



FAQs
Suspicious Betting Reporting
&
Suspicious Betting Reporting Mechanism

Sports Betting Integrity department
Malta Gaming Authority

June 2021

Contents

| | | |
|------|---|----|
| 1 | Context..... | 5 |
| 2 | FAQs - Suspicious Betting Reporting & Suspicious Betting Reporting Mechanism | 6 |
| 2.1 | If an operator has an MGA licence but the customers whose bets are being considered suspicious fall within the remit of another licence, should they also be included in a report being filed on the SBRM?..... | 6 |
| 2.2 | When sending an RFI, do you (the SBI department) require details of accounts that do not fall under the MGA’s remit? | 6 |
| 2.3 | I have already sent most of the required data to the relevant SGB, but I have not sent them all of the personal data due to internal data protection measures. If we decide not to share all of this data with the relevant SGB, could I just send all of the required data directly to you (the MGA) as opposed to sending similar data out twice? | 6 |
| 2.4 | Should I (the operator) be reporting all accounts involved in participant breaches or only those that fall under the remit of the MGA?..... | 7 |
| 2.5 | When in the IPRs you (the MGA) ask how many suspicious accounts have been recorded, are you referring to accounts falling within the remit of the MGA licence, or in general?..... | 7 |
| 2.6 | I (the operator) want to submit a report to the SBI department but I have issues in accessing or using the SBRM via the MGA portal. What is the procedure in successfully registering an account on the MGA portal and in receiving the necessary rights to be able to use the SBRM successfully? 8 | |
| 2.7 | When I (the operator) submit a report using the SBRM via the MGA portal, what is the level of information that I should report pertinent to the suspicious event or suspicious account that I will be reporting? | 11 |
| 2.8 | When I (the operator) submit a report using the SBRM via the MGA portal, is it a must to also report any suspicious event or suspicious account to the SGB? Do I need to inform the MGA if I have (or have not) already reported such suspicious event or suspicious account to the relevant SGB at the time of submitting a report via the SBRM? | 11 |
| 2.9 | I (the operator) am facing a technical issue regarding the SBRM. Therefore, I have submitted a ticket via the MGA helpdesk. What can I do in the meantime until this ticket is handled by the relevant department? | 12 |
| 2.10 | I (the operator) have received an RFI from the SBI department regarding a suspicious event that occurred after 01 January 2021. Since the event occurred after 01 January 2021, the obligation to report suspicious betting through the SBRM was already in force. However, we did not report | |

such event through the SBRM as when we evaluated the degree of suspicion we determined that it was not high enough to report. At the time we received the RFI, and upon re-reviewing the event being queried, we now consider the event as suspicious and we wish to report and inform the SBI department accordingly. What should we do in this case?..... 12

2.11 I (the operator) have submitted a report regarding a suspicious event via the SBRM. After such a report, I have received a formal RFI from the SBI department requesting the relevant betting data. How should I correspond the relevant betting data?..... 13

3 Conclusion..... 14

Annex 1 Sports Betting Reporting Mechanism Manual..... 15

Acronyms

| | |
|-------------|--|
| B2C | Business-to-Consumer |
| IPR | Industry Performance Return |
| MGA | Malta Gaming Authority |
| RFI | Request for Information |
| SBI | Sports Betting Integrity |
| SBRM | Suspicious Betting Reporting Mechanism |
| SGB | Sport Governing Body |

1 Context

In May 2020, the Malta Gaming Authority (MGA/Authority) published a consultation paper on *Suspicious Betting Reporting Requirements and Other Matters*. Moreover, in September 2020, the MGA published a feedback paper and a guidance paper, taking into account all the feedback received from the consultation paper. The consultation objective aimed at gathering feedback on the proposed bringing into force of the *Suspicious Betting Reporting Requirements* together with other measures which the Authority intended to implement in support of its commitment to safeguard the integrity of sports and sports betting.

The obligation of B2C licensees which offer betting on sporting events to inform the Authority of any instance of suspicious betting was brought into force on 1 January 2021. The reporting instrument to be used for reporting purposes between B2C licensees and the Authority shall be the 'Suspicious Betting Reporting Mechanism' form via access through the MGA portal shared with licensees. In light of this, the MGA is publishing this document which aims to answer the frequently asked questions on suspicious betting reporting and the use of the SBRM. Regarding the latter, the Authority also published a manual (see [annex](#)), to better aid its operators in the ways and means of how this mechanism is to be operated.

