



Sports Betting Reporting Mechanism Manual

Malta Gaming Authority



Contents

1	Introduction.....	4
2	Sports Betting Reporting Mechanism	4
2.1	LRMS Portal Sections.....	4
2.1.1	T&Cs.....	5
2.1.2	Contact Details.....	6
2.1.3	Reporting details	8
2.1.4	Enclosures.....	14
2.1.5	Confirm.....	15
2.1.6	Email Confirmation.....	16
2.1.7	Timeline.....	16
3	Conclusion	17

Acronyms

SBRM	Sports Betting Reporting Mechanism
B2C	Business-to-Consumer
MGA	Malta Gaming Authority
LRMS	Licensee Relationship Management System
SBI department	Sports Betting Integrity department
SGB	Sports Governing Body

1 Introduction

The Sports Betting Reporting Mechanism (SBRM) is to be used as a reporting instrument that bridges B2C and B2B licensees with the Authority when reporting suspicious betting activity. The SBRM shall be accessed through the Malta Gaming Authority (MGA) portal, the Licensee Relationship Management System (LRMS) that is already shared with all licensees.

The aim of this document is to provide guidance on how one can make use of the mechanism. Despite the fact that the mechanism is a user-friendly one, this document shall act as a point of reference to any queries one may have when reporting suspicious betting activity to the Authority.

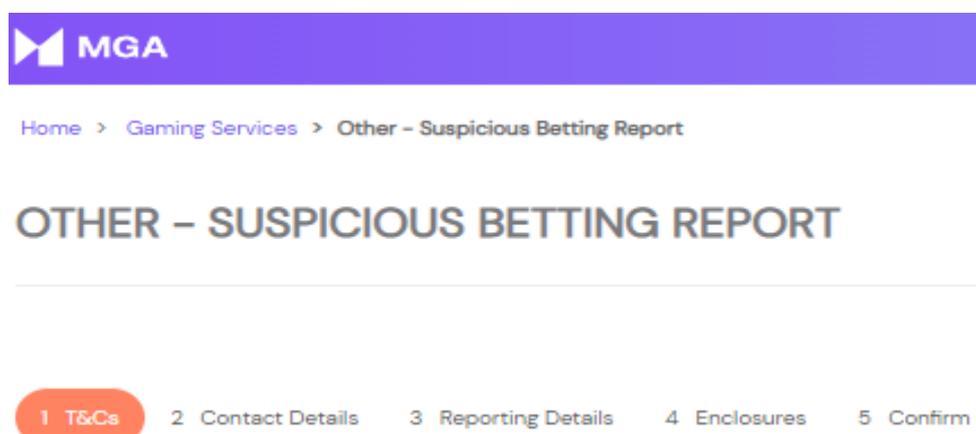
2 Sports Betting Reporting Mechanism

Upon logging into the LRMS portal, the persons reporting must select the company which they are representing, and which has noticed the suspicious betting activity. '*Suspicious Betting Report*' must be selected to input a suspicious betting report.

2.1 LRMS Portal Sections

Once the SBRM is accessed through the MGA's LRMS portal, one will see how the SBRM entails five different sections:

1. T&Cs;
2. Contact Details;
3. Reporting Details;
4. Enclosures;
5. Confirm.



2.1.1 T&Cs

In section one, the Terms and Conditions of the SBRM are visible. These must be read and understood thoroughly in order to continue to the next section, especially when submitting a report for the very first time. Furthermore, as seen in **step 1**, the name of the entity reporting will be automatically selected in accordance with what was previously selected. As seen in **step 2**, the relevant licence number must be selected also. Moreover, to continue after selecting the necessary information, 'Next' must be selected as seen in **step 3**.

OTHER – SUSPICIOUS BETTING REPORT

1 T&Cs 2 Contact Details 3 Reporting Details 4 Enclosures 5 Confirm

T&CS

All answers must be submitted in English.

If there is not enough space on this application for any particular answer kindly attach a sheet in the 'Enclosures' section.

The Authority reserves the right to request additional information.

If there are any changes to the information provided in the application, it is the applicant's responsibility to advise the Authority immediately.

