

ESSA Response: Australian Gambling Law Review

Introduction

1. ESSA is a global betting integrity body that represents many of the largest regulated sports betting operators and which serve over 40 million consumers in the EU alone.
2. It 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 working groups at the European Commission, Council of Europe and the International Olympic Committee (IOC).
4. The organisation's principal goal is to protect sports, consumers and betting operators from potential fraud caused by the unfair manipulation sporting events and associated betting.
5. ESSA helps to combat this fraud with evidence-based intelligence, principally obtained from its alert system which identifies suspicious activity on its members' betting markets.
6. This includes crucial information on consumer identities, locations and other transactional information which is not available via other platforms.
7. ESSA has information sharing arrangements with a number of gambling regulatory bodies and sports governing authorities, through which it disseminates data relating to any relevant suspicious betting activity it has identified.
8. The association's members invest over €50m (around Aus\$76m) in compliance and internal security systems every year in order to help combat betting related fraud in sport.
9. We also help co-fund a multi-jurisdictional player betting education programme with EU Athletes, the European Commission and other partners from the regulated betting sector¹.
10. That investment has been successful in helping to drive criminals away from regulated betting markets, creating a safe and secure environment for our customers and sports.
11. Many of our members are licensed and operate within the regulatory framework for gambling managed by the various states and territories within Australia.
12. ESSA, and its members, therefore have an interest in the review of Australia's current gambling framework, most notably with regard to sports betting integrity issues.

Betting integrity framework

13. Modern technological advances have opened new global channels of interaction between businesses and consumers; the betting and sports sectors are no different in that regard.

¹ http://www.eu-ssa.org/wp-content/uploads/Eu-Athletes_Erasmusfunding_2015_FINAL.pdf

14. It is important that national legislation is able to adequately cater for and readily adapt to new commercial developments and any regulatory challenges that may accompany those.
15. The adoption of legislation providing the regulatory authority with the power to determine, amend and fully enforce appropriate betting integrity licence conditions is thus paramount.
16. The UK was one of the first jurisdictions to implement such legislation. This provides a clear regulatory framework, but is flexible enough to adapt quickly to changing circumstances. Other countries such as Denmark and Spain have adopted a similar approach.
17. The British Gambling Commission's regulatory structure, cross-sector partnership working and evidence-based approach to policy making on integrity issues represents one of the more advanced, fair and effective betting frameworks currently in operation.
18. The Commission's licensing conditions require its regulated betting operators to report any suspicious betting activity (section 15.1 of the licence conditions and codes of practice²) and it has established a specific Sports Betting Intelligence Unit (SBIU) to investigate reports.
19. The legislation also provides the Commission with the ability to void bets, share information with sports, law enforcement and other parties, as well as utilise an offence of cheating, and it has set out clear guidance covering its betting integrity decision making framework³.
20. Such provisions have been employed to positive effect in the UK and have resulted in successful prosecutions using offences under gambling legislation and separate bribery laws.
21. A small number of countries, such as Russia and Japan, and the state of New South Wales, have also enacted specific match-fixing offences. Whether such explicit legislation and offence is necessary is an issue for each government within its criminal justice framework.
22. However, what is vitally important is that suitably robust criminal sanctions are available and applied consistently and with due vigour. From our experience, the UK model, overseen by the British Gambling Commission, has one of the most effective approaches in this regard.
23. It has been identified as incorporating a comprehensive list of preventative provisions on betting-related match-fixing in sports in an independent assessment of best practices enacted by national authorities in this area for the European Commission in 2014⁴.
24. The Gambling Commission has also established important information sharing agreements with a range of parties, including ESSA, which allow it to benefit from betting integrity data from markets outside of its licensing structure, recognising that this is a transnational issue.

