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KCOOS (2016) 23

"Keep Crime Out Of Sport"

Study Visit 2

FINAL REPORT



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TUESDAY 13 DECEMBER 2016

1. Introduction

This was the second study visit in a series of four 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 Albania, Belgium and Ukraine 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. Round-table of participants

Ukraine

All key stakeholders participated in the process for ratification. In January-March 2017, the National platform should be set up. They are engaged in cooperation, with international organizations including Interpol and IOC. All relevant stakeholders are going to be involved in the national platform. The Convention is almost ratified, as it is currently at the Council of Europe Legal office.

Belgium

Belgium has set up its national platform. Many initiatives have been taken; already 3 meetings have been taken. On Friday 16 December, a declaration of intention that was made on cooperation on the national platform will be signed by the Minister of Justice. There is a wide scope of members. The steering group is of the ministry of Justice, the federal police and regional sports organisations. Tennis, basketball and football are also present at national level. The Gambling commission and the lottery is onboard, as is the prosecutor's office. The Olympic and Paralympic Committees are also onboard. Bilateral meetings with Transparency International as well are in talks with Belgium. They also speak with Universities to have academics on board. These sorts of national platform meetings are important to discover who is who. There have been some cases in the press with a famous footballer who allegedly fixed cases. They have also had cases with a Chinese businessman. Belgium is ready to take things seriously in this domain, notably on how to tackle cases. Non-betting related offences are not as regulated specifically.

Albania

This is a very good experience to discover operationally the processes and encourage the ratification of the convention. The process of ratification: the council of ministers has approved the Convention. Albania is in the process of ratification. The Minister for Sport has established an inter-ministerial working group: internal affairs, prosecutors, finances, as well as sport movement: a sort of pre-national platform. Meetings have been organized to see what the challenges are. A draft has been sent to government on the legislation that needs to be amended and created. The Criminal code since 2008 has

an article on manipulations; for now, there have been no convictions, because a national organization of actors is missing – this would be solved by the creation of a national platform. An online system has not been established as yet. In 2016 the government has established a new gambling law which requires the establishment of an online system: there will be a tender from January 2017 for establishing this. Assistance in this field would be very helpful.

UKGC: here the NP is a small core team, so exchange and feedback is important.

3. Overview of Britain's National Platform – Lorraine Pearman, UK Gambling Commission (presentation in annex)

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.

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. National Platform strategic meeting: Sports Betting Integrity Forum United Kingdom -Leeds

The SBIF is the core strategic aspect of the UK National Platform. It meets every 3 months to discuss priority actions and current actions. Three sessions took place.

Session 1: Changes in the Data Protection regulatory landscape: how to be prepared.

Session 2: Gambling anti-money-laundering group

Session 3: SBI Action Plan

- a. Visit of William Hill Betting operator HQ

The participants were taken on a tour of the

- b. National Crime Agency presentation

They use the UK Bribery Act

There are 4 types:

- Section 1: bribing another person
- Section 2: being bribed
- Section 6: bribing of foreign public officials
- Section 7: failure of commercial organisations to prevent bribery

There is a defence if it can prove: the existence of adequate procedures to prevent bribery (s7(2) BA 2010).

There is the serious fraud office, which has its own investigators. A normal bribery investigation takes approximately 5 years, but with this office, it is a lot quicker.

The NCA has a number of MOUs with other organisations (for example, TI).

They have a whistleblowing policy which still allows protection by employment law.

They have an anti-bribery outreach programme.

There is the foreign bribery register with five main sectors.

The UKGC as a NP puts sport governing bodies in touch with the NCA during large tournaments.

UK Bribery act – ministry of justice – adequate procedures. There is no precedent nationally on what adequate procedures are.

6. Measuring the manipulation of sports competitions: the Betting Integrity Spectrum
 1. Opportunistic breach of rules

- a. Low-paid athletes who know there is a market there to influence the outcome of the game or a part of the game. This is not very sophisticated or organized. This could even just be a breach of the rules of the federation.
- 2. Deliberate under-performance
 - a. Not necessarily betting, but maybe easier progression.
- 3. Misuse of inside information
- 4. Manipulation for sporting reasons(ranking point/promotion, etc.) / opportunistic manipulation (spot fixing)
- 5. Organised crime (match-fixing/spot fixing)

The lower acts on the spectrum are more common. Thanks to good relations with sport governing bodies and also the regulation obliging betting operators to report suspicious activity to the regulator, it is not too difficult to identify the offenders on the lower end of the spectrum. With sport education programs increasing, the participants are more aware of the problem and the NP receives more and more reports. Education and awareness raising increases the opportunity for whistleblowing.

