitor players betting patterns?

Suspicion arrives:

1. They start from the legislation: in the UK, they look to see if it falls under the offence of cheating. If so, they set up the triage process. If not, it is a disciplinary process.

Important:

Opportunistic breach of rules to organised crime and match-fixing

Understanding of each actors' role is important.

## 6. Round-up and The Study Visit in a few points

- The study visit allowed for a mix between EU and non-EU countries. It was a great opportunity for notably two countries closing in on ratification (Georgia and Azerbaijan) to see the functioning of another national platform (UK) and the working of its criminal legislation.
- Latvia particularly benefitted from the betting-related information, as this is fast developing nationally.
- The co-operation between different stakeholders, private and public, was particularly a great point for the study visit, as this is weak in all countries.
- The countries were particularly interested in the process leading up to the establishment of a functional national platform and how the UK overcame challenges and obstacles.
- The relations between the LEA and the disciplinary movement are a crucial aspect for allowing the smooth development of disciplinary and criminal cases.
- The appointment of relevant points of contacts within various stakeholders is vital to the rapid and effective exchange of information, even if the contact is not exclusively on this topic.
- It is important to retain that the manipulation of sports competitions is wider than simply betting and match-fixing, as evidenced by cases arising in some of the study visit countries.
- A legal analysis of the system currently in place is crucial for the effective development of national systems, mechanisms and legislation in view of becoming compliant to the Macolin Convention and effectively combating the manipulation of sports competitions.
- Latvia has had a meeting of potential stakeholders and is working on developing meetings, as well as applying for a KCOOS Expert mission for specific onsite assistance, notably with regard to involving all relevant stakeholders. They have a specific issue with bringing all legislation in line and proceeding to the ratifying process (hopefully signing by the end of 2016).
- Georgia is undergoing a legal analysis and preparing for ratifying, having put in place an interagency commission.

## Annexes

### Annex I: KCOOS Update



- ❖ Month 15 of Project KCOOS
- ❖ Questionnaires –over 150 replies
- ❖ Regional Seminar 1 (June 2016): Albania-Belgium-The Netherlands-Slovenia-Spain-Switzerland-The United Kingdom
- ❖ Regional Seminar 2 (September 2016): Austria-Bosnia Herzegovina-Croatia-Germany-Hungary-Ukraine
- ❖ Regional Seminar 3 (October 2016): Denmark-Estonia-Finland-Latvia-Lithuania-Norway-Sweden
- ❖ Regional Seminars 4 (Bucharest: Oct 2016) : Azerbaijan-Bulgaria-Georgia-Ireland-Moldova-Poland-Romania-Slovakia
- ❖ Regional Seminar 5 (Athens: Nov 2016): Cyprus-France-Greece-Italy-Montenegro
- ❖ Study Visits France (ARJEL)14-15 Nov 2016: Germany-Lithuania-The Netherlands-Switzerland and Jan 17-18 2017 Cyprus – Hungary - Poland
- ❖ Study Visit UK (UK GC) 13-15 Dec 2016 (Albania-Belgium-Ukraine) and 7-9 March 2017 – Azerbaijan-Georgia-Latvia)

Regional Seminars – a few conclusions

- More stringent legislation tackling this issue is required
- It is not a priority police issue, often due to lack of awareness of underlying problems such as organised criminality and financial crimes

- Assistance is requested from many States for guidelines on implementing measures as well as establishment of the national platform
- Interactive events such as regional seminars and study visits are very welcome for learning, networking and improving bilateral relations, as well as exchange of information
- Steps closer to entry into force and building national platforms
- Support for the Convention as a legal basis for implementation of measures
- Across the board understanding of the political situation by operational actors
- Concrete examples of establishing platforms and tackling the human and financial resources question
- All key stakeholders-including private- are invested in the integrity of sport
- Integration of previously marginalised stakeholders

### Mapping

- Initial mapping conducted by Council of Europe T-MC Secretariat and KCOOS Partner, Oxford Research
- Needs to be developed
- Place your institutions

### National Platforms

#### Article 13 –National platform

117. Article 13 provides for the identification of a national platform responsible for the fight against the manipulation of sports competitions by each Party.

