

ESSA response: Australia's National Sports Plan Consultation

July 2017



INTEGRITY QUESTION

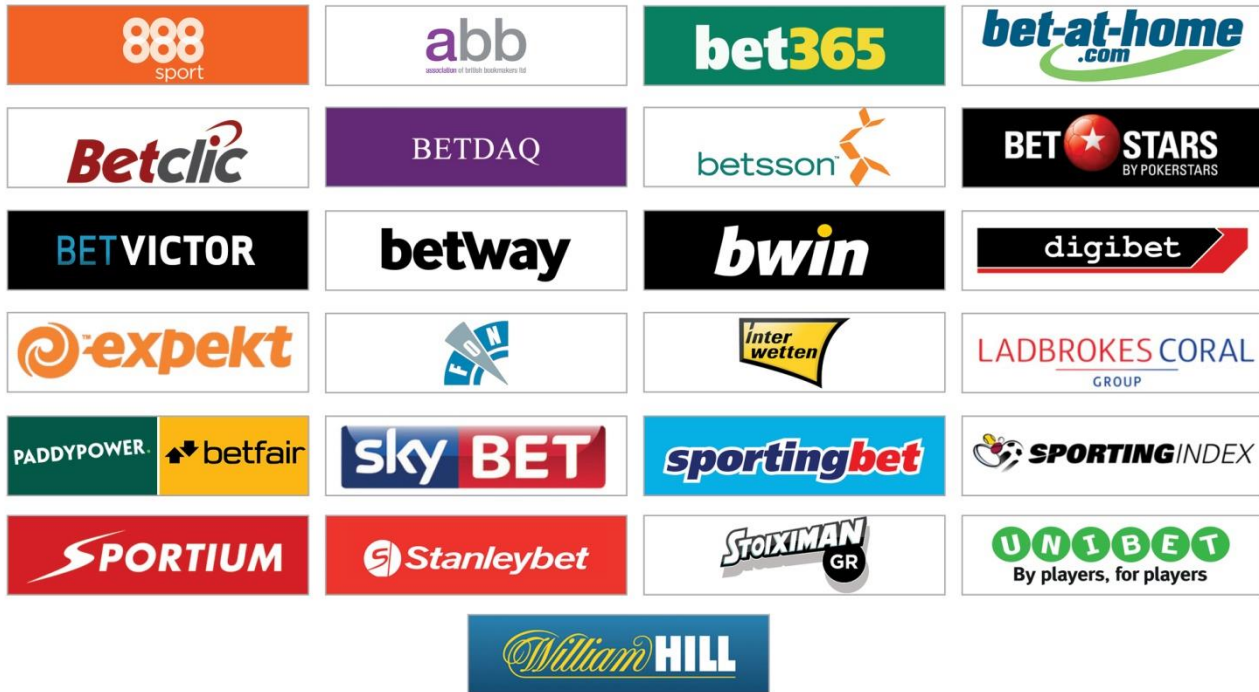
What are the best arrangements for the Australian Government's sports integrity capability to ensure Australian sport is effectively protected against integrity threats?