2 FAQs - Suspicious Betting Reporting & Suspicious Betting Reporting Mechanism

2.1 If an operator has an MGA licence but the customers whose bets are being considered suspicious fall within the remit of another licence, should they also be included in a report being filed on the SBRM?

If an operator offered an event to MGA licensed customers and that event was later deemed suspicious, then the MGA would be interested to know about that suspicious event. However, if the accounts pertaining to the suspicious betting are not within the remit of the MGA licence, then the MGA will never request betting data in relation to those accounts because it is not within its remit to do so. It is usually the case that operators point this out to the SBI department, and with this confirmation, the MGA would advise the entity investigating to contact the relevant regulator.

2.2 When sending an RFI, do you (the SBI department) require details of accounts that do not fall under the MGA's remit?

No. However, in terms of reporting suspicious events, the MGA would appreciate it if it is made aware of those events that were offered to customers falling within the remits of the MGA licence but reported as suspicious due to accounts not falling within the remits of the MGA licence. The reason being the fact that, when queried by SGBs, Enforcement Bodies, and other sports integrity-related stakeholders, the MGA would be in a position to direct them to the relevant regulator, and be in a position to let them know whether the event was actually deemed suspicious or not by any of its operators. However, as stated in the previous question also, in such cases the MGA would still not request the betting data of those customers falling outside MGA's remit.

2.3 I have already sent most of the required data to the relevant SGB, but I have not sent them all of the personal data due to internal data protection measures. If we decide not to share all of this data with the relevant SGB, could I just send all of the required data directly to you (the MGA) as opposed to sending similar data out twice?

There are two approaches to this question. Some operators find it comfortable in directly sharing betting data with the SGB requesting it directly from them. This could either be the fact that their *Terms & Conditions* allow them to do so, or because they would have a data sharing agreement in place with that particular SGB which allows them to share such

information. However, other operators may only accept to exchange that data via the regulator alone, as they would not be comfortable in doing so any other way. Having said that, whenever the MGA corresponds an RFI to the industry because it is assisting an SGB in an investigation in relation to the manipulation of sports competitions, the data being requested from the operators would then be transferred securely to the SGB. However, this is only the case when an SGB submits a formal RFI to the MGA confirming that the data is being requested on the basis of an investigation into the potential manipulation of sports competitions. In compliance with Maltese law, the MGA would need to have a data-sharing agreement with the SGB before transferring any data. Hence, the MGA will only share betting data emanating from its licensees when the said process is in compliance with Maltese law.

2.4 Should I (the operator) be reporting all accounts involved in participant breaches or only those that fall under the remit of the MGA?

Only suspicious betting accounts falling within the remit of the MGA licence ought to be reported. This also applies to when an account holder is deemed to have breached sports rules governed by an SGB. However, if an event would be deemed suspicious due to activity emanating from such account holders, then the MGA would still require that it is notified of such an event (if the said event was offered to bettors falling within the remit of the MGA licence also). This will allow the MGA to remain aware of suspicious events being flagged by its operators, whilst also being in a position to liaise with regulators governing the betting data in question should the need arises.

2.5 When in the IPRs you (the MGA) ask how many suspicious accounts have been recorded, are you referring to accounts falling within the remit of the MGA licence, or in general?

