



FAQs
Suspicious Betting Reporting
&
Suspicious Betting Reporting Mechanism

Sports Betting Integrity department
Malta Gaming Authority

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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 license, 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?	8
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?	9
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?	9
2.10	I (the operator) have received an RFI or an alert 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 or alert, 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? 10

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?..... 10

2.12 What does the alerting process refer to? 11

2.13 What is the difference between the alerting process and the Request for Information process? 11

2.14 When the relevant betting data falls under the remit of the MGA, when should we correspond such betting data? 12

2.15 How should betting data be corresponded? 12

2.16 When should we expect alerts to be corresponded by the MGA?..... 13

2.17 To whom are Sports Integrity related matters corresponded to by the MGA? 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

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 whilst for all licensees that offer a critical gaming supply relating to betting on sport events came into force on 1 October 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 license, 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 activity are not within the remit of the MGA licence, then the Authority would want to be advised of such and notified with the name of the regulatory authority under which the betting data falls under. However, in such cases, the Authority will never request betting data in relation to those accounts because it is not within its remit to do so. 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 the 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 do not find any issues 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 relating 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?

In such cases involving a participant breach but not necessarily entailing a suspicious event, only suspicious betting accounts falling within the remit of the MGA licence ought to be reported. 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?

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.

For guidance on how to make use of the mechanism, despite the fact that the mechanism is a user-friendly one, the Authority published [a manual](#) which shall act as a point of reference to any queries one may have when reporting suspicious betting activity to the Authority.

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 MGA's 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 would be appreciated and would avoid any additional emails requesting further clarifications. B2C licensed operators should also correspond the relevant betting data that falls under the MGAs remit at the reporting stage.

- 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 or an alert 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 or alert, 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. The MGA highlights the fact that at reporting stage, betting data is being requested to be provided via the SBRM if such betting data falls under the MGA's remit. If not, clarification under which jurisdiction the relevant betting data falls under should be highlighted. This will decrease further correspondence between the MGA and the operator requesting this betting data if it has not already been attached at the reporting stage. 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.

2.12 What does the alerting process refer to?

The MGA started alerting its licensees with any knowledge of suspicious betting activity in its possession reported via the SBRM by other licensees. Without revealing the source of the information, the MGA is informing its licensees of any instance of suspicious betting activity in relation to any event that has been adverted by such. This ensures that MGA-licensed operators are aware of suspicious betting activities known within the MGA's radar. This also allows MGA-licensed operators to review their monitoring systems and verify if the licensee has been subject to similar activities. When receiving an alert, there is no need to revert with a reply should no suspicious betting activity be recorded on any of the events noted in the alert. If suspicious betting is recorded by an operator after receiving an alert, then the suspicious event in question is to be reported via the *Suspicious Betting Reporting Mechanism*.

2.13 What is the difference between the alerting process and the Request for Information process?

The alerting process is separate from the Request for Information process. When an alert is corresponded, the MGA is informing the industry regarding a suspicious event that was reported to us by another operator (without revealing the source of the information). The MGA expects that operators will then be in a position to review the event in question and establish whether the information being provided by the MGA may reveal any new indications that were previously not noticed. For example, an operator may be already deeming an event to be borderline suspicious due to irregular betting patterns noticed surrounding the event and hence the new information provided by the MGA may establish a better conclusion in that regard. The MGA also expects that licensees will be able to review (or re-review) the betting activity surrounding the event being indicated in the alert, as this will increase the odds of recognising any suspicious behaviour (if there is any). If suspicious betting is recorded by an operator after receiving an alert, then the suspicious event in question is to be reported via the *Suspicious Betting Reporting Mechanism*.

With regards to the Request for Information process, the MGA sends a Request for Information when the MGA is officially requesting betting data (if the operator does indeed deem the event as suspicious). The MGA is aware that such events should have been reported via the SBRM if the event took place after 01 January 2021 as per the reporting requirements.

However, 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. Therefore, in the Request for Information process, the MGA requires a reply informing the MGA if suspicious activity was indeed recorded on such request or not before the set deadline is met.

2.14 When the relevant betting data falls under the remit of the MGA, when should we correspond such betting data?

As highlighted in the above FAQ, the relevant betting data should be corresponded in the *Enclosures* section of the report via the SBRM at reporting stage if such betting data falls under the MGAs remit. If not, clarification under which jurisdiction the relevant betting data falls should be highlighted. This will decrease further correspondence between the MGA and the operator requesting this betting data if it has not already been attached at the reporting stage.

2.15 How should betting data be corresponded?

Licensees that offer a gaming service (B2C) are to provide betting data in a spreadsheet file format (specifically “.xls”) so that it may be viewed using Microsoft Excel. If betting data is being requested after a Request for Information has been corresponded, then 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)).

When betting data is being corresponded at reporting stage, the following information should be included in the betting data being corresponded:

- **Full name (forename and surname);**
- **Username;**
- **Address;**
- **Date of Birth;**
- **Country of registration;**
- **Contact email;**

- **Contact telephone numbers;**
- **IP history;**
- **Date of account opening;**
- **Details of any linked accounts;**
- **Details regarding how the bets differ from the account behaviour seen to date;**
- **Precise time at which the bets in question were made;**
- **Assessment of how these wagers may differ from overall market activity on this offer;**
- **Betting history on the relevant match/s (including all dates, timings, stakes, odds and winnings).**

2.16 When should we expect alerts to be corresponded by the MGA?

Alerts are corresponded by the *Sports Betting Integrity* department with the Malta-licensed betting operators every Friday.

2.17 To whom are Sports Integrity related matters corresponded to by the MGA?

Sports Integrity related matters (including Alerts and Requests for Information) are corresponded with the licensee's appointed *Key Compliance* (since said function holder is the person responsible for any compliance obligations relating to sports integrity as per the *Gaming Authorisations and Compliance Directive*). However, we are also copying in the contact email of the departments designated to cater for sports integrity-related issues. Only email addresses associated with the designated department (e.g. sportsintegrity.mga@mga.org.mt) will also be included in such correspondence. Licensees who wish to include a department email address (not a personal address) should do so by informing the Sports Betting Integrity department on sportsintegrity.mga@mga.org.mt.

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](#)