² <http://www.gamblingcommission.gov.uk/pdf/Latest-LCCP-and-Extracts/Licence-conditions-and-codes-of-practice.pdf>

³ <http://www.gamblingcommission.gov.uk/pdf/Betting%20integrity%20decision%20making%20framework.pdf>

⁴ <http://bookshop.europa.eu/en/study-on-risk-assessment-and-management-and-prevention-of-conflicts-of-interest-in-the-prevention-and-fight-against-betting-related-match-fixing-in-the-eu-28-pbNC0414716/?CatalogCategoryID=CdcKABstHUGAAAEJBJEY4e5L>

25. Importantly, it engages with stakeholders in an open and transparent manner, employing an evidence-based approach. Along with ESSA⁵, it is one of the few bodies (and only regulatory authority) to regularly publish betting integrity statistics⁶ covering its licensed operators.
26. The Commission's betting integrity work alongside the Olympic authorities and betting operators for the London 2012 Olympic Games, and the establishment of a Joint Assessment Unit (JAU), has become the basis for betting integrity practices at future Olympic Games⁷.
27. In September 2015, the UK announced the publication of its national Sport and Sports Betting Integrity Action Plan⁸ developed by the British Gambling Commission, law enforcement authorities, sports bodies and the regulated betting sector.
28. It sets out a detailed strategic joint approach across all sectors and is a blueprint of good practice and effective detection and enforcement measures to protect sports, consumers and regulated betting operators from the negative impact of betting related match-fixing.
29. The Commission has allocated significant resources to its betting integrity regulatory activity - in 2015/16 it plans to spend around £1.2m or 6% of its budget on betting integrity issues⁹.
30. Licence fees from regulated betting operators are the central means of meeting those costs and protecting markets, consumers and, by association, sporting events from corrupt activities. However, any integrity costs must be justified and not an over-burdensome.
31. Indeed, other stakeholders such as sports bodies also need to show that they are contributing to the protection of their events. This is most notably achieved through the developmental and enforcement of suitable betting integrity rules and player education.
32. There are some good examples of this led by the International Olympic Committee (IOC) and others such as the World Professional Billiards and Snooker Association (WPBSA).
33. However, there are also many sports which have not sought to prioritise mitigating actions covering the manipulation of sporting events in same way they would in other areas. This inactivity and poor governance creates an environment where corruption can flourish.
34. ESSA draws your attention to the FIFPro report 2012¹⁰ which details the impact of poor financial practices in sport as a facilitator of match-fixing, and the 2014 Bangladesh match-fixing tribunal which found that "more often than not, sports regulators do not stop matches or events even where they have information about corruption in the match or event."¹¹
35. Whilst the sports sector claims that betting creates risks for them, it should be noted that corrupt sports personnel and poor sports governance actually creates increased risk and associated regulatory costs for betting operators, who are often the focus of sports fraud.

⁵ <http://www.eu-ssa.org/documents/>

⁶ <http://www.gamblingcommission.gov.uk/Gambling-data-analysis/statistics/Industry-statistics.aspx>

⁷ <http://www.gamblingcommission.gov.uk/pdf/jau%20report%20-%20march%202013.pdf>

⁸ <http://www.gamblingcommission.gov.uk/Press/2015/Sports-betting-integrity-action-plan-published-today.aspx>

⁹ Paragraph 1.7 <http://www.gamblingcommission.gov.uk/pdf/Business-plan-2015-2016.pdf>

¹⁰ <http://www.fifpro.org/en/don-t-fix-it/black-book>

¹¹ Paragraph 56 Bangladesh Cricket Board Anti-Corruption Tribunal (Issued 8 June 2014) <http://www.thedailystar.net/upload/gallery/pdf/bpl-full-verdict-file-.pdf>

36. Betting related match-fixing is fundamentally the product of corrupt sports people either alone, or colluding with criminal elements, to unfairly manipulate sporting events to financially defraud betting operators (regulated or unregulated) and their consumers.
37. For any sports betting integrity framework to be effective, it must include requirements on all stakeholders, including the sports sector, and sanctions if those are not implemented.
38. The Council of Europe Convention on the Manipulation of Sports Competitions, which ESSA was involved in developing 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.”¹²

