

# Sport and Sports Betting Integrity Action Plan 2021

Britain's approach to address risks to the integrity of  
sport and sports betting





# Sport and Sports Betting Integrity Action Plan

## Introduction

1. The Sport and Sports Betting Integrity Action Plan (the Plan) outlines Britain's approach to managing the risks to betting integrity. The Plan sets out how the members of the Sports Betting Integrity Forum (SBIF) aim to protect Britain's national and international reputation for being a safe place to enjoy both sport and sports betting.
2. The SBIF was established in 2012 to develop Britain's approach to tackling the corrupt interference of sporting events and related betting markets, a phenomenon that is often also described as match-fixing or competition manipulation.<sup>1</sup>
3. The first Plan was published in September 2015 and formed the foundation of Britain's strategy to protect betting integrity. In line with the SBIF's commitment to produce an annual review, revised versions have been published each year since 2015 with accompanying progress reports.
4. In 2020 the global pandemic brought with it many unprecedented challenges to sport and the gambling industry. Where relevant, these challenges are reflected in the 2021 Plan.
5. The Plan sets out the expected focus of the SBIF stakeholders (who include sport governing bodies (SGBs), player associations, betting operators, gambling regulators, police agencies, prosecutors, Government and other key partners) in delivering timely and effective actions to identify and mitigate risks associated with competition manipulation and sports betting integrity.
5. Each subsequent Plan has sought to build on progress made since the publication of the [Report of the Sports Betting Integrity Panel](#) in January 2010, that provided the initial roadmap for action. It also progressed Action 31 of the UK Anti-Corruption Plan, published in October 2014.<sup>2</sup> A progress update on the UK Anti-Corruption Plan was published in May 2016.<sup>3</sup> The Government's most recent Anti-Corruption Strategy (2017-2022) also includes a goal to work towards greater integrity in domestic and international sport.<sup>4</sup>
6. The 2021 plan builds on the SBIF's work to date, continuing the collaborative approach to prevent and protect against competition manipulation and sports betting related corruption. It also includes relevant updates and new priorities. The primary objective of the SBIF - to protect the integrity of sport and sports betting - will remain the same as in previous years, however, in 2021 the priority actions will reflect the risks brought about by the COVID-19 pandemic, as well as the challenges and opportunities resulting from the UK's exit from the European Union.

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<sup>1</sup> [The Council of Europe's Convention on the Manipulation of Sports Competitions](#) defines manipulation of sports competitions as "an intentional arrangement, act or omission aimed at improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for others"

<sup>2</sup> [UK Anti-Corruption Plan](#) (Oct 2014) – Action 31: Gambling Commission and DCMS to implement the Sports Betting Integrity Action Plan

<sup>3</sup> [Progress Update on the UK Anti-Corruption Plan \(May 2016\)](#)

<sup>4</sup> [United Kingdom Anti-Corruption Strategy \(2017-2022\)](#)



7. The SBIF's approach reflects the objectives and approach of the Council of Europe's Convention on the Manipulation of Sports Competitions (known as the Macolin Convention).<sup>5</sup> The UK Government signed the Macolin Convention (the Convention) on 6 December 2018.<sup>6</sup>
8. Article 13 of the Convention sets out what is expected from signatories in terms of establishing a National Platform. The key operating principles of a National Platform are to:
  - a. Coordinate the fight against the manipulation of sports competitions;
  - b. Identify and coordinate the actions of key partners;
  - c. Collect, assess and exchange information to support the collective and individual partner's efforts.
9. The SBIF and the Gambling Commission's (the Commission) Sports Betting Intelligence Unit (SBIU) fulfil the role of Britain's National Platform. More information on the SBIF and SBIU can be found in Part 1 of this Plan.
10. The Convention came into effect in 2019. The UK Government will consider ratification of the Convention once its relationship with the European Union is better understood.
11. The Commission acts as the lead agency for the UK's approach to combatting the risk to sports betting integrity. Working closely with DCMS and relevant national and international bodies, the Commission ensures that the Plan is coordinated with the UK Government's sports integrity policies and strategies. This includes *Sporting Future: A new strategy for an active nation* published in 2015.<sup>7</sup>
12. The Commission will also contribute to the delivery of Priority 3 within the UK Government's Anti-Corruption Strategy,<sup>8</sup> which aims to promote "*greater integrity in domestic and international sport*".

