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A Review of the Recommendations of the *Report of the Sports Betting Integrity Panel* in Assessing the progress towards tackling Match-Fixing in Sport

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Abstract

A recent influx in match-fixing occurrences has led to a loss of faith in sports governing bodies regarding the prevention of (and response to) match-fixing. Ultimately this had led to the current state of ambiguous regulation and discipline, and uncertainty both over how the rules should be implemented and how athletes and officials should be sanctioned.

This paper analyses the recommendations posed by Rick Parry's "Report of the Sports Betting Integrity Panel 2002" and considers whether any of the conclusions of the 2002 report have been taken on board by the relevant bodies. The paper also evaluates whether the absence of a national or global agency to govern match-fixing (for example like WADA - the World Anti-Doping Agency does within anti-doping) has compounded these difficulties, particularly in relation to understanding the policies and procedures surrounding this branch of corruption. The paper will finally conclude by evaluating whether match-fixing remains as prominent and as unregulated as ever or whether the issue can be excused by a lack of funding, priority or severity.

Keywords: *Corruption, Gambling, Betting, Integrity, Match-Fixing, Questionnaire, WADA, Parry Report*

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INTRODUCTION

In 2009, Gerry Sutcliffe (the former Sports Minister) announced Rick Parry as the chair of the Sports Betting Integrity Panel [The Panel]. Created as a result of Sutcliffe's efforts to uphold integrity in sports and associated betting,¹ members of The Panel included experts from the betting industry, the police, players, fans, sports governing bodies [SGBs], the legal profession and the Gambling Commission.² Parry expressed his confidence in creating the toughest possible approach to corruption³ through the Report of the Sports Betting Integrity Panel 2010 [*The Parry Report*]. The recommendations also outlined how relevant organisations could work together more effectively. Indeed, the merging of betting organisations and sporting bodies in order to create a strategy for assisting integrity in sports and sports betting was a key recommendation of *The Parry Report*. Other recommendations included the implementation of individual education programmes and the formation of bodies to improve both regulation and access.

Match-fixing (whereby elements or the outcome of a match or event are dishonestly predetermined) is known as a cancer to sport.⁴ The widespread use of this phrase implies that both the awareness and fight to defeat match-fixing is strong. This may however be less true than desired, especially in regard to the expectations following the release of *The Parry Report*. Whether this is due to financial barriers, misconceptions through the media or a simple lack of interest, the match-fixing community has not received the same level of attention as a similar cancer of sport, anti-doping. One presumption is that doping poses a higher threat to sporting integrity than match-fixing⁵ and therefore a match-fixing alternative of the World Anti-Doping Agency [WADA] approach⁶ is not believed necessary. The detection and conviction of match-fixing also poses more difficulties whereas tests to establish breaches of anti-doping rules are comparatively easy to administer.⁷

The view that match-fixing occurrences are not common may indeed be credible, especially within the United Kingdom. After all, most of the blame is placed on Asian syndicates⁸ - that is not to say that the corruption ends there however, as the majority of cases have occurred from communication overseas. However, monetary incentives may be less enticing to UK athletes⁹ as opposed to athletes from alternative locations.¹⁰ The belief that the lack of prosecutions are due to match-fixing not being a regular occurrence, could also result in the assumption that regulation need not be so strict in the UK. As *The Parry Report* highlights however, match-fixing is a growing threat and is regularly happening behind closed doors. It is therefore important to recognise and prevent match-fixing activity as it arises. Due to the attractive sums of money involved, profits

¹ 'Report of the Sports Betting Integrity Panel' (February 2010) 6
[\[http://www.sportsbettinggroup.org/docs%5Creports_sports_betting_integrity_panel.pdf\]](http://www.sportsbettinggroup.org/docs%5Creports_sports_betting_integrity_panel.pdf)

² *ibid*

³ 'Parry given Betting Integrity Job' *BBC Sport* (24 June 2009) [\[http://news.bbc.co.uk/sport1/hi/front_page/8116904.stm\]](http://news.bbc.co.uk/sport1/hi/front_page/8116904.stm)

⁴ Examples of those using this term in the media are: Andrew Strauss, former English international cricket captain (September 2010); Zhang Jilong, AFC's acting president (February 2013); Javier Tebas, La Liga president (May 2013); Dean Wilson, sports journalist (July 2014); Emanuel Medeiros, CEO International Centre for Sports Security (September 2014)

⁵ cf Rogge's views in Kevin Carpenter, 'Match-Fixing—the Biggest Threat to Sport in the 21st Century?' [2012] 2 ISLR

⁶ With the creation of the World Anti-Doping Agency (WADA) and the six documents that make up the anti-doping empire (the World Anti-Doping Code, Prohibited List, Therapeutic Use Exemptions, Laboratories, Testing Protocols, Privacy and Data Protection) the Agency has become a force to be reckoned with. WADA constantly revises its procedures to remain current with breaking technologies.

