



GOVERNMENT OF MALTA

---

# Government response to the Consultation on Suspicious Betting Reporting Requirements & Other Sports Integrity Matters

05<sup>th</sup> September 2020

Ministry for Finance and Financial Services (Malta Gaming Authority)  
30, Maison Demandols, South Street, Valletta VLT 1102

This publication (excluding Logos) may be re-used free of charge in any format or medium provided that it is re-used accurately and not used in a misleading context. This material must be acknowledged as Government of Malta and the title of the publication specified.

Any queries regarding this publication should be sent at: [onlineconsultations@gov.mt](mailto:onlineconsultations@gov.mt).

Published by the Ministry for Finance and Financial Services (Malta Gaming Authority)

# Contents

## CONTENTS

Contents.....	3
<b>Executive Summary.....</b>	<b>4</b>
<b>Introduction and overview .....</b>	<b>4</b>
<b>Responses to the consultation and process used to seek stakeholder views .....</b>	<b>5</b>
<b>Summary of responses and decisions.....</b>	<b>5</b>
<b>Implementation.....</b>	<b>6</b>
<b>Contact Details .....</b>	<b>6</b>

# Executive Summary

## Introduction and overview

### 1. A brief introduction about the subject.

The term integrity has found itself to be a common appearance in the sports world, and for good reason. Sports is an essential component of everyday life in the context of health, entertainment, competition and relationship-building. Participation in sport ought to be based upon the concepts of fairness, fun, sportsmanship, deference, wellbeing, and personal and collective responsibility. To safeguard these values, the notion of integrity must be maintained, and the betting industry is obliged to play an integral part in this endeavour. In this regard, the Malta Gaming Authority intends to continue playing a role in help protecting the integrity of sport and sports betting.

In August 2019, the Authority announced the creation of its very own Sports Integrity Unit. The Unit's role consists of the gathering of intelligence and information relating to suspicious betting and serves as liaison with local and foreign regulatory authorities, law enforcement agencies, betting monitoring systems, sporting bodies and gaming operators in order to investigate irregular and suspicious betting activity. It is now the Authority's intention to bring into force the *Suspicious Betting Reporting Requirements*, which will oblige B2C licensees which offer betting on sporting events to inform the Authority of any instance of suspicious betting.

Prior to bringing into force this requirement, the Authority is taking the opportunity to reach out to its stakeholders and seek their feedback on the proposed mechanisms to take place once its licensees become obliged by law to report suspicious betting. By consolidating perspectives of fellow stakeholders, of the online gaming industry and key experts in the sports betting sector, the Authority is issuing for public consultation, criteria as set out in this paper which will support the function of the Authority's suspicious betting reporting requirements, and ensure effective and efficient regulatory processes.

### 2. The public consultation date.

Include the objective and purpose of the public consultation.

On the 27<sup>th</sup> May 2020, the MGA published a consultation paper with the objective being to gather feedback on the proposed bringing into force of the *Suspicious Betting Reporting Requirements* as noted in section 43 of the *Gaming Authorisations and Compliance Directive* (Directive 3 of 2018). Section 43 states:

- 43. (1)** B2C licensees which offer betting on sporting events shall also inform the Authority, in such circumstances and in such manner as the Authority may in any other instrument prescribe, of any instance of suspicious betting.
- 43. (2)** B2C licensees which offer betting on sporting events shall also inform the Authority of any circumstances which may lead to one or more bets being voided owing to suspicion of manipulation of the event to which they relate, and shall provide any supporting documentation which the Authority may, on a case-by-case basis, reasonably require.
- 43. (3)** This article shall not come into force on 1st August 2018, but on such date as the Authority may, by binding instrument, establish.

### 3. This consultation sought views on:

- *The bringing into force of the Suspicious Betting Reporting Requirements;*
- *Other Sports Integrity matters (e.g. Defining Suspicious and/or Irregular Activity, Request for Information, Sharing of information, Industry Performance Return, Policy, etc.)*

## Responses to the consultation and process used to seek stakeholder views

This document is the Government Response to this consultation and sets out the Government's decisions on these matters.

