

[This is the overview of the Section –]

The Sports Wagering and Competition Manipulation team identifies potential sports wagering and sport competition manipulation threats and vulnerabilities through research, analysis, and relationships with key stakeholders to provide policy advice for the Government, sports, and other stakeholders.

The Sports Wagering and Competition Manipulation team is currently working on a number of policy and program initiatives to enhance the integrity framework for Australian sport including:

- Working with government, sport and industry partners to influence and advocate for sport integrity outcomes to be included within broader wagering policy and regulatory settings
- Forecasting trends and issues associated with the threat of competition manipulation such as sports data, online in-play wagering and serious and organised crime risks to Australian sport
- Assisting sports navigate the streaming and wagering sponsorship opportunities and approaches they receive
- Active membership on various relevant international groups and fora
- Pursuing the ratification of the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention)
- Establishing National Sport Integrity Offences that provide a consistent national approach to match-fixing offences
- Development of the Australian Sports Wagering Scheme (ASWS) which aims to provide a clearer, more transparent, and consistent regulation of sports wagering.

Further information on the Macolin Convention, ASWS and National Sport Integrity Offences are at [Attachment A1](#)

Attachment A1 – Sports Wagering and Competition Manipulation Overview

Policy development

The primary function of the Sports Wagering and Competition Manipulation team is to lead Sport Integrity Australia's, and thus the Australian Government's, policy response to competition manipulation and sports wagering issues affecting Australian sport.

The team works with sports, the sports-wagering industry, and state and territory regulators and international counterparts to provide a clearer, more transparent, and consistent sports wagering regulatory framework to, ultimately, protect Australian sport from competition manipulation and sports wagering related threats.

We do this by the identification, analysis, and assessment of issues specific to, or associated with, the threat of competition manipulation and betting related corruption. This is key to delivering an informed, evidence-based approach to respond effectively to competition manipulation and sports betting related corruption.

Australian Sports Wagering Scheme

The ASWS is a suite of policy and regulatory reforms focussed on sport integrity outcomes, primarily around how betting information is collated, analysed and disseminated to relevant bodies. The intent of the ASWS is to streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth, State and Territory jurisdictions and to ensure sports wagering occurs within a regulatory framework to effectively protect the integrity of sport and ensuring Australian sporting competitions are more resistant to evolving manipulation threats.

The key elements of the ASWS are:

- Elevating from NSW and Victorian regulators to Sport Integrity Australia the accreditation of sports as Sports Controlling Bodies and therefore oversight of integrity elements in their contractual arrangements with wagering service providers
- Sport Integrity Australia to facilitate a national forum with all relevant stakeholders to pursue an agreed national schedule of sports contingencies
- Sport Integrity Australia to establish a sports wagering data and information sharing ecosystem consolidating all sports betting related data and information to provide a complete and holistic view of the sector and enabling a suspicious activity alert system.

Sport Integrity Australia has engaged in significant consultation with stakeholders to develop the ASWS operating principles. Sport Integrity Australia has released a series of consultation papers including the ASWS Strategy and Operating Principles paper and a Regulatory Impact Statement which have been informed by and shared with stakeholders.

Macolin Convention

The Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention) is a multilateral, international treaty, which aims to prevent, detect and sanction national or transnational manipulation of sports competitions; and to promote national and international cooperation.

Australia is seen as an international leader in addressing the threats and risks of competition manipulation and related betting corruption. Australia is a member of the Bureau of the Group of Copenhagen which supports the implementation of the Macolin Convention and has fostered relationships with the international community responding to the competition manipulation threat. Maintaining this leadership position, and our international relationships, requires Australia to ratify the Macolin Convention.

Sport Integrity Australia will work with relevant Commonwealth agencies responsible for treaty ratification, including the Office of International Law, within the Attorney-General's Department and the Treaties Section of the Department of Foreign Affairs and Trade, to progress ratification.

Development of National Sport Integrity Offences

The lack of a harmonised, consistent national approach to match-fixing offences, and the absence of Commonwealth criminal legislation, may inhibit the investigation and prosecution of offences, particularly in circumstances where such offences tend to be cross- or multi-jurisdictional and transnational in nature. ^{s 47C}

^{s 47C}

The development of the Offences has been guided by ongoing and close collaboration with the Commonwealth Attorney-General's Department, Australian Government Solicitor and Office of Parliamentary Counsel.

Australian Sports Integrity Unit

The Australian Sports Integrity Unit (ASIU), a unit within the Australian Criminal Intelligence Commission (ACIC), is the central hub for the collection, collation, analysis and dissemination of betting related information and tactical intelligence. Sport Integrity Australia maintains a close relationship with the ASIU to utilise its suite of law enforcement powers and organised crime insights to protect sports. ACIC staff are placed in SIA structures to facilitate effective responses to sport integrity threats.

Attachment A2 – Competition Manipulation Glossary

Australian Criminal Intelligence Commission (ACIC)

The ACIC is Australia's national criminal intelligence agency. The ACIC works with its law enforcement partners to improve the national ability to respond to crime impacting Australia.

Australian Communications and Media Authority (ACMA)

The ACMA administers the *Interactive Gambling Act 2001* which sets the rules for companies that offer or advertise gambling services. The ACMA also maintains a register of approved licensed wagering service providers and provides information about how people can protect themselves from illegal gambling operators.

Contingencies

A contingency is an approved bet type or betting event as defined by the relevant State and Territory gambling legislation.

Integrity Betting Intelligence System (IBIS)

The International Olympic Committee created the IBIS to support International Sports Federations and organisers of multisport events, including the Olympic Games, to combat competition manipulation by collecting and distributing information and intelligence related to sports betting.

The Council of Europe's Convention on the Manipulation of Sports Competitions (Macolin Convention)

The Macolin Convention is an international treaty aimed at combating competition manipulation and other corruption in sport. On 1 February 2019, the Australian Government signed the Macolin Convention and is undergoing the process for ratification.

Product Fee and Integrity Agreements (PFIA)

PFIA's are an agreement between an approved Sports Controlling Body and a wagering service provider that facilitates the sharing of information and a financial return to the sport to support the delivery of its integrity programs.

Responsible Wagering Australia (RWA)

RWA is the independent peak body for Australian-licensed online wagering service providers. Members currently include bet365, Betfair, Entain Australia, Sportsbet and Unibet. Tabcorp are not a member.

Suspicious Activity Alert Scheme (SAAS)

The SAAS is a Stage 2 recommendation in the Wood Review. The intent of the SAAS is to enable receipt and dissemination of wagering activity and alerts, collection of responses and assessment of integrity risk, to allow timely and decisive action.

Australian Sports Integrity Unit (ASIU)

The ASIU was established within the ACIC as a central hub to manage and exploit betting related information and intelligence. It centralises the collection, collation, analysis and dissemination of betting related information and intelligence through partnerships with primary stakeholders responsible for the protection of the integrity of Australian sport from criminal influence.

Sports Controlling Body (SCB)

An SCB is an organisation that is approved by a state gambling regulator as the controlling body for a sport for the purposes of entering a PFIA for betting on an event.



Australian Government
Sport Integrity Australia



SPORT INTEGRITY
AUSTRALIA

Sport Integrity Australia Advisory Council Meeting

9:00 – 2.30
Wednesday 22 June 2022
Operations Room
Sport Integrity Australia
Unit 14, 5 Tennant Street, Fyshwick

Agenda Item 6

Sport Integrity Australia International Engagement Strategy

Purpose

To seek advice and feedback from the Sport Integrity Australia Advisory Council on the draft Sport Integrity Australia International Engagement Strategy.

A verbal overview will be provided by Darren Mullaly, Deputy CEO – Strategy and International Engagement.

Key Issues

- Sport Integrity Australia has never previously formalised an international engagement strategy. This is an opportunity for the Advisory Council to provide advice to guide the direction of the agency's international engagement at the commencement of the process.
- The agency has mandated functions and legal obligations (through, for example, the UNESCO International Convention against Doping in Sport) to undertake international engagement.
- The requested areas of focus for Advisory Council discussion include:
 - What experience do any Advisory Council members have with similar engagement strategies and what advice can members lend, based on that experience?
 - What international roles and/or current contacts do Advisory Council members have that could help bring this strategy to life?
 - What advice can members provide, based on their experience, in measuring the effectiveness of such undertakings?
 - Do members have any comments on the specifics of the draft strategy including the initial seven identified priorities?

Background

Sport Integrity Australia operates in a global ecosystem for all sports integrity issues. These threats do not stop at the border - they are worldwide and increasing. To only operate at a domestic level would potentially result in Australian athletes being disadvantaged and in unknown environments as soon as they travel internationally to compete.

It was identified that Sport Integrity Australia would benefit from an overarching international engagement strategy to guide and inform the agency's engagement with the international community and ensure international engagement undertaken aligns with the agency's corporate plan and legislative requirements.

Through implementation of the strategy, the agency will identify strategic opportunities and partnerships to build domestic and international capabilities, and be influential in our contributions to the development of international policy and outcomes. The strategy is being drafted as an internal-only document at this stage. However, it is proposed once the strategy has been finalised a 'strategy-on-a-page' will be developed with the high-level details, which could be provided externally.

The strategy document itself (see Attachment A) has been drafted to be effective for two years (July 2022 – June 2024) and identifies the purpose/objectives of our international engagement, as well as seven key priorities:

1. Engaging and collaborating with countries in the Asia/Pacific/Middle East region to build sports integrity capability
2. Establish and build international relationships and networks with individuals or organisations with a specific focus on:
 - o Learning from international best practice in areas where SIA is still developing (e.g. Child Safeguarding)
 - o Assisting other governments and organisations to understand the benefits of a broader integrity agency and providing advice and/or support to those looking to follow our path
3. Improve global anti-doping governance through secretariat of OneVoice and active leadership in international anti-doping forums to improve government collaboration
4. Foster developing NADO relationships and networks with a focus on supporting iNADO
5. Capitalise on the agency, and/or Australia, hosting international events to increase our influence and strengthen existing relationships
 - o Particularly focus on the various events being held in NSW in September 2022
 - o Support the government's "Green and Gold Decade" initiative
6. Ensure Australia ratifies the Council of Europe Convention on the Manipulation of Sport Competitions (Macolin Convention) and remains active in influencing and supporting Council of Europe working groups
7. Through engagement in AUSGOV international activities, promote Sport Integrity Australia's work and support in enhancing the global response to threats to the integrity of sport.

Note: The first priority specifies engagement with countries in the Asia/Pacific/Middle East region. These regions have been chosen due to their geographical proximity to Australia, the broader Government focus on the regions, strong interest received from them for assistance or collaboration, involvement of our athletes in their competitions, and our ability to positively impact sport integrity issues in the region.

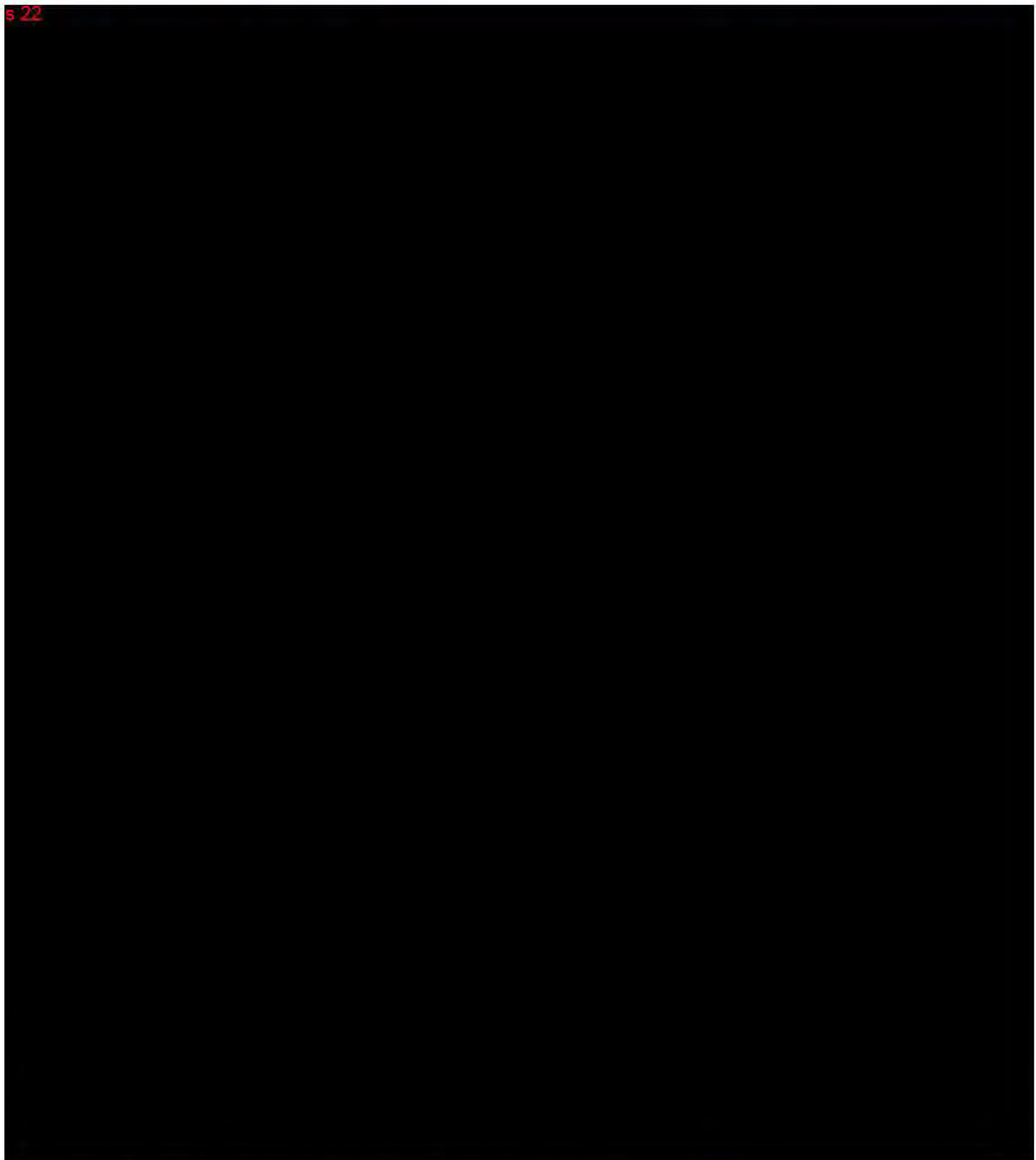
Attachments

- A. Sport Integrity Australia International Engagement Strategy

Sport Integrity Australia Advisory Council

Key activity	Action taken	Next steps
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s 22



Ensure Australia ratifies the Council of Europe Convention on the Manipulation of Sports	Responses from all jurisdictional Governments to questions posed around authority to act in certain circumstances have been received.	s 42
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Key activity	Action taken	Next steps
<p>Competitions (Macolin Convention)</p> <p>(JASE)</p>	<p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>	<p>s 42 [Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>
<p>Develop and implement the Australian Sports Wagering Scheme for Australian Sport and Commonwealth Sport Integrity Offences</p> <p>(JASE)</p>	<p>The ASWS Consultation RIS was released in November 2021. We received 8 submissions to the RIS. The majority of stakeholders are supportive of the implementation of ASWS refer Attachment A(i). [Redacted] s 47C</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>Two research projects are ongoing:</p> <ol style="list-style-type: none"> Impact of online in-play wagering on consumer behaviour and sport integrity outcomes. - The report is in final stages of drafting. KPMG have provided an economic model enabling SIA to forecast the impacts certain factors have on the market. Impact of distribution of Australian sports data into foreign jurisdictions. Both research projects are proceeding to finalisation and analysis of outcomes. Drafting of the final report is underway and is nearing completion. <p>[Redacted] s 47C</p>	<p>s 47C [Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>s 47C [Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>The Sports Data research report has been circulated to Gambling Research Australia for endorsement, and once endorsed it will be sent for peer review.</p> <p>The economic modelling for the Online In-Play Wagering research has been completed, Sport Integrity Australia is waiting the final research report to be submitted for endorsement.</p> <p>[Redacted] s 47C</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted] s 47C</p> <p>[Redacted]</p> <p>[Redacted]</p>

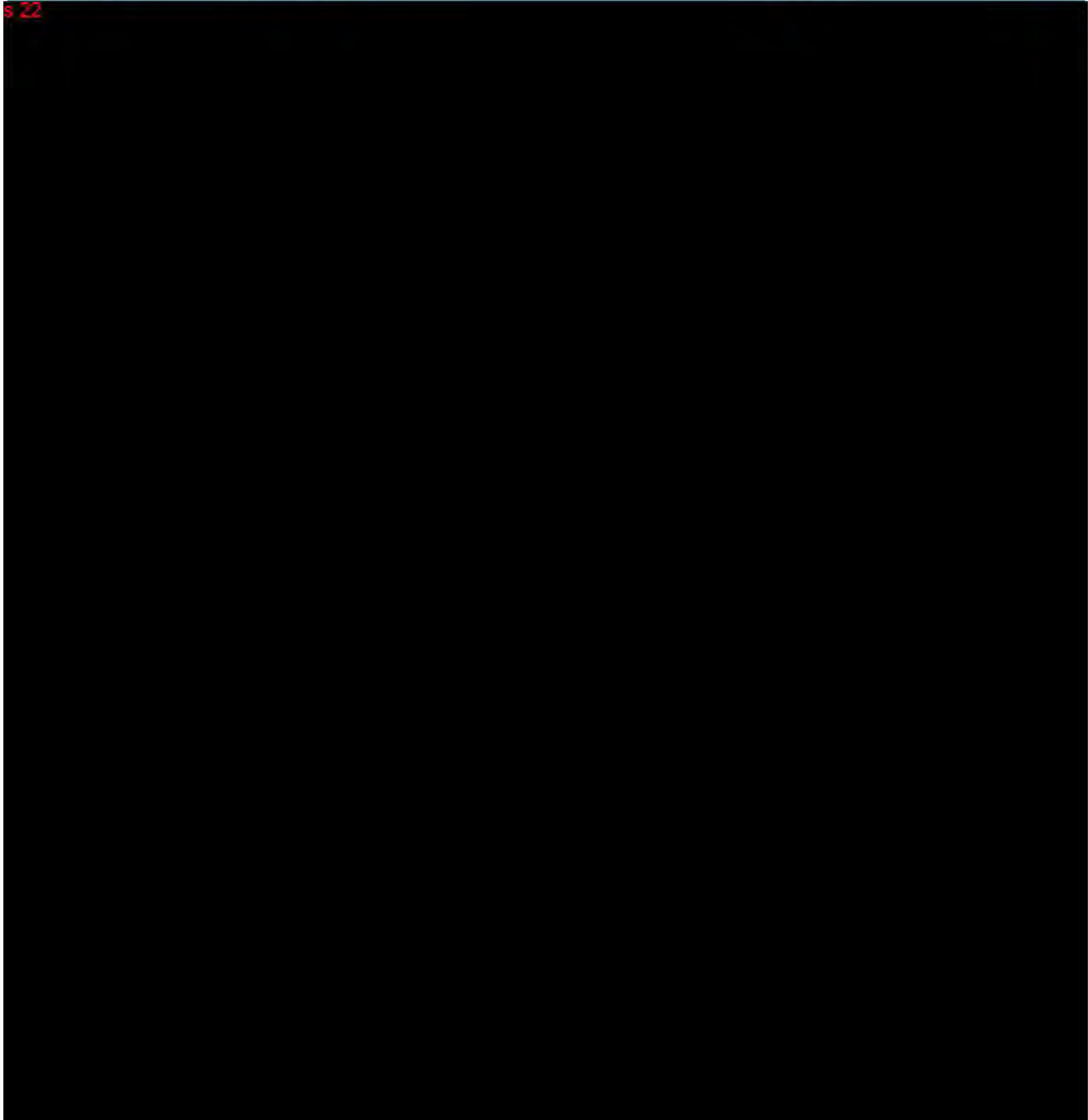
Key activity	Action taken	Next steps
		<p>s 47C [REDACTED]</p> <p>s 47C [REDACTED]</p> <p>Re the data research, at the completion of the final draft the report will be sent for peer review. Once peer review is completed, the report will be tabled at the Gambling Research Australia governance committee meeting for endorsement and sign off.</p>
<p>s 22 [REDACTED]</p>		