### **What is meant by the manipulation of sports events?**

13. This term refers to the corrupt manipulation of a sporting event by those involved (e.g. participants, officials, organiser, coaches, etc), with the intention of producing a result or occurrence which benefits the corrupter(s) and/or their associates.
14. The benefit gained may involve a direct financial reward related to the deception of betting operators or betting customers, or an indirect financial benefit relating to sporting outcomes (e.g. gaining promotion, avoiding relegation, obtaining an easier draw, etc). Dependant on the specific details of an incident, some of these types of activity could be considered criminal in nature, whereas others may represent breaches of sporting codes or regulations, provided the relevant clauses and/or conditions are in place.
15. Such manipulations can affect both the outcome of an event or a specific element within an event.

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<sup>5</sup> [The Council of Europe's Convention on the Manipulation of Sports Competitions](#)

<sup>6</sup> [Britain signs the Macolin Convention](#)

<sup>7</sup> [Sporting Future: A new strategy for an active nation](#)

<sup>8</sup> [United Kingdom Anti-Corruption Strategy 2017 - 2022](#)



## Why is prevention and protection so important?

16. Sport and sports betting rely upon high standards of integrity. Event manipulation, integrity issues and related betting corruption undermines the ethos, reputation and commercial viability of sport and the betting industry. It can have an impact on the social, political and economic benefits derived from sports and sports betting. It can also potentially tarnish the reputation of all athletes and negatively impact upon Britain's reputation as a safe environment within which to host sporting events and conduct gambling related business.

## The Sports and Sports Betting Integrity Action Plan: overview and purpose

17. The purpose of the Plan is to put in place a framework of actions to:

- a. Prevent sporting events and regulated sporting betting markets from being corrupted
- b. Deter the manipulation of sports events to gain an unfair advantage on betting markets

18. Britain is not viewed as having an endemic integrity problem, although it is recognised that sports integrity issues and instances of corruption of betting markets do exist. The threat is ongoing, and it is accepted that national stakeholders need to prevent and be prepared to act when incidents of concern are identified. The COVID-19 pandemic has increasingly highlighted areas of vulnerability, as well as identifying emerging issues within the field of sports betting integrity.

19. The Plan recognises the need for key stakeholders to plan for and act within their areas of responsibility, to support others where appropriate and to collaborate as part of the broader National Platform; this is the basis of Britain's strategic approach. A crucial aspect of this is to continue to develop a culture of co-operation and co-ordinated actions, which is reflected in the terms of reference of the SBIF, which has responsibility for delivery of the Plan's priority actions.<sup>9</sup>

20. The Plan also reflects the continual need to be vigilant and recognise that Britain is not immune from external influences. Successes to date in identifying and responding to the threats, reflect the learning and experience gained from both criminal and sports investigations.

21. Progress has been achieved by building upon the benefits derived from effective information-sharing and collaborations between sports, licensed betting operators and other agencies in Britain, as well as engaging with overseas jurisdictions and international bodies where appropriate to do so.

22. The SBIF will continue to develop its understanding of emerging threats by undertaking focussed, collaborative risk assessments, where deemed necessary. Any specific outputs from these assessments will be incorporated back into the working processes of each of the SBIF stakeholders.

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<sup>9</sup> [SBIF Terms of Reference](#)



23. There can be no complacency; those responsible for corrupting the integrity of sports and sports betting are resilient and resourceful and the efforts of the SBIF and its partners need to be sustained.
24. The threat to Britain has international dimensions because of the global nature of sport, betting and communications. Event manipulation can involve serious organised crime networks operating at national and international level using sophisticated technologies and organisational structures. Consistent with the “Pursue, Prepare, Protect and Prevent” delivery framework as outlined in the UK Government’s 2018 Serious and Organised Crime Strategy,<sup>10</sup> prevention in combination with disruption and deterrence plays a key role in the national approach.
25. Through the Commission, SBIF will continue to engage with the Council of Europe, working with the Macolin Convention’s Secretariat. This will ensure Britain’s interests are represented in activities that support the implementation of the Convention in Europe and beyond. The Commission will also continue to work with the Group of Copenhagen<sup>11</sup> to support the sharing of intelligence and information within relevant legal frameworks, as well as the sharing of expertise across jurisdictions.
26. Event manipulation can also be local and opportunistic in nature. Whilst these instances may involve relatively small sums of money, such actions still have the potential to undermine the reputation of the sport, sports betting and the wider reputation of athletes. A requirement to identify and address such concerns therefore also exists.
27. It is understood that illegal or unregulated betting provides challenges in terms of both the detection and subsequent investigation of instances of sports betting corruption. The SBIF will continue to promote the benefits of effective regulation. It will also work to address illegal gambling in Britain, supporting the Commission’s strategic objectives to prevent gambling being a source of crime or disorder and ensuring betting markets remain fair and open. In support of these aims, the SBIF will also work towards a better understanding of the impacts of international grey and black markets.
28. The threat of event manipulation and match-fixing presents an unceasing challenge for the leadership and culture of sports and to sports betting; there is a clear need to identify and implement concrete actions to prevent and deter those seeking to corrupt. This requires longer term commitment to the development of competencies and approaches.
29. The longer-term challenges remain; the SBIF recognises the need to enhance its understanding to address the complex nature of the risks and issues connected to competition manipulation. The SBIF will continue to work collaboratively to combat the associated criminality, corruption and money laundering in sports and sports betting to protect Britain’s reputation and influence.
30. The SBIF also recognises the need to balance effective investigation and disciplinary processes against respect for fundamental human rights including privacy and a fair hearing.
31. In the next section, Part 1 provides an overview of the Plan’s aims. Part 2 outlines the specific actions that will be undertaken by SBIF stakeholders in 2021.