The Authority may in certain circumstances share any relevant data, including personal data, in its possession with local and/or foreign regulators entrusted with the governance and regulation of a particular sector, when such transfer of data is (i) considered by the Authority as a necessary measure in the public interest, and (ii) necessary for the process of detecting, preventing and investigating activities constituting a criminal offence in Malta, or in accordance with Maltese law and the law of the country of the relevant foreign regulator. The Authority is empowered to do so in accordance to article 9(2) of the Gaming Act (Chapter 583 of the Laws of Malta). The Authority is also legally obliged to share information with competent law enforcement agencies, such as the RAU and the Malta Police.

Provided that the public interest requirement shall be deemed ipso jure satisfied where the transfer of data is required in relation to the process of detecting, preventing and investigating activities relating to any of the following offences:

- a. money laundering;
- b. terrorist financing;
- c. fraud, identity theft and misappropriation of funds;
- d. computer misuse; and
- e. manipulation of sports competitions;

Provided further that for the purposes of detecting, preventing and investigating the manipulation of sports competitions, the Authority may also share information, including any relevant personal data, with sport governing bodies and other platforms whose function includes the detection of suspicious betting activities and/or are responsible to take action to prevent such manipulation of sports competitions from taking place, and with whom the Authority has signed a data-sharing agreement. Provided further that all processing operations shall be in accordance with the applicable data protection legislation. The Authority is empowered to do so in accordance to article 9(2) of the Gaming Act (Chapter 583 of the Laws of Malta).

Disclaimer: If the application remains unmodified for a period exceeding 30 days, the application will be automatically deactivated. In such an instance, the applicant will be required to restart a new application.

Company *

Se7en Gaming Limited

Step 1

Licence *

Q

Step 2

Next

Step 3

2.1.2 Contact Details

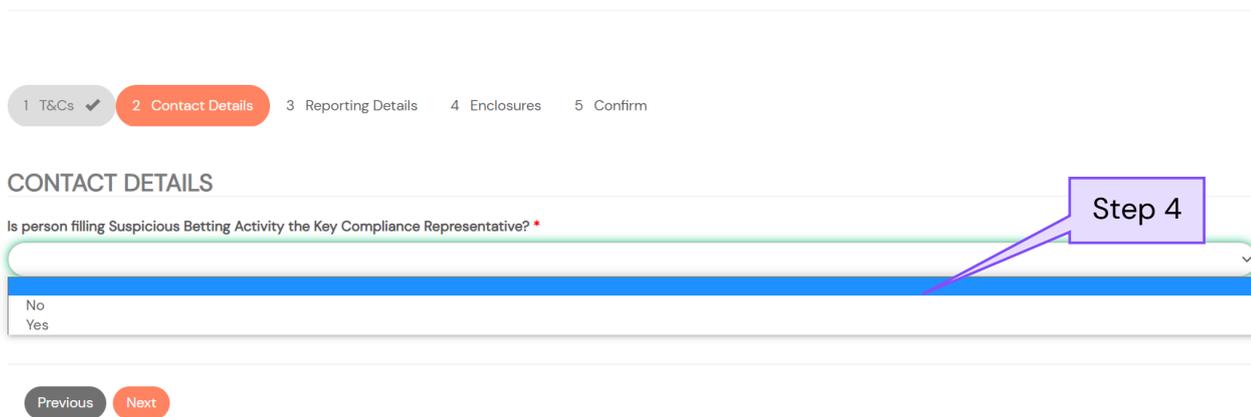
In section two, the person reporting will be required to input their contact details. First, the person reporting will be required to select if they are the Key Compliance representative of the company as can be seen in **step 4**. If the person reporting is indeed the Key Compliance representative, the system would already be aware of the representative's details.

However, should the person reporting be another designated point-of-contact (e.g. Head of Integrity, Head of Sportsbook, etc.), then the system will not have the individual's details and hence the person reporting will be required to input the contact details.

Therefore, in the case that the person reporting is **not** the Key Compliance representative, such individual should select '**No**' to the question '**Is person filling Suspicious Betting Activity the Key Compliance Representative?**'.

[Home](#) > [Gaming Services](#) > [Other - Suspicious Betting Report](#)

OTHER - SUSPICIOUS BETTING REPORT



1 T&Cs ✓ 2 Contact Details 3 Reporting Details 4 Enclosures 5 Confirm

CONTACT DETAILS

Is person filling Suspicious Betting Activity the Key Compliance Representative? *

No
Yes

Previous Next

When 'No' is selected, the contact details must be submitted as seen in **step 5**. All details must be inputted in order to proceed. Once the necessary details are submitted, 'Next' must be selected to continue to the next section as seen in **step 6**.