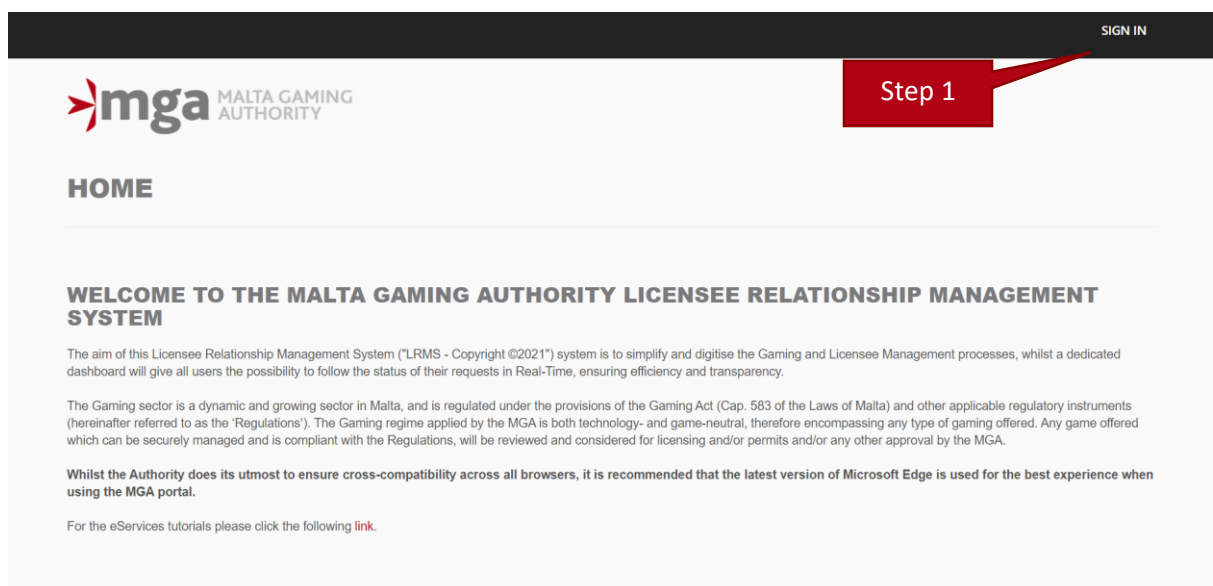
When the Authority requests betting data, it is only requesting betting data of account holders that fall within the remit of the MGA licence. Therefore, when the MGA asks in the IPRs how many suspicious accounts have been recorded, the MGA is only referring to those that fall under its remit.

2.6 I (the operator) want to submit a report to the SBI department but I have issues in accessing or using the SBRM via the MGA portal. What is the procedure in successfully registering an account on the MGA portal and in receiving the necessary rights to be able to use the SBRM successfully?


First, to be able to access the portal, and the SBRM, the *Power User* of the operator submitting the report must provide the necessary rights to the individual accessing the SBRM. The *Power User* is normally the person who had first opened the operator's account on the MGA portal. However, in the meantime, such user could have given such rights to another individual so it is best to check internally who is the current individual in possession of the *Power User* rights. Furthermore, such *Power User* must assign you the rights of an *Approver / Contributor*. Therefore, this must be done internally by the *Power User*, without the need to notify the MGA.

Once this is done, in order to be able to report suspicious events / accounts via the SBRM, please follow the below instructions:

1. Click on: <https://portal.mga.org.mt/>
2. Click on 'Sign In' as seen in Step 1 below:



SIGN IN

 **MALTA GAMING
AUTHORITY****Step 1****HOME****WELCOME TO THE MALTA GAMING AUTHORITY LICENSEE RELATIONSHIP MANAGEMENT SYSTEM**

