



Scottish Rowing Anti-corruption (Sports Betting) Policy

Approved June 2015

1. Introduction

- 1.1. All Scottish Rowing (“SR”) employees, whether paid or unpaid, have a contractual obligation to maintain the highest standards of integrity by carrying out their work in a way that will not compromise the reputation of the organisation.
- 1.2. This policy sets out Scottish Rowing’s standards and procedures relating to Anti-Corruption (Sports Betting) and applies to all individuals working for and representing SR which includes SR Board members and all employees paid or unpaid, contractors, consultants, and/or related personnel of SR acting in any capacity or activity sanctioned by SR; or acting in the course of the business of SR. To a limited extent, this policy also applies to SR members and members of clubs affiliated to SR.
- 1.3. The framework and desirability for this policy is based on the Scottish Governing Bodies and Sporting Organisations Sporting Integrity, a copy of which can be obtained from the Scottish Rowing office.
- 1.4. The purpose of this policy is to provide an overview and general advice to all the above people on the issues associated with the integrity of sports betting.
- 1.5. This policy is intended to protect the reputation of sport, Scottish Rowing, and each individual acting for it. **Please note that responsibility for complying with this policy lies with all those to whom it applies.**

2. Sporting Integrity

- 2.1. A core function of SR is to maintain, and be seen to be maintaining the integrity of sport.
- 2.2. SR must take action to protect itself from the threats posed to its integrity by corrupt betting and associated activity both from within and outside the organisation. As sports betting activity has increased across all sports and disciplines, it is essential that such activity does not take place in a manner which has the potential to compromise sporting conduct and endeavour.

- 2.3. There will be clear rules for employees, whether paid or unpaid in positions of trust and/or at particular risk and this will depend on the role of the Staff member.
- 2.4. SR Board Members, SR employees, athletes on the SR performance programme, SR performance coaches and coaches working in SR funded performance programmes (for list see Appendix 2) cannot:
- 2.4.1. bet on the sport, anywhere in the world;
- 2.4.2. ask someone to bet on your behalf on the sport anywhere in the world.
- 2.5. SR members and members of clubs affiliated to SR and those bound by paragraph 2.4, cannot:
- 2.5.1. share any “Inside Information” with anyone including but not limited to your spouse, cohabitee or dependent children which could enable them to gain an advantage through corrupt betting activity (See section 4 (Inside Information) for further information); and
- 2.5.2. become involved in any other activity associated with corrupt betting which could reasonably be deemed as suspicious and detrimental to the image and reputation of SR and the sport.
- 2.6. The following conduct is also prohibited for all persons affected by this policy:
- fixing a race or event or attempting to fix a race or event;
 - benefiting from failing to perform;
 - soliciting, inducing, encouraging, offering or attempting to offer a bribe to any other party to do any of the above;
 - receiving, seeking a bribe (or attempting to) in order to fix a race or event or attempt to fix a race or event;
 - posing a threat to the integrity of the sport governed by SR;
 - destruction of evidence in relation to a potential breach of any of the above; and
 - failing to report suspicions or approaches in connection with any of the above.

3. Criminal offence of cheating - section 42 of the Gambling Act 2005

- 3.1. Section 42 of The Gambling Act 2005 has created a new offence of “cheating at gambling” which would include cheating in sports influenced by betting involvement (see the extract of section 42 of the Gambling Act 2005 in Appendix 1).

- 3.2. Breach of the Gambling Act 2005 new rules may result in the imposition of severe penalties for individuals (fines and jail).
- 3.3. Depending on the nature of the activity, SR's Investigation Panel (see section 6.5-6.15) may refer the matter to the Gambling Commission for consideration of an investigation of the criminal offence of cheating at gambling.

4. "Inside Information"

- 4.1. The sharing of "Inside Information" by anyone affected by this policy is specifically prohibited by Scottish Rowing.
 - 4.1.1. "Inside Information" means any information, which is not Publically Known that would materially affect peoples' expectations relating to the participation in, or the likely or actual outcome of a races or races. Such information includes, but is not limited to, factual information regarding the competitors, crew selection, the conditions, tactical considerations, injuries, or any other aspect of the event. "
 - 4.1.2. "Publically Known" means any information that is already published as a matter of public record, able to be readily acquired by an interested member of the public, or disclosed according to the rules and regulations governing the event.
- 4.2. With regard to clause 2.5, it is the responsibility of anyone affected by this policy to determine whether information which they have access to falls under the definition of "Inside information". Individuals are advised to err on the side of caution and should also seek advice from Scottish Rowing's Betting Integrity Officer.

5. Betting Integrity Officer - Roles and Responsibilities

- 5.1. SR's Director of Corporate Governance or his/her proposed nominee is Scottish Rowing's designated Betting Integrity Officer.
- 5.2. All SR employees whether paid or unpaid, directors, and volunteers, hereinafter collectively referred to as "Staff" are responsible for betting integrity issues but the Betting Integrity Officer has specific additional responsibilities including:
 - establishing and maintaining a sound Sports Betting Policy that supports the achievement of SR's policies, aims and objectives; and
 - advising the Investigations Panel (see section 6 below).