[Home](#) > [Gaming Services](#) > [Other – Suspicious Betting Report](#)

OTHER – SUSPICIOUS BETTING REPORT

1 T&Cs 2 Contact Details 3 Reporting Details 4 Enclosures 5 Confirm

Step 5

CONTACT DETAILS

Is person filling Suspicious Betting Activity the Key Compliance Representative? *

No

Name *

Surname *

Email Address *

Previous

Step 6

Moreover, if the person reporting selects 'Yes' to the question '**Is person filling Suspicious Betting Activity the Key Compliance Representative?**', the person must select the search button as seen in **step 7** to identify which representative the report is originating from.

[Home](#) > [Gaming Services](#) > [Other – Suspicious Betting Report](#)

OTHER – SUSPICIOUS BETTING REPORT

1 T&Cs 2 Contact Details 3 Reporting Details 4 Enclosures 5 Confirm

Step 7

CONTACT DETAILS

Is person filling Suspicious Betting Activity the Key Compliance Representative? *

Yes

Key Compliance Representative *

Previous

When the search button is selected, a drop-down list of Key Function roles is displayed, and hence the Key Compliance representative submitting the form must select his role accordingly. 'Select' must be selected in order to continue as seen in **step 8**.

LOOKUP RECORDS ×

Q

Choose one record and click Select to continue

Contact ↑	Role (Old)	Key Function Role	Company
<input type="checkbox"/> MGA IT	Key Compliance		Se7en Gaming Limited

Step 8 Select Cancel Remove value

2.1.3 Reporting details

In section three, the form will request the reporting entity to choose between reporting a suspicious event, a suspicious account, or both. Details pertaining to the suspicious event and account must be selected accordingly.

Therefore:

- If one is reporting a suspicious event, one must select 'Add Suspicious Event' as seen in **step 9** below.
- If one is reporting a suspicious account pertaining to the suspicious event, one must first add the suspicious event before adding the suspicious account. This is due to an option to link the account to the event which is given when submitting the suspicious account.
- If one is reporting a suspicious account, one must select 'Add Suspicious Account' as seen in **Step 10** below.

Home > Gaming Services > Other – Suspicious Betting Report

OTHER – SUSPICIOUS BETTING REPORT

1 T&Cs ✓ 2 Contact Details ✓ 3 Reporting Details 4 Enclosures 5 Confirm

REPORTING DETAILS

When reporting suspicious betting to the Malta Gaming Authority (MGA) through the Suspicious Betting Reporting Mechanism (SBRM), remote gaming licensees are reminded to also consider their reporting obligations with the Financial Intelligence Analysis Unit (FIAU) in terms of the Prevention of Money Laundering and Funding of Terrorism Regulations (PMLFTR).

List all Suspicious Betting Event as per reporting requirements

Step 9

Add Suspicious Event

Created On ↑	Suspicious Event	Sport	Event	Event Date	Match	Country	Please Specify Other	Status	Status Reason
--------------	------------------	-------	-------	------------	-------	---------	----------------------	--------	---------------

There are no records to display.

List all Suspicious Betting Accounts as per reporting requirements

NOTE: If the reasoning for the alert regarding the event above was individual account activity (e.g. bettor is a participant betting on his/her own sport; bettor is linked to one (or more) participants taking part in the event on which bets were placed, bettor is an individual who has access to insider information, etc.), as opposed to general market movement, please can you please indicate below. If the reasoning for the alert is due to general market movement, betting data will be requested upon a formal *Request for Information* submitted by the MGA, and in the instance that the MGA would be investigating the event, or assisting in an investigation into the event.

Step 10

Add Suspicious Account

New Account ↑	Is suspicious account linked to suspicious event?	Linked Event
---------------	---	--------------

There are no records to display.

Previous Next

- When selecting 'Add Suspicious Event' as seen in **step 9** above, details pertaining to the suspicious event must be inputted as seen in **step 11** below.

