

**The Professional Players Federation of the United Kingdom
Response to the
EC Green Paper on On-line Gambling in the Internal Market**

Introduction

The Professional Players Federation (PPF) is an umbrella body for the player associations in the United Kingdom. We represent 12 member associations who in turn represent in excess of 15,000 professional athletes.

Professional sport will often be the subject to sports betting markets which has an affect upon the people who earn their living playing sport. These athletes are in a unique position and special recognition needs to be given to how sports betting directly and indirectly affects them.

The PPF is a member of EU Athletes, the European federation of player associations, and is pleased to also support its submission.

Overview

The response from the PPF will focus on sports betting issues with a particular emphasis on sports betting education for professional athletes in order to protect the integrity of sport and also sports betting markets.

Participants in matches are the only people who can fix a match. Athletes and officials are on the front-line in the fight against match fixing. It is therefore essential for the integrity of sport (and sports betting markets) that participants are properly and effectively educated about the issues and the risks. This education needs to be delivered in a player friendly manner and include advice and information on the rules; the need to report any suspicious approaches; the fact that suspicious bets are monitored and that wrong doers will be caught; and the penalties for breaking the rules.

We would strongly encourage the Commission to endorse the EU Athletes Code of Conduct on Sports Betting for Players as the model of best practice for sports betting education for athletes.

Licensing

Question 10: It is important for the integrity of sport (and sports betting markets) that there is a flow of information between the betting companies, regulator bodies and sports associations. This enables suspicious betting issues to be shared with sport as well as information on threats to the integrity of sport and sports betting markets.

This will need to operate on a European (or even world) level and so there will be benefit to European coordination though not necessarily a unified licensing system. It is vitally important that betting companies are licensed and reputable.

Problem Gambling

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The issue of problem gambling amongst professional sportsmen and women is one which requires special attention. There is anecdotal evidence from the PPF members that professional sportsmen may be subject to higher rates of problem gambling than the wider society.

The professional player associations provide education for athletes about responsible gambling. A number of the better funded associations also have in place treatment programmes for members suffering from gambling addictions including private operators, such as Performance Healthcare, and dedicated charities, such as the Sporting Chance Clinic. These are normally funded by the members themselves with little or no outside financial support.

It is widely accepted that pathological gamblers will often turn to crime to fund their gambling habit. This has the potential to create problems for sport in that an athlete with gambling problems and debts may be at higher risk to corrupting influences with regards to match fixing. For this reason it is essential that sports put in place support mechanisms for athletes with betting problems in order that treatment is freely available to minimise the risks to integrity.

For the avoidance of doubt, the PPF is firmly of the view that it would be wholly inappropriate and disproportionate to prohibit athletes from all forms of betting and gambling. The most practical way forward is to ensure that athletes are aware of the risks of problem gambling and have treatment services in place.

Prevention of Fraud

Question 30. Professional sportsmen and women in the UK are subject to sporting regulation which will cover issues surrounding match fixing and betting either specifically or through a more general “bringing the game into disrepute” clause. These are normally contained within the federations’ regulations and which are usually included within employment contracts. It must be noted that (unless they are specifically informed about an issue) there is a level of ignorance amongst some athletes about their federation’s rules, especially with regards to sports betting issues.

In general athletes are not permitted to bet on any competition that they are involved in, though some sports take a firmer view and prohibit athletes from betting their sport regardless of whether they are involved or not.

In addition, the 2005 Gambling Act created an offense of “cheating” which will cover match fixing by athletes and carries a maximum custodial sentence of two years.

It should be noted that athletes can be required to submit their telephone, computer and bank records to their sports federations where there is a suspicion of sports betting irregularities. This obviously presents some privacy issues but on the whole provided the regulations are agreed with the relevant player association (trade union) with appropriate safeguards in place then they are probably proportionate. There will be concerns when such rules are imposed upon players that have no opportunity for discussion or negotiation.

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Whilst the issue of sports betting integrity generates significant media and political interest, the PPF firmly believes that the scale of match fixing in the United Kingdom is very limited and is aware of only one proven case involving greyhound racing where a police caution was issued.

A more commonplace occurrence is athletes breaking their federation's rules on betting on their sport, mostly (but not always) due to ignorance.

Sponsorship

Question 32

It is the view of the PPF that the risk of any licensed betting operator seeking to influence the outcome of a sports event in the UK through its sponsorship with a club or association is effectively zero. The financial and reputational damage that any suspicions of such behaviour would do a company would more than outweigh any short term financial gain. The Gambling Commission would also be in a position to suspend the license of any operator found to be breaking the rules and the police would also look to get involved as laws would have been broken.

In addition sports clubs and association will carry out background checks on potential sponsors to help protect their own reputation.

The PPF is also aware of a number of corporate social responsibility programmes that the betting industry funds within sport, including education projects for athletes and even the provision of medical support. It is imperative that these projects are exempt from any restrictions on sponsorship.

Possible existence of a principle of return to event organisers.

The PPF notes with interest questions on an event organisers sports betting rights.