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<sup>10</sup> [Serious and Organised Crime Strategy 2018](#)

<sup>11</sup> [Network of National Platforms \(Group of Copenhagen\)](#)





## Part 1: Aims of the Sports and Sports Betting Integrity Action Plan

32. Due to the impact of the COVID-19 pandemic, the approach of the SBIF will be temporarily modified in 2021 to enable members to meet the current challenges, whilst continuing to protect against the threats to sports betting integrity. The SBIF will therefore adopt a revised approach with priorities instead focussing on those areas that will best meet the demands of the current situation. Collaboration between all SBIF stakeholders remains a critical element of this approach.

### A - The strategic approach

33. Activity will be taken at a national level by Government, the Commission, SGBs, player and membership associations, betting operators, law-enforcement agencies and other key stakeholders with the objectives of:

- Sustaining the SBIF to develop and deliver the Plan through both individual activities and coordinated responses to joint issues;
- Working to develop risk assessments to support prevention and deterrence activities by the key partners;
- Taking action at partner levels, focusing upon developing preventative measures within sport and betting operators' organisations to raise awareness of the threats, promoting a culture of resistance;
- Providing channels to enable those that wish to provide information, the opportunity to do so securely;
- Being information-led and having robust exchange arrangements that operate between public authorities and private organisations, including working with Government towards solutions to address any impacts of Brexit that may threaten Britain's ability to protect against betting integrity risks;
- Promoting sports' and betting operators' governance arrangements and cultures that support risk management strategies;
- Encouraging the implementation of effective education programmes, sharing and promoting good practice across all stakeholder groups;
- Establishing complementary and effective disciplinary frameworks within SGBs and betting operators, that are capable of being enacted concurrently with gambling regulation and criminal justice action;
- Contributing to and learning from international developments and operational collaborations;
- Coordinating national policy development in international contexts. Specifically, this will involve working with and supporting the development of



the Council of Europe's Group of Copenhagen.<sup>12</sup> SBIF will also aim to be represented at the Convention Follow-Up Committee at such a point that the UK Government ratifies the Macolin Convention.

## **B - The Sports Betting Integrity Forum (SBIF)**

34. The SBIF will:

- Have oversight of members' and partners' individual and collective actions in developing and implementing Britain's strategic approach;
- Support and develop the activities at an organisational and national level to deliver the Plan;
- Debate issues and identify potential solutions;
- Progress issues of common concern through sub-groups reporting to back to the SBIF.

35. The SBIF will comprise senior representatives of the key stakeholders and will have co-chairs (to change every two years), ideally with one chair from within the sport sector and the other from within the betting sector. The secretariat role will be fulfilled by the Commission. The Terms of Reference for the SBIF can be found on its website.<sup>13</sup>

## **C - Sport** (including SGBs and player associations and working in collaboration with the [Sports Betting Group](#))

36. Good leadership and governance are recognised as essential conditions for addressing the challenges to integrity that match-fixing creates. Recognising there is no single model, SGBs and player associations will continue to:

- Ensure that the principles of democracy, inclusiveness, transparency and accountability in decision-making are embodied within their sport;
- Develop an understanding of the threats to the integrity of their sport;
- Develop effective risk management arrangements;
- Be seen to maintain the integrity of their sport;
- Work with each other to develop best practices to be shared amongst all sports.