Step 11

SUSPICIOUS EVENT

Suspicious Event Report Details

Sport * Score *

Event Date * Event *

Match * Country

Does the reported event/account fall under the MGA remit? *

Was this alert reported to a relevant SGB or Betting Monitoring Body? *

Basis of Suspicion

Stake and volumes above the average expectation for market *

Significant price movements *

- Furthermore, after all the details are inputted, 'Submit' must be selected for the event to be saved and one can continue to add more suspicious events or add a suspicious account. This can be seen in **step 12** below.

Activity focused on specific markets when little other interest in an event *

In-play prices do not reflect the action in the relevant event *

Activity from accounts of sporting participants or account likely linked to a participant *

Other *

Additional Information

Step 12

- When a Suspicious Event or Suspicious Account has been submitted, this can be edited or deleted as seen in **step 13** below.

OTHER – SUSPICIOUS BETTING REPORT

- 1 T&Cs ✓
- 2 Contact Details ✓
- 3 Reporting Details
- 4 Enclosures
- 5 Confirm

REPORTING DETAILS

When reporting suspicious betting to the Malta Gaming Authority (MGA) through the Suspicious Betting Reporting Mechanism (SBRM), remote gaming licensees are reminded to also consider their reporting obligations with the Financial Intelligence Analysis Unit (FIU) in terms of the Prevention of Money Laundering and Funding of Terrorism Regulations (PMLFTR).

List all Suspicious Betting Event as per reporting requirements

[Add Suspicious Event](#)

Created On ↑	Suspicious Event	Sport	Event	Event Date	Match	Country	Please Specify Other	Status	Status Reason	
13/02/2023 10:29 AM	Se7en Gaming Limited – Suspicious Betting Report – SBRO00866	Basketball	n/a	01/02/2023	n/a			Active	Active	<div style="border: 1px solid #ccc; padding: 5px; display: inline-block;"> ⌵ </div>

Step 13

Edit Suspicious Event

Delete Suspicious Event

List all Suspicious Betting Accounts as per reporting requirements

NOTE: If the reasoning for the alert regarding the event above was individual account activity (e.g. bettor is a participant betting on his/her own sport; bettor is linked to one (or more) participants taking part in the event on which bets were placed, bettor is an individual who has access to insider information, etc.), as opposed to general market movement, please can you please indicate below. If the reasoning for the alert is due to general market movement, betting data will be requested upon a formal *Request for Information* submitted by the MGA, and in the instance that the MGA would be investigating the event, or assisting in an investigation into the event.

[Add Suspicious Account](#)

New Account ↑	Is suspicious account linked to suspicious event?	Linked Event
There are no records to display.		

- Previous
- Next

If the reasoning for the alert regarding the event above was an individual account activity (e.g. bettor is a participant betting on his/her own sport; bettor is linked to one (or more) participants taking part in the event on which bets were placed, bettor is an individual who has access to insider information, etc.), as opposed to general market movement, the user is required to submit a report and indicate details pertinent to the suspicious account. If the reasoning for the alert is due to general market movement, betting data will be requested upon a formal Request for Information submitted by the MGA, and in the instance that the MGA would be investigating the event, or assisting in an investigation into the event.

In case of a suspicious account, the person reporting will be required to state whether the suspicious account is a newly opened one or not, whilst also being required to note down the basis of suspicion.

Throughout this section, the person reporting will also be given the opportunity to include additional information should this be deemed of benefit when disclosing suspicion.

- A suspicious account can be submitted by selecting ‘Add Suspicious Account’ as seen in **step 14** below.

[Home](#) > [Gaming Services](#) > [Other – Suspicious Betting Report](#)

OTHER – SUSPICIOUS BETTING REPORT

1 T&Cs ✓ 2 Contact Details ✓ 3 Reporting Details 4 Enclosures 5 Confirm

REPORTING DETAILS

When reporting suspicious betting to the Malta Gaming Authority (MGA) through the Suspicious Betting Reporting Mechanism (SBRM), remote gaming licensees are reminded to also consider their reporting obligations with the Financial Intelligence Analysis Unit (FIAU) in terms of the Prevention of Money Laundering and Funding of Terrorism Regulations (PMLFTR).

List all Suspicious Betting Event as per reporting requirements

[Add Suspicious Event](#)

Created On ↑	Suspicious Event	Sport	Event	Event Date	Match	Country	Please Specify Other	Status	Status Reason
--------------	------------------	-------	-------	------------	-------	---------	----------------------	--------	---------------

There are no records to display.

