

GAMBLING COMMISSION

Working together to protect the Integrity of Sport

The role of the Joint Assessment Unit at the London 2012 Olympic Games

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Section 1 - Background

1. Two forms of sports betting posed potential risks to the integrity of the 2012 London Olympic Games (the Games), Olympic sports and the reputations of the International Olympic Committee (IOC) and UK Government (HMG);
 - Betting in breach of the IOC Code of Conduct for the Games; and
 - Betting related to the manipulation of the Games events as a criminal offence.
2. London 2012 was the first Games where threats from corrupt sports betting were elevated to a level of focus that doping has attracted. Whilst no specific threat was identified and many of the steps to provide effective protection were already in place in Great Britain. It was agreed however that a mechanism for the collection, collation and initial assessment of information relating to incidents of sports betting integrity specific to the Games was required. This led to the establishment of a Joint Assessment Unit (JAU). Its focus was to ensure that the UK was prepared to receive and quickly assess information related to possible corrupt sports betting activity and assist primary decision makers in determining the appropriate responses, in the run up to and during the Games.
3. The International Olympic Committee (IOC) and the Gambling Commission's Sports Betting Intelligence Unit (SBIU), with the support of other stakeholders including the Metropolitan Police (Operation Podium and the Olympics Intelligence Centre (OIC) and LOCOG were the principal actors within the JAU.

Section 2 – Overview of Operational Activity

4. The JAU was operational from Monday 16 July (day after the opening of the Athletes Village) until Monday 13 August (day after the Closing Ceremony)
5. Access to secure office space in central London was provided by the UK Anti Doping agency.
6. It was originally suggested that JAU stakeholders should meet daily during the Games, however after consultation; stakeholders agreed that this was unnecessary unless a major incident occurred. Two operational review meetings were planned during the Games with the agreement that additional meetings would be arranged as and when required. Stakeholders had continual communications capability in the interim periods.
7. The JAU logged a total of sixteen reports/actions during the operating period. These ranged from a question raised at the daily IOC press conference (about what had been put in place to deal with sports betting integrity incidents) to an accusation of an athlete breaching the IOC code of ethics by placing a bet on an Olympic sport.
8. The majority of actions were identified by the IOC, SBIU and JAU monitoring of media, identifying cases where unusual or unsporting practices had allegedly occurred. For example, controversial decisions in boxing, allegations of match fixing in badminton and volleyball, albeit not for betting related purposes; rather, it appeared that the teams involved were trying to avoid a particular draw in the next round of the competition.
9. Each report was investigated; UK and foreign betting operators and regulators were consulted in the majority of cases to determine if corresponding unusual betting activity could be seen on the regulated markets. Similarly daily phone conferences were held with

International Sports Monitoring (ISM), where market movements on Olympic sports were discussed along with specific cases where suspicions had been aroused. Background or supporting information was gathered as appropriate via open source or relevant organisations such as International Federations and National Olympic Committees.

10. Apart from one very minor alert, none of the cases dealt with were driven by unusual betting patterns. The established networks of communications with operators, regulators and law enforcement assessed each incident and could reassure stakeholders that unusual activity within sport was not related to corrupt sports betting integrity.
11. Stakeholders agreed that the processes put in place worked very well. Principal decision makers used the JAU as a coordination hub exactly as intended which ensured stakeholders were notified of issues within very short time after being identified. Actions were agreed within the early stages of each investigation and updates on progress were timely and accurate, exchanges of information were coordinated effectively via the JAU which allowed stakeholders to reach reliable conclusions on the nature of incidents relatively quickly. All incidents and associated activity were logged by the JAU, providing a robust audit trail.
12. None of the cases dealt with by the JAU was shown to involve criminal activity. The Metropolitan Police's operational team (Operation Podium) and the Olympic Intelligence Centre were continually informed of what issues the JAU were dealing with.
13. It was clear during the work to establish the JAU that police and law enforcement had responsibilities for other areas (other than corrupt sports betting) of criminal threats to and emanating from the Games (e.g. issues with unauthorised ticket sales). The pre Games planning and liaison very positively supported interaction between JAU stakeholders around these other areas during the Games; in particular, feedback suggests that the JAU engagement and scenario testing (in particular) had a positive effect upon mutual confidence and understanding of each other's roles and responsibilities.
14. No incidents were considered serious enough to involve Ministers, although officials in the relevant government Department (Culture Media and Sport and the Government Olympic Executive) were made aware of the high level details of some cases to ensure that relevant information and enquiries could be recognised.
15. Liaison with the media was monitored and coordinated via the JAU. Due to the nature of the incidents the IOC took the lead on communications in all cases. The interaction between the JAU and the IOC ethics commission secretary and press lead was a key factor in enabling effective determination of lines to take and for these to be cascaded clearly to other relevant parties as quickly as possible.