SBIU Remit

When the sport participant, the bettor and the event come together. If there is an apparent link to Britain, they will carry out enquiries.

Decision making processes

- They will share the information with the right agencies: policy/sport body/international organisations. There are relationships in place with as many bodies as possible, either via legislation or MoUs, etc.
- What can they investigate?
 - Customer/participant/event location?
 - Number of corroborating information sources? From whom? What? How?
 - Suspicious betting indicators?
 - Concerns around sporting event?
 - Media interest/enquiries?
 - Outcomes – consider best option to progress.
- The NP does regular assessments of their operations. Accountability = efficiency.

As a national platform

- The SBIF is the steering group – meetings are every 3 months;
- Meetings happen as and when and involve the necessary actors based on the case in hand.

7. Case studies

Things to consider for the NP:

- Who contacted the NP in any given case? Who does the NP then notify?
- If they consider it is a criminal offence, contacting the prosecutor is imperative
- Perhaps record/check phone records/IP addresses, etc.
- Suspend the betting – speaking to the operator
- Notify a single point of contact at the sport governing body: this way the sport can take early action
 - Assess the risk quickly - Secure evidence - Engage with the player
- Request full betting data (if applicable):
 - Date/time the bets were placed
 - Full personal details of bettors
 - Betting history
 - Any linked accounts: IP addresses, devices used by bettors, payment methods, etc.
- The betting operator reporting to the regulatory authority can be enshrined in national law (as in the UK) but the CoE Convention ALSO supports this legally (article 9).
- Interview the player
- Outcome possibilities: using sporting rules, using criminal laws, using Terms and conditions of Betting operators (lose stake, accounts closed).
- Need to decide between a sport sanction, more investigation or involve the police?
Communication between all parties is very important.
- Key factors include
 - Vigilant betting industry
 - Information reporting
 - Sport integrity – sanction or prosecution
 - Resource and appetite
 - Information sharing and stakeholder relationships
- Raising awareness among the media – so that when they have a tip, they would report it first to the NP and then see how to publicize information.

7. Round-up of the Study Visit

- Overall feedback on the study visit format?
 - The practical aspects were very useful to incite reflection.
 - It allows countries to take back a collection of information to build their NPs.
- Initial ideas on national platforms?
 - Inform the government nationally about how the other countries function.
 - Belgium signing the NP internal regulation- to meet at least twice a year.
 - Practical action plan.

The Study Visit in a few points

- ✚ There is an overall curiosity on the functioning of the platforms that are now coming up.
- ✚ The guidelines would be extremely useful for setting up the National Platform, as particularly Albania have requested this. Countries are starting to set up pre-national platform groups to assess the legal and national situation before setting up the NP. Conducting a risk assessment within the NP is very important in order to stay on top of emerging markets, for example now with e-sports.
- ✚ Belgium has also decided to look to academics for input, a point that was raised at the Regional Seminar in Athens.
- ✚ Get the right people involved, establish the connections and contacts: these are very important aspects. For example, getting law enforcement and the sport movement together at the start of a case is important to save time and ensure co-ordination. MoUs are encouraged between sport movement and betting operators.
- ✚ A lot of promotion nationally and internationally was carried out to ensure a coordinated approach in dealing with major competitions.
- ✚ A policy on misuse of information is very useful (exists in the UK as well as in France, for example).
- ✚ A list of sport bodies with whom exchange of information is mentioned in the convention.
- ✚ The Convention will provide a specific support for all types of manipulations, betting and non-betting related.
- ✚ Good relations with sport governing bodies and the regulators increase chances to catch low level (yet more common) match-fixing.
- ✚ The regulation obliging betting operators to report suspicious activity to the regulator also allows for achieving the first point.
- ✚ With sport education programs increasing, the participants are more aware of the problem and the NP receives more and more reports. Education and awareness raising increases the opportunity for whistleblowing.
- ✚ The NP does regular assessments of their operations. Being held accountable is a way of ensuring efficiency.
- ✚ In the NP there is an operational, sensitive level and then a more general circle of actors.