ESSA RESPONSE

1. ESSA (see <http://www.eu-ssa.org/>) is an international betting integrity body that represents many of the world's largest betting operators and which serve over 40 million consumers in the EU alone.
2. The association is a key player in the fight against betting related match-fixing and acts for the regulated betting sector at national and international match-fixing policy discussion forums.
3. In particular, the organisation holds positions on important betting policy working groups at the European Commission, Council of Europe and the International Olympic Committee (IOC).
4. Many of our members are licensed and operate within various regulatory frameworks for gambling around the world, including Australia, and we welcome the opportunity to reply to this consultation.
5. Australia developed a National Policy on Match-Fixing in Sport in 2011 and should be commended for its proactive approach in this regard; ESSA supports much of the content of that policy.
6. However, as our submission to the Australia gambling review states, we oppose the sports betting right and the ban on online in-play betting; see <http://www.eu-ssa.org/wp-content/uploads/Australian-gambling-review-Nov-2015-FINAL.pdf> for our detailed reasoning.
7. ESSA helped to develop the Council of Europe (CoE) Convention on the Manipulation of Sports Competitions and broadly supports the measures contained within it, most notably the development of a national platform to fight match-fixing and partnership working between key stakeholders.
8. Regardless of whether Australia ratifies the Convention, we promote the establishment of a similar national platform with powers to intervene where suspicious betting has been identified.
9. To that end, it is important that responsible Australian regulated betting operators are involved as key stakeholders in any future discussions regarding any national betting related integrity provisions.
10. It is also suggested that any national platform consider engaging a wider international audience in its policy discussions, noting that betting related match-fixing is a cross-border global issue.
11. ESSA would be delighted to engage on behalf of its licensed international betting operators and to discuss the development of an information sharing arrangement with the Australian authorities.
12. The sports betting integrity model currently in operation in the United Kingdom (UK) is one of the most effective approaches, with a Sports Betting Integrity Forum (SBIF) established in 2012 to develop the UK's approach to protecting sport and sports betting from being corrupted.

13. The SBIF has put in place a national Sport and Sports Betting Integrity Action Plan developed by its key members: gambling regulator, law enforcement, sports and licensed betting operators.
14. It details the expected focus and actions of those parties in delivering timely and effective actions to identify and control risks associated with match-fixing and sports betting integrity.
15. This strategic cross-sector approach forms part of the UK's wider Anti-Corruption Plan and is a blueprint of good practice and effective detection and enforcement measures to protect sports, consumers and regulated operators from the negative impact of betting related match-fixing.
16. As such, it complements the important work of the British Gambling Commission's Sports Betting Intelligence Unit (SBIU), which investigates reports of betting-related corruption and is principally financed from the licence fees of that market's regulated betting operators.
17. In addition to the above, ESSA identifies three key actions which we contend should be part of the national sports plan in relation to match-fixing and betting integrity, namely that:
 - Sports bodies are required to develop and impose suitable betting rules and sanctions;
 - There is a focus on the education of players and other sports personnel on match-fixing; and
 - Information sharing between betting operators, sports, law enforcement and regulators
18. Poor sports governance invariably contributes to the conditions that facilitate match-fixing; the enforcement of clear rules and sanctions regarding betting are therefore vitally important.
19. The IOC has been an example of best practice in this area, and which has also involved the establishment of its Integrity Betting Intelligence System (IBIS) which works closely with ESSA.
20. Complementary to robust sports governance is the education of sportspeople on the dangers of match-fixing; ESSA has co-financed a player education programme with EU Athletes since 2010.
21. Information sharing is a key component of the CoE Convention and many national level policy actions; only in partnership can match-fixing be addressed and sports integrity protected.
22. It is important that sports bodies commit to cooperation and partnership working with all key stakeholders and to taking robust and prompt action where potential integrity issues exist.
23. Whilst some in the sports sector claim that betting creates risks for them, it should be noted that corrupt sports personnel and poor sports governance (e.g. rules) actually creates increased risk and associated regulatory costs for betting operators, who are often the focus of sports fraud.
24. Betting related match-fixing is fundamentally the product of corrupt sportspeople, either acting alone or colluding with criminal elements, seeking to unfairly manipulate sporting events to financially defraud betting operators (regulated or unregulated) and their consumers.
25. For any sports integrity framework to be effective it must include requirements on all stakeholders, including the sports sector, and involve sanctions if those are not properly implemented.
26. The Council of Europe Convention on the Manipulation of Sports Competitions importantly proposes that governments: "withhold some or all financial or other sport-related support from any sports organisations that do not effectively apply regulations for combating manipulation of sports competitions." ESSA supports the availability and enforcement of this approach.

OUR MEMBERS



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