



**Consultation Paper on Suspicious Betting
Reporting Requirements & Other Sports
Integrity Matters**

Sports Integrity Unit
Malta Gaming Authority

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Foreword

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. The Authority is also interested in initiating a dialogue with B2B licensees to consider what their contribution towards sports integrity can look like in terms of detection and exchange of information with either B2C licensees, or the Authority itself.

While looking forward to receiving your feedback to this paper, on behalf of the Malta Gaming Authority, I would like to take the opportunity to thank all stakeholders who have collaborated with us and helped us in continuing to play a part in protecting sports integrity.

Heathcliff Farrugia
Chief Executive Officer

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Definitions

Unless otherwise stated, terms in this document shall have the same meaning as defined in the Gaming Definitions Regulations (S.L. 583.04 of the Laws of Malta):

Authority	The Malta Gaming Authority as established by the Gaming Act (Chapter 583 of the Laws of Malta).
Critical Gaming Supply Licence	A business-to-business (B2B) licence to provide or carry out a critical gaming supply.
Gaming	An activity consisting of participating in a game, offering a gaming service or making a gaming supply.
Gaming Service Licence	A business-to-consumer licence (B2C) to offer or carry out a gaming service.
Licensee	An operator that has been licensed to carry out a gaming service or a critical gaming supply by the Malta Gaming Authority.
Operator	A person who carries out a gaming service.
Player	An end customer who participates or takes preparatory steps to participate in a game.
Stake	Money or money's worth that is or must be committed in order for a player to participate in a game, whether or not it is risked directly on a result of the game.

Acronyms

B2B	Business-to-Business
B2C	Business-to-Consumer
MGA	Malta Gaming Authority
SGB	Sport Governing Body
SIU	Sports Integrity Unit

1 Context

1.1 Introduction

On 29 August 2019, the MGA announced the creation of a new Sports Integrity Unit as part of an initiative to increase focus and resources towards the fight against the manipulation of sports competitions. The SIU's role consists of the gathering of intelligence and information relating to suspicious betting and will serve as a liaison with local and foreign regulatory authorities, law enforcement agencies, betting monitoring systems, sporting bodies and gaming operators in order to support the investigation of irregular and suspicious betting activity.

Furthermore, the Unit will also be liaising with other Directorates within the MGA to implement various policy initiatives, such as bringing into force the provisions at law relating to the reporting of suspicious betting activity by gaming operators to the MGA, signing agreements and deepening collaboration with entities having similar objectives and otherwise establishing a culture of cooperation amongst industry stakeholders to tackle the worldwide problem of corruption in sports.

It is now the MGA's objective 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). 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.

1.2 MGA's Consultation Objective

The MGA is continuously analysing best practices in the field of sports betting integrity. Conscious of the need to remain at the forefront in the fight against the manipulation of sports competitions, the Authority intends to bring into force section 43 of the *Gaming Authorisations and Compliance Directive* (Directive 3 of 2018), together with other measures as expounded in this document.

The consultation objective is to gather feedback on the proposed bringing into force of the *Suspicious Betting Reporting Requirements* together with other measures which the Authority intends to implement in support of its commitment to safeguard the integrity of sports and sports betting. In this regard, the Authority is also interested in gathering feedback from B2B licensees and how their data can help in detecting potential manipulation in sports competitions.

1.3 Pre-Consultation Activities

On 29 August 2019, the MGA announced the creation of a new SIU as part of an initiative to increase focus and resources towards the fight against the manipulation of sports competitions. In the meantime, the MGA continued to be participant to investigations of suspected match-fixing, assisting both enforcement agencies and sport governing bodies. The MGA also continued to participate in various fora and events, sharing its knowledge and practices with other stakeholders who share the common interest of protecting the integrity of sports and sports betting.

During this period, the Authority continued to reinforce its belief 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), hence obliging B2C licensees which offer betting on sporting events to inform the Authority of any instance of suspicious betting.

2 Consultation process

2.1 Period

This consultation will be open for a period of 7 **weeks** from date of publication ending on the 15 July 2020.

2.2 Queries

Industry participants and all other interested parties are invited to send their responses to this guidance paper and any other related feedback on sportsintegrity.mga@mga.org.mt by the date stipulated above.

2.3 Post Consultation

It is the intention of the MGA to take on-board stakeholder feedback and publish a revised final version of the guidance paper in due course.