118. The identification of the body fulfilling the function of national platform will be made in accordance with national law, and at the Parties' discretion, taking into account existing structures and the distribution of national administrative functions. A public authority would provide a neutral framework for co-operation between private stakeholders from different sectors and a suitable framework for the exchange of information. Therefore, national platforms are also implicitly covered by the generic references made to "competent public authorities". However, this feature is not explicitly specified in the provisions of the convention, so as to give the Parties a margin of discretion in identifying their platform.

119. The national platform serves as an information hub, collecting and disseminating information relevant to the fight against manipulation of sports competitions to the relevant organisation and authorities (paragraph 1.a).

120. In particular, the national platform is responsible for receiving, centralising and analysing information on irregular and suspicious bets placed on sports competitions taking place on the territory of the concerned Party and, where appropriate, issuing alerts (paragraph 1.c) and transmitting information to public authorities, sports organisations, and/or sports betting operators, in connection with possible breaches of legislation or sports regulations (paragraph 1.d). The information may, for instance, concern the placing of bets by a person involved in the

competition or irregular or suspicious bets. However, this article does not involve a strict requirement to transmit specific types of information.

121. The national platform, the name and address of which must be communicated by each Party to the Secretary General of the Council of Europe (paragraph 2), is responsible for the co-ordination of the fight against the manipulation of sports competitions at national level (paragraph 1.b) and must co-operate with all organisations and relevant authorities at national and international level, including national platforms of other states (paragraph 1.e).

This may include co-ordinating the diffusion of public information. Given the transnational nature of the risks related to the manipulation of sports competitions, it is very important for information to be exchanged quickly between the Parties.

122. When the information exchanged constitutes personal data, it should be processed subject to the relevant national and international personal data protection laws and standards, as set out in Article 14 of the convention, in particular those defined under the Convention 108.

123. Paragraph 2 requires the Parties to communicate to the Secretary General the names and addresses of the national platform. According to the practice on such notifications, Parties are expected to notify this information, by means of a declaration addressed to the Secretary General of the Council of Europe, at the time of signature or when depositing its instrument of ratification, acceptance or approval. They subsequently may, at any time and in the same manner, change the terms of their declaration.

#### Why a network is important

- Other projects, including PRECRIMBET and BETMONITALERT – highlight technically specific needs, including monitoring report elaboration, etc. The needs should be in the framework of coordination of the strategy implemented by the CoE Secretariat.
- With regard to needs following various stages of project KCOOS:
  - Need for a platform within the NP to exchange sensitive information
  - Need to regularly communicate and know each other
  - Knowing each other + trust = developing further common activities, such as those proposed by Betmonitalert and Precrimbet – not just among regulators, but also in cooperation with other stakeholders
  - A network will allow for more harmonised or at least a better understanding of various obligations and rules proposed to betting operators for better exchange of information.
  - Common training and awareness-raising activities presenting a more united front can be exchanged and developed.
  - A network will help develop an informal system on exchange of information for illegal betting.
  - Regional and international networks of different stakeholders in order to enhance exchange of information.

### Group of Copenhagen

- 1st Meeting: July 2016 (Copenhagen)
- 2<sup>nd</sup> Meeting: 13-14 December 2016 (Helsinki)
- 3rd Meeting: 30-31 March 2017 (Paris)
- Network of National Platforms to enhance international cooperation and put in place concrete action plans for projects, work programmes and accompanying new and upcoming NPs.
- Current actions: developing concrete actions – related to exchange of alerts on ongoing matches and operational monitoring during the Ice hockey world championship)

### Importance of a study visit

- A more customised version of assistance
- Developing on from regional seminars and questionnaires
- Encouraging thought and reflection on the establishment of a national platform
- Learning from the experience of an existing national platform
- Interaction – networking – questioning
- Building cooperation and trust

### Looking long-term

- Entry into force of the Convention
- Risk and legal assessments at national level
- Setting up of national platforms
- Creation of thematic and stakeholder networks of networks
- Developing the Copenhagen Group
- Developing a second 'KCOOS' project in an updated format

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## Annex II: Britain's National Platform

### How betting integrity fits into our wider Strategy



GAMBLING COMMISSION



### Global...24/7...365 days per year

- £12.6 bn - Total Gross Gambling Yield in GB in 2014/15
- 8809 - Betting shops in GB
- £34bn - Sport's estimated value a year to the UK's economy.
- 70m - Tickets sold for UK sports events in 2015.