⁷ These tests are governed by strict rules under the WADA International Standard for Testing and Investigations (2015) document

⁸ For example, see: Jonah Fisher, 'Trailing Singapore's 'Football Match-Fixing Boss'' *BBC Sport* [\[http://www.bbc.co.uk/news/world-asia-21653846\]](http://www.bbc.co.uk/news/world-asia-21653846)

⁹ cf the cases of Stephen Lee, UK snooker player; although respected to be almost 100 years ago, the Manchester United v Liverpool scandal in 1911; the 1919 World Series Black Sox scandal

¹⁰ UK salaries are generally higher than those overseas. To use football as an example- Thai AFC average annual salary €30,000 (<http://blog.fielddoo.com/2014/04/thai-premier-league-review/>); English Premier League £2.3m (<http://www.dailymail.co.uk/sport/football/article-2833020/Premier-League-wages-dwarf-Europe-flight-players-England-earning-average-2-3million-year.html>); Indian Super League €85,000 (<http://blog.fielddoo.com/2014/07/how-is-it-like-to-be-a-football-player-in-india/>)

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from one successful fix can provide for a whole business in corruption. If we are not quick to act, match-fixing has the potential to grow into a wide spread global disease.

While there are many documents, text book chapters and media articles that define match-fixing and/or discuss its occurrences, what is less available is the evaluation of operations issued from both the government¹¹ and sporting bodies in determining the effectiveness of the five-year-old Parry Report recommendations. The investigation within this project aims to fill this void and to clarify exactly what, if anything, has materialised as a result of The Panel's extensive research.

This research project will discover the levels of awareness of *The Parry Report* and match-fixing as a whole within both the general public (Group A) and Sports Governing Bodies [SGBs] (Group B). It will highlight views both on the importance of match-fixing and the levels of concern within the two groups. It will then gather opinions regarding sanctions and procedures in relation to Group A, and in relation to Group B, whether *The Parry Report's* recommendations have been implemented, including appointed authority, an inside-information definition and education programmes.

Two tailored questionnaires were distributed to each group by a number of means (including instant messaging¹² and social media,¹³ with follow ups issued where necessary). To aid this investigation, a master contacts list was created through the collation of specified SGBs¹⁴ obtained from Sport and Recreation Alliance members.¹⁵ This Excel document was used as a reference to distribute Group B's Questionnaire, with preference given to the e-mail method.¹⁶

The primary finding expected from Group A was that the awareness of *The Parry Report* will be limited. Other expectations included that the general public will:

- favour harsh sentences for match-fixing offences;
- not have the knowledge of how and where to report suspicions;
- believe that the police should be responsible for the fight in combatting match-fixing;
- believe that the government should be responsible for the funding of operations;
- be confused on whether bodies exist that regulate match-fixing;
- not consider education programmes for sportsmen/women effective.

The findings from Group B were used to analyse how influential *The Parry Report* was. Although it is recognised that SGBs may not divulge all of the information asked for,¹⁷ the results collated have provided insight into the stature of *The Parry Report*.

¹¹ Prior to the UK Anti-Corruption Plan, there had been a hiatus in governmental match-fixing projects. The Plan was released during the research stage of this project. It will be discussed further in the Literature Review, however it is important to point out its existence here in relation to the gap in research

¹² WhatsApp & iMessage; beginning 24 March 2015 and administered regularly until close of survey (20 April 2015)

¹³ Twitter & LinkedIn; 24 March 2015-20 April 2015

¹⁴ SGBs were eliminated where no betting markets were available for their sports

¹⁵ Sport and Recreation Alliance, 'Who are our Members?' [<http://www.sportandrecreation.org.uk/membership/who-are-our-members-0>]

¹⁶ Alternatively via website contact forms if no direct e-mail was provided. Failing both, bodies were administered the questionnaire via post

¹⁷ See discussions within the Literature Review of this work

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Predicted theories around the findings from Group B included:

- the bodies who do not have procedures in place will be unexpected;
- a high level of confidence will be shown that members are aware of the consequences and reporting procedures of match-fixing;
- there will be varying levels of concern that match-fixing exists within the respective sports;
- a low amount of SGBs have read UK Anti-Corruption Plan (The Plan);¹⁸
- although some may have read *The Parry Report*, a substantial amount of the recommended measures will not have been implemented.