Section 3 - Overview of Cases

16. The first case dealt with by the JAU and one with a definite link to betting concerned a member of the Irish Sailing Team. An article in the Irish Independent on the morning after the Opening Ceremony alleged that an Irish athlete had contravened the IOC entry rules by placing a bet on an event in which he was competing.
17. Investigations followed several lines of enquiry via the IOC and the SBIU. Findings were discussed between the Gambling Commission and the IOC. The information collated revealed likely breaches of IOC rules at the Beijing Olympics and as such the IOC assumed responsibility for disciplinary investigation.
18. A number of other incidents involving a cross section of sports were investigated with enquiries focused upon visible market betting activity. The JAU was able to confirm that there were no unusual or suspicious links on the regulated markets.

Section 4 - Betting at London 2012

19. A number of UK licensed operators contributed data for our analysis and the report also includes remote and overseas betting activity not regulated by the Gambling Commission. It has proved difficult to provide a precise analysis of betting activity as not all operators provided details and those responding gave varying levels of information. There are further difficulties in determining scale and scope when considering the total staked with bookmakers with the amounts 'matched' on the Exchanges.
20. Prior to the Games a number of operators were canvassed for views on their expectations and forecasts on betting on the London 2012 Games, either directly or via their regulator. A total of thirty three provided us with responses. Information on the Beijing Games was also requested to enable us to make comparisons and assess and changes. Most forecast that betting in London would be considerably higher than Beijing.
21. In line with forecasts, the majority of the operators reported much higher levels than experienced for Beijing, with betting in some cases increasing tenfold. Most operators offered bets on all sports in 2012, although a few were more selective. In general, turnover on the 2012 Olympics Games was low compared to regular (non Games) betting although this was also in line with expectations. Those sports which are already popular with the betting public e.g. football and tennis were at most 25% of what would be expected for a normal Premiership football match or major tennis championship.
22. As a good comparison, one operator reported the Men's Olympic Tennis Final (Federer v Murray) attracted only 20% of the bets wagered on the 2012 Wimbledon Championship final, played between the same players' only weeks earlier.
23. Analysis of the data received suggests that the amount staked by customers or matched on exchanges on Olympic betting was at minimum £350 million with over 9 million bets placed.
24. The split between pre-event and in-play betting varied between responding operators. Some reported very minimal in-play whereas others reported a split of 50:50 across in-play and pre-event. The one exception was a major operator reporting the majority (85%) of their business coming from in-play bets due to its operating model focusing upon these offers.

25. Most betting was through remote channels. For those operators that have a UK retail estate, bets in shops represented a maximum of a third of all Olympics bets. Across the various sports the ratio between event outcome and micro market betting was estimated to be 70:30. There is variance according to sport. Betting on an individual aspect of a sporting event rather than the final result (e.g. first goal scored in a football match, first game won in a tennis match etc) was much more significant for sports such as tennis and basketball; bets on next game or current set were popular in tennis or quarter / half markets in basketball. Betting on football indicated approximately just over 80% was pre-event, whilst for the less significant (in terms of betting volumes) sports betting was 90% pre-event.
26. UK customers were seen to bet on sports they usually don't show interest in, considered akin to betting on the annual Grand National horse race, where the event captures the wider public attention. Foreign bettors were considered most likely to bet on sports within which they had a favoured competitor, or where their national team had reached a final stage.

27. Betting by Sport

28. Generally the betting reported by respondent operators showed similar patterns and more or less in line with expectations. Not all operators specifically reported the overall numbers of bets and the information provided differed across the various responses. However the following approximate profile by sport is outlined below:
- Football was commonly reported as attracting the biggest markets, representing 20-25% of all Olympics bets.
 - Tennis was reported the next largest market at 15-20% of bets.
 - Basketball was reported as attracting between 10-20% of bets.
 - Volleyball and Athletics, some markets were reported as high as 10%.
29. Other sports attracted relatively low interest, although specific events attracted significant bets being placed. The Men's Athletics 100m final was reported to have the largest betting volumes on any single event for the games. Betting on the men's basketball final was reported as a prominent event specific market. Less significant sports that are very popular in specific countries showed a marked increase to what would normally be expected.