- ITF Futures Tennis
  - over 600 Men's tournaments in 77 countries
  - over 500 Women's tournaments in 65 countries
- World Football
  - 211 FIFA member associations with professional leagues
  - Tens of thousands of matches played around the world every year



GAMBLING COMMISSION

### Britain's Betting Integrity Journey



GAMBLING COMMISSION

### Major impact on the BI programme...



.....increase in reports from operators



The change in legislation (Gambling and Advertising Act) as this had a significant impact for us in two immediate ways:

- ❖ More sportsbook operators now licensed by us = more reports of suspicious activity received because more operators are bound by the LCCP and so obliged to report.
- ❖ so we were sighted on a larger proportion of the market than before, which is very positive from an intelligence perspective



## How does the National Platform work?



So, how does it work? SBIU are at the hub of what has become known as the national platform. This is basically the Commission, LE, operators and sport collaborating and cooperating to address match fixing and betting integrity in the UK.

Reports come into SBIU – around 70% from operators – operators are obliged under LCCP 15.1 to report suspicious betting activity to SBIU

but reports can also come from sport, police, media reports, public etc.

SBIU will consider the Intel using the internal Decision Making Framework to decide on the best course of action.

This action could be a criminal investigation, in which case we would produce an Intel package and then liaise with the police, could be a GC investigation so we'd work with the investigations team, it may be a sports issue – a breach of SGB betting rules for example - in which case we would pass the Intel over to the appropriate SGB for them to conduct an investigation. It could be both a criminal investigation and a sports investigation running in parallel.

SBIU don't investigate - may still be involved in these investigations, collecting additional Intel, depending on the case.

We could just log the information – we may not have anything to hang our hat on to take this further – but everything is logged because these could be the golden nuggets of information that could be critical in a future case.

And one point to note the national platform are supported on a strategic level by the sports betting integrity forum which is made up of senior reps from sport, operators, GC and police. GC look after the secretariat of the Forum.

SBIF

## Sports Betting Integrity Forum



To show the key stakeholders that are committed to SBIF & fight against MF

Meets 4 times per year. Responsible for delivering the national action plan. Group splits into small sub groups to deliver specific outcomes.

Achievements

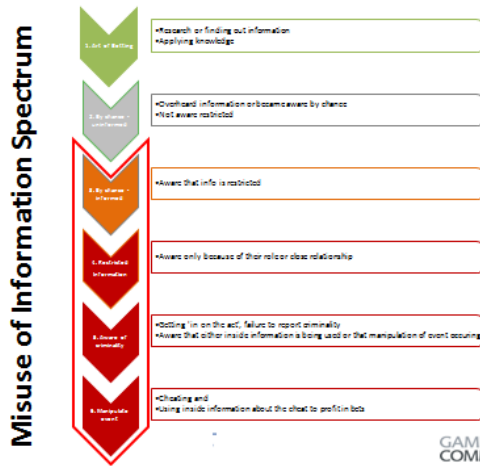
## What have we have achieved?



- ❖ providing a platform for collaboration around effective early warning systems for the London 2012 Olympics Games
- ❖ improved communication between the Forum's partners
- ❖ organising practitioner events to share best practice and to promote collaboration between national and international stakeholders
- ❖ supporting awareness raising of integrity matters through engagement with sports participants
- ❖ implementation of a case triage process to better manage incidents of sports betting corruption where criminality is suspected
- ❖ development of a framework to promote consistency in the set of indicators betting operators use around reporting unusual or suspicious betting patterns
- ❖ identifying issues that need to be resolved to improve individual and collective performance across sport, betting operators, law enforcement and the Gambling Commission
- ❖ working in collaboration with the European Commission to raise awareness of sports integrity issues
- ❖ And – business as usual!