List all Suspicious Betting Accounts as per reporting requirements

NOTE: If the reasoning for the alert regarding the event above was individual account activity (e.g. bettor is a participant betting on his/her own sport; bettor is linked to one (or more) participants taking part in the event on which bets were placed, bettor is an individual who has access to insider information, etc.), as opposed to general market movement, please can you please indicate below. If the reasoning for the alert is due to general market movement, betting data will be requested upon a formal *Request for Information* submitted by the MGA, and in the instance that the MGA would be investigating the event, or assisting in an investigation into the event.

Step 14

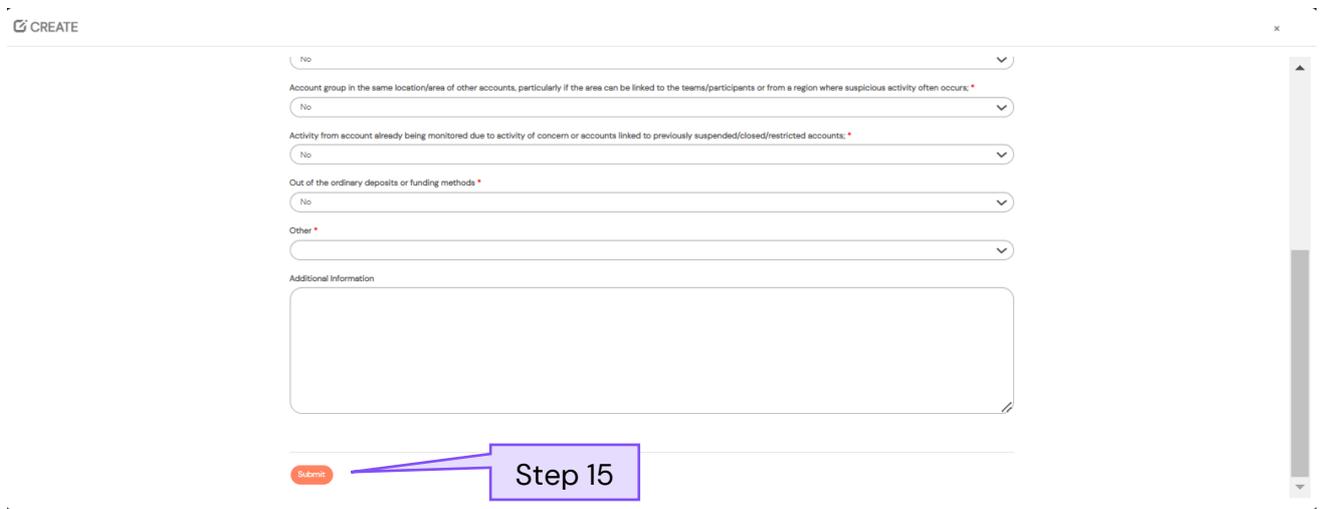
[Add Suspicious Account](#)

New Account ↑	Is suspicious account linked to suspicious event?	Linked Event
---------------	---	--------------

There are no records to display.

[Previous](#) [Next](#)

- After details pertaining to the suspicious account are inputted, ‘Submit’ must be selected to submit the suspicious account as can be seen in **step 15** below.



The screenshot shows a web form titled 'CREATE' with a close button 'x' in the top right corner. The form contains several dropdown menus, each with 'No' selected. The dropdowns are for: 'Account group in the same location/area of other accounts, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs.*', 'Activity from account already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts.*', 'Out of the ordinary deposits or funding methods.*', and 'Other.*'. Below these is a large text area labeled 'Additional Information'. At the bottom left of the form is a red 'Submit' button, which is pointed to by a purple callout box labeled 'Step 15'. A vertical scrollbar is visible on the right side of the form.

- Furthermore, once all the suspicious events and accounts (if any) have been inputted, 'Next' must be selected to advance to the next section. This can be seen in **step 16** below.

[Home](#) > [Gaming Services](#) > [Other – Suspicious Betting Report](#)

OTHER – SUSPICIOUS BETTING REPORT

1 T&Cs ✓ 2 Contact Details ✓ 3 Reporting Details 4 Enclosures 5 Confirm

REPORTING DETAILS

When reporting suspicious betting to the Malta Gaming Authority (MGA) through the Suspicious Betting Reporting Mechanism (SBRM), remote gaming licensees are reminded to also consider their reporting obligations with the Financial Intelligence Analysis Unit (FIAU) in terms of the Prevention of Money Laundering and Funding of Terrorism Regulations (PMLFTR).