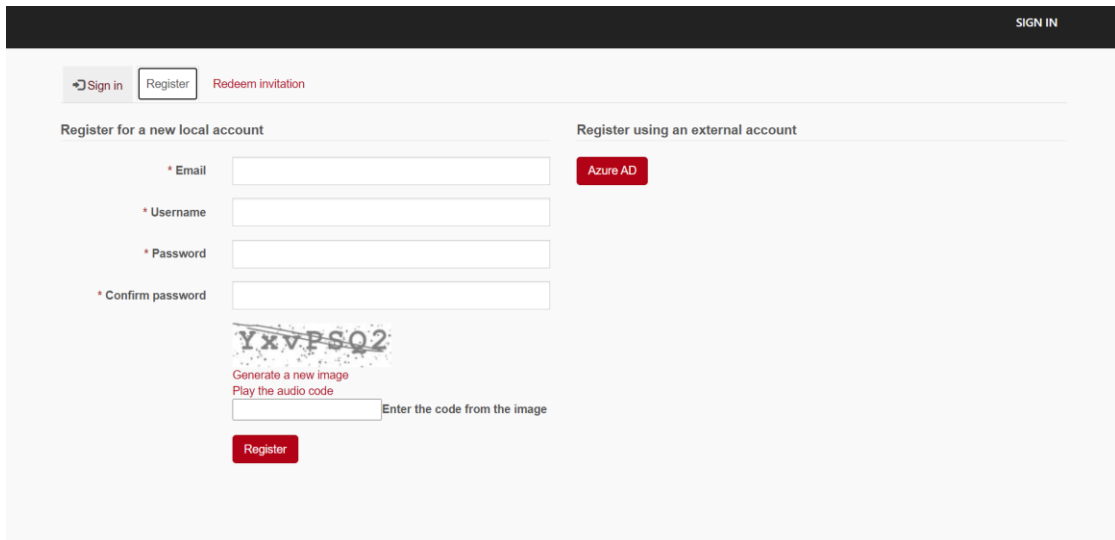
The aim of this Licensee Relationship Management System ("LRMS - Copyright ©2021") system is to simplify and digitise the Gaming and Licensee Management processes, whilst a dedicated dashboard will give all users the possibility to follow the status of their requests in Real-Time, ensuring efficiency and transparency.

The Gaming sector is a dynamic and growing sector in Malta, and is regulated under the provisions of the Gaming Act (Cap. 583 of the Laws of Malta) and other applicable regulatory instruments (hereinafter referred to as the 'Regulations'). The Gaming regime applied by the MGA is both technology- and game-neutral, therefore encompassing any type of gaming offered. Any game offered which can be securely managed and is compliant with the Regulations, will be reviewed and considered for licensing and/or permits and/or any other approval by the MGA.

Whilst the Authority does its utmost to ensure cross-compatibility across all browsers, it is recommended that the latest version of Microsoft Edge is used for the best experience when using the MGA portal.

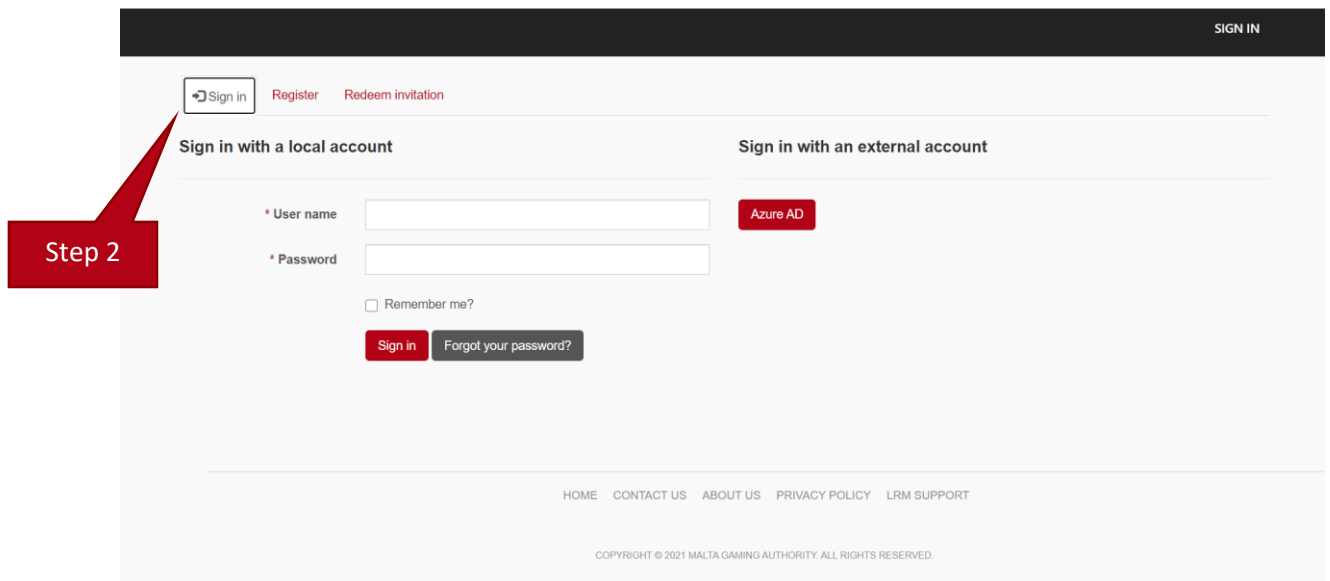
For the eServices tutorials please click the following [link](#).