Annex III: How the platform works in practice: Focus on the Sports Betting Integrity Unit



Snapshot of reports into SBIU....

Year	(1) Original Reports	(2) Secondary Reports	(3) Total Reports
2010	102	-	102
2011	80	-	80
2012	85	-	85
2013	84	-	84
2014	165	10	175
2015	175	31	209
2016 (to 30 November)	295	24	319



SBIU Decision Making Process



Outputs of the decision making process. This action could be a criminal investigation, in which case we would produce an Intel package and then liaise with the police, could be a GC investigation so we'd work with the investigations team, it may be a sports issue – a breach of SGB betting rules for example - in which case we would pass the Intel over to the appropriate SGB for them to conduct an investigation. It could be both a criminal investigation and a sports investigation running in parallel.

SBIU don't investigate - may still be involved in these investigations, collecting additional Intel, depending on the case.

We could just log the information – we may not have anything to hang our hat on to take this further – but everything is logged because these could be the golden nuggets of information that could be critical in a future case.

Don't monitor – mention HIOs

## Other supporting policies



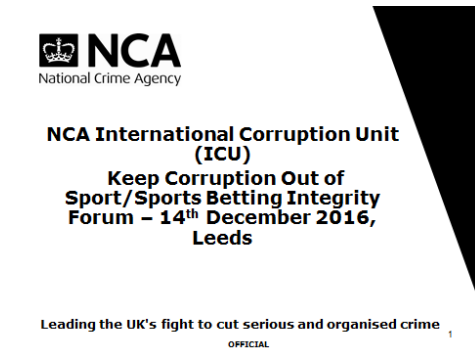
## Framework for identifying unusual or suspicious betting patterns



## Challenges

- ❖ One - Sharing information – bound by Data Protection Act.
- ❖ Most difficult area is sharing with sport. We need to be assured that the information we share can be shared securely, stored securely and used appropriately.
- ❖ Also need to make sure there is consent for the data to be shared by individuals.
- ❖ The data we can get is very far reaching – operators – account details, ip addresses, device details – we'll go into more detail about that over the course of the next two days.
- ❖ Two – global nature of betting and sport. Only around a third of reports are purely relating to GB. We will do our best to share information with overseas organisations – Interpol and Europol come in very handy.
- ❖ Network of NPs via the Convention should assist with this.

## Annex IV: National Crime Agency International Corruption Unit (ICU)- Keep Crime Out of Sport/Sports Betting Integrity Forum



Vision: 24/7 operational crime-fighting agency, employing around 4,500 officers with specialist capabilities to undertake and support operations, covering a broad range of complex areas

Mission: To lead the UK's fight to cut serious and organised crime.

### Key Publications

- ❖ National Strategic Assessment of Serious and Organised Crime 2016 - <http://www.nationalcrimeagency.gov.uk/publications/731-national-strategic-assessment-of-serious-and-organised-crime-2016/file>
- ❖ Annual Plan 2016/2017

### NCA Structure

- ❖ PROSPERITY – Economic Crime & Cyber Crime
- ❖ INVESTIGATIONS – Investigations, Borders, International & Specialist Support
- ❖ INTELLIGENCE - Collection & National Intelligence Hub
- ❖ ORGANISED CRIME COMMAND: Modern Slavery Human Trafficking, Commodities

### Remit

The main functions of the ICU are to:

- ❖ Investigate money laundering in the UK resulting from grand corruption overseas;
- ❖ Investigate bribery involving UK-based companies or nationals which has an international element;
- ❖ Investigate other cross-border bribery with a UK nexus;
- ❖ Trace and recover the proceeds of international corruption

The ICU also:

- ❖ Supports HM Treasury with the enforcement of financial sanctions;
- ❖ Supports foreign law enforcement agencies with international anti-corruption investigations;
- ❖ Engages with government and business to reduce the UK's exposure to the proceeds of corruption; and
- ❖ Works with business to support increased compliance with the UK Bribery Act 2010