Availability of regulated betting products

39. It is fundamental to the viability of regulated betting operators and their markets that they are able to offer a wide range of products. Imposing restrictions invariably leads to consumers seeking prohibited products through other markets, including unregulated channels.
40. Some sports bodies and others have pressed for certain types of bets to be prohibited on sporting integrity grounds. They believe that these products, such as in-play betting, are detrimental to the integrity of sport, although no clear supporting evidence has been shown.
41. Indeed, law enforcement bodies such as INTERPOL and Europol have stated that match-fixing is not primarily focused on regulated, but unregulated operators, mainly in Asia¹³.
42. Corruptors are also known to focus on the more mainstream traditional betting markets, such as the final result, which have higher levels of liquidity and offer greater opportunity to mask illicit activities, rather than newer forms of betting such as in-play (or live) betting.
43. An independent report¹⁴ published by the ASSER Institute, which assessed the integrity risks of certain sports bets on the basis of quantitative empirical evidence, supports this position.
44. Published in January 2015, the report analysed a detailed set of betting data covering football matches likely to have been manipulated for betting purposes over a period of five years (May 2009-November 2014) to assess the impact of pre-match and in-play betting.
45. The report shows that match-fixers primarily take advantage of high liquidity betting markets and that almost all suspicious betting patterns were observed in the main betting markets which relate to the final outcome of a match (with only 0.4% in side markets).
46. The report concluded that the evidence does not support the claim that live betting, in comparison to pre-match betting, significantly encourages corruption in sport. The study therefore found no correlation between live betting or side betting and possible instances of betting-related match-fixing that would justify a prohibition of these bet types.

¹² Article 8 <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016801cdd7e>

¹³ Page 11 Interpol Match-fixing in Football Training Needs Assessment 2013 & <https://www.europol.europa.eu/content/results-largest-football-match-fixing-investigation-europe>

¹⁴ <http://www.asser.nl/media/2422/the-odds-of-matchfixing-report2015.pdf>

47. The assessment of risk and product availability is of course an issue for national legislators and regulatory authorities to determine, and where all stakeholders should be involved in evidence-based policy discussions regarding the associated betting market framework.
48. The British Gambling Commission has taken such an approach and, after a detailed consideration of stakeholder positions and market analysis, published its initial position in 2009; it has continually reassessed this important matter and its policy since that time.
49. The regulator, which has detailed data from one of the largest betting markets and “works on the principle of risk-based regulation and must act in a proportionate manner”, was “not persuaded that there is a sufficient case for restricting types of bets”.¹⁵
50. The British gambling regulatory body has since reiterated this stance following the European Parliament’s Resolution Online Gambling adopted in September 2013, which proposed the prohibition of certain types of bets, such as in-play betting, stating that “any threat to sports betting integrity can be managed without the need to ban what is a very popular activity.”¹⁶
51. In its subsequent October 2013 position paper entitled “Protecting betting integrity” the British Gambling Commission further commented that it is “familiar with methods used in other countries to promote betting integrity such as restricting the types of bets offered or approving sports governing bodies’ rules before allowing betting on those sports.”¹⁷
52. The regulator importantly noted that the: “Commission has the power to impose such restrictions. However, the Commission does not consider, based on the available evidence, that such intrusive or resource intensive methods are warranted or would be effective”.¹⁸
53. Indeed, most countries that regulate betting on sporting events do not currently impose significant restrictions on bet types or events, with operators able to offer a wide range of products and services and employing risk-based security systems to monitor their markets.
54. Significant product restrictions are therefore only enforced in a small number of jurisdictions and there is no evidence to suggest that the sporting events taking place in these countries are any less susceptible to corruption, often perpetrated through unregulated operators.
55. Australia has enforced an inconsistent position on in-play (or live) betting. The Interactive Gambling Act 2001 prohibits the supply of interactive gambling services to customers in Australia, except for online betting which is permitted if state or territories permit.¹⁹
56. There are, however, restrictions on the type of betting which can be permitted under the legislation and which bans in-play (or live) sports betting to Australian consumers via the internet, but which permits this same activity through telephone or land-based betting.²⁰

¹⁵ Paragraph 3.2 <http://www.gamblingcommission.gov.uk/pdf/Betting%20integrity%20policy%20position%20paper%20-%20March%202009.pdf> & Paragraph 1.5 <http://www.gamblingcommission.gov.uk/pdf/Betting%20integrity%20policy%20position%20paper%20-%20March%202009.pdf>

¹⁶ http://www.egrmagazine.com/news/gambling_commission_rejects_in-running_ban_proposal

¹⁷ Paragraph 3.6 <http://www.gamblingcommission.gov.uk/pdf/Protecting%20betting%20integrity.pdf>

¹⁸ Ibid.