4. The closing date of the public consultation. Which methods were used to receive the feedback. The total amount of responses. From whom you received the feedback.

The consultation closed on the 15 July 2020. The consultation paper was available online and responses were accepted via email. In total, there were 10 responses. These were received from across the gaming industry, mostly from gaming operators in possession of an MGA licence. Responses were also received from outside the industry including local institutes, international bodies, and integrity units whose role is to prevent, detect, or investigate match-fixing.

5. Include (if any) meetings with stakeholders and list who the stakeholders were.

A number of meetings with stakeholders were also held prior to the publication of the consultation paper, including with other regulatory bodies. These stakeholders are the UK Gambling Commission (UKGC) and the International Betting Integrity Association (IBIA). These meetings have also informed our thinking and preparation pre-publication.

## Summary of responses and decisions

The following is a summary of the consultation responses received. We would like to thank all those who took the time to respond to the consultation and participate in stakeholder meetings around the consultation exercise.

6. Statistics.

- Total feedback received: 10
- Total feedback received by individuals: 0
- Total feedback received by organisations: 10
- Total feedback received through email: 10
- Total feedback received through online form: 0
- Total feedback received by post: 1 (Same feedback was received via email also)

7. Summary of feedback received.

All respondents were in no way opposed to the Authority's proposal of bringing into force the *Suspicious Betting Reporting Requirements* as noted in section 43 of the Gaming Authorisations and Compliance Directive (Directive 3 of 2018). The consultation paper also highlighted the mechanism which will be used by betting operators to submit reports of suspicious betting to the Authority, and all respondents did not sound any opposition towards this matter either.

However, most respondents did provide feedback on the other sports integrity related matters highlighted in the paper:

- 60% of respondents sounded their opinion on how they are currently handling customer disputes emanating from suspicious betting, with one respondent particularly highlighting their own mechanism in handling customer disputes and how this benefits their stakeholders.
- Whilst the majority of respondents commended the Authority for providing its stakeholders with the opportunity to provide feedback on the *Suspicious Betting Reporting Requirements* prior to enforcing them, 40% of respondents highlighted the importance of having an Authority that continuously discusses matters of sports integrity with its stakeholders, specifically with its licensees. For example, respondents recommended bi-annual roundtable discussions between the Authority and its licensees, annual gatherings between stakeholders specifically dedicated to sports integrity, and the occasional issuing of an MGA report highlighting integrity issues together with statistical data related to the suspicious betting reported to the Authority.
- 30% of respondents did query the list of proposed questions noted in the *Industry Performance Returns* section. Respondents highlighted specific questions and provided valid reasons to why it would be very difficult for them in answering them.
- Other respondents (20% or less) also provided comments on other matters highlighted within the consultation paper.

#### 8. Your assessment and the Government's decision (list the Government's decisions).

Having reviewed the feedback on the *Consultation Paper on Suspicious Betting Reporting Requirements & Other Sports Integrity Matters*, our assessment is:

- that *the Suspicious Betting Reporting Requirements* as noted in section 43 of the *Gaming Authorisations and Compliance Directive* (Directive 3 of 2018) are to enter into force.
- that a dedicated reporting mechanism is to be provided to the Authority's B2C licensees that will facilitate these requirements.
- that a feedback paper, together with an updated version of the consultation paper, is to be published by the end of September 2020 in order to communicate with the respondents (and other interested stakeholders) any comments made to the feedback provided on other sports integrity matters highlighted within the paper.

## Implementation

#### 9. When you intend to implement the decisions

We intend to bring into force the *Suspicious Betting Reporting Requirements* as noted in section 43 of the *Gaming Authorisations and Compliance Directive* (Directive 3 of 2018) by the end of December 2020, with the aim of the changes coming into force on 1 January 2021.

In the meantime, the authority also intends to publish a paper highlighting the feedback received through this consultation process, together with an updated version of the consultation paper out of which changes will reflect the feedback provided. This is to be published by the 30 September 2020.

## Contact Details

If you have any questions regarding this response, please contact: [sportsintegrity.mga@mga.org.mt](mailto:sportsintegrity.mga@mga.org.mt)