It has been our experience that better progress is made with betting operators when the issue of sports betting integrity and sports betting rights are treated separately.

On a legal issue, the PPF is firmly of the view that any new sports betting right cannot only exist for event organisers. It is our understanding of the law that any new betting right must be based on the individual rights of citizens and workers and that it would be highly unusual, and subject to challenge, if any right was to bypass the athletes and be assigned direct to the event organisers. We note that a number of legally enforceable collective bargaining agreements exist in sport which would be the best way to assign individual rights to event organisers.

Education, early warning systems and cooperation

Question 48

In February 2010, the PPF signed a three year agreement with the Remote Gambling Association, bet365, Ladbrokes and Betfair to provide funding for player education on sports betting issues. This pioneering project has made a real difference to

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sportsmen and women's understanding of the issues and made a significant contribution to protecting and enhancing sporting integrity whilst also helping to protect the integrity of sports betting markets.

More than 2,400 professional athletes were provided with face to face education on sports betting integrity issues in 2010. The first year's pilot projects covered a range of different areas and are being evaluated and expanded in 2011 when we will educate at least 5,500 sportsmen and women on sports betting integrity.

The four pilot projects in 2010 were as follows:

- The Professional Footballers Association researched footballers understanding on the current regulations around betting and inside information. This identified the need for targeted education and showed the most appropriate communication methods for different groups. This was followed up by tutor training courses for the PFA Executives, who are responsible for delivering support and information to players within football clubs.
- The Professional Cricketers Association has developed a web-based interactive programme on betting and corruption education in cricket. The programme includes a 'test' section which allows them to certificate participants who have completed it and to check comprehension. It was recently rolled out to all the 400 first class professional cricketers in England and has already been completed by over a quarter of them. Feedback shows that the programme has been well received and it is likely to be adapted by several other sports for use by their participants.
- The Rugby (Union) Players Association designed and developed a customised betting integrity education programme and responsible gambling policy, which they are currently using at a series of seminars covering all 12 Aviva Premiership clubs. The delivery of this programme was supported by tutor training for the player development managers.
- PFA Scotland has set up a pilot scheme with 8 clubs from various levels within Scottish professional football. Working with the Senior Management at the clubs, awareness sessions for both Professionals and Apprentices were designed and delivered covering integrity and responsible gambling.

One of the first results from the pilot project research in football was the need for the message to be regularly reinforced and that face-to-face education was the most effective way of communicating the message to players and that this should be supported by a range of materials and different mediums.

From the pilots in Football and Rugby it quickly became apparent that a large number of players (up to 60%) were not previously aware of the rules within their sport covering betting. Similarly in Scotland it became apparent that a small but significant number of players face gambling addiction problems and were in need of specialist support and advice.

The effectiveness of the pilot projects will be evaluated at the end of the three year partnership but it is already clear that players are much better informed about sports betting rules and integrity issues.

In 2011, the PPF and its partners in the betting industry signed up to the EU Athletes Code of Conduct on Sports Betting for Players. This sets out a commonly agreed set of standards for what an effective athlete education programme should include and how it should be delivered. The Code was developed in 2010 in partnership between the on-line betting industry and athlete's representatives. It is reviewed annually to ensure it remains relevant and up-to-date.

The PPF is supportive of the EU Athletes Code of Conduct and would strongly encourage the European Commission to consider officially endorsing the Code.

The PPF has worked closely with EU Athletes as it has developed and delivered its education campaign for athletes in France, Germany and Spain which is again based on best practice of concentrating on face-to-face education for players delivered by people they players trust (the player associations and ex-players).

The PPF was a member of the Parry Report to the UK Government on Sports Betting Integrity. This report from 2010 probably represents a model of best practice in sports betting issues. The PPF is also member of the UK's Sports Betting Group which arose from the Parry Report and is charged with assisting sports to adopt the recommendations of the Parry Report with regards to education, rules and enforcement.

With regards to cooperation and early warning systems the PPF is aware of a number of models of good practice. In particular we would draw attention to the early warning system operated by European Sports Security Association and also the Memorandum of Understanding, pioneered by Betfair, which a number of bookmakers have with sports.

Conclusions

On the issues of sports betting integrity and match fixing it is important to focus on the proven facts rather than allegations and media speculation. The PPF believes that the vast majority of British sport is free from organised corruption and match fixing.

Nevertheless there is no room for complacency and it is imperative that athletes are educated about the issues in a way that is tailored to their needs. Athletes are in the front-line in the fight against match fixing and must be educated about the issues. The PPF has developed a body of expertise on player education which it is happy to share with interested parties.

It is the PPF's opinion that there already exists mutually beneficial cooperation between the betting industry and sport on the issue of integrity. It is important that any EC action in this field does not undermine existing partnerships but rather adds value.

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The Commission should give consideration to providing and promoting the allocation of public funds to help protect sporting integrity through sports betting education for participants.

The EU Athletes Code of Conduct on Sports Betting for Players represents a model of good practice on sports betting education and should be recognised and endorsed by the Commission.