Key activity

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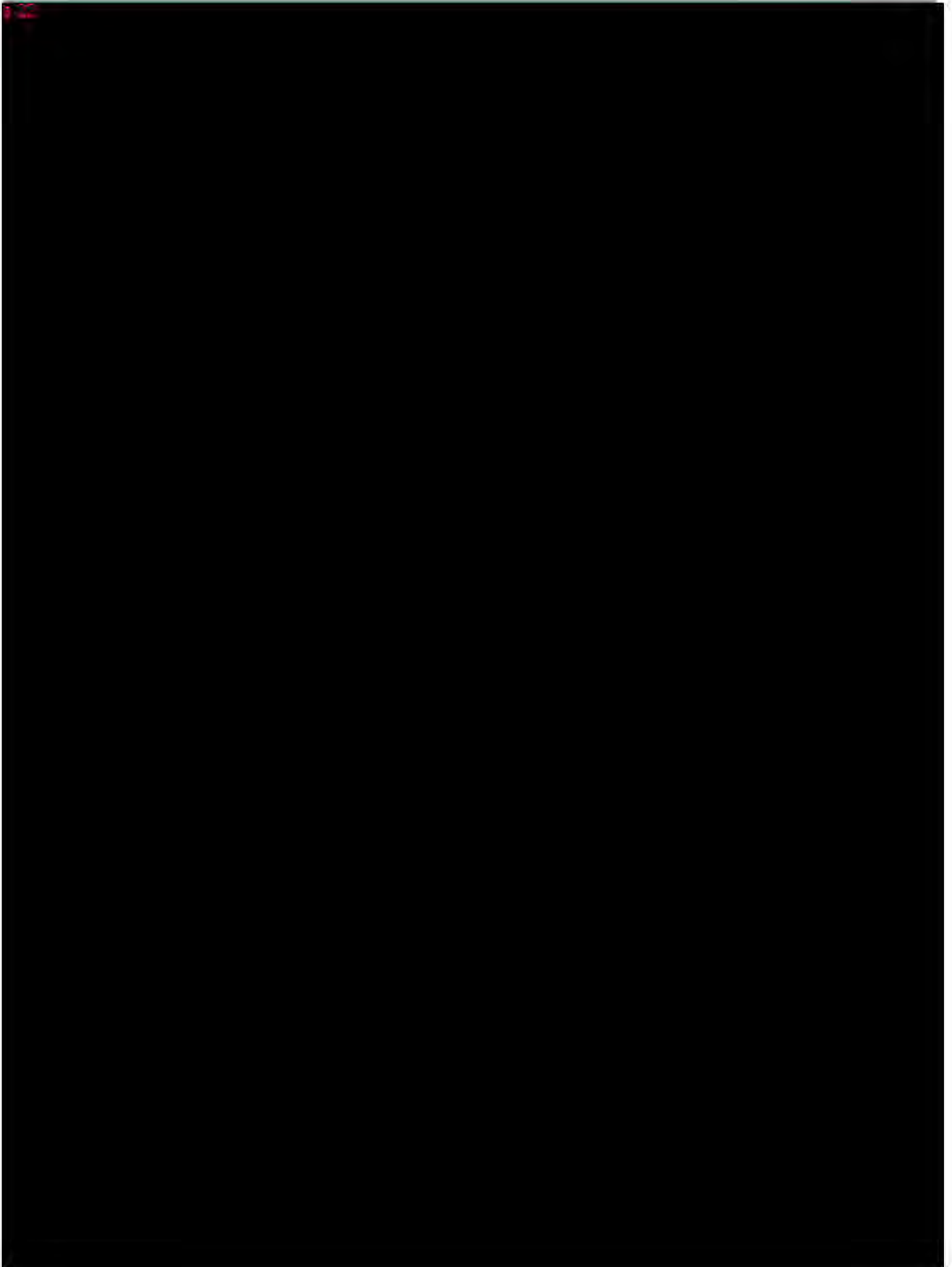
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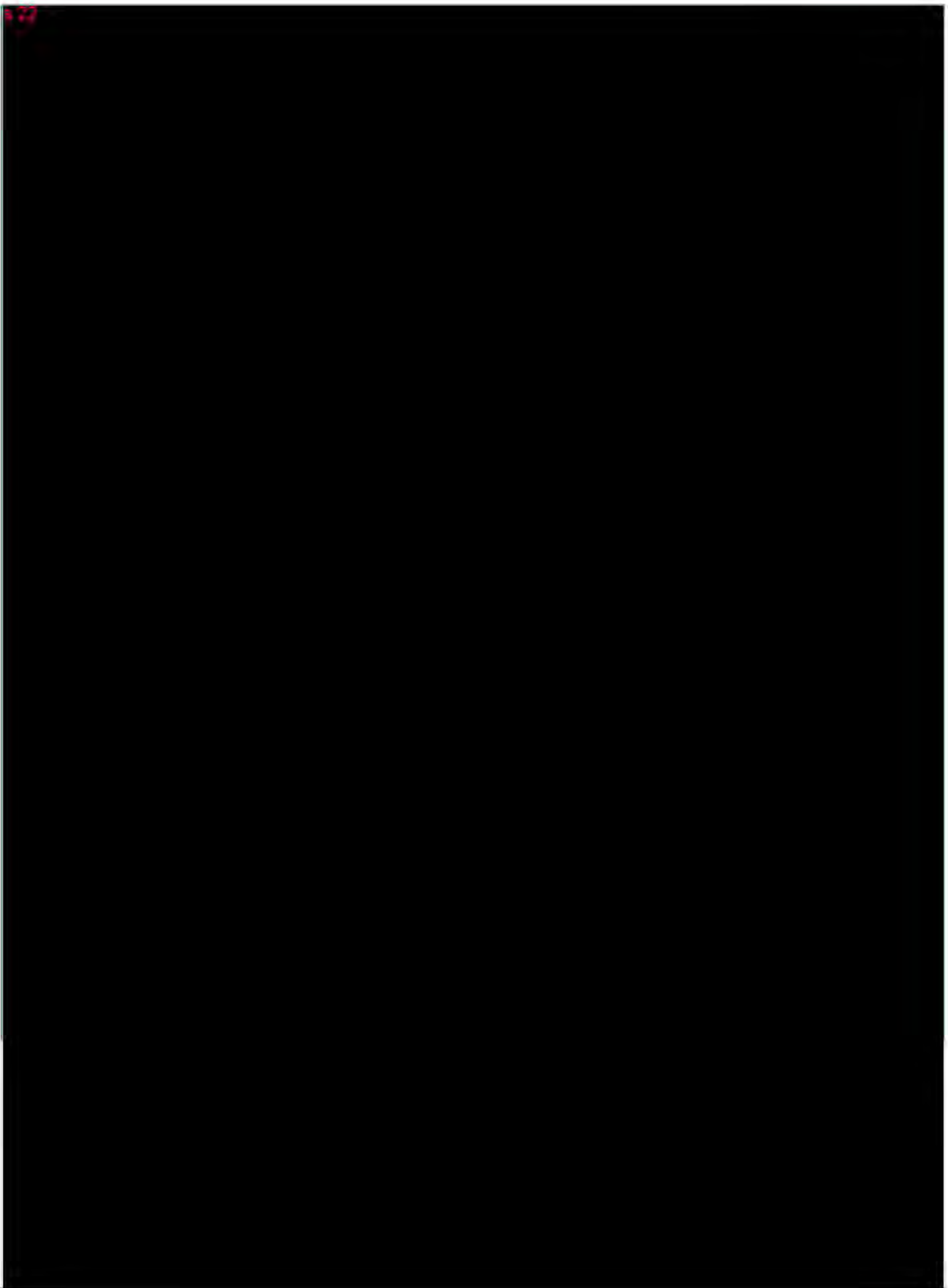


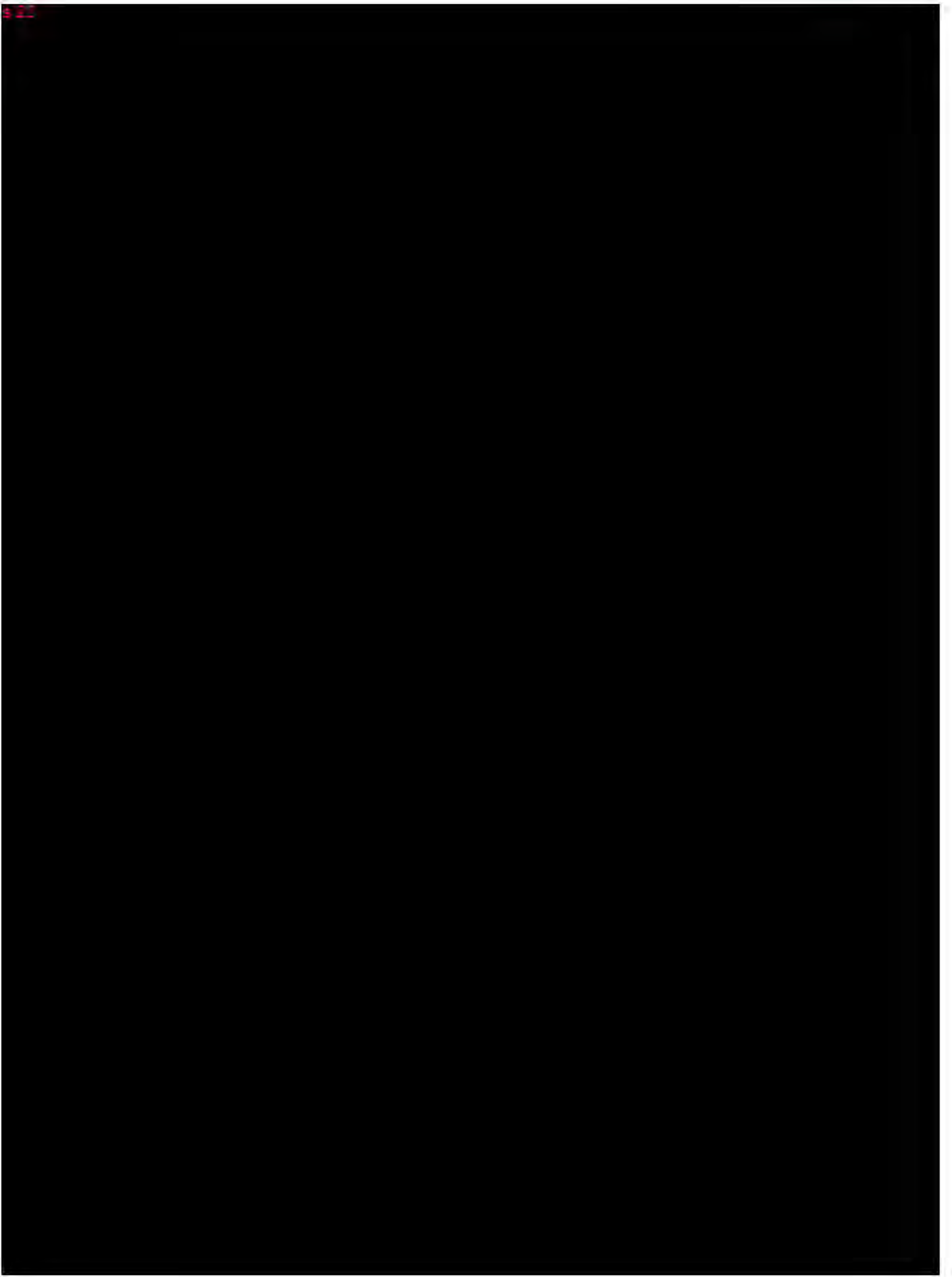
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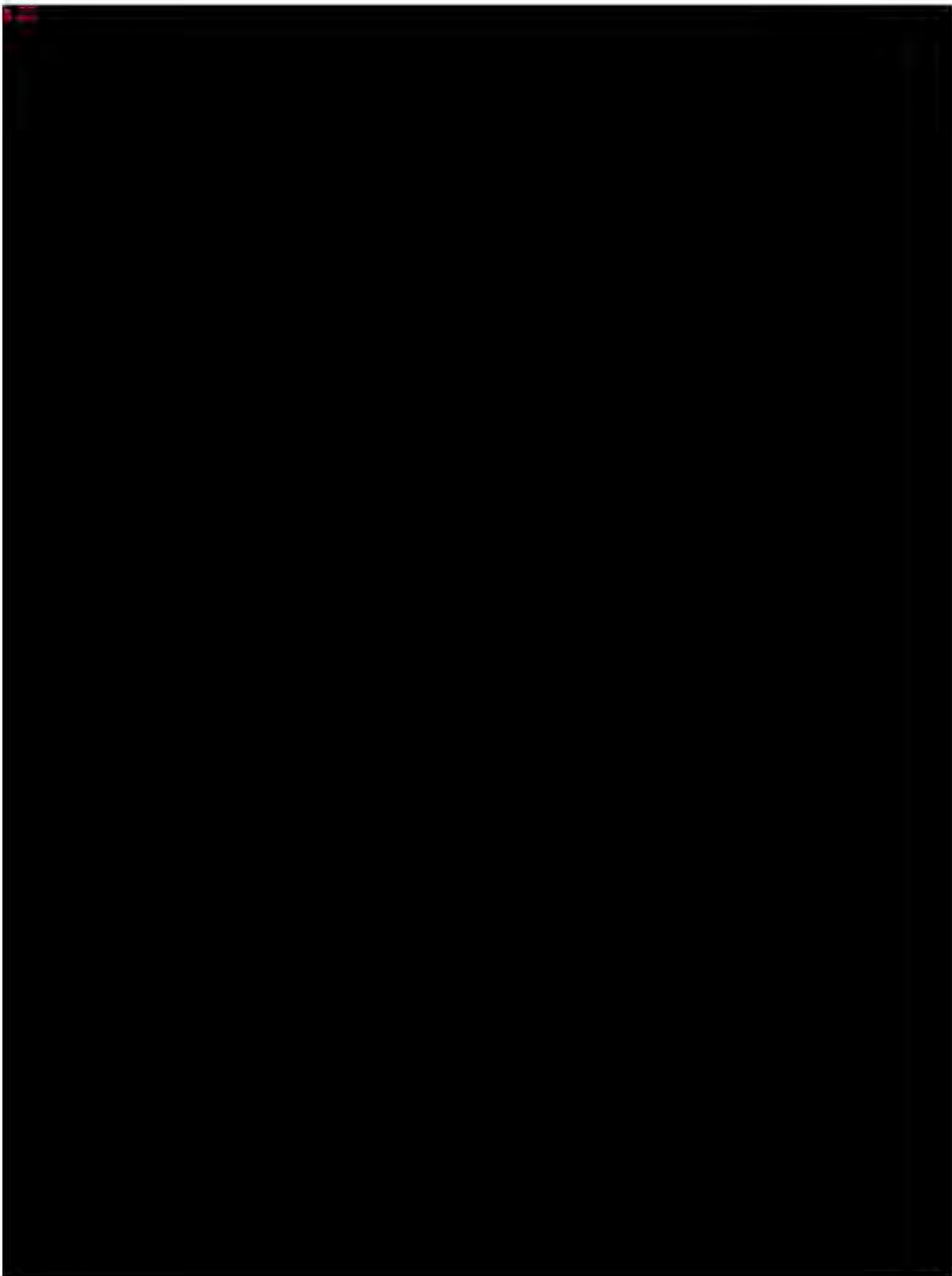






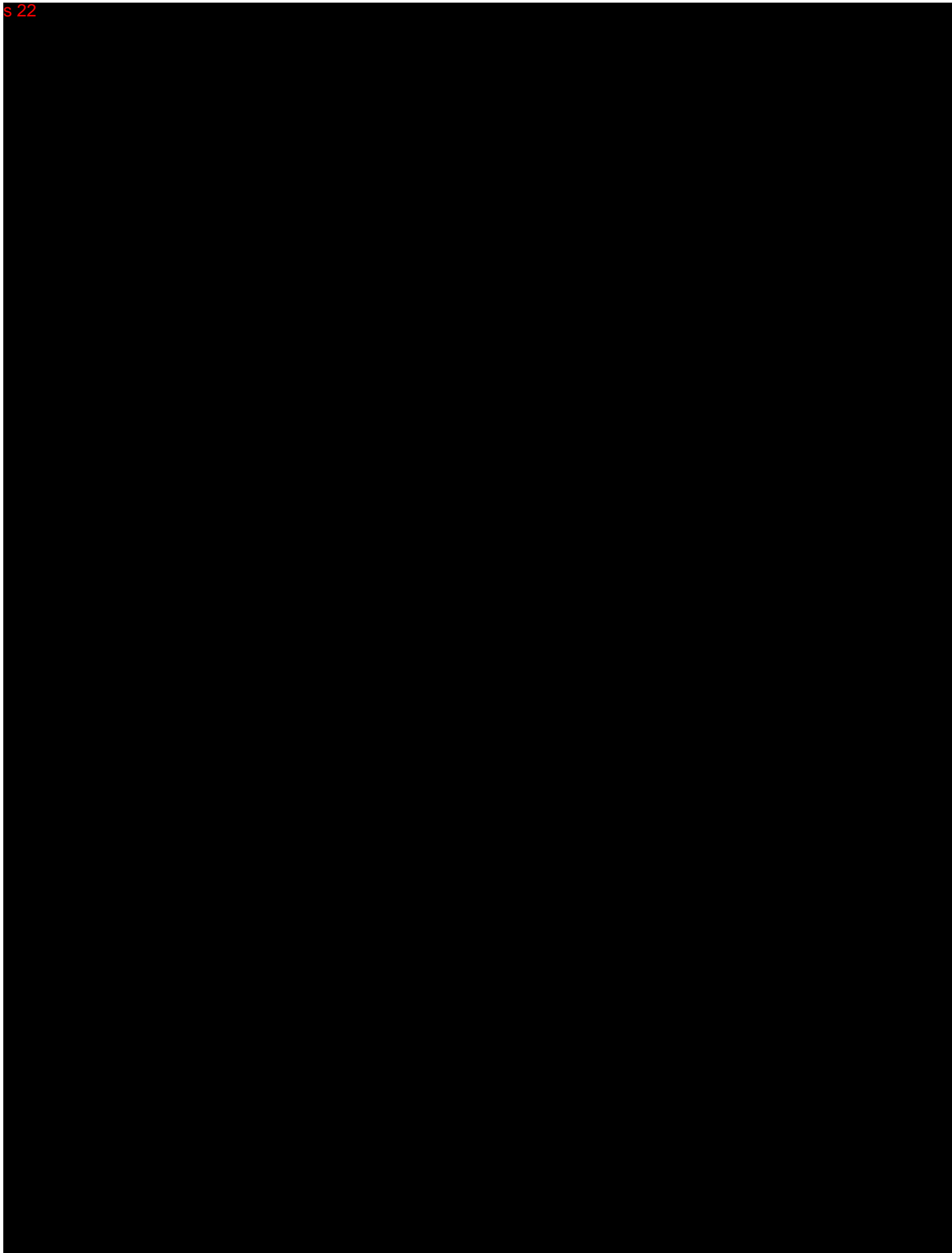
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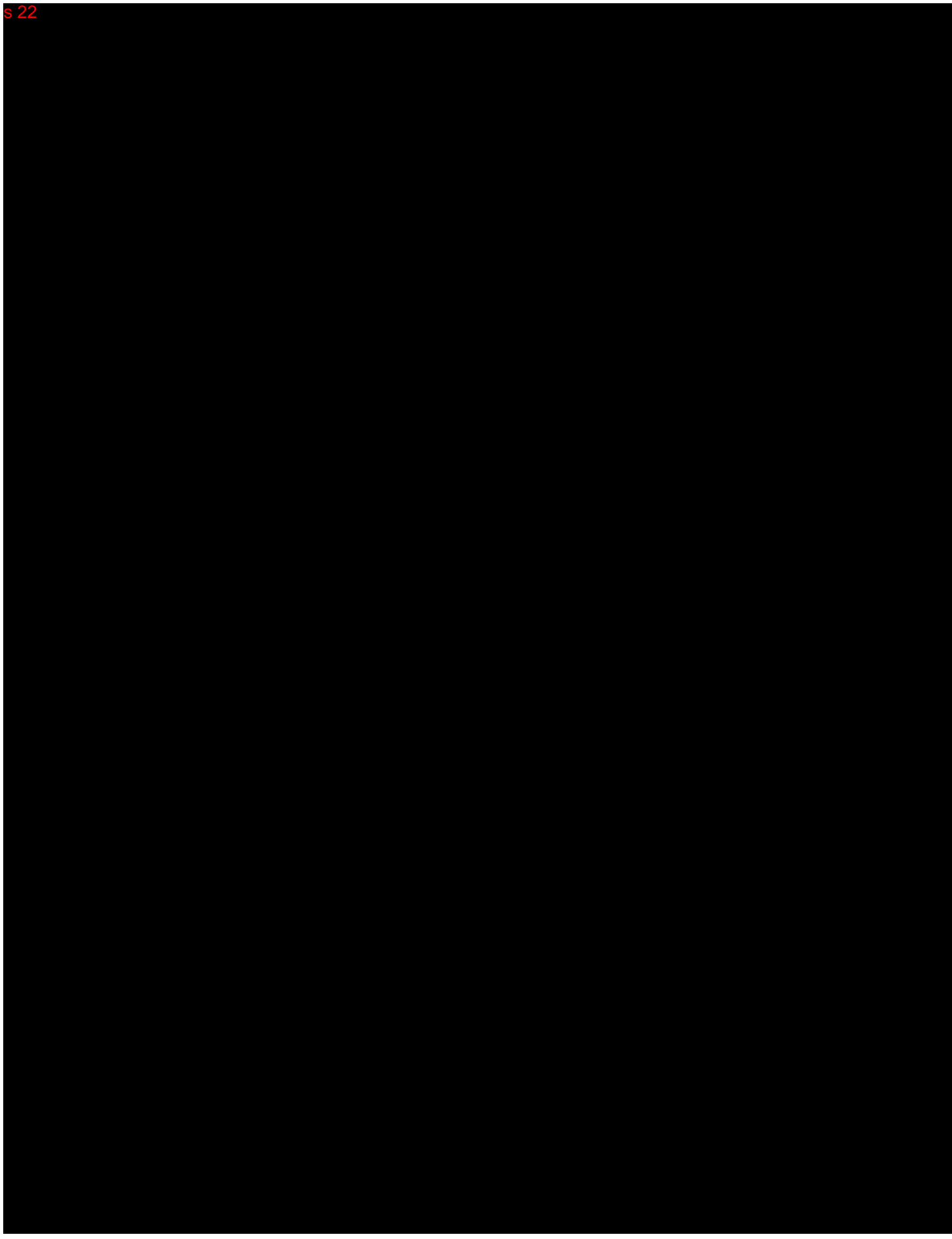