It was anticipated that surprising results may arise, along with those that are not consistent with the message of urgency that *The Parry Report* conveys. Although it is accepted that integrity will not be fully restored through this study alone, the author hopes that inconsistencies in beliefs regarding the severity of match-fixing will be resolved.

LITERATURE REVIEW

The influx of match-fixing cases¹⁹ has heightened the awareness of this method of corruption in sport and increased pressure on the sporting world to prove that they are taking action to preserve the integrity of sport. This corruption has the ability to affect sport globally in many ways, negatively affecting the reputation and commercial viability of not only the sport in question but also the sports betting business.²⁰ A loss of faith in SGBs also results. The ease of manipulation and detection difficulty should have caused betting organisations to work alongside sporting bodies to improve account management and monitoring methods, however, due to the continuing amount of offences globally, it appears that either this has not happened or its effectiveness has proven to be weak.

Both the Sports Betting Integrity Unit [SBIU]²¹ and the Sports Betting Group [SBG]²² were formed in 2010 following the publication of *The Parry Report*.²³ The SBIU is a body located within the Gambling Commission where potential match-fixing activity can be reported.²⁴ The Unit shares the intelligence it gathers with selected parties, for example betting operators, sports governing bodies and overseas regulators in order to assist with investigations. Although the SBIU is one of the primary proposals of *The Parry Report*, the Unit's success has been debatable. Lack of funding and powers have been suggested to be contributing factors, with Tom Serby (Solicitor and Senior Lecturer of Anglia Law School)²⁵ stating that the 'scant financial resources'²⁶ have hindered its accomplishment in the fight against corruption. When funding for the Unit had been

¹⁸ HM Government, 'UK Anti-Corruption Plan' (Dec 2014) [<https://www.gov.uk/government/publications/uk-anti-corruption-plan>]

¹⁹ For recent investigations, see: Adam James, 'Integrity in Sports Update: IOC Meets IFSI to Discuss Athlete Protection' (online) [http://www.lawinsport.com/blog/item/integrity-in-sports-update-ioc-meets-ifs-i-to-discuss-athlete-protection?category_id=139]

²⁰ Benjamin Simon, 'UK: Government Launches Anti-Corruption Plan' (23 December 2014) (online) [<http://blogs.dlapiper.com/mediaandsport/uk-government-launches-anti-corruption-plan/>]

²¹ Sports Betting Intelligence Unit (SBIU): [<http://www.gamblingcommission.gov.uk/Licensing-compliance-enforcement/Intelligence/sbiu.aspx>]

²² Sports Betting Group [<http://www.sportsbettinggroup.org>]

²³ supra (n1) 9 [1.12-1.15] (SBIU); 9, [1.9] (SBG)

²⁴ Suspicious activity can be reported direct to the SBIU at sbiu@gamblingcommission.gov.uk or via the confidential intelligence line; supra (n22)

²⁵ Profile here: Anglia Ruskin University, 'Tom Serby' [http://ww2.anglia.ac.uk/ruskin/en/home/faculties/alss/deps/law/staff0/tom_serby.html]

²⁶ Tom Serby, 'Gambling Related Match-Fixing: a Terminal Threat to the Integrity of Sport?' 1, 5 [<http://angliaruskin.openrepository.com/arro/bitstream/10540/287385/1/Integrity%20in%20sport%20article%20march%206%202012.doc>]

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requested, reference was made to the £6m raised from public funding towards anti-doping investigations.²⁷ This caused allegations that the government's preference has resulted in match-fixing not being awarded the attention it needs.²⁸ These concerns were presented to government at the highly relevant time of the *Remote Gambling Bill* going through Parliament- subsequently the *Gambling (Licensing and Advertising) Act 2014* (the Act). Enacted on the 1st December 2014, the Act provides for the government's gambling taxation reform. Gambling companies are now required to pay tax on the gross gambling profit generated from UK customers, wherever the operator is located.²⁹ Speculations arose about whether the money raised through the provision would go towards funding the Unit, as before the Act, Rick Parry himself had called for this to be the case.³⁰ These speculations abound due to the Act being just months old.