Section 5 - Lessons Learned

30. This was the first time the JAU approach had been deployed to a major sporting event and there were understandably initial concerns on how this would work in practice. There has been very positive feedback from all stakeholders as to the contribution of JAU in managing the assessment of incidents that occurred during the Games and supporting decision making. Whilst the JAU didn't deal with any major corruption cases there appears to be a general consensus that the model can be deployed and enhanced to provide similar, even more effective support at future Games or other major sporting events.
31. The process of feasibility from design to implementation took 18 months. Early stakeholder engagement to gain agreement as to high level operating principles and to produce initial operational designs is seen a critical factor by all those involved to setting direction and providing the momentum for the project
32. A recognised project management approach was utilised, decisions taken to minimise bureaucracy and shorten reporting lines, reporting through clear oversight and management structures. The appointment of a full time project manager proved invaluable. A major benefit of early consultation was establishing trust and confidence between JAU partners

along with developing a sound understanding of each other's role within the incident management process. This facilitated stakeholders to communicating quickly removing any possible personal hesitancy and gaining quick agreement as to courses of action.

33. Learning point: If the IOC wish to deploy a similar capability at future events then arrangements need to be put in place as early as possible. For the Rio Games, a minimum of two years should be considered necessary to establish principle, produce operating designs and policies and agree Games time operating arrangements. Project management arrangements need to be established and accommodate the likelihood that scenario testing may prove more difficult /reliant on remote communications given the distance from the IOC.
34. Early notification of potential incidents to decision making stakeholders is crucial. The JAU played a significant coordination role in ensuring that assessed information was exchanged or disseminated as quickly as possible.
35. Learning Point. The primary information and intelligence sources need to be identified early and engaged to enable understanding of the JAU approach and agreements to provide information quickly¹.
36. Learning point. A JAU should have ready access to persons familiar with the operation of betting markets to contribute to the assessments provided to IOC and law enforcement decision makers.
37. The clarity of respective roles of the IOC, the National Olympic Committees (NOCs) and International Federations (IFs) is crucial. Their involvement in the prevention and management of any threats is twofold: firstly to ensure that athletes fully understand the IOC codes /rules of entry to relating to the accredited persons betting on the Games events. Secondly to ensure that communication with the IOC as quickly any possible potential incidents related to sports integrity or betting.
38. Learning Point: The establishment of a JAU should be notified to NOCs and IFs and there may be need to reinforce understanding of the importance of identifying potential corrupt sport betting issues and notifying the IOC quickly.
39. In addition, the UK Gambling Commission experiences demonstrate that it may be the case that circumstances indicate the need to refer an assessment to law enforcement agencies. At worst corrupt sports betting/match fixing investigations have close similarities with complex fraud investigations and it is likely that evidence from internet betting and communications will be important. It would be prudent to ensure that law enforcement investigators have understanding of the type of criminal threat posed.
40. Betting data will primarily be that from regulated markets. Betting within completely unregulated markets/illegal will not be visible and as such law enforcement sources of information may be vitally important. The capability of law enforcement intelligence capabilities to accommodate corrupt sports betting/match fixing within its terms of reference should be considered.
41. Learning point. There may be need to establish corrupt sports betting/match fixing as a specific threat within tournament organisers overall risk plans. Assessments of investigation and intelligence gathering capabilities would need to be undertaken and steps taken to ensure the relevant capacity is put in place.

¹ The time differences from major European betting markets, regulators and operators needs to be accommodated.