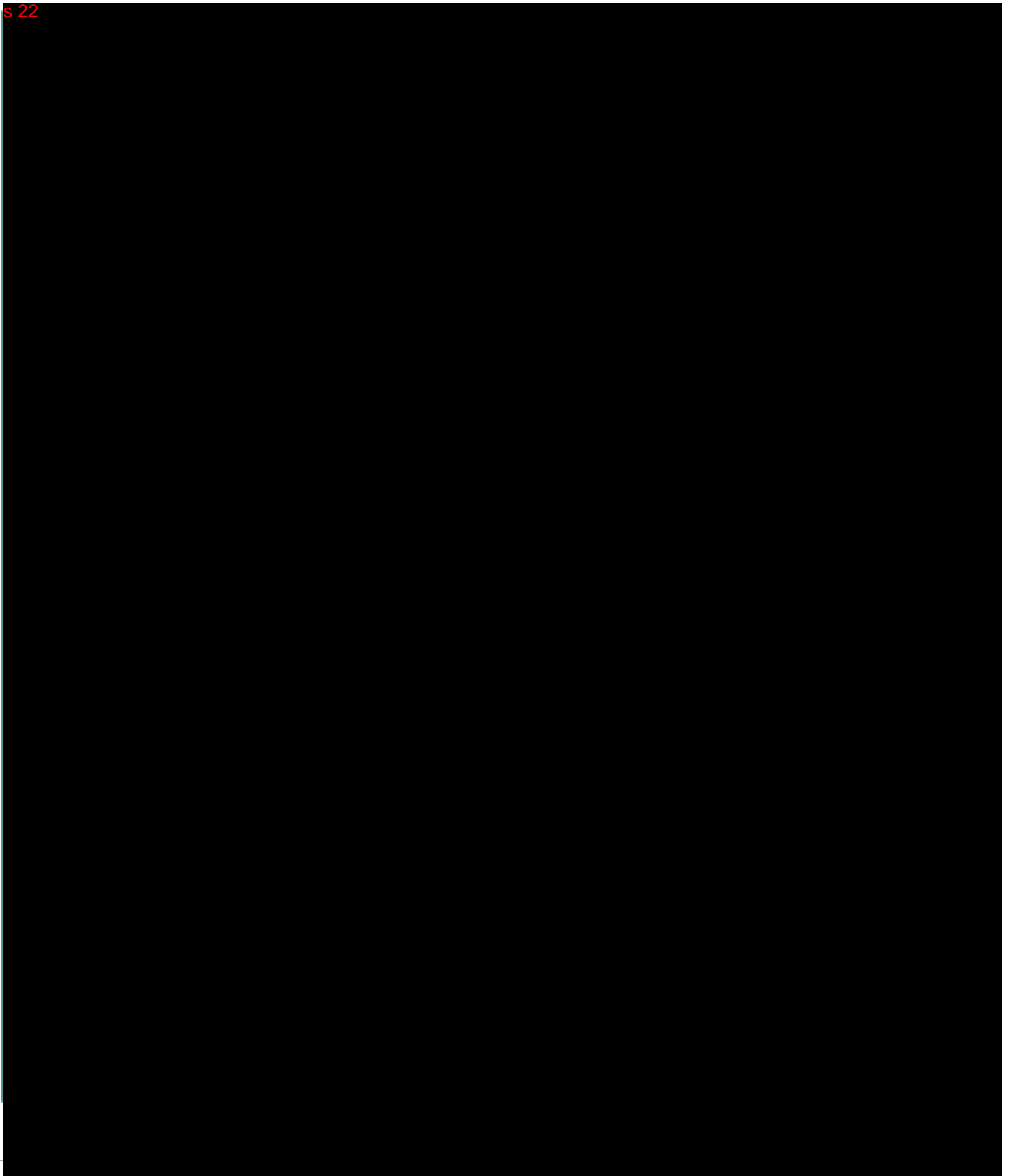


s 22









Sport Integrity Australia Advisory Council

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2. s 22 [REDACTED]	4
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4. s 22 [REDACTED]	5
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Purpose

This report provides a briefing to the Advisory Council members, from the CEO of Sport Integrity Australia. The briefing is provided as an overview of the key strategic priorities of Sport Integrity Australia in the period following the last mid-term update to the Advisory Council in April 2022. It serves as a reporting tool, that also seeks guidance and input from the Advisory Council Members on areas of relevance.

Under Section 3A of the *Sport Integrity Australia Act 2020* the agency is responsible for coordinating a national approach to Australia's response to matters relating to sports integrity, including threats to sports integrity. This report informs the Council of our progress against the requirements of the Act, the functions of the CEO as set out in the Act, current issues of importance to the agency and progress against our strategic activities identified through the [Corporate Plan](#).

It should be highlighted that several key issues and priorities for Sport Integrity Australia will be tabled for consultation with the Advisory Council members at the meeting in June 2022. These topics have therefore not been addressed in this report, they will instead be tabled as individual briefings at this meeting. The topics include:

- s 22 [REDACTED]
- s 22 [REDACTED]

Overview

This paper provides a briefing on the following key issues:

Issues

1. s 22 [REDACTED]
2. s 22 [REDACTED]
3. International Engagement
4. s 22 [REDACTED]
5. Progress made against the 12 key activities and strategic goals as outlined in the Corporate Plan (Attachment A)

Issues

1. s 22 [REDACTED]

s 22 [REDACTED]

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3. INTERNATIONAL ENGAGEMENT

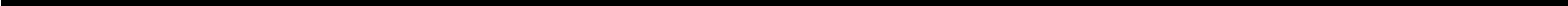
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The agency also represents Australia at international forums on match-fixing and is a participant on the Group of Copenhagen bureau and will soon have international compliance obligations under the Council of Europe Convention on the Manipulation of Sports Competitions (the Macolin Convention).

These activities are mandatory to ensure Australia is compliant with our international legal obligations. s 22

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The CEO also attended the European Union Agency for Law Enforcement Cooperation (Europol) to receive a sensitive operational briefing on a global integrity threat impacting Australia. The CEO also received briefings relating to global match fixing and organised crime infiltration of sport and entered discussions around formalising arrangements for the sharing of intelligence and capability. The CEO also met the Director General of the International Criminal Police Organisation (Interpol) in Lyon, as a result of Australia's leading role in sharing operational intelligence through Interpol and as a result of multiple global forums where Australia has been the keynote speaker, in recognition of our leading role in addressing integrity threats. This meeting also resulted in discussions around formalising the arrangements for sharing the intelligence and capability between agencies.

s 22 [Redacted text block]



Each of our key activities and strategic goals are mapped to our four performance measures (outlined in the Corporate Plan). Our annual performance statement, published in the annual report, will provide the analysis of our performance against these measures and the [2020-21 annual report](#) provides an example of this accountable reporting.

Key activity	Action taken	Next steps
<p>s 22</p>	<p>[Redacted]</p>	<p>[Redacted]</p>
<p>s 22</p>	<p>[Redacted]</p>	<p>[Redacted]</p>
<p>Ensure Australia ratifies the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention) and Commonwealth Sport Integrity Offences</p>	<p>Responses from all jurisdictional Governments to questions posed around authority to act in certain circumstances have been received.</p> <p>s 42 [Redacted]</p> <p>s 47C [Redacted]</p>	<p>Sport Integrity Australia is waiting for advice from DFAT Office of International Law regarding the next steps required to support ratification of Macolin.</p> <p>s 47C [Redacted]</p>

Key activity	Action taken	Next steps
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s 47C [Redacted]

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Develop and implement the Australian Sports Wagering Scheme for Australian Sport

s 47C [Redacted]

s 47C [Redacted]

Two research projects are ongoing:

1. **Impact of online in-play wagering on consumer behaviour and sport integrity outcomes.** - The report is in final stages of drafting. KPMG have provided an economic model enabling SIA to forecast the impacts certain factors have on the market.
2. **Impact of distribution of Australian sports data into foreign jurisdictions. Both research projects are proceeding to finalisation and analysis of outcomes.** Drafting of the final report is underway and is nearing completion.

The Sports Data research report has been circulated to Gambling Research Australia for endorsement, and once endorsed it will be sent for peer review.

The economic modelling for the Online In-Play Wagering research has been completed, Sport Integrity Australia is waiting the final research report to be submitted for endorsement.

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Key activity	Action taken	Next steps
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Key activity	Action taken	Next steps
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	<p>[REDACTED]</p> <p>[REDACTED]</p>	

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Key activity	Action taken	Next steps
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Key activity	Action taken	Next steps
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Minutes

Meeting: Sport Integrity Australia Advisory Council

Location: Offices of Herbert Smith Freehills - Level 34, 161 Castlereagh St Sydney

Date: Wednesday 14 December 2022

Time: 1:40 pm to 4:30 pm

Participants:

Advisory Council Chair: Sarah Kenny

Members: Scott Draper, Margot Foster, Megan Mitchell, Ken Moroney, Jason Marocchi (virtual), James Sutherland (virtual – attendance from 2.15pm), Lynne Anderson

Sport Integrity Australia: David Sharpe, Ramzi Jabbour, § 22, § 47F, § 22

Secretariat: § 22 (virtual) and § 22

Observers: § 22 and § 22

Item 1 – Welcome

The Chair opened the meeting at 1:40 pm and thanked everyone for their attendance.

Item 2 – Administrative matters

§ 22
[Redacted text block]

Item 3 – CEO Written Report

§ 22
[Redacted text block]

- § 22
[Redacted text block]

- s 22 [redacted]

Item 4 – Callida Review closure

The Chair advised that the Callida report was commissioned as a requirement of the previous Minister. She thanked everyone for their feedback and noted that the report was consistent with that feedback.

Presented by s 47F [redacted] - Paper taken as read.

The three key outcomes of the review are:

- The agency is operating effectively
- There is a requirement to implement a fit for purpose structure for the agency
- Sustainable funding is critical

There were 14 recommendations. Recommendations on Wagering and the Macolin Convention are for decision by Government. All others can be integrated into BAU.

Item 5 – s 22 [redacted]

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Item 6 – § 22

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Item 7 – § 22

Item 8 – § 22

Minutes

Meeting: Sport Integrity Australia Advisory Council

Date: Wednesday 22 June 2022

Time: 9.20 am to 1.59 pm

Participants:

Advisory Council Chair: Sarah Kenny. Members: Scott Draper, Margot Foster, Megan Mitchell, Jason Marocchi (virtual), James Sutherland (virtual), Lynne Anderson.

Apologies: Ken Moroney

Sport Integrity Australia: David Sharpe, Darren Mullaly, Anne-Marie Phippard

Secretariat: s 22 s 22 and s 22

Part Meeting attendance by Speakers/Presenters and Guests: Minister Wells, s 22, s 22 Susie Ball, s 47F s 22

Item 1 – Welcome

The Chair opened the meeting at 9:20 am, thanked all members for attending and congratulated Minister Wells on her appointment, and thanked her for attending the meeting.

Item 2 – s 22

[Redacted content]

Item 3 – Administrative matters

s 22 [Redacted content]

Item 4 – CEO Written Report & Commonwealth Games Liaison

Mr Sharpe welcomed feedback on his report including its structure. Mr s 47F was introduced to members. Mr s 47F has commenced with the agency to review the Callida report and prepare an implementation plan to present to the CEO and government. At this stage the Callida report cannot be distributed to members as it needs to be presented to the Minister first.

Members were provided with an update on activities since the last CEO report was issued:

- Mr Sharpe updated the information in his report that advised the Callida report had been sent to the Minister. This has not yet happened, but will, once there is an opportunity to do so, noting the Minister recently commenced.
- As part of the Callida review process Mr s 47F will be engaging the Advisory Council on the next steps.
- Mr Sharpe and Mr Mullaly recently travelled to Europe for a series of meetings including the WADA Symposium. Amongst an extremely busy schedule of meetings some of the highlights included:
 - Meeting with the Commonwealth Games Federation and discussing legacies for the Birmingham games
 - Presenting to 30 countries from across the across the world about Sport Integrity Australia’s broader integrity remit.
 - Meeting with Interpol (195 member countries) and Europol - there is a significant push to get the governments and law enforcement at the table on integrity issues.

Key Issues for the agency:

- Sports Wagering Scheme

- s 22

Mr Sharpe discussed the importance of relaunching the agency now that the two-year building phase of the organisation was over and nearly all of the Wood Review recommendations implemented.

Item 5 – s 22

[Redacted text block]

• s 22

Item 6 – International Update

Presented by Darren Mullaly

6.1 Sport Integrity Australia International Engagement Strategy

In advance of the meeting members were provided with a copy of the draft International Engagement Strategy. The document is an internal document only to give staff direction in terms of the international messaging and, the agency's direction in the international engagement space.

Mr Mullaly spoke about Sport Integrity Australia's international obligations under the UNESCO Convention, the Council of Europe, and the Macolin Convention.

Mr Mullaly explained there is a focus on Asia, the Pacific and the Middle East in the Strategic International Priorities section of the policy. The reasoning for the selection of those regions comes about through where Australia sits in the international structures within WADA, UNESCO, and our activities in the Oceania/Pacific region. Mr Mullaly explained that while the resourcing for this area was limited (4 staff from 140), the topic remained an important focus.

Feedback provided by members is:

- members acknowledged there is a need for international engagement and supported the strategy whilst noting the need to balance the resource requirements with other priorities for the agency
- the document may benefit from more clearly mapping which staff are talking to which international stakeholders
- there was discussion around the difference between Tier 3 and Tier 4, and how staff would know when they were dealing with a tier 4 issue.

Sport Integrity Australia accepted Lynne Andersons offer to provide assistance from her experience in developing a policy while at Paralympics. Megan Mitchell pointed the agency towards the Human Rights Commission who were advanced in their international engagement approach, particularly in the pacific.

6.2 Law Enforcement meetings – Interpol, Europol and ACIC

Key points presented:

- Interpol are looking at hosting a conference, co-branded with Sports Integrity Australia, (funded entirely by Interpol).
- We are continuing to work with the Attorney General's Department to make a final decision on whether we can ratify the Macolin Convention and we are happy with the responses of the States and Territories.
- We are also in the final stages of the introducing national match fixing legislation.
- Despite issues with the Australian Sports Wagering Scheme, ratification of Macolin is not contingent on the ASWS being implemented.

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Item 7 – s 22

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Item 8 – § 22

Item 9 – § 22

s 22

From: s 22
Sent: Monday, 30 January 2023 9:28 AM
To: s 22
Cc: Darren Mullaly
Subject: Letter of Certification for ASWS Impact Analysis
Attachments: ASWS - agency-certification-letter-second-pass-final-assessment 300123.docx; ASWS Impact Analysis - January 2023.docx

Importance: High

OFFICIAL: Sensitive

Hi s 22,

As discussed, please find attached the ASWS Impact Assessment and accompanying letter of certification for David's signature. Grateful if you could have David review and sign the letter of certification today. We need to submit these documents to the Office of Impact Analysis for formal evaluation, as this becomes the decision tool that support the ASWS NPP. We are on tight timeframes, as coord comments are due 12 February, and the Impact Analysis needs to be finalised in advance of this date.

Thanks s 22, and happy to discuss,

s 22



**SPORT INTEGRITY
AUSTRALIA**

s 22

Acting Director | Sports Wagering & Competition Manipulation
 Strategy & International Engagement
 Mob s 22

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**ACKNOWLEDGEMENT OF COUNTRY**

In the spirit of reconciliation we acknowledge the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past, present and future and extend that respect to all Aboriginal and Torres Strait Islander peoples. We recognise the outstanding contribution Aboriginal and Torres Strait Islander peoples make to sport in Australia and celebrate the power of sport to promote reconciliation and reduce inequality.

OFFICIAL: Sensitive

Summary of issues relevant to Minister's Officer Media Liaison at 12 May 2023.

Policy background

The Australian Sports Wagering Scheme (ASWS), ratification of the Macolin Convention and the establishment of the National Sport Integrity Offences are key recommendations of the Wood Review. Sport Integrity Australia (and formerly the Sport Integrity Taskforce) have been working on these initiatives since the Government Response to the Wood Review was endorsed in 2019.

Australian Sports Wagering Scheme

The intent of the ASWS is to streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth, State and Territory jurisdictions and to ensure sports wagering occurs within a regulatory framework to effectively protect the integrity of sport and ensuring Australian sporting competitions are more resistant to evolving manipulation threats.

The key elements of the ASWS are:

- Elevating from NSW and Victorian regulators to Sport Integrity Australia the accreditation of sports as Sports Controlling Bodies and therefore oversight of integrity elements in their contractual arrangements with wagering service providers
- Sport Integrity Australia to facilitate a national forum with all relevant stakeholders to pursue an agreed national schedule of sports contingencies.
- Sport Integrity Australia to establish a sports wagering data and information sharing ecosystem consolidating all sports betting related data and information to provide a complete and holistic view of the sector and enabling a suspicious activity alert system.

Sport Integrity Australia has engaged in significant consultation with stakeholders to develop the ASWS operating principles. Sport Integrity Australia has released a series of consultation papers including the ASWS Strategy and Operating Principles paper and a Regulatory Impact Statement which have been informed by and shared with stakeholders.

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Macolin Convention

The Macolin Convention is a multilateral, international treaty, which aims to prevent, detect and sanction national or transnational manipulation of sports competitions; and to promote national and international cooperation.

Australia is seen as an international leader in addressing the threats and risks of competition manipulation and related betting corruption. Australia is a member of the Bureau of the Group of Copenhagen which supports the implementation of the Macolin Convention and has fostered relationships with the international community responding to the competition manipulation threat. ^{s 47C}

Australia became a signatory to the Macolin Convention on 1 February 2019 and has been working towards ratification since then. ^{s 42}

Sport Integrity Australia will recommence working with relevant Commonwealth agencies responsible for treaty ratification, including the Office of International Law, within the Attorney-General's Department and the Treaties Section of the Department of Foreign Affairs and Trade, to progress ratification of the Macolin Convention.

National Sport Integrity Offences

The lack of a harmonised, consistent national approach to match-fixing offences, and the absence of Commonwealth criminal legislation, may inhibit the investigation and prosecution of offences, particularly in circumstances where such offences tend to be cross- or multi-jurisdictional and transnational in nature. ^{s 47C}

Establishment of the Offences will further strengthen Australia's compliance with the Macolin Convention.

The development of the Offences has been guided by ongoing and close collaboration with the Commonwealth Attorney-General's Department, Australian Government Solicitor and Office of Parliamentary Counsel.

Funding

Sport Integrity Australia does not have funding for these initiatives in the out years. ^{s 34(3)}

^{s 47C}

Policy Authority

^{s 47C}

s 47C

Current Role

The primary function of the Sports Wagering and Competition Manipulation team is to lead Sport Integrity Australia's, and thus the Australian Government's, response to competition manipulation and sports wagering issues affecting Australian sport.

We work with sports, the sports-wagering industry, and state and territory regulators and international counterparts to provide clearer, more transparent, and consistent sports wagering regulatory framework to, ultimately, protect Australian sport from competition manipulation and sports wagering related threats.

Trends and issues forecasting

Central to providing an effective response to these issues is the identification, analysis, and assessment of issues specific to, or associated with, the threat of competition manipulation and betting related corruption. This is key to deliver an informed, evidence-based approach to respond effectively to competition manipulation and sports betting related corruption.

Current trends and issues that we are monitoring include:

- Broadcast and streaming of sub-elite sporting competitions
- Sports Data
- Online In-play wagering
- Serious and organised crime risks to Australian sport
- Beneficial investment in sport

Research

The Sports Wagering and Competition Manipulation team actively commission research into wagering matters that pose integrity risks to sports and the broader wagering ecosystem. We have recently partnered with Gambling Research Australia to commission research into the *Distribution of Australian sports data into foreign jurisdictions*. We are also finalising a research project looking at the impacts of online in-play wagering and its impacts on consumer protection and sport integrity outcomes.