3. Click on 'Register', when such button is selected, please input the necessary data as seen below:



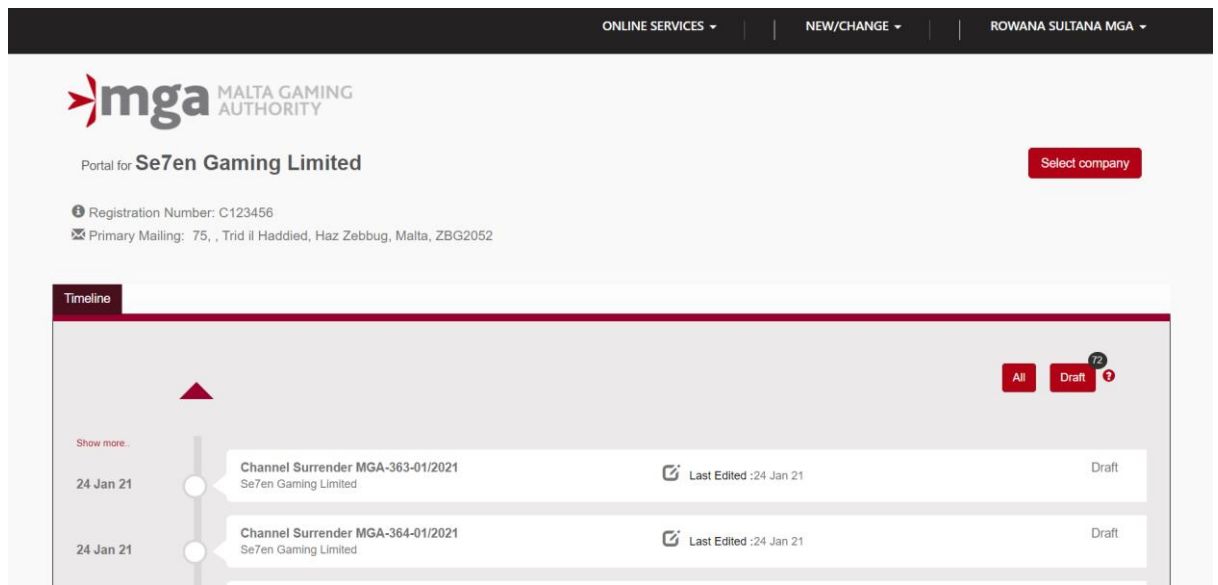
The screenshot shows the registration page with a dark header containing a 'SIGN IN' link. Below the header, there are three navigation buttons: 'Sign in', 'Register' (highlighted with a red border), and 'Redeem invitation'. The page is divided into two main sections: 'Register for a new local account' and 'Register using an external account'. The local account section includes input fields for Email, Username, Password, and Confirm password. Below these fields is a CAPTCHA image with the text 'YxvPSQ2' and a 'Generate a new image' link. There is also a 'Play the audio code' link and an input field for the code. A red 'Register' button is at the bottom of this section. The external account section has a red 'Azure AD' button.