42. Scenario testing proved to be a key element in the design and implementation process. The testing not only helped develop the enabling processes but also created the basis for common understanding of each partner's role and requirements along with building up trust and confidence. Scenario testing that included media management revealed most likely difficulties.
43. Learning Point: Development of a future JAU type model should include phases of scenario testing escalating in complexity and involving media management arrangements. Scenario planning needs to have understanding of the local and international contexts.
44. Only one alert was received from operators about movement on the markets. The majority of investigations initiated were the result of media reports and event monitoring, involving incidents such as controversial decisions by officials or athletes accused of not trying their best in order to achieve a more favourable draw in the next round of a competition. Proactive monitoring of the media played a key role in helping the unit spot potential issues and react quickly to offer reassurance that betting integrity was not the driver behind the incident.
45. Learning Point: Mechanisms to ensure robust monitoring of media reports during games time needs to be put in place in any future iterations of the JAU model.
46. It is critical to have in place the ability to confirm as early as possible whether there is betting or other market factors associated with potential incidents or allegations. The established networks between the Gambling Commission, other regulators and Operators and the relationship between the JAU and ISM were major contributory factors to making this work in monitoring betting during London 2012.
47. The Gambling Commission and IOC enhanced these relationships by working with regulators and operators to ensure they understood the role of the JAU, its working practices. The benefits of collaborative working was promoted and resulted in positive responses to requests for information.
48. Operators and ISM have commented that the proactive intervention activity of the JAU helped them focus on potential issues and review their market activity management.
49. Learning Point: Ensure good relationships with principal betting operators are established and maintained, directly, through regulators or operators' industry associations. The JAU should ensure that operators are made aware of their contribution and how much their efforts are appreciated.
50. The above applies to Gambling Regulators based outside of the host country. The Commission informed foreign national gambling regulators to let them know what was being put in place and how they might help. Whilst engagement during the Games was fairly limited, many provided information for the JAU Strategic Threat Assessment and facilitated access to their licensed operators. All were extremely supportive.
51. Learning Point: The gambling regulators upon which the JAU is likely to rely should be to be engaged in the development of any JAU type models.
52. Given the range of Olympic sports and the limitations upon resources, the Gambling Commission produced a Strategic Assessment to identify the sports with potential vulnerabilities. Monitoring of the identified sports was prioritised.

53. This ensured that the JAU had the background information to quickly understand any emerging issues. During the Games, the investigations conducted resulting from events observed/reported occurred primarily within the sports identified within the assessment which proved most valuable. This helped focus research or investigation and could help inform the development of preventative approaches in the future, including education programmes.
54. Learning Point: Conducting an assessment of threats by sport prior to the Games will assist in determining where monitoring effort should be focused and within which betting markets most likely occurrence will appear. Build on the proactive nature of managing incidents by continuing with the Strategic Assessment between Games will help to develop any JAU approaches pre Games as well as during Games time.
55. A challenge that will possibly be encountered in the capability of those investigating (sports discipline or criminal investigations) to convert intelligence into suitable evidence. Whilst intelligence may provides the focus for evidential enquiries but is unlikely to be sufficient to sustain a sanction. It may however be sufficient to enable disruptive action.
56. The investigative capability of the IOC and international federations and National Organising Committees need to be able to effective to build upon intelligence provided, and options to disrupt potentially corrupt activity should be available as a tactical consideration
57. Learning Point: The IOC may need to be assured that their investigative (disciplinary) capabilities and those of the International Federations and National Organising Committees align. Not least Games and standard sports code provisions relating to corrupt sports betting/match fixing should not work against each other, particularly given that some investigations may take some time after the games to fully resolve.
58. The importance of promoting as widely as possibly the aims and objectives of the approach should be recognised.
59. Learning Point: Engaging with as many stakeholders as possible raises, awareness, garners support and can possibly have a deterrent effect upon those considering corrupt activity.
60. Managing consistent media messages is also extremely important in the run up to and during the Games. In promoting a JAU approach there will be thoughts that this signals the existence of a specific risk. This may not be the case and how one promotes the value as a precautionary measure should be consistent across all stakeholders and as early as possible once the decision is taken to establish the approach.

Section 6 - Conclusions

61. As far as we are aware no major incidents of sports betting integrity impacted the London 2012 Olympic Games. We cannot say this with complete certainty as monitoring of betting markets was restricted to those that are regulated and limited by the criminal intelligence gathering capabilities of those others with whom the JAU operated.
62. All the indications are that the JAU approach adopted for the 2012 Games provided an effective mechanism to identify and support decision makers with any suspicious activity driven by either unusual betting, suspected corrupt sports betting or other match fixing activity.

63. The importance of detailed operational planning, stakeholder engagement testing of the JAU approach and communication management cannot be over emphasised. The planning will ensure the processes and protocols that form the basis of the model are in place; the engagement will ensure those directly involved understand what needs to be achieved and their responsibilities within the model; and testing will reiterate responsibilities, identify capability gaps and how those gaps can be addressed.
64. Future models of the 2012 Games JAU will almost certainly need to be adapted for use by other event organising bodies to reflect individual contexts. The JAU has value in providing a proven workable template within the context of global event. Decisions to establish such a capability for national and international sporting events will need to be taken as soon as possible given the level of international connectivity required.

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