Sport Capability

The Sports Wagering and Competition Manipulation team will continue to work with government, sport and industry partners to influence and advocate for sport integrity outcomes to be included/embedded within broader wagering policy and regulatory settings. Sport Integrity Australia is seeing an increasing number of requests for assistance in navigating the streaming and betting opportunities and approaches they receive.

Examples:

Table Tennis – worked with international law enforcement counterparts to disrupt an international match-fixing syndicate resulting in criminal charges being laid which are currently in front of the courts.

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FIFA – currently in negotiations with FIFA to develop a taskforce response for the Women’s 2023 FIFA World Cup to identify suspicious betting patterns and potential competition manipulation of world cup matches.

International Engagement

Sport Integrity Australia are active members of various relevant international groups and fora including:

- International Partnership Against Corruption in Sport (IPACS) – capacity building and awareness raising for sport issues.
- Group of Copenhagen – sharing betting related information across national platforms
- United National Office of Drugs and Crime thematic experts’ groups for publications and events.
- INTERPOL – Invitation to present at the General Assembly to 195 member nations on the emerging threats to sport. This resulted in a placement of a SIA staff member in INTERPOL to assist in developing the sports anti-corruption capability.
- INTERPOL Match-Fixing Taskforce – to focus on cross jurisdictional efforts to counter manipulations and support major events, including targeting illegal betting activity.

Australian Criminal Intelligence Commission

SIA maintains a close relationship with the ACIC’s Australian Sports Integrity Unit to utilise its suite of law enforcement powers and organised crime insights to protect sports. ACIC staff are placed in SIA structures to facilitate effective responses to sport integrity threats.

Australian Sports Wagering Scheme overview

Background:

The development and implementation of the ASWS is a key pillar of the Government Response to the Review of Australia's Sport Integrity Arrangements. The intent of the ASWS is to streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth, State and Territory jurisdictions and to ensure sports wagering occurs within a regulatory framework protecting the integrity of sport and ensuring Australian sporting competitions are more resistant to evolving manipulation threats.

To improve the coordination of sport integrity outcomes in line with the Government Response to the Wood Review, the ASWS Operating Principles that Sport Integrity Australia will bring forward to Government for policy authority include:

- Sport Integrity Australia will accredit and regulate Sports Controlling Body (SCB) Status
- Sport Integrity Australia will have regulatory oversight of Product Fee and Integrity Agreements (PFIAs)
- Sport Integrity Australia will convene a forum to establish a national schedule of sports wagering contingencies
- Sport Integrity Australia will establish the principles for a data/information sharing ecosystem for the sports wagering environment that captures transactional betting information and enable a suspicious activity alert system.

Key points:

1. Sport Integrity Australia's engagement with relevant stakeholders has been ongoing including several focused engagements in recent months to refine the strategic approach.
2. Sport Integrity Australia's Advisory Council is supportive of the proposed ASWS Operating Principles.
3. Sport Integrity Australia will convene stakeholder workshops in September to continue to refine the proposed ASWS Operating Principles.
4. s 42 [REDACTED]
5. Sport Integrity Australia has commenced drafting an early assessment Regulatory Impact Statement (RIS) to determine the regulatory impact of the proposed ASWS Operating Principles and other potential regulatory reform options.
6. s 47C [REDACTED]

Stakeholder feedback:

Stakeholders are generally supportive of the proposed ASWS Operating Principles and are comfortable with Sport Integrity Australia's proposed new role in regulating the sport integrity elements of the wagering environment. s 47E(d)

Stakeholder support does appear to be contingent on whether a cost recovery model is introduced to fund the ASWS. Sport Integrity Australia foreshadows that stakeholder support for the ASWS will diminish should cost recovery be pursued.

Research Projects:Online In-Play Wagering

Sport Integrity Australia has partnered with the Department of Social Services to commission research which will determine the economic and consumer behaviour impacts that the current restriction on online in-play wagering in Australia is having on the domestic wagering markets and will look to model the economic and consumer behaviour trends of allowing online in-play wagering within Australia.

s 34(3)

Data Providers

Sport Integrity Australia has partnered with Gambling Research Australia (GRA) to commission research to examine the official and unofficial collection, dissemination and use of sports data and its direct and indirect impact on the regulated Australian wagering environment in terms of:

- market loss and regulator enforcement;
- the impact on effectively implementing consumer protection measures; and
- the impact on sport integrity specifically in relation to facilitating match-fixing.

Next Steps:

Indicative next steps and timings are as follows:

- September 2021 – Stakeholder design workshops
- October 2021 – Release early assessment RIS
- October 2021 – Develop cost recovery options
- October/November 2021 – Draft NPP
- January 2022 – Draft decision RIS and finalise NPP
- April/May 2022 – Budget 22-23
- July 2022 – Commence transition and implementation of ASWS

ASWS back pocket dot points for Senate Estimates

- The ASWS aims to streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth, State and Territory jurisdictions.
- The ASWS has been developed as a light touch proportionate response to the current sports wagering environment and associated sport integrity threats.
- In 2021 Minister Colbeck agreed to an extension of time for this important modelling to be further developed and refined with input from stakeholders.
- Sport Integrity Australia has engaged extensively with stakeholders to develop and test various regulatory reform options and operating principles.
- Based on these consultations and feedback, Sport Integrity Australia developed and released the ASWS Strategy and Operating Principles Paper in August 2021 for stakeholders and released a Regulatory Impact Statement for public consultation in November 2021.

- s 47C [REDACTED]
- [REDACTED]

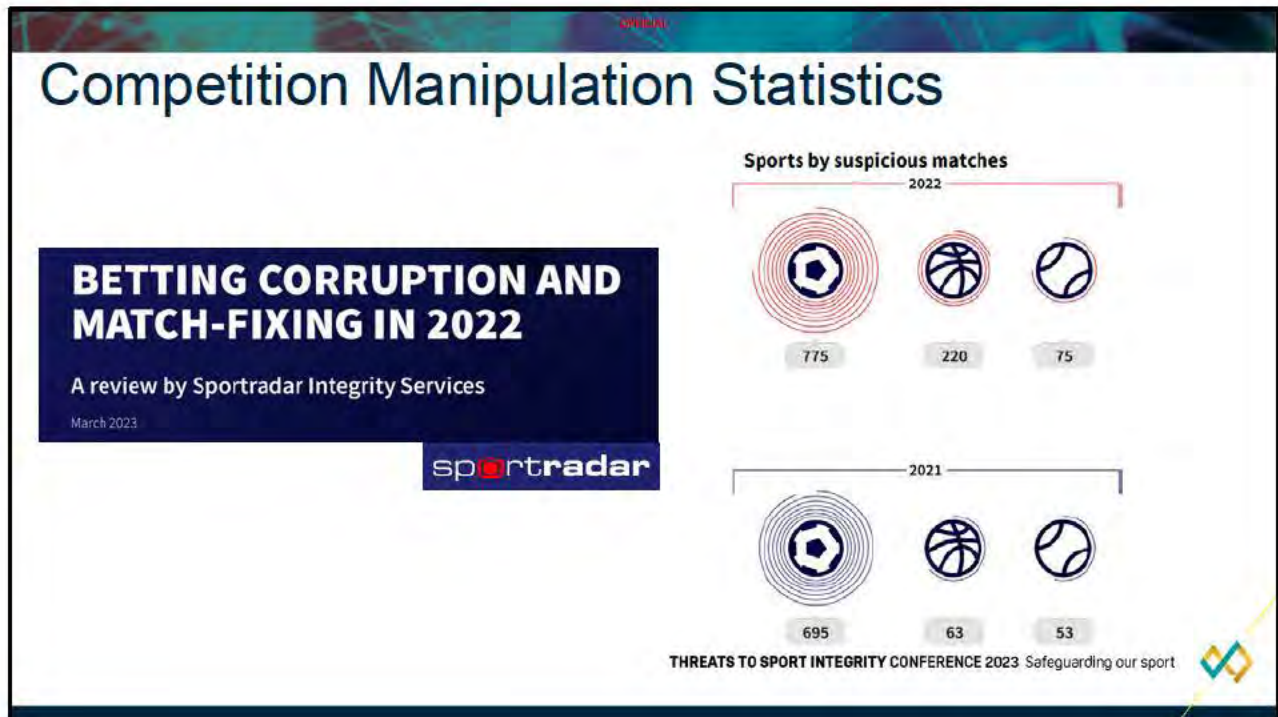
Recent Media and Data and Information Sharing Ecosystem

- Sport Integrity Australia is aware of the issues raised by Responsible Wagering Australia (RWA) in the ABC reports and it is acknowledged that the illegal offshore wagering threat is significant.
- Sport Integrity Australia does not have policy authority to pursue the illegal offshore wagering threat at this time; however we do work the Sport Betting Intelligence Unit on these matters.
- s 47C [REDACTED]
- The intent behind the proposed ASWS Data and Information Sharing Ecosystem is to consolidate the existing data into a centralised place.
- Wagering Service Providers already provide transactional data to a range of partners, including regulators and SCBs. No additional data will be required from WSPs at the commencement of the ASWS
- However once established, if the analysis of the data suggests that there is greater incidents of competition manipulation or suspicious betting activity, real time transactional data may be pursued.

Budget and costs

- Sport Integrity Australia received approx. \$1.8mil from Government to develop the ASWS.

- To date, Sport Integrity Australia has spent \$853,861.70 on the development on the ASWS. These costs include:
 - Staffing
 - Research into online in play wagering and sports data
 - Australian Government Solicitor to undertake legislative and constitutional review
 - Frontier Economics to develop the Regulatory Impact Statement
 - Consultants to explore cost recovery options
 - Consultants to support the release of the data and information sharing ecosystem Request for Information
- Sport Integrity Australia forecasts future expenditure of \$482, 219 for the remainder of the financial year.

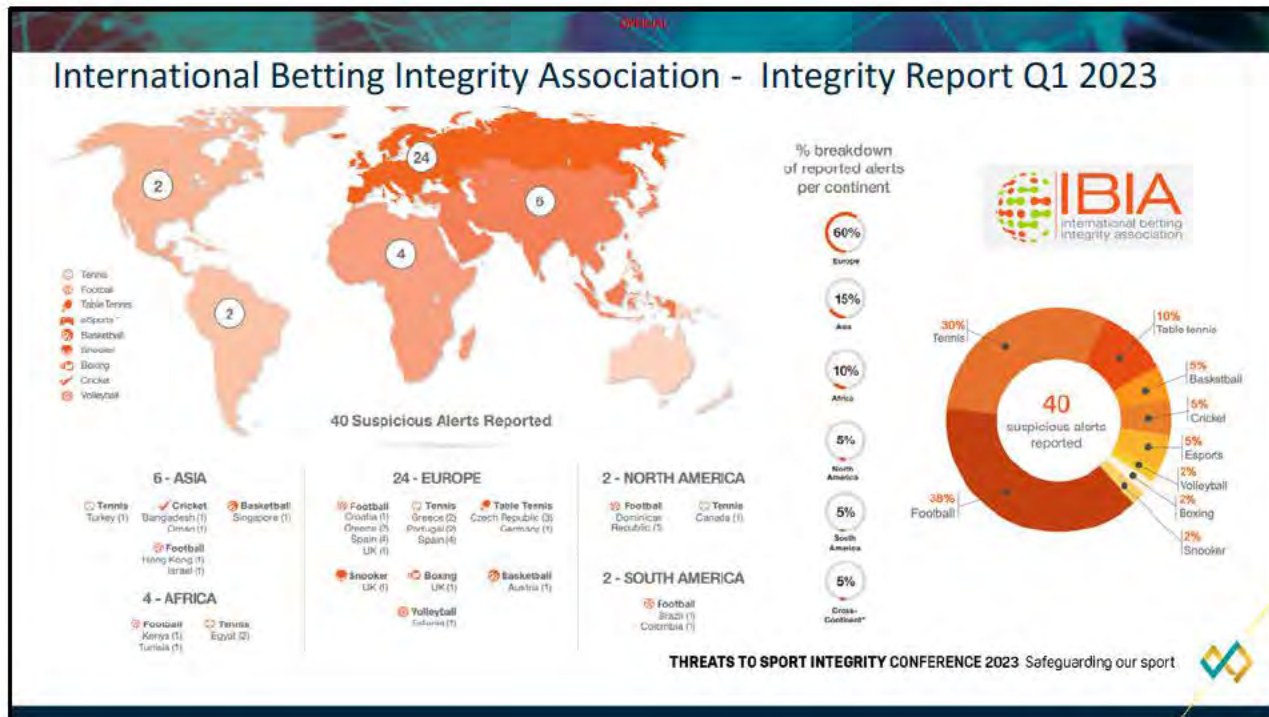


- Sport Integrity Australia addresses the competition manipulation threat in Australia through close collaboration with LEAs, NSOs, WSPs, gambling regulators and industry bodies such as Sportradar and IBIA
- In March 2023, Sportradar released its annual 'Betting Corruption and Match-Fixing in 2022' report.
- The report showed an increase of 307 suspicious matches compared to 2021
- Soccer continued to have the highest number of suspicious matches and had a moderate increase from the 2021 figures

- 220 basketball matches were deemed suspicious, a large increase of 250% compared to 2021



- Still on Sportradar. In 2022, 1,212 suspicious matches were detected in 12 sports, across 92 countries. This is the first time that the annual number of suspicious matches exceeded 1,000
- Of the 1,212, 1,188 came from men's sporting events and 24 came from women's sporting events.
- Soccer had the highest number of suspicious matches with 775
- Basketball and table tennis showed the steepest rise in suspicious matches:
 - Basketball had an increase of 157, and
 - table tennis increased by 51



- IBIA just released its Q1 integrity report for 2023
- Note the differing results in this report compared to Sportradar
- For example, football had the most suspicious matches in both reports
- However, basketball was number 2 in the Sportradar by some margin, however down at number 4 in this IBIA report
- The differing results demonstrate the complexities involved in determining the true prevalence of match-fixing across the globe

Overview for meeting with Chief of Staff

SW&CM team have prepared a Ministerial Brief and Ministerial Submission for consideration and action by Minister Wells.

Ministerial Brief – Macolin Convention and National Sport Integrity Offences

s 47C

s 47C

Previous policy authority extinguished with change of government. These are non-controversial pieces of work that stakeholders are supportive of and are expecting to progress.

Sport Integrity Australia requires policy authority to secure resourcing from other agencies to progress these measures. Agencies include the Office of International Law and DFAT Treaties Office, AGD for amendments to the *Criminal Code*, the Office of Parliamentary Counsel to draft the Offences and AGS for constitutional legal advice.

Ministerial Submission – ASWS, Macolin Convention and National Sport Integrity Offences

This MinSub is in draft and has not been provided to the MO.

s 47C

It also seeks approval for Sport Integrity Australia to re-establish the ASWS Advisory Groups to restart engagement on the ASWS.

It provides a status update on the progress to date of the ASWS s 47C

It also provides an overview of the Macolin Convention ratification times frames and steps and the National Sport Integrity Offences and associated penalties.

The MinSub includes the following attachments:

- ASWS Strategy and Operating Principles paper
- s 34(1)(a)
- s 47C
- Macolin Convention ratification proposed next steps
- s 47C

Background

Australian Sports Wagering Scheme will streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth, State and Territory jurisdictions and to ensure

sports wagering occurs within a regulatory framework protecting the integrity of sport and ensuring Australian sporting competitions are more resistant to evolving manipulation threats.

- Key elements of the ASWS
 - Elevate accreditation of sports controlling body status to SIA from NSW and Victoria state gambling regulators. This includes approval in legislation for SIA to regulate the PFIA system regarding integrity elements, of the relationship between NSO and WSP (broad agreement).
 - National input into contingencies forum to include SIA expertise in bet type approval processes.
 - Development of a sports wagering information and data sharing ecosystem for consistent collation, analysis and dissemination of wagering related intelligence.

s 34(3)

s 42

Macolin Convention is a Council of Europe Treaty specifically targeting competition manipulation. It includes elements of:

- Cross border collaboration e.g. Group of Copenhagen monitoring of the FIFA World Cup 2023 betting and any related alerts.
- Requirements for criminal sanctions for competition manipulation.
- Enhancing the exchange of information between public authorities, sporting organisations and wagering service providers.

s 42

- [Redacted]
- [Redacted]

1.6 Wood implementation

1.6.1 Overview of Wood implementation

SUBJECT / ISSUE

To provide an update on the status of Wood Review recommendation implementation.

WHAT IS THE STORY TO TELL?

- The environment has shifted considerably since the government released the Wood Review in 2018. Sport Integrity Australia opened our doors in a dynamic and constantly changing world that was highlighted by Wood.
- We have built the agency and responded to new issues and threats. We have developed partnerships, collaborations and solutions to the issues raised in Wood and that have eventuated post-July 2020.
- As such, we have not implemented the same solutions enunciated in Wood; however, we have put in place structures and processes that meet the intent and are fit for purpose in the contemporary environment.
- There remain 4 critical areas to complete:
 - ratification of the Macolin Convention – this is progressing well
 - Commonwealth competition manipulation legislation – we are nearing completion of this work
 - a whistle blowing scheme (now known as a Confidential Reporting Scheme) – we anticipate this will be in place at the start of 2023.
 - the Australian Sports Wagering Scheme – s 47C [REDACTED]
- All other recommendations we consider completed and will be seeking agreement from the minister in due course.

KEY POINTS

- The environment has shifted considerably since the release of the Wood Review.
- We have responded to the issues at hand and developed processes and systems fit for purpose and meeting the intent of the Wood recommendations.
- There are 4 key areas still to be completed. These are on track.

Lead author:	Bill Turner	
Cleared by:	Bill Turner	Date cleared: 12 October 2022
Publish to intranet?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
Revision cleared by	Bill Turner	

Date of revision	10 November 2022
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1.6.2 Australian Sports Wagering Scheme (ASWS)

SUBJECT / ISSUE

Australian Sports Wagering Scheme

WHAT IS THE STORY TO TELL?

- The development and implementation of the Australian Sports Wagering Scheme (ASWS) is a key pillar of the Government Response to the Wood Review.
- It is a complex piece of policy development, with multiple stakeholders affected. Extensive consultation has occurred to get the proposed operating principles right.
- We are committed to the development and implementation of the ASWS.
- s 47C [REDACTED]

KEY POINTS

- The ASWS Operating Principles anticipate that:
 - accreditation of Sports Controlling Body (SCB) status including, oversight of the Product Fee and Integrity Agreements, elevated to Sport Integrity Australia to regulate
 - we facilitate a national forum with all relevant stakeholders to provide input into an agreed national schedule of sports contingencies
 - we establish a sports wagering data and information sharing ecosystem.
- s 47C [REDACTED]
- s 34(3) [REDACTED]
- The intent of the ASWS is to streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth, state and territory jurisdictions and to ensure sports wagering occurs within a regulatory framework protecting the integrity of sport.
- Stakeholder consultations identified that several related issues of interest, including reconsideration of 'online in-play' wagering, the inclusion of racing information and further addressing illegal offshore wagering, are important considerations. These issues are, however, outside the current identified scope of the ASWS.
- Subsequent stakeholder consultation and input has led to the development of the ASWS Strategy Paper and Operating Principles that outlined the operating model and principles.
- The ASWS Regulatory Impact Statement was released for public consultation in November 2021. Six submissions were received.
- s 47C [REDACTED]
- [REDACTED]

§ 47C

▪ § 42

BACKGROUND

Stakeholder Consultation

- In May 2020, we released the ASWS Discussion Paper for public consultation; we received 13 submissions to the Discussion Paper. Based on the feedback, it was clear that there was not consensus on the preferred ASWS model.
- Former sports Minister, Minister Colbeck, on 19 March 2021, approved an extension of time for this important modelling to be further developed and refined with input from stakeholders.
- Throughout 2021, we conducted extensive stakeholder consultation in order to build consensus for the proposed ASWS regulatory reform options and operating principles which are outlined in the ASWS Strategy and Operating Principles Paper released in August 2021.
- In addition, we have commissioned economic modelling research to better understand the sports wagering environment including consumer protection and sport integrity impacts of online in-play wagering.
- Ongoing stakeholder consultation and input has resulted in clearer and more supported ASWS operating principles being established. The ASWS operating principles were tested as part of the Regulatory Impact Statement (RIS) process.

ASWS Operating Principles

- Throughout 2021, we conducted a series of direct engagements with over 30 key stakeholders to inform the strategy paper and the ASWS operating principles. These discussions enabled the development of a refined set of proposed operating principles as outlined in the ASWS Strategy and Operating Principles Paper.