### UK Bribery Act

- ❖ Bribing another person (section 1)
- ❖ Being bribed (section 2)
- ❖ Bribing of Foreign Public Officials (section 6)
- ❖ Failure of commercial organisations to prevent bribery (section 7)

but the organisation has a defence if it can prove

...it had in place adequate procedures, designed to prevent bribery (s7(2) BA 2010)

### ICU Anti-Bribery Outreach Programme Aims

1. Raise industry awareness of/promote the new NCA International Corruption Unit (ICU) and its role, remit and activities
2. Encourage reporting/allegations of UK Bribery Act 2010 offences to the ICU
3. Promote anti-bribery compliance to industry through:
  - a. Support of the UK MOJ Bribery Act 2010 Guidance and other education materials; and
  - b. Industry engagement
4. Identify initiatives in support of the above

### ICU Anti-Bribery Outreach - Work Strands

1. Identify sector trade associations/business networks and build relationships with them
2. Capacity-building/awareness sessions on anti-bribery compliance at trade association & business network members' events
3. Presentations & NCA ICU Stands at anti-bribery and corruption conferences and business network conferences, to promote the ABC message
4. Articles on the ICU and anti-bribery compliance in business network/trade associations

### IFBT – International Foreign Bribery Taskforce

- ❖ Trans-border agreement to combat foreign bribery
- ❖ Specialized investigators from across the globe
- ❖ Platform for police experts from Australia, the United States, Canada and the United Kingdom to share knowledge, skills, methodologies and case studies
- ❖ Annual conference
- ❖ Outreach Sub-Group

### Corporate Reporting

- ❖ [www.nationalcrimeagency.gov.uk/about-us/what-we-do/economic-crime/international-corruption-unit-icu](http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/economic-crime/international-corruption-unit-icu)

## Annex VI: Protecting Betting Integrity Who does what in Britain's strategy to tackle sports betting corruption

The Sports Betting Intelligence Unit (SBIU) is a unit within the Gambling Commission which deals with reports of betting-related corruption. It is at the heart of Britain's approach to dealing with suspected cases of sports betting integrity. This approach is known as the national platform.

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.

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. In some cases this information may then be used by these bodies in their investigations; for example a sports governing body investigating a breach of its sports rules. Contact the SBIU by phone on +44 121 230 6655 or by email [sbiu@gamblingcommission.gov.uk](mailto:sbiu@gamblingcommission.gov.uk)

The Sports Betting Integrity Forum (SBIF) was established in 2012 to develop Britain's approach to protecting sport and sports betting from corruption. It is part of Britain's national platform to address the risks of match-fixing and threats to sports betting integrity.

It 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.

If you would like to contact the Forum about issues related to betting integrity or have a question you can get in touch via the Contact Us Page on the SBIF website.

The Sports Betting Group (SBG) brings together representatives from across sport to provide leadership and to share good practice to address the risks from sports betting corruption.

The group provides a source of help and support for sports governing bodies looking to put in place measures to protect the integrity of their sport. It can also raise issues with the SBIF on behalf of sports governing bodies.

Central to the SBG's work is the SBG Code of Practice which sets out seven key actions sports governing bodies should take to protect integrity. In addition, the SBG website provides sports governing bodies and wider stakeholders in the sports betting field with a central resource containing information and good practice including betting rules, reporting contacts and educational material.

You can contact the SBG by phone on 0207 976 3900 or by email [sbg@sportandrecreation.org.uk](mailto:sbg@sportandrecreation.org.uk).



## Annex VII: List of Documents provided by UK National Platform

These may be found on the KCOOS Website or on request by email/contact form

### 1 – Parry Report

In summer 2009, the then Minister for Sport, Gerry Sutcliffe, put together a panel of experts, including key people from the betting industry, the police, players, fans, Sports Governing Bodies (SGB), the legal profession and the Gambling Commission. They explored a wide range of issues relating to sports betting integrity and were asked to make recommendations on how the various bodies concerned could work together more effectively. This formed the Report of the Sports Betting Integrity Panel, more commonly known as the Parry Report.