- Points of contacts within the key stakeholders are a very important aspect of dealing with a case quickly.
- Sport movement may consider including rules such as being enabled to seize mobile phones and electronic evidence to examine for MF. Tennis, Snooker, Cricket (soon) all have this at international level.
- Betting operators to consider including in their terms and conditions in such cases, in order to suspend bets; annulling stake and closing accounts.
- Communication between all parties is very important.
- If the sufficient legislation is not in place, fixers will be satisfied to run the risk of getting caught to continue fixing matches.
- Even if you do not have the legislation yet, the Convention is an international legal instrument – this is a way forward.

Annexes

Annex I: KCOOS Update

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2nd Study Visit
Keep Crime Out of Sport
#KCOOS

13-15 December 2016
 UK Gambling Commission And National Platform


 13-15 December 2016 – Birmingham/Leeds, United Kingdom


 Honour the game.
 KCOOS
 Keep Crime Out Of Sport

- ❖ Month 12 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
- ❖ Study Visit France Jan 17-18 2017
- ❖ Study Visit UK (UK GC) 13-15 Dec 2016 and 7-9 March 2017)

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)
- 2nd Meeting: 13-14 December 2016 (Helsinki)
- 3rd Meeting: March 2017
- 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 the roadmap of concrete actions for the next couple of years

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 co-operation 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

Annex II: Britain's National Platform

How betting integrity fits into our wider Strategy



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.



GAMBLING COMMISSION

Britain's Betting Integrity Journey



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.

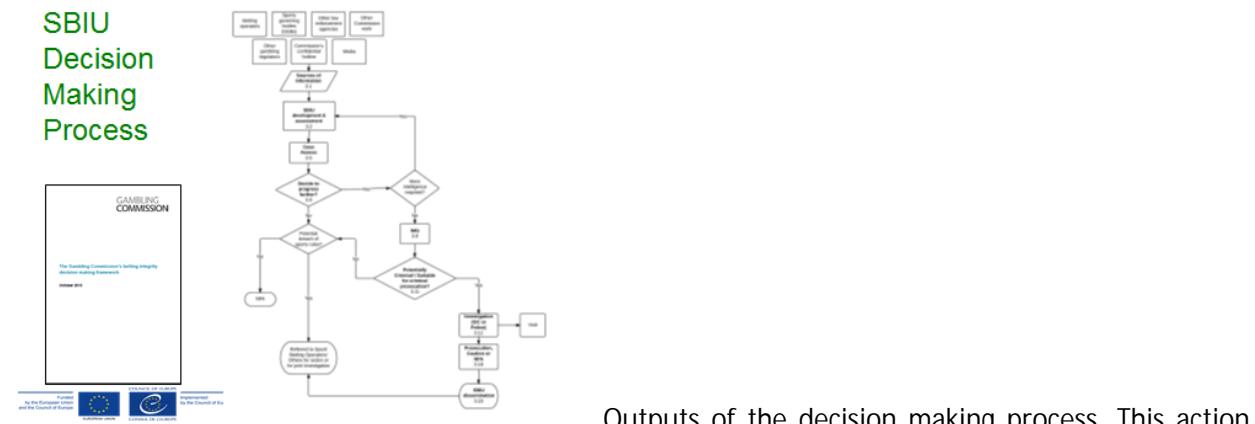
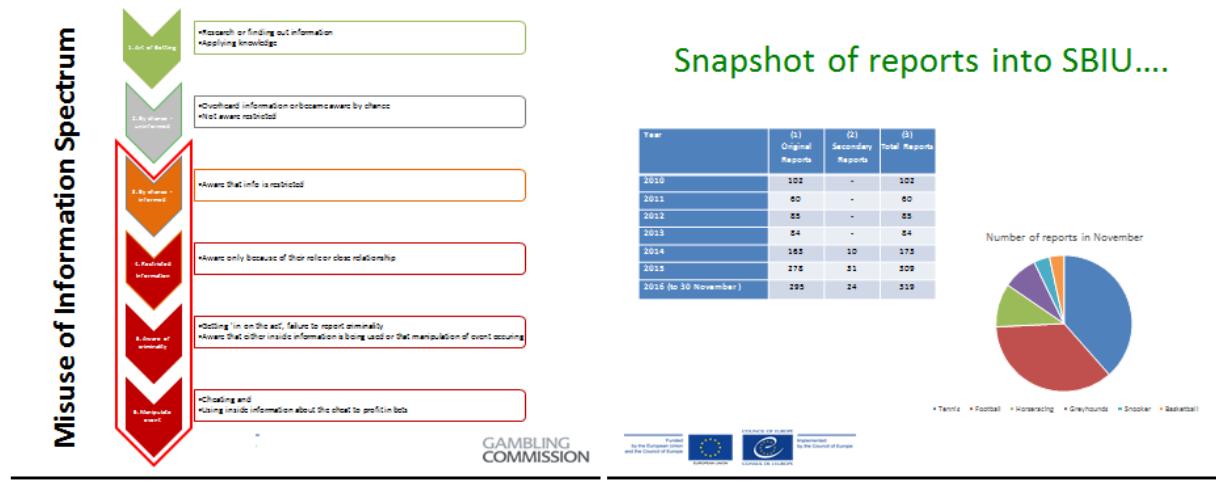
Achievements