¹⁹ Chapter 10 http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Former_Committees/gamblingreform/completedinquires/2010-13/interactiveonlinegamblingadvertising/report/c10

57. The Interactive Gambling Act (IGA) also allows in-play betting via the internet for horse and greyhound racing, whilst Australian residents can place in-play bets with online betting operators based outside of Australia, creating further inconsistencies with the law.²¹
58. A review of the State of Victoria's betting legislation in 2011 determined that: "There was widespread agreement amongst all stakeholders that the ban on internet betting 'in the run' contained in the Interactive Gambling Act 2001(Cwlth) serves no useful purpose."²²
59. It "was also put to the review that, in some cases, in the run betting was to be preferred. Certain betting markets may be better served from an integrity perspective if they can only be bet on during the game, as this would avoid the possibility of pre-game collusion."²³
60. National sports have supported the provision of online in-play betting stating: "This form of betting is being driven offshore by the current prohibition. Australian sports and regulators have no access to suspicious betting data and have no means of tracking illegal activity."²⁴
61. A Government review of the IGA in 2013 again noted that the majority of online in-play wagering is conducted on the final outcome of an event, rather than on contingencies within the event (e.g. who will score the first goal) and that the public policy case for banning such betting, "especially if this form of gambling is driven off-shore, has not been established."²⁵
62. Moves to ban regulated in-play (or live) betting are borne of little supporting evidence and it is of questionable positive integrity impact given the limitations of any national level approach in a fragmented global market of differing regulatory models.
63. It is important to remember that many other integrity measures are available to regulatory authorities, depending on the legislative framework, including: information sharing, voiding bets, the suspension of betting markets and the instigation of criminal prosecutions.
64. Moreover, unregulated operators will continue to offer whatever types of products they chose without any regulatory limitation, oversight or possible sanctions. There is also no requirement to engage in responsible preventative actions to protect betting markets.
65. Imposing bet type restrictions on regulated operators does not therefore make it any less likely that the sporting events in that licensing jurisdiction will be any safer from betting related corruption, which can take place with a multitude of operators around the world.
66. The proposal that products offered by regulated betting operators should be restricted on integrity grounds is not a policy generated from any firm evidence base; placing product restrictions on regulated operators does not represent a proportionate or effective policy.

²⁰ http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Former_Committees/gamblingreform/completedinquires/2010-13/interactiveonlinegamblingadvertising/report/c10 &

http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Former_Committees/gamblingreform/completedinquires/2010-13/interactiveonlinegamblingadvertising/report/c11

²¹ Page 120 http://www.communications.gov.au/_data/assets/pdf_file/0007/162277/Final_Report_-_Review_of_the_Interactive_Gambling_Act_2001.pdf & Paragraph 11.14

http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Former_Committees/gamblingreform/completedinquires/2010-13/interactiveonlinegamblingadvertising/report/c11

²² Page 22 http://assets.justice.vic.gov.au/justice/resources/5c9236e3-f37e-440d-ae53-4dc5fbdef7ef/sports_betting_review_2011_report.pdf

²³ Ibid.

²⁴ Pages 125 & 126 http://www.communications.gov.au/_data/assets/pdf_file/0007/162277/Final_Report_-_Review_of_the_Interactive_Gambling_Act_2001.pdf

²⁵ Page 129 http://www.communications.gov.au/_data/assets/pdf_file/0007/162277/Final_Report_-_Review_of_the_Interactive_Gambling_Act_2001.pdf

67. Any proposals in this area should also recognise that the ability to advertise and sponsor, subject to suitable restrictions, is a fundamental business necessity for regulated betting operators, as with many others business sectors.
68. Directing consumers to operators which report to a national regulator has many potential benefits from an integrity perspective. Imposing restrictions on licensed operators which are not forced on operators outside of a jurisdiction can have a significant detrimental impact on the business model of in-country operators and the attractiveness of a licensing jurisdiction.
69. ESSA recommends that Australia should seek to adopt a consistent policy that regulates and allows Australian citizens access to all types of betting products across all betting platforms as a means of maintaining both the viability and integrity of its betting market.