3 Sports Integrity

3.1 Definition of Sport & Sporting Event

Chapter 455 of the Laws of Malta, the *Sports Act*, defines sport as including:

[...] all forms of physical or mental activity which, through casual or organised participation or through training activities, aim at expressing or improving physical and mental well-being, forming social relationships or obtaining results in competition at all levels, but excludes those activities held for therapeutic or clinical purposes or are part of the activities of health institutions or health centres [...]

Moreover, the MGA defines a sporting event as being an event comprising a sport (as defined above) that is administrated by a set of rules or customs and often undertaken competitively.

For the avoidance of doubt, it should be clarified that the above definition also encompasses esports. Furthermore, notwithstanding the fact that it falls outside of the ‘sports integrity’ nomenclature and definition, the principles within this document also apply to non-sporting events; for example, betting on outcomes of events which are not sports-related, such as the outcome of a TV talent competition or movie/music awards.

3.2 Suspicious Betting Reporting Requirements

B2C licensees which offer betting on sporting events shall 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.

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.

3.3 Designated Point of Contact

The role of the ‘Key Compliance’ shall be the designated point of contact between B2C licensees which offer betting on sporting events and the Authority. However, the ‘Key Compliance’ may delegate the reporting function to the B2C entity’s Integrity Manager, or another individual entrusted with the function, to embark the function of reporting suspicious betting to the Authority.

3.4 Defining Suspicious and/or Irregular Activity

The Authority understands that each and every case is different and requires an assessment to be made on a case-by-case basis. In this regard, the Authority also understands that its licensees, and

other stakeholders, have their own definitions about what is tantamount to irregular or suspicious betting activity hence recognising the fact that industry standards on defining suspicious betting activity already exist. Whilst the Authority has its own definition of suspicious and irregular betting activity, it is understood that irregular activities are those activities which may be clarified or explained via information procured from the public domain and accessible through open-source research. The Authority affirms that if an irregular activity cannot be explained via the public domain, then this is to be deemed suspicious and hence reported to the Authority as per requirement noted in section 43 of the *Gaming Authorisations and Compliance Directive* (Directive 3 of 2018).

3.5 Reporting Instrument

The reporting instrument to be used for reporting purposes between B2C licensees and the Authority shall be the ‘Suspicious Betting Reporting’ form via access through the MGA portal shared with licensees. However, until such time the form is available for use, individuals reporting to the Authority shall report via email to sportsintegrity.mga@mga.org.mt.

The ‘Suspicious Betting Reporting’ form entails five different sections:



In section 1, the reporting entity will be required to establish the name of the company reporting the suspicious activity, together with the licence number. The selection will be in the form of a *drop-down menu* since the details of the licensee would already be recorded on the system.

In section 2, the person reporting will be required to input their contact details, including the name and surname, ID card number, email address, telephone number, and mobile number. Should it be the case that the person reporting is the individual holding the function of *Key Compliance*, the system would already be aware of the representative’s details. Should the person reporting be another designated point-of-contact (as defined in section 3.3 of this document), then the system would not be aware of that individual’s details hence having to input the details noted above.

In section 3, the form will request the reporting entity to choose between reporting a suspicious event, a suspicious account, or both. In case of a suspicious event, the person reporting will be required to state the type of sport, date of the event, names of participants/teams, and the name of the league, cup, or event involved. Importantly, the person reporting will be required to note down the basis of suspicion, as per section 3.4. 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, as per section 3.4. 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.

In section 4, the reporting entity may upload any documentation which they would deem to be of added benefit and relevant to the suspicion being reported.

In section 5, the reporting entity is required to confirm all details entered and submit the form.

3.5.1 Methods of Reporting

Once a licensee has decided that there is enough suspicion to warrant a notification to the MGA, then the licensee is to notify the Authority in the immediate. The Authority will require the licensee to provide it with the following information:

- Description of the markets on which suspicious activity has occurred;
- Geographic origin of the account holder;
- Timing of bets;
- Notification of any new accounts;
- Account profile information;
- Possible links to participants partaking in the sporting event;
- Reasons as to why the activity is being deemed as suspicious;
- Notification of which bodies/agencies are also being notified of the activity reported.

The Authority articulates the fact that in order to be able to perform an effective evaluation, sufficient detail needs to be provided by the licensee hence, if deemed relevant, said licensee may be required to provide to the Authority additional information which is extraneous to the above criteria. This information is to be provided via the reporting instrument noted above.