### 2 – Betting Integrity Decision Making Framework

This document is aimed at those bodies the Commission might work with in respect of betting integrity. It sets out the Commission's processes and decision making framework in the context of betting integrity, from when it first receives a piece of information through to when a case is closed

### 3 – Betting Integrity Policy Position Paper

This document summarises the Commission's policy and approach to protecting betting integrity, which is primarily concerned with sports betting. It also covers betting on non-sporting events; for example the winners of film awards

### 4 – Misuse of Inside Information Policy Position Paper

This document sets out the Commission's approach to dealing with potential incidents of misuse of inside information in betting. It also covers what is expected from SGBs and betting operators in relation to protecting sport and betting from the misuse of inside information. This includes a broad outline of the trigger points where we would expect organisations to inform the Commission of a potential incident.

### 5 – Sports Betting Intelligence Unit

The intention of the SBIU is that they will help bring together the intelligence efforts of partners and play its part in protecting sport from corruption in support of the Sports Betting Integrity Action Plan. This document sets out the terms of reference for the unit.

### 6 – Report on the London Olympics 2012 Joint Assessment Unit (JAU)

Report on the JAU, which was set up to manage sports betting integrity issues related to the 2012 Olympic Games.

### 7 – UK Anti Corruption Plan

This cross government anti-corruption plan, backed by coordinated resources, will bring more coherence to our efforts and ensure that future activity to tackle corruption is joined up and collaborative.

## 7a - Progress Update on the UK Anti-Corruption Plan

Published 2016

## 8 – Sports and Sports Betting Action Plan

The Sport and Sports Betting Integrity Action Plan (SBI Action Plan) outlines Britain's approach to address risks to the integrity of sport and sports betting and to protect our national and international reputation for being a safe place to enjoy both.

## 9 – Sporting Future

At the heart of this new strategy sit five simple but fundamental outcomes: physical health, mental health, individual development, social and community development and economic development. It is these outcomes that will define who will be funded by Government, what will be funded and where priorities lie in the future.

## 10 – Sports Betting Profiles

The Profiles set out a series of recommendations, which will be incorporated into the work of Sports Betting Integrity Forum as part of its strategy to deliver the Sports and Sports Betting Action Plan.

## 11 – Sports Betting Integrity at the 2015 Rugby World Cup

Report on the joint working between World Rugby, the Gambling Commission, and Law Enforcement and betting operators to help protect the tournament against betting integrity issues.

## 12 – License Conditions and Codes of Practice

This document sets out the Gambling Commission's general licence conditions and associated code of practice provisions under the Gambling Act 2005.

## 13 - Protecting Betting Integrity

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Funded  
by the European Union  
and the Council of Europe



COUNCIL OF EUROPE



Implemented  
by the Council of Europe

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## Annex VII: Useful Website links

Sports Betting Integrity Forum

<http://www.sbif.uk/home.aspx>

Gambling Commission

<http://www.gamblingcommission.gov.uk/Licensing-compliance-enforcement/Intelligence/sbiu.aspx>

Department for Culture Media and Sport

<https://www.gov.uk/government/organisations/department-for-culture-media-sport>

Council of Europe Convention on the Manipulation of Sporting Competitions

<http://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/215>

<http://www.coe.int/macolin>

<http://www.coe.int/sport/kcoos>

Council of Europe

Keep Crime out of Sport Study Visit

Tuesday 7 March 2017 – Thursday 9 March 2017

Date: Tuesday 7 March 2017

Venue: Gambling Commission, Victoria Square House, Victoria Square, Birmingham  
Board Room

Agenda: 12:00 Buffet Lunch (flexible depending on travel plans)

13:00 Welcome and Introductions

Mikhael de Thyse - Secretary of the Convention on the Manipulation of  
Sports Competitions

Nick Tofiluk – Director of Regulation, Gambling Commission

Overview of Keep Crime out of Sport

Cassandra Fernandes, Senior Project Officer - Project Keep Crime out of  
Sport

Plans for the Study Visit

Lorraine Pearman, Betting Integrity Project Lead

Georgia, Latvia and Azerbaijan delegations

Each jurisdiction to give brief overview of progress against national platform  
and any specific areas of interest

14:00 Overview of Britain's National Platform

Including lessons learned, challenges and future plans

Nick Tofiluk

15:00 How the national platform works in practice

16:00 Break

16:15 Round up of the afternoon, actions and outputs

16:45 Close of afternoon.