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



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.

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Don't monitor – mention HIOs

Other supporting policies



GAMBLING COMMISSION

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Framework for identifying unusual or suspicious betting patterns



Framework for Identifying Unusual or Suspicious Betting Patterns

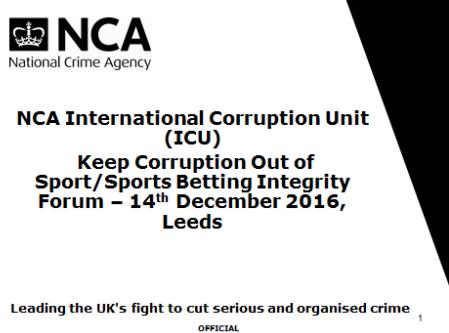
GAMBLING COMMISSION

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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

Annex V: SBIG Strategic meeting: Data Protection

Changes in the data protection regulatory landscape: What steps can you take to be prepared?

14 December 2016, Sports Betting Integrity Forum
Richard Nevinson, Senior Policy Officer, ICO

ico.
Information Commissioner's Office

EU General Data Protection Regulation: The background





Where do we go from here?

8 data protection principles

- 1. Personal information must be fairly and lawfully processed
- 2. Personal information must be processed for limited purposes
- 3. Personal information must be adequate, relevant and not excessive
- 4. Personal information must be accurate and up to date
- 5. Personal information must not be kept for longer than is necessary
- 6. Personal information must be processed in line with the data subjects' rights
- 7. Personal information must be secure
- 8. Personal information must not be transferred to other countries without adequate protection

Sports betting integrity: key data sharing considerations



Basis for sharing



Fairness & transparency



Sensitivity of data

Preparing for the General Data Protection Regulation (GDPR) 12 steps to take now

- 1. **Assessments**
You should make sure that decision makers and key people in your organisation are aware that the law is changing to the GDPR. They need to appreciate the impact this is likely to have.
- 2. **Information you hold**
You should document what personal data you hold, where it came from and who you share it with. You may need to organise an information audit.
- 3. **Communicating privacy information**
You should review your current privacy notices and put a plan in place for making any necessary changes in time for GDPR implementation.
- 4. **Individuals' rights**
You should check your procedures to ensure they provide individuals with access to their data, including how you will handle requests within the new timescales and provide data electronically and in a commonly used format.
- 5. **Subject access requests**
You should review your procedures for handling and storing subject access requests within the new timescales and provide any additional information.
- 6. **Legal basis for processing personal data**
You should look at the various types of data processing you carry out, identify your legal basis for carrying it out and document these.
- 7. **Consent**
You should review how you are seeking, obtaining and recording consent and whether you need to make any changes.
- 8. **Children**
You should start thinking now about putting systems in place to get parental or guardian consent for the data processing activity.
- 9. **Data breaches**
You should make sure you have the right procedures in place to detect, report and investigate a personal data breach.
- 10. **Data Protection by Design and Data Privacy Impact Assessments**
You should familiarise yourself now with the guidance the ICO has produced on Privacy Impact Assessments and how and when to implement them in your organisation.
- 11. **Data Protection Officers**
You should designate a Data Protection Officer. If your organisation is large, you may need more than one DPO. You should also consider how this role will sit within your organisation's structure and governance arrangements.
- 12. **International**
If your organisation operates internationally, you should review your data protection supervisory authority you come under.