List all Suspicious Betting Event as per reporting requirements

[Add Suspicious Event](#)

Created On ↑	Suspicious Event	Sport	Event	Event Date	Match	Country	Please Specify Other	Status	Status Reason
--------------	------------------	-------	-------	------------	-------	---------	----------------------	--------	---------------

There are no records to display.

List all Suspicious Betting Accounts as per reporting requirements

NOTE: If the reasoning for the alert regarding the event above was individual account activity (e.g. bettor is a participant betting on his/her own sport; bettor is linked to one (or more) participants taking part in the event on which bets were placed, bettor is an individual who has access to insider information, etc.), as opposed to general market movement, please can you please indicate below. If the reasoning for the alert is due to general market movement, betting data will be requested upon a formal *Request for Information* submitted by the MGA, and in the instance that the MGA would be investigating the event, or assisting in an investigation into the event.

[Add Suspicious Account](#)

New Account ↑	Is suspicious account linked to suspicious event?	Linked Event
---------------	---	--------------

There are no records to display.

[Previous](#) [Next](#) Step 16

2.1.4 Enclosures

In section four, the reporting entity may upload any documentation which is deemed to be of added benefit and relevant to the suspicion being reported. As seen in **step 18** below, 'Choose File' must be selected to browse the device for the necessary data. Furthermore 'Upload' must be selected to upload such data on the portal as seen in **step 19** below. To continue to the next section, 'Next' must be selected as can be seen in **step 20** below.

[Home](#) > [Gaming Services](#) > [Other – Suspicious Betting Report](#)

OTHER – SUSPICIOUS BETTING REPORT

1 T&Cs ✓ 2 Contact Details ✓ 3 Reporting Details ✓ 4 Enclosures 5 Confirm

 An attachment can only be deleted within 24 hours after uploading.

Other Documents (Suspicious Betting Report)	File Name	
	<input type="button" value="Choose File"/> No file chosen	<input type="button" value="Upload"/>
Relevant Event / Account details	File Name	
	<input type="button" value="Choose File"/> No file chosen	<input type="button" value="Upload"/>

2.1.5 Confirm

In section five, the reporting entity is required to confirm all details entered and submitted in the form. This can be done by selecting 'Yes' as seen in **step 21** below. To submit the report, 'Submit' must be selected as seen in **step 22** below.

[Home](#) > [Gaming Services](#) > [Other - Suspicious Betting Report](#)

OTHER – SUSPICIOUS BETTING REPORT

- 1 T&Cs ✓
- 2 Contact Details ✓
- 3 Reporting Details ✓
- 4 Enclosures ✓
- 5 Confirm

CONFIRM

By clicking submit, I hereby certify that all the information provided through the MGA portal is correct, accurate, complete and true to the best of my knowledge, information and belief, and that there are no other facts relevant to this submission of which the Malta Gaming Authority ('the Authority') should be made aware.

If there are any changes to the information provided in the submission, I acknowledge that it is my responsibility to advise the Authority immediately.

We use all reasonable efforts to safeguard the confidentiality and security of the information submitted. However, by their very nature, transmissions made by means of the Internet cannot be made absolutely secure. We accept no responsibility and expressly exclude any liability for any disclosure of information due to errors in transmission or unauthorised acts of third parties.

The Licensee confirms that he/she has read and understood all the terms and conditions to which this application is subject to

Yes Step 21

[Previous](#) [Submit](#) Step 22

Once the report has been submitted, a receipt will appear as seen below.

[Home](#) > [Gaming Services](#) > [Other - Suspicious Betting Report](#)

OTHER – SUSPICIOUS BETTING REPORT

Submission completed successfully.