Check into hotel: [Copthorne Hotel](#), Paradise Circus, Birmingham B3 3HJ

Evening: Meet in reception of the Copthorne Hotel at 18:30

19:00 [Bowlplex](#): Join the Gambling Commission's Betting Integrity Team for an evening's bowling, food and drinks.

KCOOS (2017) 5

Date: Wednesday 8 March 2017

Venue: Gambling Commission, Victoria Square House, Victoria Square, Birmingham  
Board Room

- Agenda
- 9:00 Welcome Back to the Commission  
Overview of today's agenda
  - 9:15 Case Study: The National Platform;  
How we developed and implemented the Triage Process to manage cases involving  
suspected criminality  
Lorraine Pearman
  - 9:45 Case Study 1– Interactive walkthrough of a case with the Sports Betting  
Intelligence Unit  
Steve Paine and Nick Oliver from the SBIU
  - 10:45 Break
  - 11:15 Case Study 2 – Interactive walkthrough of a case with the Sports  
Betting Intelligence Unit  
Steve Paine and Nick Oliver from the SBIU
  - 12:15 Case Study – Overview of how the National Crime Agency managed a  
betting integrity case  
Sarah Eley from NCA
  - 13:00 Buffet Lunch
  - 13:45 How British Betting Operators manage betting integrity  
Russell Wallace – Integrity Manager, Paddy Power Betfair

14:45 Education Matters? Sports Governance and Education  
Chris Watts - Anti-Corruption Manager, England and Wales Cricket Board

15:30 Break

15:45 Q & A Session

17:00 Close

Evening: Meet in reception of the Copthorne hotel at 18:45

Evening Meal: [Pure Craft Bar](#)  
30 Waterloo St, Birmingham B2 5TJ

Date: Thursday 9 March 2017

Venue: [Cullinan Suite, Copthorne Hotel](#).

- Agenda:
- 9:00 Welcome back  
Round up and any questions from days one and two
  - 10:00 Group 1: Three Study Visit delegates will be invited to attend the [Sports Betting Integrity Forum](#) Meeting, held in the Cullinan Suite at the Copthorne Hotel  
  
Group 2: Will be escorted back to the Commission's offices in Victoria Square by Jack Stephenson-Saunders. This will be an opportunity to meet other Commission staff to raise questions about specific topics
  - 12:30 Buffet Lunch, Copthorne Hotel Group 2 will be escorted back to the Copthorne hotel to join the rest of the delegation. This will be an opportunity to meet members of the Sports Betting Integrity Forum
  - 13:45 Round up of the Study Visit, Cullinan Suite Copthorne Hotel.
  - 14:30 Event close

## List of Participants

### AZERBAIJAN

1. Mr Javad AKHUNDZADA (Azeridmanservis, National Regulator)
2. Mr Elshan SALAMOV (Azerinteltek, Sport Betting Operator)

### GEORGIA

3. Mr Shalva GOGOLADZE (Ministry of Sport and Youth Affairs) (07/03 + 09/03 only)
4. Ms Manana KAVTARADZE (Ministry of Sport and Youth Affairs)
5. Mr Vasil LIPARTELIANI (Ministry of Sport and Youth Affairs)

### LATVIA

6. Mr Jānis UNGURS (Lotteries and Gambling Supervision Inspection)
7. Mr Kristaps **KALNIŅŠ** (State Police, Central Criminal Police Department)
8. Ms Liena **LĪKSNĪTE** (Ministry of Education and Science, Sports Department)

### UK National Platform

9. Members of the UK National Platform and the UK Gambling Commission

### KCOOS SECRETARIAT

10. Miss Cassandra Matilde FERNANDES (Council of Europe Sport Conventions Unit)