37. Education and other preventative measures play a key part in tackling threats to integrity. They form an essential part of the roles played by SGBs and player associations, their effectiveness being linked to clear rules, fair and proportionate sanctions and good governance.

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<sup>12</sup> [Network of National Platforms \(Group of Copenhagen\)](#), Council of Europe

<sup>13</sup> [SBIF Terms of Reference](#)



SGBs and player associations will work to:

- Develop and deliver educational programmes to raise awareness and knowledge of athletes, coaches, officials and those in governance roles as to the threats posed by those that would corrupt the integrity of sport from within or outside the sport;
- Encourage sports leaders and elite athletes to act as role models in their sport and support players in having a voice in the development and delivery of education and deterrence strategies;
- Ensure that their codes of conduct, betting rules and contractual provisions establish clear frameworks to enable relevant and appropriate sanctions to be applied;
- Take steps to ensure all participants are aware of their responsibilities outlined in codes of conduct, betting rules and contractual provisions and the implications of potential breaches;
- Establish the policies and capabilities that enable them to identify and respond to match-fixing and corruption issues;
- Have clear processes for reporting, information gathering, exchange and investigation, which will include clear reporting mechanisms for integrity related issues;
- Ensure that commercial arrangements with gambling operators or others do not create a conflict of interest with regards to the prevention and deterrence of sports betting corruption. Where commercial arrangements exist with sports betting operators, sport will ensure these are with appropriately licensed operators with adequate monitoring and reporting mechanisms for suspicious betting.

#### **D - Licensed sports betting operators**

38. Licensed betting operators have obligations under the Gambling Act 2005 to ensure that sports betting is not associated with or used to support crime.

39. This Plan recognises that licensed betting operators will have risk management arrangements that, in addition to their individual regulatory obligations, contribute to the collective effort.

40. As such, licensed betting operators will work to:

- Prevent sports betting being associated with crime and/or corruption;





- Provide information on irregular betting and/or suspicious sports events to the Commission's SBIU and where appropriate to the relevant SGBs in accordance with the provisions of Licence Condition 15.1;<sup>14</sup>
- Include specific rules and provisions within their customer terms and conditions that highlight that personal information may be shared with regulators or relevant sports bodies where there are suspicions of involvement in match-fixing or breach of sports regulations;
- Raise the awareness of event manipulation and the misuse of insider information with their employees and implement contractual rules with sanctions for employees acting inappropriately;
- Ensure that commercial arrangements with sports do not create a conflict of interest with regards to the prevention and identification of sports betting corruption.

## **E - The Gambling Commission**

41. The Commission will seek to ensure that the gambling regulatory framework compels licensed sports betting operators to support the prevention of sports betting from becoming a source of or associated to event manipulation or corruption. The Commission will support the Plan by ensuring that:

- Only individuals and businesses who are deemed suitable in terms of their integrity and competence, will be licensed as sports betting operators;
- In cases where operators identify suspicious or irregular activity, they endeavour to report this promptly to the Commission and, where appropriate, to SGBs.

42. The Commission will be responsible for the development and operation of the Sports Betting Intelligence Unit (SBIU)<sup>15</sup> and a confidential reporting facility.<sup>16</sup>

43. The Commission fulfils the role of lead agency within the UK's approach to combatting the risk to sports betting integrity. Working closely with DCMS in the development and delivery of the Plan, the Commission will:

- Provide logistical assistance to the SBIF and support engagement with and between members;
- Maintain and administer the communications portal to facilitate communications between SBIF partners;

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<sup>14</sup> [Licence Conditions and Codes of Practice](#)

<sup>15</sup> [Sports Betting Intelligence Unit \(SBIU\)](#), Gambling Commission

<sup>16</sup> [Gambling Commission - Confidential Intelligence Line](#), Gambling Commission



- Engage with appropriate Government departments and agencies, both domestically and overseas, to ensure that, where required, the Plan is aligned to relevant national and international strategies;
- Where appropriate, support prevention and education initiatives;
- Where appropriate, engage with international bodies, regulators, SGBs and other relevant stakeholders on sports betting integrity related policy, strategy and operational issues;
- Apply the Commission's *Betting Integrity Decision Making Framework*<sup>17</sup> to all reports it receives concerning betting related integrity issues.

