



Sports Betting and Anti-corruption Policy

30 July 2019

Version 1.0

1. Policy Statement

- 1.1 The relationship between sport and betting has changed profoundly over recent years. The proliferation of online betting (particularly in-play betting), the growth of betting exchanges (where it is possible to “play to lose”) and an upsurge in the availability of “novelty bets” means betting on sport is more popular and easier than ever before. Betting markets are expanding, particularly when live broadcast coverage is available.
- 1.2 A core function of Scottish Athletics is to maintain, and be seen to be maintaining, the integrity of sport. Scottish Athletics must take action to protect itself from the threats posed to its integrity by corrupt betting and associated activity both from within and outside the organisation. As sports betting activity has increased across all sports and disciplines, it is essential that such activity does not take place in a manner which has the potential to compromise sporting conduct and endeavour.
- 1.3 The Scottish Athletics Sports Betting and Anti-Corruption Policy (hereinafter referred to as “this policy”) provides a framework and process for maintaining the highest standards of integrity within the sport of athletics in Scotland.
- 1.4 Should an alleged Offence occur under this policy, any subsequent disciplinary action will be taken under the Disciplinary Policy for Partakers in a manner that is fair and consistent.
- 1.5 All those involved in the sport of athletics in Scotland have an obligation to maintain the highest standards of integrity by participating in a manner that does not compromise the reputation of Scottish Athletics, or the sport itself.
- 1.6 The framework for this policy is based on the Scottish Governing Bodies and Sporting Organisations Sporting Integrity.

2. Purpose of this Policy

- 2.1 The purpose of this policy is to provide a clear understanding of the Sports Betting and Anti-corruption Policy and to give an overview and general advice to all those involved in athletics in Scotland on the issues associated with the integrity of sports betting.
- 2.2 To provide guidance on how the procedure should be followed.

3. Policy Objectives

- 3.1 This policy is intended to protect the reputation of sport, Scottish Athletics, and each individual and organisation involved with the sport in Scotland. Please note that responsibility for complying with this policy lies with all those to whom it applies.

4. Scope of the Policy

- 4.1 This policy sets out the standards and procedures expected by Scottish Athletics relating to Sports Betting and Anti-corruption.
- 4.2 This policy applies to any person or body who is a member, or who is operating in the capacity of a member of Scottish Athletics through one of its membership categories, including volunteers, entrants to events operating under a Scottish Athletics licensed event, and individuals or organisations contracted to or whose services are engaged to deliver

programmes and courses on behalf of Scottish Athletics who will collectively be called Partaker throughout this policy.

4.2.1 This policy takes precedent over any other Sports Betting and Anti-corruption policy that the Partaker may be subject to with any other Affiliated Organisation.

4.3 This policy also applies to any individual who as well as being a Partaker is also employed by Scottish Athletics (Scottish Athletics Employee). Where the alleged Offence was committed out with the course of the person's employment, Scottish Athletics reserves the right to also make the decision as to whether any further disciplinary action should be taken under the individual's terms of employment.

4.3.1 For the avoidance of doubt, to the extent that the alleged Offence was committed during the course of that person's employment, he or she shall be subject to disciplinary action as an employee only and not under this policy.

5. Sporting Integrity

5.1 Partakers should not become involved in any activity associated with corrupt betting which could reasonably be deemed as suspicious and detrimental to the image and reputation of Scottish Athletics and the sport.

5.2 The minimum rules identified in the *Report of the Sports Betting Integrity Panel* into betting integrity are set out below. They and Scottish Athletics oblige a Partaker to:

5.2.1 Not place or attempt to place a bet on a match, race or other event or competition in which he/she or his club participates in;

5.2.2 Not solicit or facilitate, or attempt to solicit or facilitate, another person to bet on a match, race or other event or competition in which he/she or his club participates in;

5.2.3 Not offer, or attempt to offer, a bribe in order to fix or contrive a result or the progress of a match, race or other event or competition in which he/she or his club participates in;

5.2.4 Not receive, or seek or attempt to receive, or seek a bribe in order to fix or contrive a result or the progress of a match, race or other event or competition in which he/she or his club participates in;