Online In-play Wagering Research

- § 47C
- Online in-play wagering prohibitions are part of the *Interactive Gambling Act 2001* and policy responsibility sits with the Minister for Communications.
- We have partnered with the Commonwealth Department of Social Services to commission research into online in-play wagering, to ensure an appropriate focus on harm minimisation measures is prioritised.
- The research will explore the economic impact, consumer behaviour trends and sport integrity benefits of current and potential regulation of online in-play wagering within Australia.

Lead author:

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Cleared by:	Darren Mullaly	Date cleared: 18 October 2022
Publish to intranet?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
Revision cleared by		
Date of revision		

1.6.4 Macolin Convention

SUBJECT / ISSUE

Ratification by Australia of the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention) – status update

WHAT IS THE STORY TO TELL?

- Enhancing our ties with the international community to fight competition manipulation is a key tool in protecting Australian sport.
- This treaty shows we are serious in the fight against corruption.
- Macolin facilitates an effective global information and capacity building program specifically relating to competition manipulation.
- Australia remains strongly engaged with the Macolin community in advance of our formal ratification, through membership of key advisory body the Bureau of the Group of Copenhagen.

KEY POINTS

- The Macolin Convention is the only multi-lateral treaty aimed solely at combatting competition manipulation and related corruption in sport.
- As with any treaty, Australia takes its responsibilities seriously and we are currently examining our compliance with the details of the Convention, which requires detailed legal and policy examination across the Commonwealth and jurisdictional governments prior to confirming the ratification.
- An important part of the response is to develop Commonwealth offences under the Criminal Code to update our criminal response to evolving threats and techniques. We are well advanced in this task.

- s 47C [REDACTED]

- We are compiling final policy advice to progress to the next stage of assessment for ratification.

- s 47C [REDACTED]

CONSULTATION

- We have consulted with each state and territory government s 47C [REDACTED]

- All jurisdictions have provided written feedback on their state-and-territory-specific questions.
- We will continue to work with the Office of International Law to ensure Australia meets the required threshold to ratify the Macolin Convention.

BACKGROUND

- The purpose of this Convention is to prevent, detect, punish and discipline the manipulation of sports competitions, as well as enhance the exchange of information and national and international cooperation between the public authorities concerned, sports organisations and sports betting operators. The Convention calls on governments to adopt measures, including legislation, that notably:
 - prevents conflicts of interest in sports betting operators and sports organisations
 - encourages the sports betting regulatory authorities to fight against fraud, if necessary by limiting the supply of sports bets or suspending the taking of bets
 - fight against illegal sports betting, allowing to close or restrict access to the operators concerned and block financial flows between them and consumers.
- The Review of Australia's Sports Integrity Arrangements (the Wood Review) recommended, and the government agreed, to Australia becoming a party to the Macolin Convention.
- In February 2019, the then Minister for Sport, the Hon Senator Bridget McKenzie, signed the Macolin Convention on behalf of Australia and we are now working towards ratification.
- Sports organisations and competition organisers are also required to adopt and implement stricter rules to combat corruption, sanctions and proportionate disciplinary and dissuasive measures in the event of offences, as well as good governance principles. The Convention also provides that signatories must provide safeguards for informants and witnesses.
- Joining the Macolin Community of States further enhances Australia's reputation as a strong advocate for effective integrity arrangements and provides greater scope and impetus to implement measures at the Commonwealth level and to prioritise ongoing work to develop enhanced cooperation and the exchange of information across all levels of Australian government and internationally, regarding match-fixing and related corruption in sport.
- We represent the government on the Group of Copenhagen Bureau to support the consistent global application of the Convention.

STATISTICS

- The Macolin Convention entered into force on 1 September 2019. It has been signed by 39 countries, with 7 of these ratifying the Convention.

Lead author:	s 22	
Cleared by:	Darren Mullaly	Date cleared: 18 October 2022
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Revision cleared by		
Date of revision		

1.1 Wood Implementation

1.1.1 Overview of Wood implementation

SUBJECT / ISSUE

The status of Wood Review recommendation implementation.

WHAT IS THE STORY TO TELL/KEY POINTS?

- The environment has shifted considerably since the government released the Wood Review in 2018. Sport Integrity Australia opened our doors in a dynamic and constantly changing world that was highlighted by Wood.
- We have built the agency and responded to new issues and threats. We have developed partnerships, collaborations and solutions to the issues raised in Wood and that have eventuated post-July 2020.
- As such, we have not implemented the same solutions enunciated in Wood; however, we have put in place structures and processes that meet the intent and are fit for purpose in the contemporary environment.
- An internal audit recently confirmed this.
- There remain 3 critical areas to complete:
 - ratification of the Macolin Convention – this is progressing well
 - Commonwealth competition manipulation legislation – we are nearing completion of this work
 - the Australian Sports Wagering Scheme – s 47C
- All other recommendations we consider completed and will be seeking agreement from the minister in due course.

Lead author:	Bill Turner	
Cleared by:	Bill Turner	Date cleared: 3 May 2023
Publish to intranet?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (if no, please complete the justification below)	
Justification not to publish:		
Revision cleared by:		
Date of revision:		

1.1.2 Macolin Convention

SUBJECT / ISSUE

Ratification by Australia of the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention) – status update

WHAT IS THE STORY TO TELL/KEY POINTS?

- In February 2019, the then Minister for Sport, signed the Macolin Convention on behalf of Australia and we are now working towards ratification.
- s 47C [REDACTED]
- Enhancing our ties with the international community to fight competition manipulation is a key tool in protecting Australian sport.
- This treaty shows we are serious in the fight against sports corruption.
- Macolin facilitates an effective global information and capacity building program specifically relating to competition manipulation.
- Australia remains strongly engaged with the Macolin community in advance of our formal ratification, through membership of key advisory body the Bureau of the Group of Copenhagen.

STATISTICS

- The Macolin Convention entered into force on 1 September 2019. It has been ratified by eight countries, and signed by an additional 34, including Australia.

BACKGROUND

- The purpose of this Convention is to prevent, detect, punish and discipline the manipulation of sports competitions, as well as enhance the exchange of information and national and international cooperation between the public authorities concerned, sports organisations and sports betting operators. The Convention calls on governments to adopt measures, including legislation, that notably:
 - prevents conflicts of interest in sports betting operators and sports organisations
 - encourages the sports betting regulatory authorities to fight against fraud, if necessary, by limiting the supply of sports bets or suspending the taking of bets
 - fight against illegal sports betting, allowing authorities to close or restrict access to the operators concerned and block financial flows between them and consumers.
- The Review of Australia's Sports Integrity Arrangements (the Wood Review) recommended, and the former government agreed, to Australia becoming a party to the Macolin Convention.
- Sports organisations and competition organisers are also required to adopt and implement stricter rules to combat corruption, sanctions and proportionate disciplinary and dissuasive measures in the event of offences, as well as good governance principles.

The Convention also provides that signatories must provide safeguards for informants and witnesses.

- We represent the government on the Group of Copenhagen Bureau to support the consistent global application of the Convention.

KEY POINTS

- The Macolin Convention is the only multi-lateral treaty aimed solely at combatting competition manipulation and related corruption in sport.
- As with any treaty, Australia takes its responsibilities seriously and we are currently examining our compliance with the details of the Convention, which requires detailed legal and policy examination across the Commonwealth and state and territory governments prior to confirming the ratification.
- An important part of the response is to develop Commonwealth offences under the Criminal Code to update our criminal response to evolving threats and techniques. We are well advanced in this task.
 - s 47C [REDACTED]
- Once renewed policy authority is secured, we will continue the process of assisting agencies to determine Australia's ability to comply with obligations of the Convention, including an analysis of the important role state and territory regulatory regimes play in satisfying obligations related to sports wagering. This includes consultation with Commonwealth Government agencies such as the Office for International Law in Department of Foreign Affairs and Trade and the Australian Government Solicitor.

CONSULTATION

- We have consulted with each state and territory government s 47C [REDACTED]
- All jurisdictions have provided written feedback on their state-and-territory-specific questions.
- Once renewed policy authority is secured, we will continue to work with the Office of International Law to ensure Australia meets the required threshold to ratify the Macolin Convention and progress the ratification process.

Lead author:	s 22 [REDACTED]	
Cleared by:	Darren Mullaly	Date cleared: 3 May 2023
Publish to intranet?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (if no, please complete the justification below)	
Justification not to publish:		
Revision cleared by:		
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1.1.3 Competition Manipulation

SUBJECT / ISSUE

Competition Manipulation is often referred to as match-fixing and is a global threat to the integrity of sport. It is often perpetrated to win money from gambling.

WHAT IS THE STORY TO TELL/KEY POINTS?

- s 47C [REDACTED]
- The competition manipulation threat is a multi-faceted and cross border crime that requires responses by all stakeholders. We are developing the Australian Sports Wagering Scheme (ASWS) to enhance this approach.
- Sports manage the rules of their competitions.
- Law enforcement agencies investigate and prosecute criminal offences.
- Gambling regulators license and monitor gambling activity in Australia.
- Sport Integrity Australia facilitates a coordinated approach to improve the response to a variety of threats related to gambling on sport.

STATISTICS

- The 2022 Sportradar's *'Betting Corruption and Match-Fixing Report'* identified the **global** number of suspicious matches by sport (note: suspicious matches does equate to fixed matches, merely that the betting activity merits investigation):
 - Football (soccer) – 694
 - Basketball – 62
 - Tennis – 53
 - Esports – 47
 - Ice Hockey – 15
 - Table Tennis – 11
 - Cricket – 9
 - Volleyball – 6
 - Handball – 5
 - Beach Volleyball – 1
- The report also revealed the prevalence of suspicious matches by sport:
 - Football (soccer) – 1 in 171 matches
 - Esports – 1 in 499
 - Basketball – 1 in 194
 - Tennis – 1 in 1441
 - All sports – 1 in 476

- Notably Sportradar report zero suspicious matches in Oceania, for the period, with the highest incidences occurring in Asia and Europe.

BACKGROUND

- The ASWS Operating Principles anticipate that:
 - Accreditation of Sports Controlling Body (SCB) status, including oversight of the Product Fee and Integrity Agreements, will be elevated to Sport Integrity Australia to regulate.
 - We facilitate a national forum with all relevant stakeholders to provide input into an agreed national schedule of sports contingencies.
 - We establish a sports wagering data and information sharing ecosystem.
- The ASWS will streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth and state and territory jurisdictions and to ensure sports wagering occurs within a regulatory framework protecting the integrity of sport.
- s 47C [REDACTED]
- s 47C [REDACTED]
- s 47C [REDACTED]
- s 42 [REDACTED]

Stakeholder Consultation

- Throughout the development of the ASWS, the agency has met with over 30 stakeholders to gain their input and feedback on the ASWS operating principles. These have included:
 - the Department of Social Services,
 - the Department of Infrastructure, Transport, Regional Development and Communications, Digital Transformation Agency, (including ACMA)
 - National Sporting Organisations
 - Domestic Wagering Service Providers, and
 - state and territory governments.
- Ongoing stakeholder consultation and input has allowed us to establish clearer and more supported ASWS operating principles. The ASWS operating principles were tested as part of the Impact Analysis process.

ASWS Operating Principles

- Throughout 2021, we conducted a series of direct engagements with over 30 key stakeholders to inform the strategy paper and the ASWS operating principles. These discussions enabled the development of a refined set of proposed operating principles as outlined in the ASWS Strategy and Operating Principles Paper.

Online In-play Wagering Research

- **s 47C** [REDACTED].
- Online in-play wagering prohibitions are part of the *Interactive Gambling Act 2001* and policy responsibility sits with the Minister for Communications.
- We have partnered with the Commonwealth Department of Social Services to commission research into online in-play wagering to ensure an appropriate focus on harm minimisation measures is prioritised.
- The research will explore the economic impact, consumer behaviour trends and sport integrity benefits of current and potential regulation of online in-play wagering within Australia.

Sports Data Research

- We commissioned research into the *Distribution of Australian sports data into foreign jurisdictions* in partnership with Gambling Research Australia (GRA) who engaged KPMG to undertake the study.
- The report was published on 23 January 2023.
- Threats remain to the integrity of Australian sport resulting from the continuing collection and dissemination of sports event data for use by offshore wagering providers.
- The availability of Australian sports data in foreign jurisdictions is unanimously considered by stakeholders to be a necessary enabler for offshore wagering service providers to offer markets on Australian sport; however, it is acknowledged that it is only one contributing factor.
- Offshore wagering service providers are unlicensed by Australian regulators and are therefore not subject to the range of integrity-related obligations and associated measures aimed to prevent, investigate and assist in the prosecution of the manipulation of Australian sporting competitions.
- The presence of offshore wagering service providers who offered wagering products, such as online in-play betting, motivated Australian consumers to engage with these products normally prohibited in Australia and with limited consumer protections.
- Some estimates and analyses are available in relation to market size and potential foregone domestic taxation revenues lost due to the availability of markets from offshore wagering service providers. However, there is no definitive source of truth of data and estimates vary greatly.
- While there is substantive coverage through legislation and regulation regarding broader sports wagering related activities, there is limited legislative and regulatory coverage of the sports data elements of the sport wagering environment.

Courtsiding v Data Scouting

- Courtsiding is the practice of the instant, covert transmission of information about developments in a sports event to obtain an advantage over wagering service providers. Essentially, it allows a gambler to take advantage of the longer time it takes for that same information to get to gambling operators by placing a bet on an outcome during a contest, with additional information (either a win or some intermediate event).
- While both courtsiding and data scouting involve the capture and dissemination of sports data, the primary difference is its use. While *courtsiding* is to collect and disseminate data for gamblers to get an advantage over gambling operators, *data-scouting* is the collection of sports data (event and/or performance data), such as live scores or statistics, to disseminate to gambling operators to assist them to offer betting options.
- There is no integrity risk to the sporting competition the courtsider is at – the courtsiders are not manipulating the event. Courtsiding can corrupt betting markets by the unfair advantage it creates.
- Data-scouting presents a threat to the integrity of sports given it facilitates the creation of unregulated betting markets, particularly at lower levels or for non-traditional betting sports. These unregulated operators and markets allow for almost no visibility or cooperation with sports and law enforcement agencies. The creation of betting markets, together with other factors such as vulnerable participants, then provides opportunity for those looking to exploit betting markets through corrupting sport.
- Courtsiding and data-scouting are not illegal in Australia. They are, however, usually in breach of event ticketing or entry conditions and, if detected by venue staff, courtsiders/data scouts can be removed from the venue and likely receive long bans preventing them from re-entering the venue. This is not an unusual occurrence in Australia, with reports of courtsiders and data-scouts being at most major sports in Australia over the last few years.

Lead author:	s 22	
Cleared by:	Darren Mullaly	Date cleared: 3 May 2023
Publish to intranet?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (if no, please complete the justification below)	
Justification not to publish:		
Revision cleared by:		
Date of revision:		

Talking points - for meeting with Health Secretary 26 May 2023

- Sport Integrity Australia prepared an Australian Sports Wagering Scheme (ASWS) new policy proposal (NPP) for consideration at budget this year.
- **s 47C** [REDACTED]
- **s 34(3)** [REDACTED]
- Sport Integrity Australia will use the next 9-12 months to further engage with stakeholders on the ASWS operating model and refine the NPP accordingly.
- Sport Integrity Australia's finance and sports wagering and competition manipulation teams are meeting with Health's Budget branch on 1 June 2023, to discuss NPP processes and ways of working together more effectively.
- **s 47C** [REDACTED]
- Sport Integrity Australia is preparing the Cabinet Submission and has been liaising with the Health Cabinet team and Prime Minister & Cabinet to clarify which Cabinet meeting the proposal will be on the agenda.
- **s 47C** [REDACTED]
- In the interim, the team is focused on policy development, capability building with sports and stakeholder engagement.

Timeline of the development of the ASWS, Macolin and Offences

January 2020

- **s 42** [Redacted]

January 2020 – January 2022

- **s 47C** [Redacted]

February 2020

- **s 42** [Redacted]
- **s 47C** [Redacted]

June 2020 - January 2021

- **s 42** [Redacted]

November 2020

- Release of ASWS Discussion Paper

April 2021

- 5 of 8 jurisdictions responded to request for further information.

August 2021

- Release of ASWS Strategy and Operating Principles Paper.

September 2021

- AGS advice on Constitutional support for the ASWS

March 2022

- 8 of 8 jurisdictions have responded to request for further information.

June 2022

- Meeting with Attorney-General to confirm the ratification process.
- AGS advice on ASWS target entities

January/February 2023

- **s 47C** [Redacted]

20 February 2023

- s 47C [REDACTED]

1 April 2023

- s 47C [REDACTED]

April/May 2023

- Sport Integrity Australia is liaising with colleagues in Health Cabinet branch, Prime Minister and Cabinet to secure date and agenda for Cabinet meeting at which the proposal will be tabled.
- Sport Integrity Australia is preparing the Cabinet Submission and will provide relevant briefings to officers at affected agencies to prepare their own ministerial briefs.
- s 47C [REDACTED]
- Sport Integrity Australia has been liaising with officers of affected agencies to ensure they are aware of next steps and to provide relevant information to inform briefing materials for their respective Minister.



Australian Government
Sport Integrity Australia

Information Brief
MB22-003730
Version (1)

Date sent to MO: [Click or tap to enter a date.](#)

To: Minister Wells

Subject: UPDATE ON THE RATIFICATION OF THE MACOLIN CONVENTION AND ESTABLISHMENT OF NATIONAL SPORT INTEGRITY OFFENCES

Comments:			
Contact Officer:	s 22	<i>Acting Director, Sports Wagering & Competition Manipulation, Strategy & International Engagement</i>	Mobile: s 22
Clearance Officer:	<i>Darren Mullaly</i>	<i>Deputy CEO, Strategy & International Engagement</i>	Mobile: s 22

Key Issues:

1. Cross-government work is ongoing to ratify the Council of Europe Convention on the Manipulation of Sports Competitions (the Macolin Convention) and to draft amendments to the Criminal Code to create offences relating to sport integrity breaches.
2. The ratification of the Macolin Convention and the establishment of Commonwealth match-fixing offences (now known as National Sport Integrity Offences) are 2 of the key recommendations of the Review of Australia's Sport Integrity Arrangements (Wood Review).
3. Sport Integrity Australia is the sponsor agency for these measures and has been leading the development of them since its establishment in 2020.
4. Existing policy authority for the ratification of the Macolin Convention and the establishment of National Sport Integrity Offences has lapsed with the change of government.
5. Sport Integrity Australia will seek guidance from the Department of Prime Minister and Cabinet about the need and process for renewing policy authority for the ratification of the Macolin Convention and the establishment of National Sport Integrity Offences.
6. Sport Integrity Australia will draft correspondence from you to relevant affected Ministers, including the Prime Minister, the Attorney General and Minister for Home Affairs, informing them of the scope of the initiatives and the impacts of these initiatives on their Ministerial and portfolio responsibilities.

Background:

Macolin Convention

The Macolin Convention is a multilateral, international treaty, which aims to prevent, detect and sanction national or transnational manipulation of sports competitions; and to promote national and international cooperation.

Australia became a signatory to the Macolin Convention on 1 February 2019 and is one of 41 signatories. The Macolin Convention has been ratified by Norway, Portugal, Ukraine, Moldova, Switzerland, Italy and Greece and entered into force on 1 September 2019.

Sport Integrity Australia is working with relevant Commonwealth agencies responsible for treaty ratification, including the Office of International Law, within the Attorney-General's Department and the Treaties Section of the Department of Foreign Affairs and Trade, to progress ratification of the Macolin Convention. **Attachment A** outlines progress to date and proposed next steps.

Australia is seen as an international leader in addressing the threats and risks of competition manipulation and related betting corruption and is represented on the Bureau of the Group of Copenhagen which supports the follow up committee overseeing the implementation of the Macolin Convention. Ratification of the Macolin Convention is important in maintaining this global leadership role.

National Sport Integrity Offences

The Wood Review identified the lack of a harmonised, consistent national approach to match-fixing offences, and the absence of Commonwealth criminal legislation, may inhibit the investigation and prosecution of offences, particularly in circumstances where such offences tend to be cross- or multi-jurisdictional and transnational in nature.

The Wood Review recommended the Australian Government establish Commonwealth match-fixing offences (now known as National Sport Integrity Offences) to complement those already introduced by some states and territories.

The development of the offences has been guided by ongoing close collaboration with the Commonwealth Attorney-General's Department, Australian Government Solicitor and Office of Parliamentary Counsel.

The previous Attorney-General and Minister for Home Affairs (as Ministers responsible for administering the Criminal Code) provided written support for the inclusion of match-fixing offences in the Criminal Code.

It is the intention of Sport Integrity Australia to seek endorsement from the current Attorney-General and Minister for Home Affairs to continue with the inclusion of the National Sport Integrity Offences within the criminal code.