3.6 Development & Assessment

The Authority receives information pertinent to the integrity of sport from a number of sources, including betting operators, other regulators, sports governing bodies, law enforcement, and other sources. Once the MGA receives the information, its SIU evaluates various factors. Most notably, the Unit will investigate whether the activity:

- Relates to an event that occurred in Malta;
- Involves individuals or entities based in Malta;

- Occurred with, or involved, an MGA licensed operator.

The MGA's SIU will assess the information presented to it and proceed with the most appropriate course of action. At this stage, the Unit could potentially:

- Refer to the relevant SGB, wherein the Unit confirms that the information being provided to the Authority was also forwarded to the SGB which is best placed to pursue the matter;
- Progress to assessing the information and determine whether sufficient intelligence has been provided to be able to progress the case further.

Should the latter be deemed to be the ideal way forward, the MGA's SIU shall secure any additional information (and evidence thereof) for further dissemination. On a case-by-case basis, it may be the case that the MGA's SIU deems it fit to liaise with the relevant SGB and law enforcement to better assess the case and determine the possibility of any potential criminal activity. In this case, the SGB concerned may consider any potential breaches of sports rules. On the other hand, should potential criminal activity be determined, law enforcement may consider initiating an investigation that may lead to prosecution. In both scenarios, the MGA will assist accordingly in order to ensure effectiveness and as it is empowered to do so in accordance to article 8(2) of the Gaming Act (Chapter 583 of the Laws of Malta).

3.7 Request for Information

The Authority may in certain circumstances request its licensees to provide it with information subject to a set deadline, in accordance with its regulatory powers as set out in article 7(2)(d) of the Gaming Act (Chapter 583 of the Laws of Malta). Such a request will be corresponded formally and via email. In these instances, the Authority may be interested in knowing which authorised persons offered bets on a sporting event whilst also detailing out the information required relating to bets placed by the customers of the authorised person, in detail, as well as information about the account holder. The specific fields required will be detailed within the request and may include personal data. In such cases, disclosure to the Authority is necessary for the prevention or detection of crime and for reasons of substantial public interest, as per article 6 of the EU General Data Protection Regulation (GDPR). This must be carried out without tipping off the data subject, so as not to prejudice the above investigation. It is the licensee's responsibility to take the necessary steps to ensure that their systems are compliant with data protection legislation when providing such information to the Authority.

3.7.1 Data Collection Method

Licensees are to provide the data in a spreadsheet file format (specifically “.xls”) so that it may be viewed using Microsoft Excel. The data requested needs to also be provided in the order as is requested (for example, if the Request for Information requests the licensee to submit the First Name of Account Holder, Second Name of Account Holder, Date of Birth of Account Holder and Country Name, then these are to be displayed in the spreadsheet file in that order (displayed in rows). In this regard, the MGA will be circulating a template which operators should use to compile the data in. The file is then to be corresponded via email to sportsintegrity.mga@mga.org.mt. Files containing personal data are to be transmitted using appropriate methods that are compliant with relevant data protection legislation.

3.8 Sharing of Information

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 8(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 FIAU 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 8(2) of the Gaming Act (Chapter 583 of the Laws of Malta).

3.9 Industry Performance Return

The Authority intends to also start publishing questions pertinent to sports integrity matters in its Industry Performance Return.

The Industry Performance Return (IPR/Return) is the obligatory report that needs to be completed, on a bi-annual basis, by all companies licensed by the MGA. The Authority utilises information provided by the industry to assess any changes in the gambling landscape amongst others, with regard to, money wagers, gaming revenue, overall participation in gaming activities, responsible gambling and much more. Statistics collected through the Return enable the Authority to understand better the dynamics of the market and provide the necessary support to the decision-making processes. The MGA is empowered to request such information as per article 7(2)(d) of the Gaming Act (Chapter 583 of the Laws of Malta).

The questions to be considered for publishing in terms of sports integrity are, but not limited to:

- How many suspicious betting events linked with sports integrity were noted throughout the year in review? What sports did these events pertain to? What was the total value of the bets?
- How many sporting events were deemed to be at risk of being manipulated? How many were reported to (a) the gambling regulator; (b) a betting integrity agency; (c) a sport governing body; (d) a law enforcement agency?
- How many player accounts linked with suspicious betting were noted in the year in review?
- How many sports betting markets (individual sports matches) were pulled from the market before the sporting event took place, due to suspicious activity?
- How many sports betting markets (individual sports matches) had all the bets placed on them cancelled due to suspicious activity, after the event took place?