4. Furthermore, once you have registered, please select 'Sign In' as seen in Step 2.

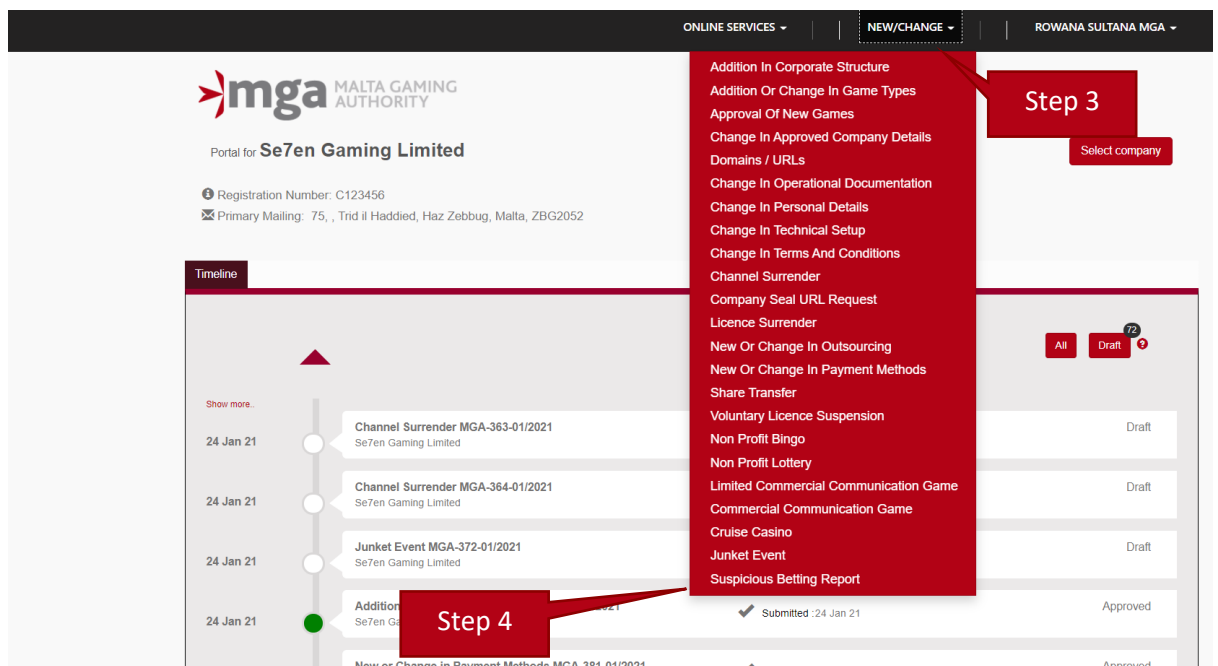


The screenshot shows the sign-in page with a dark header containing a 'SIGN IN' link. Below the header, there are three navigation buttons: 'Sign in' (highlighted with a red border and a red callout box labeled 'Step 2'), 'Register', and 'Redeem invitation'. The page is divided into two main sections: 'Sign in with a local account' and 'Sign in with an external account'. The local account section includes input fields for User name and Password, a 'Remember me?' checkbox, and a red 'Sign in' button. There is also a 'Forgot your password?' button. The external account section has a red 'Azure AD' button. At the bottom of the page, there are links for HOME, CONTACT US, ABOUT US, PRIVACY POLICY, and LRM SUPPORT. The footer contains the text 'COPYRIGHT © 2021 MALTA GAMING AUTHORITY. ALL RIGHTS RESERVED.'

5. Upon logging in, you will find the below:



6. Please click on 'New/Change' as seen in [Step 3](#) and select 'Suspicious Betting Report' as seen in Step 4 below:



** PLEASE NOTE THAT SE7EN MGA GAMING LIMITED IS A FICTITIOUS COMPANY USED ONLY FOR SUCH EXAMPLES.*

The above process will lead you to the SBRM. A [user-friendly manual](#) (link for the manual is provided in the annex section below) that was made available to all B2C Malta-licensed operators which offer betting on sporting events, can be used as guidance through the workings of the SBRM.

- 2.7 When I (the operator) submit a report using the SBRM via the MGA portal, what is the level of information that I should report pertinent to the suspicious event or suspicious account that I will be reporting?

When submitting a suspicious betting report, a detailed explanation regarding the suspicious behaviour noted should be given. An example of such could be an analysis of the unusual activity monitored that by such activity the relevant event or account was deemed suspicious. Such information is needed for the MGAs analysis and record keeping. However, this is also important for the MGA to have as a discussion regarding the report may ensue with the relevant SGB. Kindly note that the above example is the minimum requirement. Therefore, all information that can be provided (except for the betting data itself at this stage) would be appreciated and would avoid any additional emails requesting further clarifications.

- 2.8 When I (the operator) submit a report using the SBRM via the MGA portal, is it a must to also report any suspicious event or suspicious account to the SGB? Do I need to inform the MGA if I have (or have not) already reported such suspicious event or suspicious account to the relevant SGB at the time of submitting a report via the SBRM?