The proposed National Sport Integrity Offences are summarised in **Attachment B**, s [REDACTED] 47C

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

- s 47C [REDACTED]
- [REDACTED]

Attachments:

- A. Macolin Convention progress to date and proposed next steps
- B. s 47C [REDACTED]

Minister	Minister Wells
PDR Number	MB22-003730
Subject	UPDATE ON ESTABLISHMENT OF NATIONAL SPORT INTEGRITY OFFENCES AND THE RATIFICATION OF THE MACOLIN CONVENTION
Contact Officer	s 22 s 22
Clearance Officer	Darren Mullaly s 22
Division/Branch	Sports Wagering and Competition Manipulation, Strategy and International Engagement Sport Integrity Australia

Adviser/DLO comments:	Returned to Dept for: REDRAFT <input type="checkbox"/> NFA <input type="checkbox"/>
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Please complete	
Quality Assurance Check (completed by line area)	s 22 Mob: s 22

Attachment A – Macolin Convention ratification progress to date and proposed next steps

Milestones

February 2019

- Australia signed the Macolin Convention.

April 2019

- Office of International Law (OIL) provided an analysis of Australia’s ability to comply with the obligations of the Convention. More information required on sports wagering regulation.

June 2019

- **s 47C** [REDACTED]

January 2020

- **s 42** [REDACTED]

February 2020

- **s 42** [REDACTED]
- **s 47C** [REDACTED]

June 2020 - January 2021

- **s 42** [REDACTED]

April 2021

- **s 42** [REDACTED]

March 2022

- **s 42** [REDACTED]

April-May 2022

- Sport Integrity Australia analysis of jurisdictional responses.

June 2022

- Meeting with OIL to recommence ratification process.

Next Steps

- OIL to review jurisdictional responses to OIL and **s 42** [REDACTED]
- Sport Integrity Australia to draft National Interest Analysis (NIA).
- OIL to review and clear NIA.
- Department of Foreign Affairs and Trade (DFAT) to review NIA and prepare MinSub for Foreign Minister.
- DFAT to submit tabling documents for Foreign Minister’s agreement.
- Sport Integrity Australia to provide copies of all tabling documents to DFAT and DFAT to arrange tabling
- Joint Standing Committee on Treaties (JSCOT) consideration of the Macolin Convention.
- Sport Integrity Australia to appear at JSCOT hearing – DFAT to provide pre-briefing to Sport Integrity Australia witnesses.
- Sport Integrity Australia to submit Government Response (if JSCOT doesn’t simply recommend binding treaty action be taken).
- Minister Wells to write to Foreign Minister, Attorney-General and other ministers seeking agreement to submit to the Executive Council (ExCo) for approval to deposit instrument of ratification.
 - Minister Wells to also write to PM informing of proposed treaty action.

- Sport Integrity Australia to draft Explanatory Memorandum (EM) and provide to DFAT to review
- DFAT to review EM and prepare ExCo minute.
- DFAT to send draft ExCo documents to ExCo Secretariat to review.
DFAT to submit ExCo documents to Foreign Minister for agreement.



Australian Government
Sport Integrity Australia

Ministerial Submission – Standard
MS22-001780
Version (1)

Date sent to MO: Click or tap to enter a date.



To: Minister Wells
cc: Minister Butler

Subject: Progression of the Australian Sports Wagering Scheme, ratification of the Macolin Convention and establishment of National Sport Integrity Offences.

Critical date: N/A

Recommendation/s:

1. Agree that Sport Integrity Australia pursue policy authority from the Prime Minister for the ratification of the Macolin Convention and the establishment of National Sport Integrity Offences.

1. Agreed/Not agreed/Please discuss

2. s 47C
[Redacted]

3. s 34(3)
[Redacted]

4. Agree to the re-establishment of ASWS Advisory Groups.

4. Agree/Not Agreed/Please discuss

Signature 

Date: 20/2/23

Media Release required? YES/ NO

Comments:

Contact Officer:	§ 22	<i>Acting Director, Sports Wagering and Competition Manipulation, Strategy and International Engagement</i>	Mobile: § 22
Clearance Officer:	<i>Darren Mullaly</i>	<i>Deputy CEO, Strategy and International Engagement</i>	Mobile: § 22

Issues:

1. The establishment of the Australian Sports Wagering Scheme (ASWS), ratification of the Macolin Convention and the establishment of National Sport Integrity Offences (Offences) are three key recommendations of the Review of Australia’s Sport Integrity Arrangements (the Wood Review).
2. This suite of measures will position Australia at the forefront of combatting competition manipulation and betting related corruption in sport.
3. § 47C
4. Sport Integrity Australia is the sponsor agency for these measures and has been leading the development of them since its establishment in 2020.
5. § 34(3)
6. Policy authority for the ratification of the Macolin Convention and the establishment of the National Sport Integrity Offences requires approval from the Prime Minister.
7. § 42
8. Re-establishment of Advisory Groups is critical in the success of the ASWS, particularly in relation to the design and development of the data and information sharing ecosystem.

Background:

Australian Sports Wagering Scheme

The intent of the ASWS is to streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth, State and Territory jurisdictions and to ensure sports wagering occurs within a regulatory framework to effectively protect the integrity of sport and ensuring Australian sporting competitions are more resistant to evolving manipulation threats.

The key elements of the ASWS are:

- elevating from NSW and Victorian regulators to Sport Integrity Australia the accreditation of sports as Sports Controlling Bodies and therefore oversight of their contractual arrangements with wagering service providers
- Sport Integrity Australia to facilitate a national forum with all relevant stakeholders to pursue an agreed national schedule of sports contingencies
- Sport Integrity Australia to establish a sports wagering data and information sharing ecosystem consolidating all sports betting related data and information to provide a complete and holistic view of the sector.

Sport Integrity Australia has engaged in significant consultation with stakeholders to develop the ASWS operating principles. Sport Integrity Australia has released a series of consultation papers including the ASWS Strategy and Operating Principles paper (**Attachment A**), and a Regulatory Impact Statement (**Attachment B**), which have been informed by, and shared with the advisory group members and other stakeholders. Sport Integrity Australia is seeking your approval to re-establish these advisory groups immediately and recommence the engagement and consultation process for the ASWS.

§ 42

§ 34(3)

Macolin Convention

The Macolin Convention is a multilateral, international treaty, which aims to prevent, detect and sanction national or transnational manipulation of sports competitions; and to promote national and international cooperation.

Australia is seen as an international leader in addressing the threats and risks of competition manipulation and related betting corruption. As a result, Australia is a member of the Bureau of the Group of Copenhagen which supports the implementation of the Macolin Convention and has fostered relationships with the international community responding to the competition manipulation threat. § 47C

Australia became a signatory to the Macolin Convention on 1 February 2019 and has been working towards ratification since then. § 42

§ 47C

. Attachment D outlines the proposed next steps in the ratification process.

National Sport Integrity Offences

The Wood Review identified the lack of a harmonised, consistent national approach to match-fixing offences, and the absence of Commonwealth criminal legislation, may inhibit the investigation and prosecution of offences, particularly in circumstances where such offences tend to be cross- or multi-jurisdictional and transnational in nature. § 47C

§ 47C

Attachment C1 outlines the proposed Offences and associated penalties.

§ 47C

§ 47C

The development of the Offences has been guided by ongoing and close collaboration with the Commonwealth Attorney-General's Department, Australian Government Solicitor and Office of Parliamentary Counsel.

§ 47C

§ 47C

§ 47C

§ 47C

Attachments:

A. ASWS Strategy and Operating Principles paper

B. § 34(1)(a)

C. § 47C

§ 47C

§ 47C

D. Macolin Convention ratification milestones and next steps

Sensitivities:

§ 47C

§ 47C

§ 47C

Law enforcement agencies will retain their role in the investigations and prosecutions of persons under the new Offences. Sport Integrity Australia will play a coordination role and facilitate information sharing with relevant agencies.

Consultations:

§ 47C

§ 34(3)

Throughout the development of the ASWS, Sport Integrity Australia has met with over 30 stakeholders seeking their input and feedback on the ASWS operating principles.



Australian Sports Wagering Scheme

Strategy Paper and Operating Principles

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Executive Summary

The development and implementation of the Australian Sports Wagering Scheme (ASWS) is a key pillar of the Government Response to the Review of Australia's Sport Integrity Arrangements (the Wood Review). The intent of the ASWS is to streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth, State and Territory jurisdictions and to ensure sports wagering occurs within a regulatory framework protecting the integrity of sport and ensuring Australian sporting competitions are more resistant to evolving manipulation threats.

Sport Integrity Australia has conducted a series of direct engagements with over thirty key stakeholders to inform the strategy paper and the ASWS operating principles.

The ASWS Operating Principles outlined in this Strategy Paper cover four key areas:

- Approval of Entities
- Product Fee and Integrity Agreements (PFIAs)
- Contingencies
- Information and Data Sharing Ecosystem

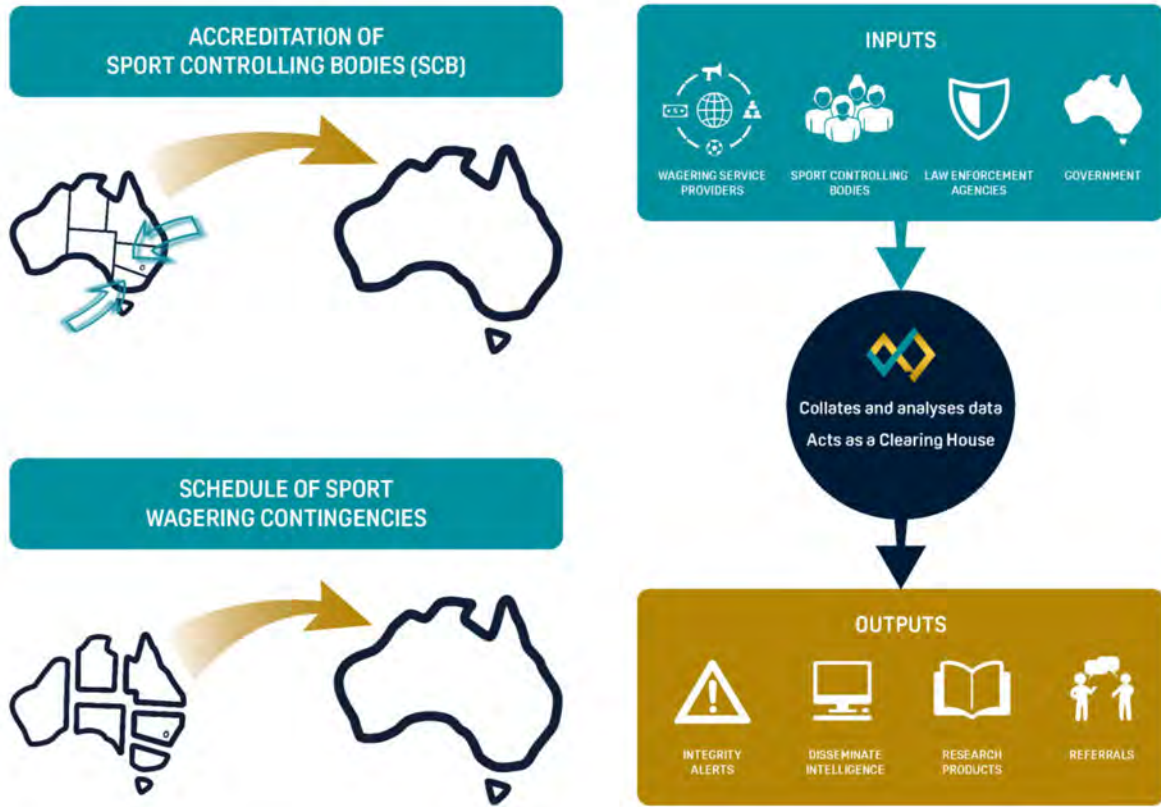
In addition, this Strategy Paper addresses:

- The case for change
- Sport Integrity Australia's value proposition
- Allied issues
- Next steps

ASWS Operating Principles

The following graphics reflect the ASWS Operating Principles, primarily that:

- Accreditation of Sports Controlling Body (SCB) status and oversight of the PFIA's are elevated to Sport Integrity Australia to regulate.
- Sport Integrity Australia facilitate a national forum with all relevant stakeholders to provide sport integrity input into an agreed national schedule of sports contingencies.
- Sport Integrity Australia establish a sports wagering data and information sharing ecosystem.



Background

Sport integrity is important to the Australian community. It contributes to the collective identity of the Australian nation which places significant cultural value on fairness in conjunction with its sporting abilities, particularly on the international stage. The Australian Government takes this responsibility in maintaining sport integrity seriously and intends to ensure that sport enjoys public confidence and stable economic growth in terms of both participation and employment.

It was on this premise that the Australian Government commissioned the Review of Australia's Sport integrity Arrangements¹ (Wood Review). At that time, as it still is today, the sport/wagering relationship was regulated at the State and Territory jurisdictional level. One of the areas that the Wood Review was asked to examine was whether the Commonwealth Government, through its institutions, could 'add value' to this relationship, given that sports and wagering had professionalised to include entities with both national and international reach.

The Wood Review published in 2018 made 52 recommendations as to how to improve the integrity of sport and sports wagering in Australia. The Wood Review and the subsequent Government Response acknowledged the need to further examine the proposed Australian Sports Wagering Scheme (ASWS) reforms and work with stakeholders to develop the ASWS operating principles and subsequent implementation strategy. With regard to the sports/wagering nexus, the Wood Review determined that the Commonwealth Government could add value through contributing a range of capabilities including regulatory capacities, that sought to enhance clarity, consistency, and transparency. The Wood Review found that a focus on achieving these elements would benefit all aspects of the relationship, and accordingly recommended that Sport Integrity Australia establish the ASWS.

As part of its initial stakeholder consultation process, the Commonwealth Department of Health, through its National Integrity of Sport Unit, developed and released the Australian Sports Wagering Scheme Discussion Paper² for stakeholder comment in May 2020. This Strategy Paper is an evolution of the Discussion Paper and is intended to narrow the proposed regulatory reform options into the ASWS Operating Principles.

Sport Integrity Australia received valuable written feedback from stakeholders regarding the issues raised and the range of regulatory reform options. The principal themes captured in the feedback was that the Commonwealth could add value to the integrity elements of the sports wagering industry, but that any involvement should not automatically impose a financial cost or be at the expense of these elements of the environment that were considered to be operating adequately. To this end the feedback suggested any reform should be as light-touch as possible to avoid undue regulatory burden.

¹ https://consultations.health.gov.au/population-health-and-sport-division/review-of-australias-sports-integrity-arrangements/supporting_documents/HEALTH%20ASIA%20Report_Acc.pdf

² <https://consultations.health.gov.au/national-integrity-of-sport-unit/australian-sports-wagering-scheme-discussion-paper/>

The Case for Change

The case for change centres on a single point: sports wagering has changed significantly in recent years while the regulatory framework has stayed largely the same. Sports wagering has seen an explosion in number of contingencies offered by wagering providers and increase in total value wagered on sporting events. By means of illustration, in 2000-01 Australian sports betting turnover was \$46.92 per capita, this increased to \$567.32 per capita in 2018-19.³ There has also been a blurring of the boundaries of sports wagering with wagering on esports and the gamification of sports wagering through products such as Fantasy Sports. The result of these changes is that the complexity of the sports wagering environment has increased in recent years and with it there is a greater need to proactively manage sport integrity risks.

The issues with the current regulatory approach

At present sports wagering is regulated by the states and territories. This current framework leads to the following issues and risks:

Inconsistencies in regulatory requirements – the regulatory requirements for sports wagering differ between the state and territory regulators. These inconsistencies can be difficult for wagering providers and sports controllers to navigate. Moreover, it is possible that inconsistencies result in some instances where sport integrity risks differ depending on which state or territory a sporting event takes place and also which state or territory a bet is placed.

For example, states and territories have differing approaches to contingencies that can be offered by wagering providers. In South Australia there is a list of approved betting contingencies by sport. In contrast in the Northern Territory Wagering providers can offer any contingencies on approved sports subject to the game or fixture not being restricted to persons under the age of 18 years. Given that the regulation of contingencies is based on where a bet is placed, hypothetically there could be a sport integrity incident on a sporting event held in South Australia for a contingency which is not permitted in South Australia. While it is acknowledged that differences in contingencies tend to be at the margins, the increased complexity and blurring of boundaries of sports wagering make these inconsistencies more pertinent.

Limitations to integrity risk identification – as previously stated, the complexity of sports wagering has increased in recent years. This increased complexity increases the need for a coordinated, national approach to identifying and managing sport integrity risks. While there is no doubt that wagering providers are incentivised to identify and raise any sports wagering integrity incidents on their markets, this a reactive approach which can identify the point at which someone has attempted to manipulate a market. The ideal way to monitor and identify sport integrity risks would be a proactive, multi-faceted national approach which brings together insights and data from sports controllers, wagering providers, Australian law enforcement and partner organisations overseas. This is a gap in the current regulatory framework.

Funding of integrity – a key funding mechanism for managing sport integrity risks is through PFIA's. These agreements are requirements of New South Wales and Victoria's regulatory frameworks. A PFIA enables the sports controller to charge a product fee based on wagering on their sport. However, while New South Wales legislation states that products fees raised by sports controllers must be used for sport integrity

³ Queensland Government Statistician's Office (2021), Australian Gambling Statistics, product table 2018-19

measures, they do not specify what these measures may be⁴. Victorian legislation does not state how the product fee should be used. While there is no evidence that PFIA funds are being misused, given the growth in sports wagering in Australia it would appear desirable to have a clear framework around how PFIA funds should be prioritised noting the differences in threats and capability of sports.⁵

Risk of sport integrity incidents are ultimately borne by the sports – while sport integrity is an issue which concerns wagering providers and government, the reputational risk is ultimately borne by sports controllers. A key funding mechanism for sport integrity is the PFIA. This fee is remitted to sports controller based on the amount wagered on that sport. While the level of sport integrity risk is likely to be correlated to the amount wagered on that sport, there is a base level of preventative education and monitoring that a sport controller should undertake. The current funding regime may mean that sports with either low or no revenues from PFIAs struggle, or are unable, to adequately fund this minimum level of integrity prevention.

It is important to note that there is no evidence to suggest a significant number of Australian sporting events are subject to widespread manipulation but rather the risks of this occurring have changed in recent years. Given that regulatory frameworks have not changed in line with the sports wagering sector, a regulatory refresh seems logical. The nature of the problem has been considered in the development of the ASWS operating principles.

The opportunity

When the current regulatory frameworks were established by the states and territories there was no single national body with a remit for sport integrity. This is no longer the case. Sport Integrity Australia was established in 2020 combining the functions of the Australian Sports Anti-Doping Authority, the National Integrity of Sport Unit and the nationally focused integrity functions of Sport Australia. Sport Integrity Australia is ideally positioned to coordinate and proactively manage sport integrity efforts across sports controllers, wagering providers and state and territory regulators.

⁴ [Betting and Racing Act 1998 No 114 - NSW Legislation](#)

⁵ [Gambling Regulation Act 2003 \(legislation.vic.gov.au\)](#)

Sport Integrity Australia's Value Proposition

Sport Integrity Australia will use its unique capabilities to provide significant support to all industry areas, creating a stronger integrity environment nationally and internationally. This support will be tailored to meet the needs of sports ensure that smaller participants and sport at the sub-elite level are better protected as they develop and deal with integrity risks.

Sport Integrity Australia, through the introduction of the ASWS can provide specific value in the following areas:

National consistency

Providing a single national system for SCB accreditation provides clarity, consistency and transparency for sports in Australia. A single set of accreditation standards will enable consistent levels of integrity protection in a landscape that at present, provides accreditation in only two states with the consequent potential for inconsistency of approach.

Sport Integrity Australia is also well placed to provide bespoke support to smaller sports organisations seeking to improve their standards to achieve SCB accreditation. In the provision of support under this scheme, Sport Integrity Australia will be able to guide sports with high level advice on sports wagering matters they might otherwise be unable to access whether they are an SCB or not.

Criminal intelligence

The threats to sport integrity from organised crime and other criminal entities are significant. The continued presence of illegal, grey market, alongside offshore wagering and the growth of money laundering through wagering create a high-risk environment for corruption.

The Australian Criminal Intelligence Commission's (ACIC) Sports Betting Integrity Unit (SBIU) has established powers and expertise in coordinating relevant intelligence relating to criminal threats in partnership with Sport Integrity Australia. Under the ASWS model, Sport Integrity Australia will leverage national and international relationships to ensure it receives up to date intelligence on individuals and organisations that present a threat to sport integrity. Through the ASWS, Sport Integrity Australia will also have the ability to assess that risk and provide intelligence products to regulators, SCBs and WSPs on a regular basis.

Australia will have through Sport Integrity Australia and the ASWS, an enhanced cohesive national approach to sports wagering intelligence. This capability is important in supporting Australia's international standing and cooperation in initiatives that form part of the national commitments to treaty obligations. These include obligations and commitments under the United Nations Convention Against Corruption, the G20 Anti-Corruption Working Group, United Nations Office on Drugs and Crime (UNODC) and the ongoing work to enable ratification of the Council of Europe's Convention Against the Manipulation of Sports Competitions⁶ (Macolin Convention).