6. Response Plan

- 6.1. It is imperative that, if there is any suspicious betting activity in SR, action is taken.
- 6.2. All Staff should be aware that they must not try to deal with or investigate any allegations of corrupt betting and associated activity by themselves but should immediately report the matter to SR's Betting Integrity Officer.
- 6.3. All Staff, SR Board Members, athletes on the SR performance programme, SR performance coaches and coaches working in SR funded performance programmes must report any approach or activity which contravenes, or which may contravene, SR's rules on sports betting. Specifically,
 - if any such person is approached about fixing any part of a race or event or asks for "Inside Information" then he/she must report this and cannot just ignore it;
 - if any such person has any concerns about any other person's activity in connection with this policy then he/she must report this; and
 - any threats should always be reported.
- 6.4. In the event that a member of Staff is concerned that the Scottish Rowing Betting Integrity Officer is involved in suspicious betting activity outlined in section 6.3 above, this should be reported to the SR Chief Operating Officer, or a Director of SR.
- 6.5. The Betting Integrity Officer will co-ordinate any investigation in relation to a suspected or alleged breach of this policy and set up an Investigations Panel consisting of not less than three Scottish Rowing Staff members including the Betting Integrity Officer.
- 6.6. The Investigations Panel will investigate the allegation. A member of the Investigations Panel will be allocated with the responsibility for leading the investigation process.
- 6.7. In any investigation or enquiry into a matter arising from this policy all said Staff, SR Board Members, athletes on the SR performance programme, SR performance coaches and coaches working in SR funded performance programmes must co-operate fully, and consistent with a duty of full disclosure. That duty includes the production of full documentation (e.g. telephone/betting records).

- 6.8. The Investigations Panel should establish the facts quickly and any threat of further corrupt betting and associated activity should be removed immediately.
- 6.9. The Investigations Panel is required to:
- act promptly in investigating the allegation and taking any action required (subject to approval by the SR Board of Directors where appropriate);
 - fully document the investigation process;
 - secure evidence in a manner which does not alert suspects at the outset of the investigation; and
 - ensure that the evidence is secured in a legally admissible form (e.g. evidence must be carefully preserved; it should not be handled and no marks made on original documents; a record should be kept of anyone handling evidence).
 - alert and refer reasonable suspicion of criminal behaviour to the appropriate authorities; and
 - report to the SR President and SR Chief Operating Officer.
- 6.10. Depending on the nature of the activity, the Investigations Panel may refer the matter to the Gambling Commission for consideration of an investigation of the criminal offence of cheating (section 42 of the Gambling Act 2005). Additionally, the Investigations Panel may wish to liaise with betting operators, European/International federations, the Police and the Sports Betting Group.
- 6.11. Depending on the nature of the activity, the Investigations Panel may wish to consult external experts for advice.
- 6.12. The Investigations Panel must obtain the consent of the SR President and the SR Chief Operating Officer before contacting any of the third parties referred to in 6.10 and 6.11 above.
- 6.13. The Investigations Panel will present a report of its findings and recommendations to the SR President and the SR Chief Operating Officer for final approval. The report will include details of:
- recommendations on how to manage persons under suspicion; which may include a range of disciplinary methods and/or supervision;
 - recommendations on how to deal with third parties under suspicion;

- recommendations for mitigating the threat of future corrupt betting and associated activity by taking appropriate action to improve controls;
- recommendations for disseminating the lessons learned from the experience in cases where there may be implications for the organisation as a whole; and
- recommendations on what information can be released externally if requested.

6.14. The Investigations Panel should liaise with Scottish Rowing's Chief Operating Officer to agree precisely what information can be released if requested. Scottish Rowing shall retain a record of what information was released and to whom.

6.15. Any person who feels that his/her concerns have not been dealt with appropriately internally, can take any concerns to the relevant authorities and other associated external bodies including the Gambling Commission, so long as all such actions are taken in good faith.

7. Scottish Rowing Board members

7.1. Any Scottish Rowing Board member who is concerned that a fellow Board member(s) or any employee of Scottish Rowing is involved in suspicious betting activity should inform the SR President or SR Chief Operating Officer as may be appropriate.

8. Compliance

8.1. This policy will be reviewed annually unless circumstances dictate more frequent reviews.

8.2. Staff, employees and others who breach this policy and procedure may be subject to disciplinary action.

8.3. Compliance of this policy will be monitored by the Chief Operating Officer and the Scottish Rowing Board of Directors..

[Month] 2015

Appendix 1

Section 42 – Gambling Act 2005

42 Cheating

- (1) A person commits an offence if he—
 - (a) cheats at gambling, or
 - (b) does anything for the purpose of enabling or assisting another person to cheat at gambling.
- (2) For the purposes of subsection (1) it is immaterial whether a person who cheats—
 - (a) improves his chances of winning anything, or
 - (b) wins anything.
- (3) Without prejudice to the generality of subsection (1) cheating at gambling may, in particular, consist of actual or attempted deception or interference in connection with—
 - (a) the process by which gambling is conducted, or
 - (b) a real or virtual game, race or other event or process to which gambling relates.
- (4) A person guilty of an offence under this section shall be liable—
 - (a) on conviction on indictment, to imprisonment for a term not exceeding two years, to a fine or to both, or
 - (b) on summary conviction, to imprisonment for a term not exceeding 51 weeks, to a fine not exceeding the statutory maximum or to both.
- (5) In the application of subsection (4) to Scotland the reference to 51 weeks shall have effect as a reference to six months.
- (6) Section 17 of the Gaming Act 1845 (c. 109) (winning by cheating) shall cease to have effect.

Appendix 2

Individuals to whom Clause 2.4 applies.

- All member of the Scottish Rowing Board
- All paid employees excluding sessional coaches
- High Performance Co-ordinator
- All professional coaches in Scottish Rowing funded performance programmes
- Scotland Team Manager and Assistant Team Manager
- All umpires