Although its set up is recognised to be a positive move, the SBIU has been labelled as not fully functional or well resourced. This has resulted in calls for the creation of a unit with a more analytical, broader coordinating and investigatory role.³¹ David Foster (the Sport and Recreation Alliance's UK and EU Regulatory Officer) whilst recognising the existence of the SBIU, also insists that we need a larger Unit.³² Unfortunately, he does not reveal any further reasoning for his opinions. Criticism in relation to resources has also been made by Paul Scotney³³ in calling for a heightened integrity unit as opposed to the current SBIU.³⁴ The author believes that with the added benefit of funding, the current SBIU can assume these roles. If the level of financial aid is brought parallel to that awarded to combat doping, or at least increased, the SBIU could hold a larger, more prominent role and the current Unit's struggle would be significantly reduced.

Some may say that a lack of funding is an excuse for failure. This can be dispelled by providing an example of a successful match-fixing organisation that is receiving that help. INTERPOL's Integrity in Sport Programme³⁵ supplies players, referees, managers and coaches with training and education programmes in conjunction with their aim to:

- educate and train key actors in football on how to recognise, resist and report attempts to corrupt or fix matches;
- better prepare law enforcement on how to investigate and cooperate in corruption or match-fixing related cases³⁶

²⁷ Ben Rumsby, 'Football Match-Fixing: Government and FA Criticised for a Lack of Commitment in Fight Against Betting Corruption' *The Telegraph* (28 November 2013) (online) [<http://www.telegraph.co.uk/sport/football/10480433/Football-match-fixing-Government-and-FA-criticised-for-a-lack-of-commitment-in-fight-against-betting-corruption.html>]

²⁸ In 2013, anti-doping investigations received £6m in public funding, match-fixing received nothing; 'Alliance Chief Executive: "We Can Tackle Match-Fixing, But We Need to Act Now"' *Sport and Recreation Alliance* (29 November 2013) [<http://www.sportandrecreation.org.uk/news/29-11-2013/alliance-chief-executive-%E2%80%9Cwe-can-tackle-match-fixing-we-need-act-now%E2%80%9D>]

²⁹ As a result of the tax provisions within the Gambling Act 2005, many of the top UK gambling companies relocated to the haven of Gibraltar. (See: HM Government of Gibraltar, 'Remote Gambling' [<https://www.gibraltar.gov.gi/new/remote-gambling>]). The new provision eradicates tax advantages of this move; for further information, see: HM Revenue and Customs, 'Gambling Tax Reform 2014' (December 2014) [<https://www.gov.uk/government/publications/gambling-tax-reform-information-notes>]

³⁰ talkSPORT, 'Rick Parry on the Spot-Fixing Scandal in English Football' (10 December 2013) [<http://talksport.com/football/rick-parry-spot-fixing-scandal-english-football-13121071321>]

³¹ David Foster, 'The Fight Against Match-Fixing- Five Ways Government Can Make a Difference' [<http://www.sportandrecreation.org.uk/blog/dfoster/16-12-2013/fight-against-match-fixing-five-ways-government-can-make-difference>]

³² *ibid*

³³ A former member of The Panel, Scotney is now a member of Sports Integrity Services

³⁴ Owen Gibson, 'Governing Bodies Move to Stop Athletes Betting on Their Own Events' *The Guardian* (15 September 2010) (online) [<http://www.theguardian.com/sport/2010/sep/15/governing-bodies-athletes-betting-own-events>]

³⁵ INTERPOL, 'Integrity in Sport' [<http://www.interpol.int/Crime-areas/Integrity-in-Sport/Integrity-in-sport/Overview>]; Operation Soga has closed illegal dens and seized more than \$27 million USD in cash

³⁶ *ibid*

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This may sound familiar? Although not directly referenced to be associated with The Panel, or generally applicable to football, INTERPOL holds the same opinion of The Panel in that the government should play its part. Considering INTERPOL's partnership with FIFA, this could in fact be FIFA's choice of action as a result of *The Parry Report's* investigations. The success of INTERPOL's Integrity in Sport Program should be presented to other sports with the aim of prompting the enhancement of the SBIU towards becoming a large pan-sports unit.