3.10 Policy

Following the bringing into force of the *Suspicious Betting Reporting Requirements*, as noted in article 43 of the *Gaming Authorisations and Compliance Directive* (Directive 3 of 2018), the Authority intends to be in a position wherein it will be able to implement procedures or protocols for the benefit of the integrity of sports betting, and sports in general. The Authority believes that in analysing reports of

suspicious betting, it will be able to better assess the risks that various sporting competitions are exposed to and hence capable in guiding the industry accordingly so as to be able to mitigate the said risks. Using this information, the Authority may be in a position to determine whether to restrict certain betting markets or provide guidelines thereto, especially in terms of betting practices on amateur competitions, competitions involving minors, etc.

3.11 Customer Disputes relating to Suspicious Betting

The Authority acknowledges the fact that any action taken by the operator relating to suspicious bets, especially where customer winnings may be voided or withheld as related investigations take place, is likely to generate customer disputes. As such, the Authority understands that this scenario involves considerable administrative time and effort on behalf of arbitration bodies and operators, with some cases taking years to be completed whilst the relevant sports governing bodies, law enforcement or integrity units conclude investigations into potential corruption.

In this regard, the Authority would like to understand the experiences of stakeholders in terms of what they would deem as best practice in minimising burdens on the operators whilst maintaining the level of integrity afforded to the investigations conducted into potential corruption in sports, as well as avoiding tipping off, or otherwise not prejudicing ongoing investigations.

3.12 The *Prevention of Corruption in Sport Act*, Chapter 593 of the Laws of Malta

Stakeholders should be aware of Chapter 593 of the Laws of Malta, the *Prevention of Corruption in Sport Act*. This law was enacted in 2018, replacing a previous version which was enacted in 1976. This law was viewed as an essential update, especially since the previous version was deemed outdated and made no reference to online betting. The MGA participated in the task force which had worked on the implementation of this new law, and it will also be involved in the implementation and function of the National Sports Integrity Unit underlined in this same law. This national platform will be responsible for the wider integrity of all local sport, and its implementation is being headed by the Government of Malta.

3.12.1 What is considered to be match-fixing in Malta?

Match-fixing in Malta is defined by *article 2* of the *Prevention of Corruption in Sport Act (Chapter 593 of the Laws of Malta)* as “manipulation of a sporting event”, as follows:

“manipulation of a sporting event” means an act or omission by virtue of which any person makes an intentional arrangement, aiming at or successfully accomplishing:

(a) the deliberate alteration of the outcome of any sporting event;

(b) the deliberate alteration of any of the aspects of a sporting event and the unpredictable nature of the sporting event, irrespective of whether such alteration affects the final outcome of the sporting event and whether such alteration, if any, is achieved as a direct or indirect consequence of the act or omission;

(c) the provision of inside information to third parties in a manner that assists or facilitates the commission of an offence against this Act;

(d) the actual acquisition of inside information with the intent of providing such information to third parties; or

(e) the aiding, abetting, encouragement and/or inducement in any other way, of third parties to commit any one or more of the aforementioned acts, which may result in an undue advantage or gain for that person or for others;

3.12.2 What are the types of liability that apply in Malta?

Whosoever engages in match-fixing or manipulating the outcome of a sporting event shall be criminally liable for such offence under Maltese Law. *Article 4 of the Prevention of Corruption in Sport Act* states that anybody who is guilty and convicted of the above offences shall be liable to a term of imprisonment of not more than 3 years and a fine from €5,000 to €30,000, or both. At this point, no administrative liability is imposed upon offenders, although additional punishments may be imposed by the Sport Governing Body or the club.

3.12.3 Is there a difference between professional and amateur sport?

Professional sport is not a criterion in Malta for the criminalising of the manipulation of sports competitions. This is made clear in *article 2 of the Prevention of Corruption in Sport Act*, whereby the definitions of “athlete” and “Maltese sporting event” do not allude to the requirement of being professional in order for the provisions of the Act to apply to them. Therefore, there is nothing in the *Prevention of Corruption in Sport Act* precluding operators from offering betting markets on amateur sport competitions taking place in Malta. At this moment in time, it is possible that the manipulation of amateur sports may fall within the scope of Chapter 593 and under criminal law.