Basis for sharing

DO

- ❖ Explore your options carefully and document your decisions
- ❖ Agree on a common basis for sharing with other parties
- ❖ Ensure you articulate your legal basis and purposes for data sharing

DON'T

- ❖ Become overly focused on consent
- ❖ Assume that your legitimate interests always outweigh the rights of the individual
- ❖ Rely on exemptions to provide a legal basis for sharing

Fairness and Transparency

DO

- ❖ Consult the ICO's privacy notices code of practice
- ❖ Ensure privacy notices provide all the information required by the regulation
- ❖ Determine the appropriate format and time for providing the information to individuals

DON'T

- ❖ Use overly complex or legal language
- ❖ Assume that privacy notices cover every disclosure
- ❖ Rely on exemptions as a starting point

Sensitivity of data

DO

- ❖ Carefully consider the nature of any alleged or confirmed offences – are they purely code of conduct breaches or is there an element of criminality?
- ❖ Determine whether there is a legal basis for sharing criminal offence data with other parties
- ❖ Ensure that data security measures take into account the sensitive nature of the data

DON'T

- ❖ Disclose data where there is no legal basis for doing so
- ❖ Share on a "just in case" basis
- ❖ Rely on exemptions!

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

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

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

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>

Annex VIII: Final Agenda

Strasbourg, 13 December 2016

KCOOS (2016) 23

"Keep Crime Out Of Sport"

Study Visit 3

Dates and working hours:

Tuesday 13 December 2017 14:00 – 17:15

Wednesday 18 January 2017 09:30 – 16:45

Birmingham, United Kingdom

(13,15 Dec 2016 at Gambling Commission, Victoria Square House, Victoria Square,
Birmingham

14 Dec 2016 at William Hill, St. John's Centre, 31 Merrion Street, Leeds LS2 8LQ)

FINAL AGENDA



TUESDAY 13 DECEMBER 2016

12:00 Lunch

13:00 Welcome and Introductions

Overview of Keep Crime out of Sport

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

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

Plans for the Study Visit

Lorraine Pearman, Betting Integrity Project Lead

14:00 Overview of Britain's National Platform

Including lessons learned, challenges and future plans

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 dinner and match

Meet in hotel reception at 18:00. Travel to St Andrews Stadium.

Birmingham City FC vs Ipswich Town FC

WEDNESDAY 14 DECEMBER 2016

7:00am - Meet in hotel reception. Transportation to Leeds

Group 1

Morning: Three Study Visit representatives will be invited to attend the Sports Betting Integrity Forum Meeting

Afternoon: A presentation from betting operator William Hill and a tour of the operations based at Merrion Street

Group 2

Morning: A presentation from betting operator William Hill and a tour of the operations based at Merrion Street

Afternoon: Meeting the Sports Betting Integrity Forum Members which will include presentations on:

- The Sports and Sports Betting Integrity Action Plan - TBC
- Education – Getting the Message Across – Simon Barker, Professional Players Federation
- National Crime Agency – Ingrid Leonard – National Crime Agency

Travel back to Birmingham approx. 15:30 – 16:00

Evening

Dinner at 20:30 [Asha's Restaurant](#) 12 – 22 Newhall Street Birmingham

THURSDAY 15 DECEMBER 2016

9:00 Welcome back to Commission

9:10 Discussion on outcomes, questions etc. from previous day

9:45 Case Study

Detailed walkthrough of a case study handled by Britain's national platform

12:30 Lunch

13:30 Round up of the Study Visit

14:00 Event close

Annex IX: Final List of Participants

ALBANIA

1. Ms Violeta SHQEVI (Directorate of Sport, Ministry of Education and Sport)

BELGIUM

2. Ms Nele FRAEYMAN (FOD Justitie)
3. Ms Ann WATZEELS (Belgian Police)
4. Mr Dirk DELDAELE (Belgian Tennis Federation)

UKRAINE

5. Mr Mykola MOVCHAN (Ministry of Youth and Sports)
6. Mr Oleksandr POGREBNYAK (National Rugby Federation)
7. Mr Anatoliy FODCHUK (Ministry of Interior)

THE GAMBLING COMMISSION

8. Mr Steve PAIN (SBIV)
9. Mr Jack STEPHENSON – SAUNDERS
10. Mr Balbir DHUGGA
11. Mr Tony HALL
12. Mr Nick DLIVER
13. Ms Lorraine PEARMAN

All members of the UK National Platform

KCOOS SECRETARIAT

14. Miss Cassandra Matilde FERNANDES (Council of Europe Sport Division)