The proposal that the SBIU should have the capability to monitor the betting activity of key nominals in real time³⁷ implies that the Unit should have investigatory powers at their disposal. However, although this privilege is awarded, in order to use both the *Regulation of Investigatory Powers Act 2000* [RIPA] and the *Proceeds of Crime Act 2002* [POCA], the SBIU has to be satisfied that they are investigating a crime and not merely an offence under a SGB's code of conduct. While match-fixing is a criminal offence in countries such as Spain, France, Italy and Portugal, the UK framework is not so simple. The *Criminal Law Act 1977*, *POCA*, the *Fraud Act 2006* [FA 2006] (including its amendment to the *Gambling Act 2005*)³⁸ and the *Bribery Act 2010* [BA 2006] all provide provisions that can be relied upon. However, they do not come without difficulties.³⁹ Although there are times where UK legislation has been successful,⁴⁰ there are many more situations where the alleged defendant has escaped prosecution despite a corrupt act being evidenced.⁴¹

A lifetime ban is not always a deterrent. In 2000, Saleem Malik received a lifetime ban from cricket for bribery offences facilitating match-fixing. In the meantime, although his ban was lifted in 2008, other Pakistani cricketers were also found guilty of match-fixing. (See discussions of the Lord's Scandal below). The apparent lack of appetite in criminalising match-fixing means that the only thing the athlete is risking through corrupt activity is a sports ban, incapable of having deterrent effects.

In an effort to combat corruption across nations, the recent EU Resolution on Organised Crime, Corruption and Money Laundering⁴² calls upon member states to make match-fixing a criminal offence.⁴³ SGBs are currently working with the UK government in the aim of creating a specific match-fixing offence,⁴⁴ however reluctance still exists.⁴⁵ For now, the SBIU faces the challenge of applying the current legislation before having consent to use RIPA. Where it seems the SBIU has significant powers, barriers exist preventing their effective use. Despite all of this, the majority of match-fixing cases are dealt with internally.⁴⁶ We now find ourselves in a vicious circle when attempting to criminalise match-fixing. It is important to look beyond the lack of funding in determining the SBIU's success. If funding is granted, whether it be from proceeds from the *Gambling*

³⁷ supra (n1), 1.14

³⁸ s.42 offence of cheating; the SBIU has called for a review of this definition

³⁹ For example, evidence of acceptance of corrupt payment is required for offences under *FA 2006 & BA 2006*

⁴⁰ Salman Butt, Mohammad Asif and Mohammad Amir were convicted in 2011 under conspiracy to cheat at gambling (s.42 *Gambling Act 2005*) and conspiracy to accept corrupt payments (s.1 *Prevention of Corruption Act 1906*)

⁴¹ See: Ben Rumsby, 'Sport and Recreation Alliance Calls on Government to Criminalise Match-Fixing' *The Telegraph* (4 June 2014) (online) [<http://www.telegraph.co.uk/sport/football/10876238/Sport-and-Recreation-Alliance-calls-on-Government-to-criminalise-match-fixing.html>]

⁴² European Parliament Resolution on Organised Crime, Corruption and Money Laundering: Recommendations on Action and Initiatives to be Taken (interim report) [2012] OJ C251/120

⁴³ UEFA, 'Protecting the Game' (23 October 2013) *UEFA* [<http://www.uefa.org/protecting-the-game/integrity/news/newsid=2014235.html#uefa+welcomes+resolution>]

⁴⁴ James Riach, 'ECB Urges Government to Make Match-Fixing a Criminal Offence' *The Guardian* (16 May 2014) (online) [<http://www.theguardian.com/sport/2014/may/16/ecb-government-anti-corruption-sport-icc>]

⁴⁵ Ben Rumsby, 'Match-Fixers Could Get 10 Year Jail Terms' *The Telegraph* (3 Feb 2014) (online) [<http://www.telegraph.co.uk/sport/10614156/Match-fixers-could-get-10-year-jail-terms.html?ub=true&ubid=53eba2d22bc269f4798b4d28&ubtoken=LubsMAic8NeT7bn>]

⁴⁶ It is undesirable to have criminal proceedings in sport unless the conduct is sufficiently grave to be categorised as criminal: *R v. Barnes* [2004] EWCA Crim 3246 [5]; see: The FA, 'Rules and Regulations of the Association' (Season 2014-2015) Rule E8(2)

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(*Licensing and Advertising*) Act 2014⁴⁷ or otherwise, it is essential that the SBIU has adequate powers in place to fulfil its expectations.