3.13 Participants Betting on their Own Sport

The Authority concurs that those who are in any way or manner whatsoever involved in a sporting event (e.g. athletes, agents, club officials and staff, match officials, and where reasonable, family members) should comply with the betting integrity rules established by the SGB organising the event. Safe and fair sports betting is reliant on the professionalism and compliant conduct of all stakeholders. The Authority understands the fact that all participants should ensure that their involvement in sport

is based on the principles of loyalty, integrity, and fair play. Thus, the Authority encourages its licensees to make it a point to not allow participants of a sporting event betting on their own sport through their systems. In addition, the Authority understands that various gaming operators are already reserving the right to immediately report any of their account holders (to the regulator or respective sport governing body) who they know to be breaking any sports rules. The Authority supports this action-plan and encourages other operators to follow suit.

Requirements in relation to this will be considered as part of the Authority's initiatives as indicated in 3.10 above. The Authority is interested in understanding the processes that operators have already put in place in this regard.

3.14 Misuse of Inside Information

Chapter 593 of the Laws of Malta, the *Prevention of Corruption in Sport Act*, defines inside information as:

[...] important information of a precise nature relating, directly or indirectly, to any sporting event that a person possesses by virtue of his position in relation to a sport or sporting event, but does not include any information already published or which is common knowledge, easily accessible to interested members of the public or disclosed in accordance with the rules and regulations governing the relevant sporting event:

Provided that:

- (i) for the purposes of this definition, information shall be deemed to be important if it is such that, if it were public, it would be likely to have a significant effect on the public's perception of the more likely outcome and, or progress of a sporting event;*
- (ii) for the purposes of this definition, information shall be deemed to be of a precise nature if it indicates a circumstance or set of circumstances which exist or may reasonably be expected to come into existence, or an event which has occurred or may reasonably be expected to occur and/or if it is otherwise specific enough to enable a conclusion to be drawn as to the possible effect of that circumstance or set of circumstances or event on the more likely outcome or progress of a particular sporting event*

The Authority recognises the fact that any bets based on inside information are substantially unfair. In certain contexts, such activity may also tantamount to cheating or fraud. As noted above, inside information is information which is known by an individual or individuals as a result of their role in connection with an event and which is not in the public domain. However, for its intents and purposes, with the word 'event' the Authority is referring to any event (even that which is considered to be a

non-sporting event) on which bets can be placed. The misuse of inside information includes individuals using this information for themselves, or passing it on to others, for betting purposes.

The Authority encourages all SGBs to include within their regulation's clauses relating to the misuse of inside information. In conjunction, the Authority notes that betting operators ought to continue addressing the misuse of inside information via their internal controls and in turn report any such activity to the relevant SGB or the MGA in compliance with the Suspicious Betting Reporting Requirements. In addition, the Authority recognises the fact that there are a number of other organisations whose products are directly or indirectly related to betting endeavours, and hence may need to also consider their own policies on betting rules and misuse of inside information. These organisations may be TV, radio production and broadcasting companies, telecoms companies, and any selection panels or committees which is involved in judging or giving awards.

The Authority will continue to ensure that gaming is fair and, in some cases, will continue to play a role in investigating cases of suspicious betting, even those which involve the misuse of inside information. The MGA will share information with relevant parties where appropriate, and in accordance to law.

3.15 Benefits of Operator Engagement with a Global Monitoring Body

Considering the continuous challenge in combatting match-fixing and other types of manipulation, the Authority recognises that there is a clear value from operators being part of a wider international integrity alert and/or monitoring system, which also feeds data into the appropriate authorities. This adds an additional layer of protection both for operators' own businesses and also the licensed framework and its operational integrity capacity and associated reputation. It further allows for the development of a common threshold for identifying and reporting suspicious betting. The MGA recognises that there is also substantial value when operators pool in resources and information in order to better meet the intended aforementioned objectives. Many a time, such networks also present value for industry and regulators alike as their positions on policy matters would be representative of a wider array of stakeholders, hence the MGA joins other regulatory bodies in recognising the benefits of operators being part of a wider international betting integrity monitoring network.

4 Concluding Remarks

The MGA would like to thank all stakeholders in advance for their feedback on this guidance paper. The MGA is seeking detailed feedback from stakeholders before bringing into force the *Suspicious Betting Reporting Requirements*, as noted in article 43 of the *Gaming Authorisations and Compliance Directive* (Directive 3 of 2018).

This consultation is open until the 15 July 2020 and it is the intention of the Authority to issue a final version of these guidelines following consultation.