Sports betting right

70. Entwined with the issue of restrictions on betting is the assertion that sports should have control over the availability of betting markets offered by regulated operators. As in France and the Australian State of Victoria (New South Wales has also passed a similar law²⁶), this would involve a payment to sports for their agreement to allow betting on their events.
71. Whilst the promotion of a sports organiser's betting right (or sports right) has commercial roots, it has also increasingly been presented as an important integrity measure, but there is little evidence to support this as a necessary or effective sports betting integrity approach.²⁷
72. The European Commission contracted a study to analyse the sport organisers' right.²⁸ The subsequent Asser Institute authored report published in April 2014²⁹ is critical of the approach as an effective integrity measure and lists numerous practical and legal obstacles.
73. The study highlights that supporters of this approach assert that it would enable sports to preserve the integrity of their events by determining the events on which bets could take place and what type of bets, with the corresponding remuneration levied on betting operators for that agreement invested in preventive measures to protect sports integrity.³⁰
74. The Australian State of Victoria first introduced this model in 2007³¹, but as the Asser report highlights that integrity and product fee prescribed by the model is "only mandatory (i.e. enforceable) for sports events that take place wholly or partially in the State of Victoria."³²
75. This drawback was highlighted in a review in 2011 and, as with France's national regime, consumers and operators outside of this territory are able to offer and engage in betting on events occurring in Victoria without any need to meet that state's integrity agreements.³³

²⁶ <http://www.parliament.nsw.gov.au/prod/parliament/nswbills.nsf/0/1FE79E2A4241FD28CA257C9F00161786?Open&shownotes>

²⁷ http://www.uefa.org/MultimediaFiles/Download/uefaorg/Clubs/01/93/51/24/1935124_DOWNLOAD.pdf & <http://www.publications.parliament.uk/pa/cm201314/cmpublic/gambling/memo/gb08.htm>

²⁸ Open Call for tender EAC/18/2012, Study on sports organisers' rights in the EU Terms of reference

²⁹ <http://www.ivir.nl/publicaties/download/1353>

³⁰ Page 123 http://www.ivir.nl/publicaties/margoni/study_sports_organisers.pdf

³¹ The Gambling and Racing Legislation Amendment Act 2007 (Sports Betting Act)

³² Page 133 http://ec.europa.eu/sport/news/2014/docs/study-sor2014-final-report-gc-compatible_en.pdf

³³ Ibid.

76. This legal framework thereby results in a “potential integrity gap”. In addition, the costs involved in seeking status as a sports controlling body (SCB) under the Victoria legislation contributes to the reluctance of some smaller sports bodies to apply for SCB status.³⁴
77. As such, it was noted by the review in 2011 that the current position where “sports controlling bodies have differing ability to negotiate with sports betting providers depending on how many of their games are played in Victoria, is unsatisfactory.”
78. The review was also unable “to form a view as to whether the legislation has strengthened public confidence in the integrity of sports.”³⁵
79. In addition, the ASSER report for the European Commission emphasised that the right to bet’s administrative costs “will always be considerable. This is evident from the experiences with both the French and the Victorian enforcement mechanism” further questioning its suitability.³⁶
80. As the report states, the “right to consent to bets enables a sports organiser to effectively control the organisation of bets on its events.”³⁷ Rather than being a positive integrity measure, this presents a clear danger to betting markets and sporting events.
81. There must be a significant question as to whether it is appropriate to permit self-regulating sporting bodies any degree of control over regulated betting markets, especially given the on-going commercial issues and conflicts that are inherent in this matter.
82. Senior representatives of sporting bodies and clubs around the world have been implicated and/or convicted of involvement in both betting and non-betting (or sporting) related match-fixing, notably in Italy, Turkey, South Africa and Brazil.³⁸ Not to mention the wider high-level corruption issues current under investigation regarding FIFA and the IAAF³⁹.
83. A report for the European Parliament’s Special Committee on Organised Crime, Corruption and Money Laundering (CRIM) in 2012 determined that “strong ties have been detected between the football establishment and criminal organisations”.⁴⁰
84. That position has been corroborated by other studies with a report by Sportradar stating that in football the organisation is “aware of at least ten owners/chairmen who are most likely linked to organised crime and their club is also most likely involved in match-fixing.”⁴¹
85. Promoting a right to bet model could therefore be deemed questionable from the simple perspective that it potentially gives controlling power over betting markets to those unregulated persons and organisations that might be involved in corrupting those markets.