Establishment of the SBG was recommended as it was found important that assistance was available for sports, whether that be:

‘...in relation to the implementation of minimum standards, education of their participants, (both generally and on specific points, e.g. what might constitute “inside information”), or on Sports Governing Bodies’ obligations under the Code to share information.’⁴⁸

The fulfilment of the precise suggestions for the SBG listed within paragraph 1.9⁴⁹ can be strongly evidenced by the Group themselves. Their website post detailing the exact recommendations taken from *The Parry Report*⁵⁰ shows transparency and establishes direct links between their aims and what they are advocating. The whistleblowing line⁵¹ is clearly stated on the homepage⁵² as a ‘Confidential Intelligence Line.’⁵³ The reports to the Department of Culture Media and Sport (DCMS) are provided⁵⁴ and communication with SGBs regarding the Code can also be evidenced.⁵⁵ Where the SBG seems to be lacking is in the recommended provision of counselling for athletes with gambling problems or addictions. Although it is recognised that there are relevant organisations who fulfil this role,⁵⁶ it was a recommendation posed⁵⁷ to create another means of assistance.

Parry spoke about the SGB in 2012:

“I welcome the continued efforts of the Sports Betting Group to implement the recommendations outlined in the report of the Sports Betting Integrity Panel. The Code of Practice and the website are there to provide information and advice to the sector from the sector and will help sports governing bodies to put in place the safeguards that are needed to protect their sports.”⁵⁸

Due to the confusion about whether inside information⁵⁹ is a form of match-fixing, it is important that the SBG exists in order educate the relevant personnel on definitions and actions that constitute its misuse in sport. In 2002, former jockey Graham Bradley was charged with a number of breaches of the Rules of Racing.⁶⁰ Resulting in a five year ban,⁶¹ his wrongdoing in connection with revealing information for monetary gain has

⁴⁷ The government will receive an extra £300m of tax revenue from the Act; Kevin Carpenter, ‘Tackling Match-Fixing: A look at the UK’s New Anti-Corruption Plan’ *LawInSport* (13 February 2015) (online) [<http://www.lawinsport.com/blog/kevin-carpenter/item/tackling-match-fixing-a-look-at-the-uk-s-new-anti-corruption-plan>]

⁴⁸ supra (n1) 15

⁴⁹ supra (n1)

⁵⁰ Sports Betting Group, ‘What is the Sports Betting Group?’ [http://www.sportsbettinggroup.org/about_us.html]

⁵¹ supra (n1) 1.9, recommendation point 6

⁵² supra (n24)

⁵³ ibid; 0121 230 6655

⁵⁴ supra (n1) 1.9, recommendation point 4

⁵⁵ supra (n1) 1.9, recommendation points 1, 2 & 3

⁵⁶ Examples include: Gamcare, rethinkgambling, Addiction Recovery Agency, Young Gamblers Education Trust

⁵⁷ supra (n1) 1.9, recommendation point 7

⁵⁸ Sport and Recreation Alliance, ‘Sport Moves to Guard Against Betting Corruption Threat’ *Sport and Recreation Alliance* (2 July 2012) (online) [<http://www.sportandrecreation.org.uk/news/02-07-2012/sport-moves-guard-against-betting-corruption-threat>]

⁵⁹ Demonstrated through answers to Question 12 of Questionnaire A

⁶⁰ *Bradley v. Jockey Club* [2004] EWHC 2164 (QB); (2007) 1 LLR 543; Rule 204(iv); Rule 62(ii); Rule 220(vii)(b); Rule 220(viii); British Horseracing Authority, ‘The Rules of Racing’ [<http://rules.britishhorseracing.com/>]; Rule 204 has since been amended by Rule 243, showing where a Trainer or Jockey may give information or express opinions on horses. See British Horseracing Authority, ‘Full List of Rule Changes and Codes of Conduct’ [http://www.britishhorseracing.com/press_releases/full-list-of-rule-changes-and-codes-of-conduct/]

⁶¹ Reduced from eight years on appeal, ‘Bradley Sentence Reduced’ *BBC Horse Racing* (2 April 2003) (online) [http://news.bbc.co.uk/sport1/hi/other_sports/horse_racing/2906839.stm]; final appeal dismissed; *Bradley*

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caused many problems for his career to this day.⁶² It is clear from this case that it is common practice for jockeys to regularly converse with others relaying inside information about horse form and training practices. The problem for Bradley however, is that this is considered more serious where disclosed for monetary reward.