Research Products

Achieving best practice in sport integrity is not possible without robust research being regularly conducted into various integrity risks. Consideration of their impacts on sports and wagering is also critical. This is of value to smaller and emerging participants who do not have resources to direct to these issues. Sport Integrity Australia has already commenced work on several research projects as part of the ASWS. The

⁶ <https://www.coe.int/en/web/sport/t-mc>

research products are intended to support policy development. This will assist in ensuring that Australia is at the international forefront of sport integrity management whilst responding to national priorities.

Consumer Protection

Sport Integrity Australia recognises that jurisdictions are best placed to provide input and approve contingencies from a consumer protection perspective. However, the threat to the 'at risk' consumer is not restricted to one jurisdiction, and is best understood when considered comprehensively, at a national level. This is particularly true when considering contingencies which differ considerably between jurisdictions.

Sport Integrity Australia can provide a significant value add, by applying a sport integrity focus for consideration when approving sports wagering contingencies. Sport Integrity Australia is also well placed to contribute to the range of gambling harm and consumer protection risks research with partner agencies and stakeholder groups.

Support to smaller industry participants

The recent international match-fixing trend towards sub-elite and emerging sports has illuminated the domestic risk faced by these sports in Australia. The principles describe the current unevenness of support available to emerging sports, and smaller wagering providers, to identify and deal with competition manipulation threats when compared to their better resourced colleagues and competitors. A nationally consistent approach to standard setting and purposefully developed expertise dedicated to supporting this component of the industry is essential to levelling this playing field.

Sport Integrity Australia is well placed to support sports with a less mature sports wagering capacity and capability by addressing gaps in their knowledge on the impacts of wagering on their sports and the attendant risks as they improve their integrity systems, which may include national accreditation.

Education

Sport Integrity Australia as the administrator of the ASWS will have an obligation to provide ongoing education to all stakeholders on emergent themes in sports wagering related integrity threats. A nationally consistent approach to education that provides more clarity in education materials and a focus on constant improvement is a key strategic focus for overall Sport Integrity Australia education strategy development.

The ASWS Operating Principles

In developing the ASWS, Sport Integrity Australia has sought to ensure the principles of clarity, consistency and transparency are embedded within the operating principles. The aim is to achieve these principles by adopting the underpinning elements of:

- light touch regulation
- avoiding duplication and creating efficiencies
- demonstrating the Commonwealth value add.

Sport Integrity Australia recognises that general regulation of the wagering sector continues to rest with the states and territories through their regulatory authorities. The ASWS is not intended to adversely impact this arrangement. Rather, the intent is to focus on enhancing and complementing the ability of current regulators to discharge their legislative responsibilities, through the provision of “value added” services and functions as described in this strategy.

Sport Integrity Australia has designed operating principles that sets the framework to develop roles and responsibilities of all stakeholders and industry partners under the ASWS. They allow for Sport Integrity Australia to receive the information to fulfil its functions and provides for Sport Integrity Australia to make the necessary and timely inputs to all sectors to assist them in discharging their responsibilities. The result is intended to be greater industry resilience to sport and sports wagering integrity risks and added consumer protections which will work to benefit of all stakeholders.

The ASWS operating model is built upon four key pillars established with the Sports Betting Operating Model⁷ and which are fundamental in ensuring an effective and viable sports wagering environment, these being:

- Accreditation of Entities
- Product Fee and Integrity Agreements
- Contingencies
- Information and Data Sharing Ecosystem

Accreditation of Entities

-
- *Two states currently accredit Sport Controlling Bodies.*
 - *This is contrary to the intent of the National Policy on Match-fixing in Sport and has the potential to lead to further inconsistencies.*
 - *A single accreditation for a sport’s integrity response in relation to wagering is desirable.*
 - *Assist relevant regulators in upcoming applications and reviews in line with current legislation.*
 - *Plan for the relevant legislative changes required to Sport Integrity Australia legislation to enable effective accreditation and regulatory roles for stakeholders.*
 - *Work with current stakeholders on effective transition.*
 - *Licensing of WSPs remains with jurisdictions.*
-

⁷ <https://www1.health.gov.au/internet/main/publishing.nsf/Content/match-fixing>

The increasing commercialisation of sport, including as a result of the rapid growth of sports wagering, means the potential for serious integrity breaches (including through the involvement of serious and organised crime) in Australian sport is real and growing.

The capability and capacity of sporting organisations to identify and manage sport integrity risks is limited by the information and intelligence they can access. The organisational capacity to analyse this information and identify and respond to threats varies considerably between sports.

To protect Australian sporting organisations effectively against a range of integrity threats, a cohesive national response is needed, to ensure that all Australian sporting organisations:

- have integrity policies and procedures in place (*including* match-fixing and wagering related policies) and that these policies and procedures have been effectively implemented;
- understand the nature and extent of wagering on their sport and the associated integrity impact;
- understand and comply with reporting requirements regarding integrity incidents and suspicious activity.

The Wood Review recommended that sports wagering in Australia be subject to an Australian Sports Wagering Scheme, which would include the establishment of a national SCB accreditation process. National accreditation of SCB status is mooted as a key mechanism for ensuring effective and appropriate support for national sporting organisations to develop their sport integrity capability.

Sports Controlling Body Status

Under the ASWS operating model, Sport Integrity Australia will be responsible for accrediting sports as SCBs.

Feedback received from stakeholders, primarily SCBs has been supportive of the introduction of a single accreditation process administered by Sport Integrity Australia at the national level to provide greater clarity and reduce duplication in securing SCB accreditation and assist sports new to the wagering environment.

Sport Integrity Australia intends to develop a robust accreditation process that leverages off existing Commonwealth processes including Sport Australia's recognition and Annual Sports Performance Review. Underpinning the accreditation process will be a set of robust requirements similar to the state based legislative requirements which sports will need to meet to be approved as an SCB. To retain or secure SCB status, sporting organisations must ensure that they can demonstrate they have established and implemented the full range of relevant integrity policies and systems against legislated requirements and maintain ongoing compliance with these policies. Further SCB accreditation will be contingent on the SCB or sporting organisation's compliance and participation in the ASWS data and information sharing ecosystem. Failure to comply with these requirements may result in Sport Integrity Australia withdrawing SCB status and ability to enter into PFAs with WSPs.

The ASWS Discussion Paper floated to concept of tiering sports reflecting the maturity of SCBs in regard to their sport integrity capability and Sport Integrity Australia's intervention and/or support of these SCBs. Under the ASWS, Sport Integrity Australia's support of SCBs and other national sporting organisations will be guided by a bespoke approach including consideration of their relative maturity in dealing with sport integrity issues.

This will mean that Sport Integrity Australia will have appropriate visibility of the integrity arrangements of accredited bodies and be in the best position to support sports that do not yet have a fully matured wagering focus.

It is important to ensure continuity of SCB status through the transition from jurisdictional to Commonwealth accreditation. It is intended to 'grandfather' existing SCBs as being accredited with Sport Integrity Australia upon commencement of the ASWS, noting that review requirements will be similar. Sports wishing to become accredited SCBs, will be required to apply to Sport Integrity Australia for accreditation upon commencement of the ASWS. Regarding existing SCBs, any gaps between their current practices and the Sport Integrity Australia legislative requirements will be expected to be met over time.

Sport Integrity Australia acknowledges that establishing a national accreditation of SCBs under the ASWS will require legislative amendment at the Commonwealth and jurisdictional level. Sport Integrity Australia will work with relevant state and territory jurisdictions to determine the legislative amendments required, a timeframe for the development of new legislation and its introduction to Parliament and any transitional provisions needed to ensure a smooth transition from state and territory to Commonwealth responsibility. Sport Integrity Australia anticipates this work to commence shortly and will continue into the ASWS transition period of 2022-23. State based legislative requirements will remain in place until transitional provisions or legislative changes are passed.

One-off or major event controlling body status

Sport Integrity Australia is considering the introduction of event controlling body (ECB) status accreditation as part of the ASWS. It is recognised that major competitions, one-off events, or event-based competitions (including the Olympic Games, World Cups and esports tournaments) bring unique wagering-related integrity risks and event organisers may not have the wagering-maturity required to manage these risks.

The introduction of ECB body status would allow Sport Integrity Australia to work with event organisers to establish robust sports wagering policies and procedures within their events or competitions and support ECBs to have greater awareness of the wagering that occurs on their event or competition.

Sport Integrity Australia is mindful of various governance and commercial arrangements between SCBs and event organisers (ie Basketball Australia and the National Basketball League) and will ensure that these arrangements are carefully considered while establishing this accreditation process.

Licensing of WSPs

The Wood Review recommended that a national platform, Sport Integrity Australia, be responsible for conferring Sport Wagering Service Provider (SWSP) status on WSP and thereby enable them to offer markets on sporting competitions. This concept was considered in the ASWS Discussion Paper. Feedback provided by stakeholders was quite clear that rather than reducing administrative burden, introducing another layer of approval would add additional burden to WSPs.

To this end, Sport Integrity Australia will work with state and territory regulators to ensure that Australian WSPs offering wagering on sports have effective sport integrity policies and procedures in place (including through PFIA) to effectively address sport wagering integrity risks.

Product Fee and Integrity Agreements

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- *PFIA are contracts required by a regulator to codify the exchange of integrity information and fees between WSPs and SCBs.*
 - *As part of the accreditation of SCBs the existence and broad oversight of this agreement is important to the integrity of the model.*
 - *SCBs and WSPs are able to negotiate any suitable commercial terms.*
 - *Appropriate dispute resolution for the establishment of the PFIA between parties will be part of the legislative environment.*
-

As PFIA are enabled through SCB accreditation, it is intended that PFIA oversight will be elevated to Sport Integrity Australia as part of the ASWS.

PFIA are the mechanism through which the commercial and integrity arrangements between SCBs and WSPs are established. They deal with settings covering bet types, information exchange and commercial fees. Under the ASWS, SCBs will continue to exercise contractual control over the approval of bet types for their sport. Sport Integrity Australia recognise that SCBs will, in many cases, possess the most granular

knowledge on the integrity risks of bet types specific to their sport and it is their reputation impacted most when match-fixing and sports wagering incidents arise. Therefore, Sport Integrity Australia's interest in PFIA arrangements will be to ensure relevant sports wagering intelligence and analysis is used to inform the terms and conditions of the PFIA.

Regarding the product fee spend, current legislation is inconsistent outlining what the product fee can and should be spent on. In New South Wales legislation requires that the product fees that are paid by WSPs to SCBs are allocated toward integrity measures but does not outline what these measures may be. The Victorian legislation is silent on what the product fee should be used toward. Sport Integrity Australia will not prescribe to SCBs the amount or percentage of product fee that is to be 'spent' on integrity measures. Rather, there will be an expectation that SCBs will use their product fee to ensure they maintain or enhance their integrity capability and response commensurate with the integrity risk of the sport. As part of SCB accreditation and review, Sport Integrity Australia will require SCBs to demonstrate that this occurs.

Currently, some regulators have the legislative powers to offer dispute resolutions services between SCB's and WSPs where agreement of the PFIA cannot be reached. Sport Integrity Australia is currently considering which dispute resolution services should be elevated to Sport Integrity Australia for resolution in conjunction with the accreditation of SCB status and oversight of the PFIA's. This element of sport wagering regulation requires careful consideration and Sport Integrity Australia will work with regulators, SCBs and WSPs to determine the appropriate regulatory response, noting there may be entities better placed to resolve the commercial elements of PFIA's and other sports-wagering related disputes.

Contingencies

-
- *Contingencies are the types of events able to be wagered on in the jurisdiction of the relevant gambling regulator.*
 - *Each regulator has a process and legislative power to determine the available contingencies.*
 - *Existing fora will be part of the negotiation of sport integrity inputs into the decision-making process.*
 - *Sport Integrity Australia will facilitate a national contingencies forum with SCBs and jurisdictions and provide expertise and advice on sport integrity risks and threats associated with sports wagering.*
 - *SCBs will retain responsibility for approving contingencies on their sport with input from Sport Integrity Australia and jurisdictions*
 - *Continue working towards harmonised contingencies and an adaptable framework for approvals.*
-

The current sports wagering regulatory landscape features diversity across the jurisdictions particularly in relation to wagering markets and contingencies which, while notionally adjusted to and adequate for individual jurisdictional requirements, creates inconsistency at a national level, exposes differing risk tolerances, complicates administration of national competitions for SCBs, and lacks ongoing strategic review, intelligence and assessment to inform ongoing regulation.

The sport integrity objectives enhanced through national collaboration and coordination for the setting of authorised sports wagering contingencies would include:

- Ensuring that robust and informed sport integrity risk assessments of proposed sports betting events and contingencies are conducted in collaboration with all state and territory regulators, WSPs and sporting organisations
- Providing that assessments/authorisation decisions incorporate intelligence and information from law-enforcement and criminal intelligence agencies (particularly national/international level intelligence)
- Establishing a greater level of national transparency, simplification, consistency, reliability and certainty of outcomes and standards – including with respect to regulatory compliance and enforcement

- Enabling more effective international collaboration with foreign/international regulators, sporting organisations and wagering providers – facilitating the incorporation of additional intelligence in the determination of authorised wagering products in Australia and engagement regarding the foreign availability of markets on Australian sport.

It is envisaged that, in addition to the above, development of a nationally consistent schedule of authorised sports wagering contingencies would incorporate stringent consumer protection considerations currently applied at the state and territory level, including through an effective governance arrangement.

Feedback from stakeholders has been consistent that a national approach to scheduling contingencies would provide greater levels of consistency and if applied effectively, consumer protection across the country. This is particularly true when considering sub-elite sports, which may be significantly impacted by contingencies over which they have no control.

To this end, Sport Integrity Australia proposes to convene a national forum, whereby regulators and policy makers, SCBs and WSPs can discuss and understand contingencies and their risks from a sport integrity and consumer protection perspective. Sport Integrity Australia will seek to work collaboratively with regulators and industry to develop and assess contingencies to ensure they align with community expectations in terms of integrity risks posed and that are as resilient as possible to risks of organised crime or other corrupting influences.

It is anticipated that an outcome of this forum would establish a framework for the approval of contingencies, specifying the general type and nature of what contingencies are preferred or not, from a consumer protection, sport integrity, and public interest standpoint. From this, SCBs would be able to determine the bet types appropriate for their sport and embed these within their PFIAs.

Sport Integrity Australia views its role as ensuring that the approval or non-approval of sport wagering contingencies does not impact on sport integrity and concurrently, that it is conducive to consumer protection outcomes. Sport Integrity Australia is able to use its research products, international relationships, and intelligence capability to assess the risk of new sport contingencies while continuing to scrutinise those that already exist.

A process for assessing requests for new contingencies is proposed that may consist of an assessment of conformity with the framework before referred to SCBs for approval. It is envisaged that most requests for new contingencies will conform with the framework for SCBs to then approve or not based on their risk assessments. It is also noted that contingency requests do not simply occur on an annual basis. Rather, this is a living process that will need to be agile and responsive in real time.

This approach will also benefit smaller sports which are impacted by wagering in the absence of PFIAs. The intention would be for Sport Integrity Australia to advocate, after consultation with the sport, on their behalf in the approval process. It is suggested that Sport Integrity Australia involvement in approving contingencies in the future will be of particular importance to lower wagering volume sports or competitions at the sub-elite level that do not have the resources to properly assess the risk of contingencies.

Information and Data Sharing Ecosystem

- *PFIAs establish the information sharing thresholds and format for integrity related information between WSPs and SCB.*
- *Law enforcement intervention occurs on a case-by-case basis.*
- *Centralised suspicious activity alerts and a strategic collation, analysis and dissemination of intelligence is a reason for enhanced activity across the sector.*
- *Establish a mechanism for sharing of suspicious activity alerts in relation to sporting events*
- *Scoping the requirements across legislation, capability, international examples, and technology to enable enhanced intelligence sharing.*

- *Jurisdictions to insert compliance with ASWS information and data sharing ecosystem within licensing conditions.*
-

The sport integrity threat environment, particularly with respect to the links between organised crime and sports wagering, is evolving quickly and risks will grow as the sports wagering market continues to develop in size and sophistication.

Match-fixing and other corruption is often motivated by the opportunity for significant financial or other personal gain – and WSPs provide opportunity for large sums to be gambled on sporting events with the prospect of high returns. Accordingly, appropriate and effective regulation of sports wagering plays an integral role in protecting the integrity of sport.

A major vulnerability is the fragmented oversight and regulatory systems in place, in which responsibility for particular activities and the collection of information takes place across a variety of bodies including international, and domestic sporting organisations, international and domestic bookmakers, state/territory/federal governments, but not harnessed in any coordinated or collective manner.

To protect the integrity of Australian sport against wagering-related integrity threats, Sport Integrity Australia proposes to establish a cohesive national response to ensure that:

- All available sports wagering data and intelligence is systematically collected by relevant stakeholders and shared with a central authority for effective collation, analysis and dissemination of integrity alerts;
- Sharing of this data and intelligence becomes routine, systematic and legislation based;
- Current sports wagering regulatory processes are streamlined to provide clarity, transparency and consistency of the sports wagering regulatory regime for all authorities with regulatory responsibilities to facilitate effective compliance and enforcement mechanisms;
- Suspicious activity reporting requirements are streamlined to provide clarity to all stakeholders and ensure that the right information and intelligence is received by the right authority at the right time on every occasion.

Within Australia there have been examples of competition manipulation within numerous sports, and whilst not to the extent as has occurred overseas, there is little doubt this presents a current and emerging threat. The current response that includes sports, law enforcement agencies and the ACIC's SBIU, can be enhanced by improving collection, analysis and dissemination point for sports wagering intelligence at the national level.

The provision of information and data to Sport Integrity Australia is critical to it fulfilling its functions and providing value to regulators, SCBs and WSPs. It is recognised that Sport Integrity Australia's ability to identify risks and alert industry as required is best achieved if it receives as much relevant data as possible. It is acknowledged it will also be necessary for Sport Integrity Australia to build this capability over time. In establishing this capability, Sport Integrity Australia will seek to minimise negative impact on stakeholders. Sport Integrity Australia also intends to provide clarity through a comprehensive data privacy and use policy.

The ASWS will enable Sport Integrity Australia to collect and use data and intelligence inputs at the national and international level to create intelligence products to assist the industry. This will include contributions to the coordination of investigation activity across jurisdictions, and sports where necessary. To enable this, the Government Response to the Wood Review proposed the establishment of the Joint Intelligence and Investigations Unit (JIIU), with dedicated representatives of state and territory law-enforcement agencies, as well as relevant Commonwealth agencies including the ACIC, Australian Federal Police (AFP) and the Department of Home Affairs (DHA). The JIIU is to be responsible for: intelligence collection and analysis for a broad range of sport integrity issues; liaison with domestic and international law-enforcement agencies and criminal intelligence commissions; and referral services – to law enforcement in criminal matters, and to sporting organisations for code of conduct issues

Effective information and data sharing is essential to the successful integrity management of sports wagering in Australia. Sport Integrity Australia has an important value adding role in ensuring sports are corruption

free. It has the international reach to understand emerging risks and will further strengthen its existing intelligence relationship with other government agencies including the ACIC and the Australian Transactions and Reporting Agency (AUSTRAC). This will assist in ensuring that it provides high quality intelligence products to the industry and law enforcement to assist the conduct investigations and enforcement activity. This will be in addition to the existing integrity capabilities of SCBs with a focus of Sport Integrity Australia on the timely sharing of intelligence and /or evidence where legislatively permitted.

Sport Integrity Australia will facilitate the following primary information and data sharing functions:

The Suspicious Activity Alert System (SAAS)

Similar to models observed internationally, Sport Integrity Australia through the establishment of the SAAS, will act as a clearinghouse for suspicious activity reports. Reports from individual WSPs, SCBs, foreign National Platforms or other sources of suspicious wagering activity would be submitted to Sport Integrity Australia who then assess, and if necessary, disseminate to all WSPs and the relevant SCB (if involving a domestic competition). The aim is to provide an early alert to WSPs to ensure they can implement appropriate strategies to remove or mitigate associated risk. To achieve this, it will be necessary to scope the requirements across legislation, capability, international examples and technology to enable enhance intelligence sharing.

Transactional data analysis

To achieve the aim of best practice in data risk assessment, it is the aim of Sport Integrity Australia to achieve as close to real time data analysis as practical and efficient. This will mean that licensed WSPs will be required to provide data to Sport Integrity Australia or other systems as required by the relevant legislation and licensing regimes.