³⁴ Page 134 http://ec.europa.eu/sport/news/2014/docs/study-sor2014-final-report-gc-compatible_en.pdf

³⁵ Page 28 http://www.premier.vic.gov.au/images/stories/documents/mediareleases/2011/110803_Gleeson_Sports_Betting_Review.pdf

³⁶ Page 152 & 154 http://ec.europa.eu/sport/news/2014/docs/study-sor2014-final-report-gc-compatible_en.pdf

³⁷ Page 150 http://ec.europa.eu/sport/news/2014/docs/study-sor2014-final-report-gc-compatible_en.pdf

³⁸ <http://news.bbc.co.uk/sport1/hi/football/europe/5215242.stm>, <http://www.bbc.co.uk/news/world-europe-13914118>, <http://www.bbc.co.uk/news/world-europe-18681119>,

<http://www.bbc.co.uk/sport/0/football/22042549> & <http://sports.ndtv.com/football/news/169887-brazil-football-chiefs-hit-with-match-fixing-fines>

³⁹ <http://www.bbc.co.uk/sport/0/athletics/34765444> & <http://www.bbc.co.uk/news/world-europe-32897066>

⁴⁰ <http://www.europarl.europa.eu/document/activities/cont/201209/20120925ATT52303/20120925ATT52303EN.pdf>

⁴¹ Page 66 https://security.sportradar.com/sites/security.sportradar.com/files/Sportradar%20Security%20Services_World%20Match-Fixing-The%20Problem%20and%20the%20Solution.pdf

86. The British Gambling Commission has, quite understandably given the issues raised in the previous paragraphs, determined that it “could not delegate a decision to a sport governing body as to the activities on which licensed betting operators could lawfully take bets.”⁴²
87. The authors of the European Commission report examining the French and State of Victoria approaches, consequently advise that other countries have understandably “opted to obtain the claimed [integrity] benefits of the right to consent to bets through other regulatory means” and which indisputably seek to prevent the manipulation of all sporting events.⁴³
88. The Italian and UK models are notable alternate approaches which ensure that there is no “integrity gap”, as an examination of the French and Victoria variations exposes, and where their respective regulators’ centralised systems are financed via betting operator fees.
89. The Italian regulator, AAMS, employs its own sports betting monitoring system with all of its licensed betting operators’ servers linked to it so that every bet can be recorded, monitored and validated. Unusual betting patterns are sent to the respective sports for investigation.⁴⁴
90. Whilst, as stated earlier, the British Gambling Commission requires all of its licensed betting operators to notify and share information with the relevant sports and the regulator of any suspected or attempted betting fraud and any breach of a sport’s rule.⁴⁵
91. The right to bet approach is not an effective or safe integrity model. It is unclear that the associated revenues are being used for integrity and the administration costs are considerable. More secure and clear integrity-focused methods are in operation.

Additional material

92. ESSA has listed (and added links) to a number of key documents for the Review, which provide a more detailed examination and explanation of the issues raised above.
- [Sports Betting and Commercial Issues report](#)
 - [British Gambling Commission betting integrity decision making guidance](#)
 - [UK Sport and sports Betting Integrity Action Plan](#)
 - [ASSER Institute Study on Sports Organisers’ Rights](#)
 - [ASSER Institute Study on risk assessment and management in the fight match-fixing](#)
 - [ASSER Institute Report on the Integrity risks of certain types of sports bets](#)

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⁴² Paragraph 4.7 <http://www.gamblingcommission.gov.uk/pdf/Integrity%20in%20sports%20betting%20-%20issues%20paper%20-%20consultation%20-%20May%202007.pdf>

⁴³ Ibid.

⁴⁴ Ibid.

⁴⁵ British Gambling Commission licensing conditions and codes of practice section 15.1 http://www.gamblingcommission.gov.uk/gambling_sectors/betting/operating_licence_holders_-_wh/information_that_must_be_provi/reporting_suspicious_bets_to_s.aspx