The use of inside information is widespread and is not only confined to players, but includes those who have previously been in the sporting world.⁶³ It is also claimed that gambling companies themselves regularly seek inside information for help in awareness of spot-fixing activity.⁶⁴ It is not clear, even to sporting members, when the use constitutes an offence. However, the consequences can be severely detrimental⁶⁵ in those situations where it is deemed to be so. The ambiguity resulting as a consequence of different methods of access to inside information is confirmation that the education programmes that the SBG implements are required.⁶⁶

The SBG's success and necessity can also be reflected in many other ways, for example, proposing the idea that sportsmen/women should not be allowed to bet on any competition in which they are involved⁶⁷ and constructing and monitoring compliance to another key recommendation of *The Parry Report*, the Code.⁶⁸ The FA's YouTube⁶⁹ video defining inside information is a great example of an effective way to educate members of the sporting world. This clarifies the definition, stating that:

'...inside information is information that you are aware of due to your position in the game and that is not publicly available'.⁷⁰

Another FATV video shows a focus on match-fixing in general,⁷¹ which includes the statement that the ban on any player, club employee or match official betting on football extends to ante post markets.⁷²

Although, under the ruling of *The Parry Report*, the Code states that a participant must report any approach or other activity which may contravene the sports' rules on betting,⁷³ there have been a considerable amount of cases where people have been found guilty of the offence. Ekaterina Bychkova⁷⁴ and John Higgins⁷⁵ received suspensions of thirty days and six months respectively, whereas serious implications can be demonstrated through the case of *Oriekhov v. UEFA*,⁷⁶ in which Oriekhov (a Ukrainian football referee)

⁶² Greg Wood, 'Graham Bradley Fears 'Grudge' Against Him May Foil Plans to Train' *The Guardian* (9 December 2014) (online) [<http://www.theguardian.com/sport/2014/dec/09/graham-bradley-fears-grudge-plans-train-bha>]

⁶³ Sir Paul Condon (Lord Condon), Report on Corruption in International Cricket (April 2001) [77]

⁶⁴ Also referred to as micro-manipulation, whereby a specific part of a game is dishonestly predetermined, which does not generally affect the final result; Rashid Latif, 'Ten Years after Cronje, How Cricket Matches are Scripted' *ESPN Cricinfo* (24 July 2010) (online) [<http://www.espnricinfo.com/match-fixing-anniversary/content/story/468255.html>]

⁶⁵ Stephen Lee suffered a 12 year ban effectively ending his career in snooker

⁶⁶ Sports Betting Group, 'Education and Communication': [<http://www.sportsbettinggroup.org/education.html>]

⁶⁷ supra (n35)

⁶⁸ Sports Betting Group, 'Code of Practice' [<http://www.sportsbettinggroup.org/docs/Final%20SBG%20Code%20of%20Practice.pdf>]

⁶⁹ YouTube, 'Inside Information – What does football mean to you? | FATV Focus' (31 July 2014); [<https://www.youtube.com/watch?v=wT3xdHUYNfc>]

⁷⁰ Ibid, [1m:19s]

⁷¹ YouTube, 'Betting – Let's keep the game special | FATV Focus' (31 July 2014) [<https://www.youtube.com/watch?v=wAw2CLZfiMw>]

⁷² ibid [1m:52s]

⁷³ supra (n1) 2.5

⁷⁴ Bychkova was asked for inside information and approached for cooperation in a fix. The handling of match-fixing in tennis has subsequently been criticised as Bychkova had turned down the offer. See: ESPN, 'John McEnroe Criticizes Tennis' Answer to Match Fixing' *ESPN* (1 November 2010) (online) [<http://sports.espn.go.com/sports/tennis/news/story?id=4815126>]

⁷⁵ Higgins failed to report an approach made in discussion about him throwing frames during a meeting in Ukraine; recorded meeting here: YouTube, '[HD] John Higgins'[s] Bribed Video [HD]' (2 May 2010): [<https://www.youtube.com/watch?v=YesmwO6jLUA>]

⁷⁶ *Mr Oleg Oriekhov v. UEFA CAS 2010 A 2172*

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received a lifetime ban for omitting to report the offers he received from a betting syndicate. The potential sanctions advocate the existence of a clear definition that strikes the balance between what may be an approach not acted upon, or one which may lead to a potential match-fixing occurrence.