Of course, the reality is that Sport Integrity Australia, as a relatively new agency, will not be in a position under the ASWS to conduct comprehensive 'real time' analysis in the short term, rather, it will progressively achieve this position over time. This will be a key capability project for Sport Integrity Australia. Before this capability is developed, however, Sport Integrity Australia will be mindful of regulatory burden on WSPs and will risk assess what type of data it requires, who should provide it and how frequently it is required.

Eventual access to this data ensures Sport Integrity Australia can analyse information received via alerts, intelligence, or information holistically across WSPs, sport and other relevant jurisdictions – a function that is not currently undertaken. Providing that analysis back to sport and/or law enforcement will better support enforcement activity by those bodies.

Transactional data will also assist Sport Integrity Australia in the production of strategic intelligence products to inform relevant parties of emerging risks. For example, analysis of the volume of a domestic market of a certain emerging market over time may inform the relevant sport of the associated risks. Likewise, analysis of offshore markets transposed with domestic transactional data may indicate a move offshore which may initiate a regulatory or legislative response to mitigate the potential risks of that change.

It is also anticipated that the provision of data to Sport Integrity Australia will also work to strengthen consumer protection as it will assess risk from a consumer perspective against the data received.

Strategic and operational intelligence analysis

Collating and analysing information received by Sport Integrity Australia from all relevant organisations, such as SCBs, WSPs, law enforcement and government will enable Sport Integrity Australia to produce and distribute strategic and operational intelligence content.

In order to assess risk, Sport Integrity Australia will require more than simple transaction data. To provide clarity to industry participants, Sport Integrity Australia will consult with stakeholders to determine its

intelligence collection priorities and engage extensively on improving its requirements with a view to reducing burden.

Sport Integrity Australia recognises the data security laws and regulations imposed by various jurisdictions. It is intended that Sport Integrity Australia will develop consistent data use and privacy policies to provide clarity and assurance to all organisations and jurisdictions providing data. It also intends to work collaboratively with individual jurisdictions to overcome local data sharing impediments.

Allied Issues

Inclusion of racing wagering data within the ASWS

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- *Analysis of wagering activity across SCBs, racing codes and WSPs can provide useful insights, alerts and protections for all stakeholders.*
 - *This aspect will require significant policy and systems discussion to ensure robust and efficient outcomes.*
-

Sport Integrity Australia acknowledges the commonalities between sport and racing organisations and the integrity threats posed to both sectors and recognises that individuals or groups intent of corrupting sport and/or racing competition outcomes are unlikely to distinguish between wagering on sport and racing.

Access to wagering data in the racing industry is well rehearsed and may provide some synergies for the ASWS and benefits to racing integrity outcomes. Analysis of wagering activity across SCBs, racing codes and WSPs can provide useful insights, alerts and protections for all stakeholders.

Once the ASWS is established, Sport Integrity Australia will work with racing organisations to determine what operational engagement provides value-add benefits.

Online In-play wagering

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- *Online In-play wagering is prohibited except for racing events.*
 - *In-play wagering is permitted on sport only via in-premises or via direct telephone contact.*
 - *Any change to this position would require an amendment to the Interactive Gambling Act 2001.*
 - *Sport Integrity Australia is not responsible for the administration or policy development relating to the Interactive Gambling Act 2001.*
-

Globally there is high and increasing demand for online in-play wagering which is currently prohibited in Australia except for racing events and via telephone or in venue. Any change to this position would require an amendment to the Interactive Gambling Act 2001⁸.

Sport Integrity Australia, in collaboration with relevant Government stakeholders, has commissioned research which will endeavour build an evidence base to understand the nature and size of the offshore online in-play wagering markets and how these offshore markets influence the domestic wagering ecosystem within Australia. The evidence base will seek to determine the economic and consumer behaviour impacts that the current restriction on online in-play wagering in Australia is having on the domestic wagering markets and will look to model the economic and consumer behaviour trends, as well as sport integrity outcomes of legalising online in-play wagering in Australia.

⁸ <https://www.legislation.gov.au/Details/C2017A00085>

It is important to note that Sport Integrity Australia does not hold policy authority over online in-play wagering and any shift in the current legislative restrictions will be a matter for whole of Government consideration.

The Offshore Wagering Threat

-
- *Wagering activity that occurs with a provider outside of Australian regulation poses threats to WSPs, SCBs and Governments in relation to lost revenue and the integrity of sport.*
 - *Some of this activity is regulated by the Australian Communication and Media Authority through its role in enforcing the Interactive Gambling Act 2001.*
-

One of the most significant integrity threats currently facing the sports wagering industry comes from offshore, unregulated wagering operators. This represents hundreds of millions of dollars in lost stakeholder revenue and is a significant risk in terms of potential match fixing and money laundering opportunities.

Sport Integrity Australia recognises this threat and works with a range of Government agencies to address this at the national level. Sport Integrity Australia is committed to developing strategies to make Australia as hostile as possible to unregulated offshore operators. It also undertakes to communicate with all stakeholders in progressing this commitment.

Ratification of the Macolin Convention⁹ is an additional mechanism through which the ASWS formalises international partnerships and information sharing arrangements to address the offshore wagering threat. Through the establishment of the JIU within Sport Integrity Australia, the JIU will draw upon dedicated representatives from state and territory law enforcement agencies, as well as relevant Commonwealth Agencies. The Wood Review suggested that the JIU be responsible for:

- Intelligence collection and analysis for a broad range of sport integrity issues
- Liaison with domestic and international law enforcements agencies and criminal intelligence commissions
- Referral services – to law enforcement in criminal matters and to sporting organisations for code of conduct issues.

The establishment of the JIU will be subject to further consideration and consultation over the next phase of ASWS development.

Next Steps

Cost Recovery Options

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- *The Government Response sets out the expectation of all stakeholders and beneficiaries of an enhanced national response, to work toward sustainable funding models.*
 - *The Minister for Sport has approved a deferral of consideration of the ASWS until Budget 2022.*
-

There has, understandably, been considerable interest in the regulatory cost of a national scheme seeking changes to the regulation of sports wagering. Feedback at all stages of this development work has consistently identified this as a key issue. Sport Integrity Australia has been mindful of these concerns in designing this model, with a focus on making it as burden free as possible.

⁹ [The Convention on the Manipulation of Sports Competitions \(the Macolin Convention\) \(coe.int\)](#)

The true cost of the scheme can only be ascertained by government in the form of a Regulatory Impact Statement (RIS) once it is fully aware of the intended model. Sport Integrity Australia will coordinate this work with the relevant agencies to explore funding options based on the ASWS operating model.

Key Milestones and Dates



Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention)

Ratification milestones

February 2019

- Australia signed the Convention

April 2019

- Office of International Law (OIL) provided an analysis of Australia's ability to comply with the obligations of the Convention. More information required on sports betting regulation.

June 2019

- States and Territories were asked to respond to a questionnaire regarding the control of sports betting in their respective jurisdictions.

January 2020

- OIL analysed jurisdictions' responses to the sports betting questionnaire and concluded Australia may not be compliant with Macolin at this time.

February 2020

- s 42 [REDACTED]
- Commissioners of State and Territory Gambling regulators were updated on the issues regarding sports betting regulation in Australia and the requirements of the Macolin Convention.

June 2020 - January 2021

- s 42 [REDACTED]

April 2021

- 5 of 8 jurisdictions responded to request for further information.

March 2022

- 8 of 8 jurisdictions have responded to request for further information.

June 2022

- Meeting with Attorney-General to confirm the ratification process.

Next Steps

- OIL review jurisdictional responses to Macolin question to determine Australia meets ratification threshold.
- Sport Integrity Australia to draft National Interest Analysis (NIA)
 - o The NIA triggers the start of the formal treaty ratification process
- OIL to review and clear NIA
- Department of Foreign Affairs and Trade (DFAT) to review NIA and prepare MinSub for Foreign Minister
- DFAT to submit tabling documents for Foreign Minister's agreement
- Sport Integrity Australia to provide copies of all tabling documents to DFAT and DFAT to arrange tabling
- Joint Standing Committee On Treaties (JSCOT) consideration of the Macolin Convention **(20 joint sitting days / anticipated to take 4 months)**
- Sport Integrity Australia to appear at JSCOT hearing – DFAT to provide pre-briefing to Sport Integrity Australia witnesses
- Sport Integrity Australia to submit Government Response (if JSCOT doesn't simply recommend binding treaty action be taken)

- Minister Wells to write to Foreign Minister, Attorney-General and other ministers seeking agreement to submit to the Executive Council (ExCo) for approval to deposit instrument of ratification
 - o Minister to also write to PM informing of proposed treaty action
- Sport Integrity Australia to draft EM and provide to DFAT to review
- DFAT to review EM and prepare ExCo minute
- DFAT to send draft ExCo documents to ExCo Secretariat to review
- DFAT to submit ExCo documents to FM for agreement

s 22

s 22

OFFICIAL

From: s 22
Sent: Friday, July 22, 2022 1:46 PM
To: David Sharpe <David.Sharpe@sportintegrity.gov.au>
Cc: s 22 @sportintegrity.gov.au
Subject: DRAFT EMAIL & ATTACHMENTS: Chief of Staff and Advisor
Importance: High

OFFICIAL

Dear David

Please see proposed words, and reduced factsheet attachments for your consideration. This information has been reviewed by s 22

Good afternoon s 22 and s 22

Congratulations on your recent appointment with Minister Wells.

I truly appreciate the volume of work that you are currently facing in the office. I would welcome the opportunity to brief you, either individually or collectively, on sport integrity matters relevant to the Minister.

I have taken the opportunity to attach information about key issues that currently relate to matters of integrity in sport. This is to support you with information as a reference should matters arise.

- The Commonwealth Games in Birmingham
- Key issues at Sport Integrity Australia
- The Australian Sports Wagering Scheme
- Sport Integrity Australia Agency Brief

I look forward to hearing from you. My mobile number is s 47F

David



**SPORT INTEGRITY
AUSTRALIA**

David Sharpe APM OAM

Chief Executive Officer

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PROTECTING SPORT TOGETHER

FACTSHEET – AUSTRALIAN SPORTS WAGERING SCHEME (ASWS)

KEY POINTS

- The ASWS aims to streamline current sports wagering regulation to provide clarity, transparency and consistency across Commonwealth, State and Territory jurisdictions.
- Sport Integrity Australia has engaged extensively with stakeholders to develop and test various regulatory reform options and operating principles.
- In 2021 the previous government agreed to an extension of time for this important modelling to be further developed and refined with input from stakeholders.
- Based on these consultations and feedback, Sport Integrity Australia developed and released the ASWS Strategy and Operating Principles Paper in August 2021 for stakeholders and released a Regulatory Impact Statement for public consultation in November 2021.
- s 47C [REDACTED]
- s 47C [REDACTED]
- s 47C [REDACTED]

RECENT MEDIA

- The Government is aware of the issues raised by Responsible Wagering Australia (RWA) in ABC reports, it is acknowledged that the illegal offshore wagering threat is significant.
- Through ongoing stakeholder consultation, s 47C [REDACTED]
- The Government is conscious of the focus on enhanced and efficient regulation of wagering to ensure no unnecessary burden on industry. It has been critical to take time to listen to industry and conduct proper consultation so as not to rush to impose additional government regulation.
- s 47E(d) [REDACTED]
- A number of other agencies have responsibilities in combatting the illegal offshore gambling threat; including the Australian Communications and Media Authority, with powers to block offshore wagering providers from offering services to Australians and take regulatory action.



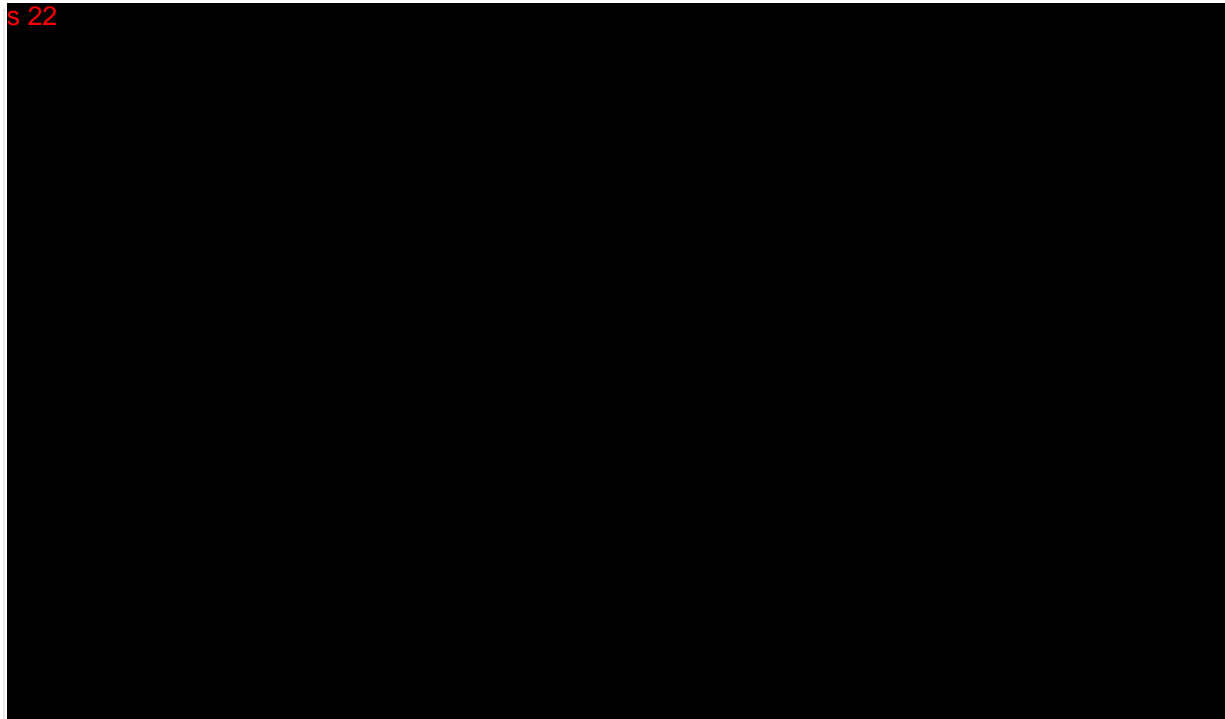
Agency brief for Incoming Minister

Sport Integrity Australia

June 2022

Contents

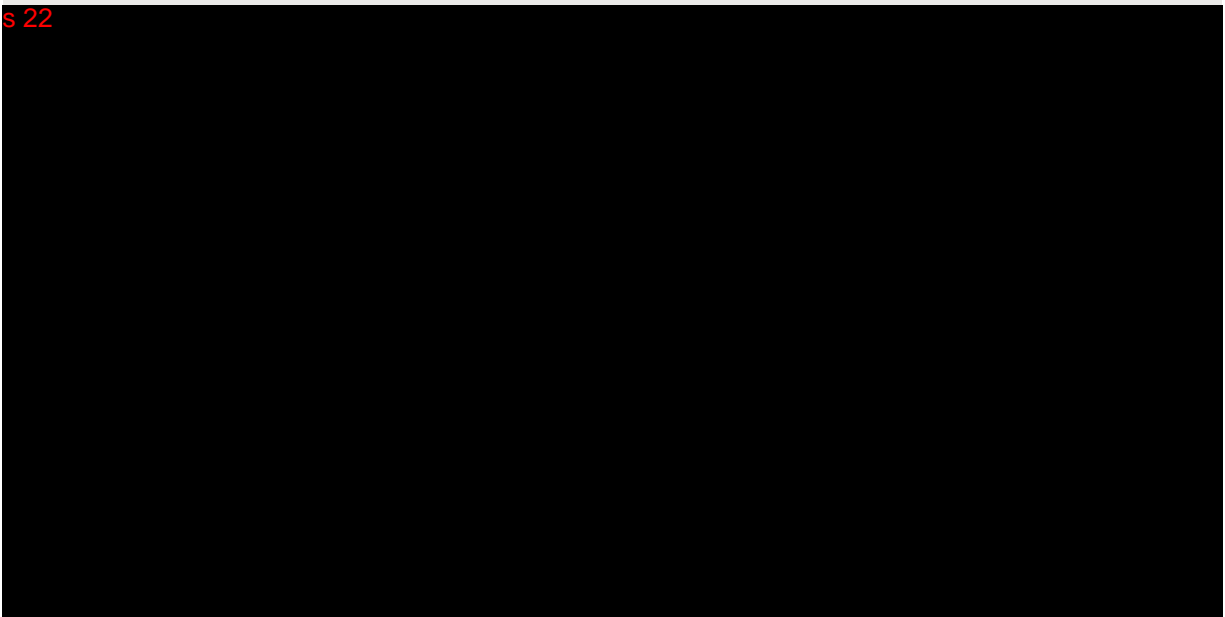
s 22



Background **7**

Australian Sports Wagering Scheme (ASWS) 7

s 22



Our Key Activities and Strategic Goals (Corporate Plan 2021-2025)

1. § 22 [Redacted]
2. § 22 [Redacted]
3. ensure Australia ratifies the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention)
4. develop and implement the Australian Sports Wagering Scheme (ASWS) for Australian Sport
5. § 22 [Redacted]
6. § 22 [Redacted]
7. § 22 [Redacted]
8. § 22 [Redacted]
9. § 22 [Redacted]
10. § 22 [Redacted]
11. § 22 [Redacted]
12. § 22 [Redacted]

6. Australian Sports Wagering Scheme (ASWS) s 47C

Sensitivities

1. s 22 [Redacted]
2. s 22 [Redacted]
3. s 47C [Redacted]
4. Stakeholder expectations are that the ASWS implementation should be prioritised to address the issues raised by the Wood Review - all stakeholders have been involved throughout the design of the ASWS operating principles and we have engaged in an extensive consultation process.
5. s 47C [Redacted]

Existing Authority comebacks

- s 47C [Redacted]
- s 47C [Redacted]

Background

The 2018 Review of Australia's Sport Integrity Arrangements (the Wood Review) addressed key domestic and international threats to the integrity of sport, and Government agreed to a 2-stage approach to implementation.

Responding to recommendation 38 of the Wood Review, the government established Sport Integrity Australia on 1 July 2020. It is a world first and has quickly established Australia as one of the leaders in improving the global response to sport integrity. Sport Integrity Australia has played a critical national coordination role since inception and has responded to emerging threats by bringing forward elements of Stage 2 of the government policy response such as Child Safeguarding and the National Integrity Framework. Additional critical functions such as Independent Complaints Handling have been taken on by the agency. These activities are now providing support to sports at all levels.

Sport Integrity Australia also operates in a global ecosystem for anti-doping and competition manipulation. The agency is responsible for representing Australia at international fora, participating in working and expert groups, and ensuring compliance with the UNESCO International Convention against Doping in Sport and the Council of Europe Anti-Doping Convention. The agency represents Australia at international fora on match-fixing, is a participant on the Group of Copenhagen and will soon have international compliance obligations under the Council of Europe Convention on the Manipulation of Sports Competitions (the Macolin Convention). These activities are mandatory to ensure Australia is compliant with our international legal obligations.

Our international relationships include the World Anti-Doping Agency (WADA) (and the management of Australia's financial contributions to the fight against doping), the Oceania Regional Anti-Doping Organisation, Europol, Interpol and other international counterpart anti-doping and integrity agencies. For a breakdown of the major international fora, we participate in, please refer to **Appendix E**.

Australian Sports Wagering Scheme (ASWS)

The ASWS aims to ensure sports wagering occurs within a regulatory framework protecting the integrity of sport and ensuring Australian sporting competitions are more resistant to evolving manipulation threats. The ASWS proposes regulatory reforms to enhance consistency, transparency and clarity across State, Territory and Commonwealth jurisdictions.

As part of their response to the Wood Review, Government agreed in principle to the ASWS recommendations. **s 47C**

If the ASWS was approved, it would become a regulatory activity as there would be an obligation on industry (Wagering Service Providers) and legislation put in place to support it.

s 47C

s 47C

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s 22

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Appendix B – Critical decisions (included in Health IGB)

FIRST 100 DAYS (until 31 August 2022)		
Critical decision	Relevant strategic brief	Contact officer
To obtain support from the Minister to bring forward Sport Integrity Australia s existing 22-23 MYEFO comeback	A ministerial brief and new policy proposal (NPP) for the implementation of an Australian Sports Wagering Scheme (ASWS) will be provided as per the required timeframes set by the Department of Health and Department of Finance.	§ 47F David Sharpe, CEO David.sharpe@sportintegrity.gov.au
To obtain support from the Minister to bring forward Sport Integrity Australia s existing § 47C	A ministerial brief and new policy proposal (NPP) for ongoing sustainable funding will be provided as per the required timeframes set by the Department of Health and Department of Finance.	§ 47F David Sharpe, CEO David.sharpe@sportintegrity.gov.au
§ 22		
§ 47F		
§ 47F		
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Appendix C – Suggested first contacts (included in Health IGB)

FIRST 100 DAYS (until 31 August 2022)				
Organisation	Name	Job title	Best immediate contact information	Key Items and points of discussion
§ 22				