5.2.5 Report any approach or other activity which contravenes, or which may contravene, the sport's rules on betting, co-operate with any investigation and/or request for information including the provision of documentation (e.g. telephone/betting records to officials engaged in the investigation of suspected integrity issues in the sport in relation to betting); and

5.2.6 Perform to the best of his ability in any match, race or other event in which he/she participates in.

6 Criminal offence of cheating

6.1 Section 42 of The Gambling Act 2005 has created a new offence of "cheating at gambling" which would include cheating in sports influenced by betting involvement. An extract from the Act describes:

- 6.1.1 A person commits an offence if he or she:
- (a) Cheats at gambling; or
 - (b) Does anything for the purpose of enabling or assisting another person to cheat at gambling.
- 6.1.2 For the purposes of paragraph 6.1.1 it is immaterial whether a person who cheats:
- (a) Improves his chances of winning anything; or
 - (b) Wins anything.
- 6.1.3 Without prejudice to the generality of paragraph 6.1.1 cheating at gambling may, in particular, consist of actual or attempted deception or interference in connection with:
- (a) The process by which gambling is conducted; or
 - (b) A real or virtual game, race or other event or process to which gambling relates.
- 6.2 A breach of Section 42 of the Gambling Act 2005 may result in the imposition of severe penalties for individuals (fines and jail).
- 6.3 Depending on the nature of the activity, Scottish Athletics' Disciplinary Committee may refer the matter to the Gambling Commission for consideration of an investigation of the criminal offence of cheating at gambling (section 42 of the Gambling Act 2005). Additionally, the Disciplinary Committee may wish to liaise with betting operators, European/International federations, the Police and the Sports Betting Group.

7. Inside Information

- 7.1 The sharing of Inside Information by anyone captured by this policy is specifically prohibited by Scottish Athletics. "Inside Information" means any information, which is not Publicly Known that would materially affect peoples' expectations relating to the participation in, or the likely or actual outcome of a sporting competition or event. Such information includes, but is not limited to, factual information regarding the competitors, the conditions, tactical considerations, injuries, or any other aspect of the sporting competition or event.
- 7.2 It is the responsibility of the Partaker to determine whether information which you have access to falls under the definition of "Inside information". You are advised to err on the side of caution.

8. Response Plan

- 8.1 It is vital that, if there is any suspicious betting activity in Scottish Athletics, action is taken.
- 8.2 All Partakers should be aware that they must not try to deal or investigate any allegations of corrupt betting and associated activity by themselves but should immediately report the matter to the Complaints Secretary. All Partakers must report any approach or activity which contravenes, or which may contravene, Scottish Athletics rules on sports betting. Specifically,
- 8.2.1 If any Partaker is approached about fixing any part of a competition or asks for Inside Information then he/she must report this and cannot just ignore it;

- 8.2.2 If any Partaker has any concerns about any other Partaker's activity, then he/she must report this; and
- 8.2.3 Any threats should always be reported.
- 8.3 All Partakers must co-operate with any investigation and/or request for information including the provision of documentation e.g. telephone/betting records to the Investigator (see paragraph 9).
- 8.4 If you are concerned that the Complaints Secretary is involved in suspicious betting activity you should inform the Chief Executive Officer.
- 8.5 If you are concerned that the Chief Executive Officer is involved in suspicious betting activity you should inform the Chair.

9. Investigation

- 9.1 Following receipt of a report of concern, the Chief Executive Officer may appoint as Investigator any person or organisation that does not have an interest in the case other than a Director and the Complaints Secretary. The Investigator may be internal (e.g. staff member) or external to Scottish Athletics.
- 9.2 The Investigator shall be entitled to conduct such investigation into a report of concern as the Investigator sees fit and all persons and parties subject to the procedures shall cooperate fully with the same. Failure to co-operate may amount to misconduct.
- 9.3 Depending on the nature of the alleged offence, the Investigator may wish to contact external experts for advice.
- 9.4 The Investigator will then conduct an investigation that is thorough, proportionate, relevant and fair to all parties. Contact with all witnesses relevant to the investigation will usually be via telephone or email but may be by face to face meetings. The Investigator, shall be given all reasonable assistance by witnesses, including promptly supplying signed statements if necessary, making themselves available for interview, answering any questions and supplying documentary or other information.
- 9.5 The Investigator shall make a written report which shall include the documentary evidence and a recommendation as to whether the Respondent has a case to answer. The report will include details of:
 - 9.5.1 Recommendations on how to deal with Partakers under suspicion (which may include action to suspend or dismiss a Partaker);
 - 9.5.2 Recommendations on how to deal with third parties under suspicion;
 - 9.5.3 Recommendations for mitigating the threat of future corrupt betting and associated activity by taking appropriate action to improve controls;
 - 9.5.4 Recommendations for disseminating the lessons learned from the experience in cases where there may be implications for the organisation as a whole; and
 - 9.5.5 Recommendations on what information can be released externally if requested.
- 9.6 The Investigator's report shall be submitted to the Chief Executive Officer who shall either confirm the recommendation or arrange for further investigation by the same or a different Investigator.