2.1.6 Email Confirmation

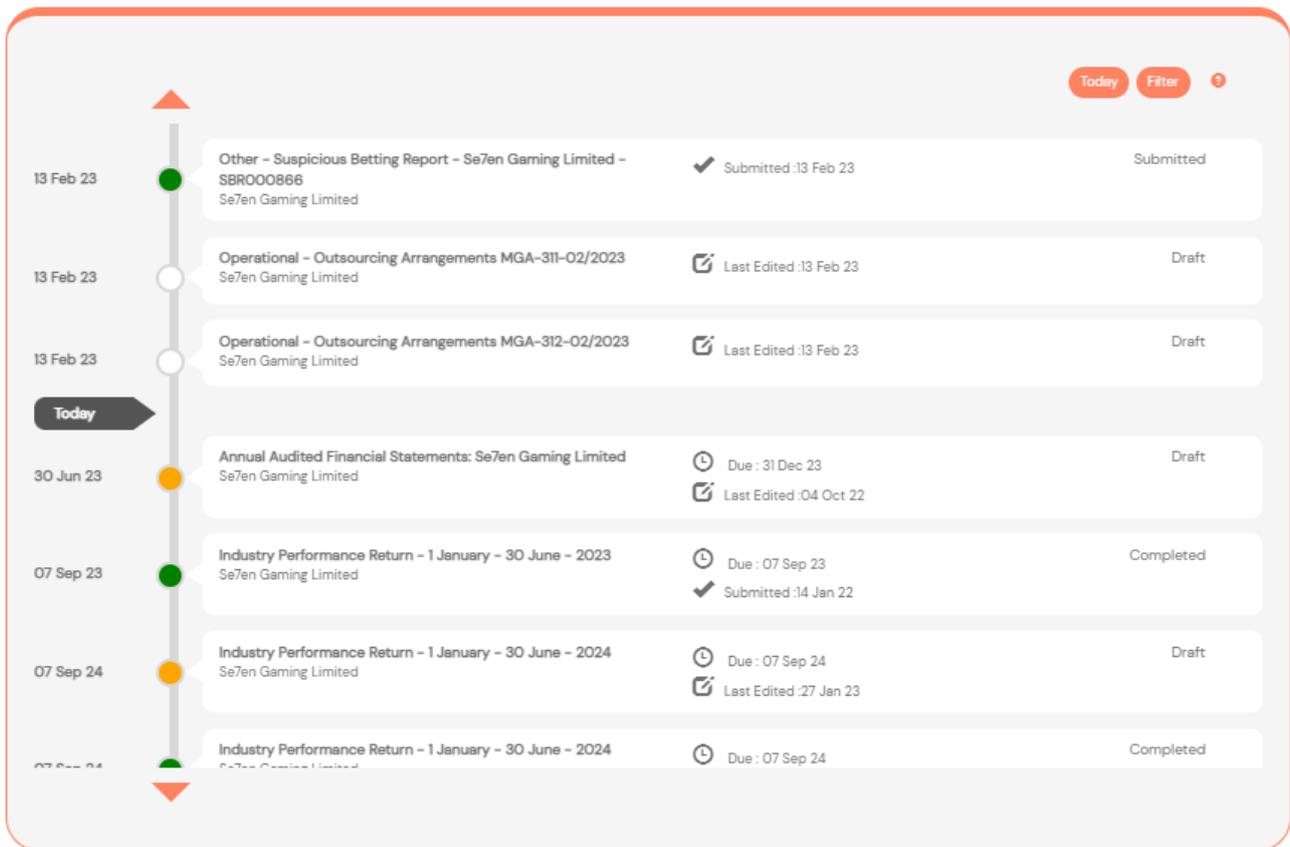
Once the report has been submitted successfully, the reporting entity will receive an email confirming that the report has been submitted and received successfully.

2.1.7 Timeline

Once submitted, the report will be visible in the entity's timeline. As seen below, the status of the report will be visible depending on whether the report is still in a 'Draft' stage or not. Should the status state

'Draft', this would mean that the report has not yet been submitted to the MGA. 'Submitted' means that the report has successfully been submitted to the MGA. If the status reads 'Completed', this indicates that the MGA has viewed and acted upon the report submitted. With "acted upon" the Authority means that the relevant Sports Governing Body (SGB) and/or policing entity would have been notified. However, this does not necessarily mean that the MGA's Sports Betting Integrity department (SBI department) will not request further information and/or betting data about the report in the future. Furthermore, in instances where the status would read 'Rejected', this would mean that the SBI department would require more information about the report submitted. Of course, the SBI department will be in contact in the immediate to explain which additional information it is expecting to receive.

Company Timeline



3 Conclusion

For any queries relating to this manual or any other sports integrity-related matters, please do not hesitate to contact the MGA's SBI department on sportsintegrity.mga@mga.org.mt.