## **F - The Sports Betting Intelligence Unit (SBIU)**

44. The SBIU contributes to the Commission's strategic priorities. It does this by supporting and facilitating collaboration across operators and other agencies concerned with raising standards in relation to sports betting integrity. It also strives to foster national and international standards where it is clearly in the interests of British consumers to do so. SBIU will fulfil the role of 'information hub' for the UK's National Platform.<sup>18</sup>
45. The SBIU's focus is on collecting and analysing information and intelligence relating to potentially criminal activity related to sports betting integrity where that activity:
- Relates to a sporting event that occurred in Great Britain, and/ or
  - Involves parties based within Great Britain,<sup>19</sup> and/ or
  - Involves betting activity that occurred under a Gambling Commission licence
46. The SBIU will develop intelligence to inform investigative decision-making concerning the prosecution or disruption of criminal offences or regulatory action under the Gambling Act 2005.
47. The SBIU will ensure that information to assist the prevention or mitigation of betting integrity risks is appropriately collected, assessed and where relevant efficiently communicated to:
- Domestic stakeholders (e.g. SGBs, police forces, licensed operators other relevant organisations);
  - Overseas stakeholders (e.g. international law-enforcement agencies, national gambling regulators, sports federations, National Platforms, etc).
48. As per its published Triage Process,<sup>20</sup> the SBIU will support operational coordination with stakeholders to ensure an early and effective response to emergent issues.

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<sup>17</sup> [Betting Integrity Decision Making Framework](#), Gambling Commission

<sup>18</sup> Article 13 - [The Council of Europe's Convention on the Manipulation of Sports Competitions](#)

<sup>19</sup> Examples of 'parties' could include participants as defined by a SGB, employees of a betting operator, employees of a TV or telecoms company, etc

<sup>20</sup> [Betting Integrity Decision Making Framework](#), Gambling Commission



## **G - Law Enforcement (LE)**

49. Law-enforcement (comprising of the National Police Chiefs' Council, the National Crime Agency (NCA), the police forces of England and Wales and Police Scotland), play a critical role in deterring match-fixing and supporting other stakeholders' efforts in doing so. This is especially pertinent when recognising that match-fixing may involve organised criminality at local, national and international levels.
50. The focus of LE activity will be upon the investigation of serious and organised criminal activity. LE will share information with other stakeholders where it is deemed proportionate and necessary to do so.
51. LE and the Commission will sustain secure information-sharing arrangements and will contribute to each other's efforts through tasking processes.
52. LE representatives will be members of the SBIF and will participate in arrangements, coordinated through the SBIU, to ensure a timely response to emerging issues identified by relevant partners.
53. LE will engage with the betting integrity points of contact in the Crown Prosecution Service (England and Wales) and the Procurator Fiscal (Scotland) to support the effective investigation and prosecution of sports betting integrity cases.

## **H - Government**

54. The Department for Digital, Culture Media and Sport (DCMS) is the lead government department for delivery of the Plan. DCMS will:
  - Co-ordinate actions that require cross-government involvement relating to national anti-corruption measures;
  - Keep under review the UK's legislative arrangements to prevent sports betting corruption;
  - Ensure that the appropriate level of prioritisation is given to sports betting corruption matters raised by the National Platform;
  - In collaboration with the Commission, support as appropriate, the implementation of regulatory measures by overseas Governments and relevant international bodies to prevent sports and sports betting corruption, and to promote coordination on a cross-border basis;
  - Engage with European and international institutions on the development of sport and betting policy initiatives to ensure that Britain's interests in addressing threats to sports betting integrity and competition manipulation are reflected;
  - Monitor and report on progress on the relevant priorities and commitments made within the UK Government's Anti-Corruption Strategy;
  - Consider the ratification of the Macolin Convention.



## Part 2: Sports and Sports Betting Integrity Action Plan – Priority Actions 2021

Priority Actions 2021		Lead
1.	Monitor the impact of the UK’s withdrawal from the European Union on information-sharing arrangements impacting both domestic and international sports betting integrity stakeholders. Where possible, seek to modify local policies and procedures to ensure effective sharing protocols are maintained.	All SBIF members
2.	In the context of the UK’s Government’s consideration to ratify the Council of Europe’s Macolin Convention, stakeholders to commit to reviewing and, where necessary, taking steps to ensure compatibility with the relevant articles of the Convention.	All SBIF members
3.	In Q3, commit to undertake a review of existing actions within this Plan and, where capacity permits, seek to revisit 2020 actions that were deferred due to the impact of the COVID-19 pandemic and/or add new actions as the SBIF members deem appropriate.	SBIF co-chairs