- 9.7 If the Chief Executive Officer confirms a recommendation that there is no case to answer the Complaints Secretary shall inform the Complainer and the Respondent accordingly. There shall be no appeal against a decision that there is no case to answer but a case may be re-examined if further evidence is later forthcoming.
- 9.8 If the Chief Executive Officer confirms a recommendation that there is a case for the Respondent to answer the Investigator shall then be responsible for presenting the case to answer to the Disciplinary Committee as per the Scottish Athletics Disciplinary Policy for Partakers.

10. If Put Before the Disciplinary Panel

- 10.1 If the Investigator's report is to be put before the Disciplinary Panel, the process to be followed can be found under the Scottish Athletics Disciplinary Policy for Partakers.
- 10.2 The Disciplinary Panel shall operate under the Scottish Athletics Disciplinary Policy for Partakers.

11. Further Recourse

- 11.1 If a Partaker feels that his/her concerns have not been dealt with appropriately by Scottish Athletics, you should also be aware that you are empowered to take any concerns to the relevant authorities and other associated external bodies including the Gambling Commission, so long as you act in good faith.

12. Definitions

"Affiliated Organisation" and "Affiliated Organisations" means a body associated with Scottish Athletics;

"Chief Executive Officer" means the chief officer of Scottish Athletics at the relevant time, or the person performing an equivalent function if there is no chief officer at the time, or their duly appointed deputy;

"Complaints Secretary" is the person so appointed as per paragraph 8 of this policy;

"Disciplinary Committee" means the committee appointed in accordance with paragraph 12 of the Disciplinary Policy for Partakers;

"Disciplinary Panel" means the panel appointed in accordance with paragraph 7 of the Scottish Athletics Disciplinary Policy for Partakers;

"Gambling Commission" license and regulate the people and businesses that provide gambling in Great Britain including the National Lottery;

"Head of Communications" means the individual holding office, or equivalent;

"Inside Information" means any information, which is not Publicly Known that would materially affect peoples' expectations relating to the participation in, or the likely or actual outcome of a sporting competition or event;

"Investigator" is the person appointed under paragraph 9.1 of this Policy;

“Partaker” means any person or body who is a member, or who is operating in the capacity of a member of Scottish Athletics through one of its membership categories, including volunteers, entrants to events operating under a Scottish Athletics licensed event, and individuals or organisations contracted to or whose services are engaged to deliver programmes and courses on behalf of Scottish Athletics;

“the Policy”, “this Policy”, and “this policy” means this Sports Betting and Anti-corruption Policy;

“Publicly Known” means any information that is already published as a matter of public record, able to be readily acquired by an interested member of the public, or disclosed according to the rules and regulations governing the relevant sporting competition or event;

“Scottish Athletics” and “Scottish Athletics Limited”, is the National Governing Body for Athletics in Scotland;

“Scottish Athletics Employee” means an individual who has been issued with a contract of employment from Scottish Athletics, which has neither expired nor been terminated.

13. Further Reading

Scottish Athletics Code of Conduct for Partakers

Scottish Athletics Complaints Procedure for Partakers

Scottish Athletics Disciplinary Policy for Partakers

Scottish Athletics Equality Policy

This Policy is approved by the Scottish Athletics Board of Directors who will consider proposals for additions and/or amendments on an ongoing basis.

Equality Impact Assessment Record

Date of Assessment:	28 July 2019
Assessed by:	Head of Operations, Equalities Officer
Review date:	31 October 2022 or as required