It is highly important to report any suspicious sporting events to the relevant SGB, in conjunction with the report being submitted via the SBRM (we understand that some entities are affiliated with a betting monitoring body and hence a report to the SGB is done via said betting monitoring body). The underlying reason is the fact that the relevant SGB would have access to other reports being submitted in relation to the same event (even non-betting related reports). Hence, having access to such reports, the relevant SGB would be in a better position to make an informed decision regarding the case in general, and to decide whether or not they ought to rope in the MGA as a participant in any investigation that may ensue. However, whether an operator reports to an SGB or not, remains at the discretion of the operator. The SBI department at the MGA always queries whether an operator has reported such event to the relevant SGB in order for the department to deem it fit whether the MGA should report it on their behalf. Therefore, it is important to identify whether you had reported such suspicious event or account to the relevant SGB so the SBI department can proceed accordingly. The above also applies to the reporting of certain suspicious accounts (for example, an operator may realise that a sports official is betting on events that they may be officiating).

- 2.9 I (the operator) am facing a technical issue regarding the SBRM. Therefore, I have submitted a ticket via the MGA helpdesk. What can I do in the meantime until this ticket is handled by the relevant department?

When an operator submits a ticket via the MGA helpdesk, the SBI department will not be aware of such ticket as the MGA's IT department is the relevant department that handles requests made via the MGA helpdesk and not the SBI department. However, when an operator submits a ticket via the MGA helpdesk regarding any issues, it would be beneficial for the operator to also inform the SBI department regarding such issue. Hence, the SBI department will be in a better position to liaise with the IT department to resolve the issue, and also liaise with the operator to find an alternative working process until the issue is resolved.

- 2.10 I (the operator) have received an RFI from the SBI department regarding a suspicious event that occurred after 01 January 2021. Since the event occurred after 01 January 2021, the obligation to report suspicious betting through the SBRM was already in force. However, we did not report such event through the SBRM as when we evaluated the degree of suspicion we determined that it was not high enough to report. At the time we received the RFI, and upon re-reviewing the event being queried, we now consider the event as suspicious and we wish to report and inform the SBI department accordingly. What should we do in this case?

The MGA understands that certain cases may not be as clear-cut and that a degree of analysis would be required before the case is actually reported in line with the *Suspicious Betting Reporting Requirements*. However, after receiving an RFI from the SBI department, it might be the case that such a request would be indicative enough for an operator to deem the event/s under review as suspicious and hence notify the SBI department accordingly. In fact, this is one of the reasons why the SBI department corresponds RFIs with all B2C-licensed operators regarding events following 01 January 2021 despite the fact that licensees are obliged to report such activities following the noted date nonetheless.

Should it be the case that a licensed entity reports an event following an RFI by the MGA, the SBI department would then kindly request the operator to report the relevant suspicious event/s via the MGA's SBRM. Such operator should attach the relevant betting data requested in the formal RFI corresponded via the *Enclosures* section of the SBRM. The SBI department would also kindly request that the operator notifies the SBI department when such reports have been submitted so that the department can review the relevant report accordingly.

- 2.11 I (the operator) have submitted a report regarding a suspicious event via the SBRM. After such a report, I have received a formal RFI from the SBI department requesting the relevant betting data. How should I correspond the relevant betting data?

When an operator reports a suspicious event via the SBRM and the SBI department requests the relevant betting data, the MGA expects the relevant betting data to be corresponded via the SBRM. As noted in a previous FAQ, the MGA highlights the fact that at reporting stage, no betting data is requested to be provided via the SBRM. Betting data is only requested upon a formal RFI from the SBI department. Following this RFI, the SBI department can set the report status of the corresponding report on the SBRM to *Amendments Required*. This will allow the operator to amend the report and upload the relevant betting data in the *Enclosures* section of the SBRM. The SBI department kindly requests that the operator notifies the department when such report has been re-submitted and the relevant betting data has been successfully uploaded.

3 Conclusion

This document will be continuously updated, as we are aware that new and diverse queries will continue to arise in the future.

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

Annex 1 Sports Betting Reporting Mechanism Manual

Link: [Sports Betting Reporting Mechanism - Manual](#)