Regardless of this remaining an illegal underground activity in many countries, prohibited gambling activity is prime. Indeed, it has been estimated that the industry can be worth up to £320bn a year.⁷⁷ Amongst those choosing to ban betting, some countries are governed by strict legal frameworks and serious consequences exist for breaches.⁷⁸ However, as activity is not recorded in these situations where it would be on legal accounts, a difficulty arises in detecting and proving those bets that are corrupt.

As well as a focus on illegal betting activity, it is equally important to review if legal betting organisations are doing what is necessary to detect and prevent any wrongdoing. Once a policy is established, awareness of such should be monitored in order to promote encouragement - whether this be through competition or otherwise, for other companies to implement changes themselves. It cannot be overlooked what effect gambling organisations can have on combatting match-fixing. It is ultimately the decision of the company whether to accept bets or not, and they have the power to implement highly efficient policies to control not only the bets, but who is placing them. Prior to publication of *The Parry Report*, the industry agreed that it should explore the workability and effectiveness of the suggested procedures.⁷⁹ An example is the implementation of schemes by certain bookmakers which involve advances in customer identification controls and other safeguards.⁸⁰ Also, by being involved with the European Sports Security Association (ESSA),⁸¹ many bookmakers are in agreement to alert sports federations of any suspicious or irregular betting activity.⁸² Bookmakers have the capacity to develop their products in line with the increase of threats that may arise, and procedures such as those mentioned should be enforced as an industry-wide practice.

It could be argued however, that although there are considerable safeguards in place, the gambling industry is responsible for some of the problems that exist. The act of competing between each other to offer the best product and service becomes apparent through the availability of in-play betting and the high number of live markets available.⁸³ These procure markets could make it easier for match fixers through spot-fixing and by having the choice of a number of small elements in a game to pre-determine which may not have a detrimental effect on the outcome. The limitation of markets has been suggested by Sutcliffe,⁸⁴ adding that a bet on the number of cards in a game is not appropriate.

The general belief is that it is the Gambling Commission's responsibility to limit the amount of products on offer that issue vulnerability to betting companies. After all, they do have the power to impose such

⁷⁷ Puneet Pal Singh, 'How Does Illegal Sports Betting Work and What Are the Fears?' *BBC Sport* (19 February 2015) (online) [<http://www.bbc.co.uk/news/business-21501858>]

⁷⁸ Imprisonment of over a year can be sentenced within those American states that hold gambling as a felony; State Gambling Law US, 'Summary Chart' (30 September 2007) [<http://www.gambling-law-us.com/State-Law-Summary/>]

⁷⁹ *supra* (n1), 1.10 & 1.11

⁸⁰ ESSA, 'Crying Foul, 12 Myths About Sports Betting' [http://www.eu-ssa.org/deutsche/images/cryingfoul_12mythsaboutsportsbetting.pdf]; these include high tech 'know your customer' technologies which flag up suspicious activity. Offline, ePOS betting systems and CCTV are used to collect evidence

⁸¹ An association created in 2005 by a selection of leading sports book operators in Europe with the aim to monitor unusual betting patterns or possible insider betting; see: [<http://www.eu-ssa.org/>]

⁸² ESSA, 'Code of Conduct': [<http://www.eu-ssa.org/code-of-conduct/>]

⁸³ Odds for leagues from all over the world are also available

⁸⁴ Richard Wheeler, 'Match-Fixing: Former Sports Minister Gerry Sutcliffe Calls for Bookmakers to Limit Their Markets to "Appropriate Betting"' *The Independent* (12 December 2013) (online) [<http://www.independent.co.uk/sport/football/news-and-comment/matchfixing-former-sports-minister-gerry-sutcliffe-calls-for-bookmakers-to-limit-their-markets-to-appropriate-betting-9000715.html>]

restrictions.⁸⁵ However, ESSA state that the availability of live betting is not a major contributor to current levels of fraud,⁸⁶ as the sophisticated systems in place apply for both pre-match and in-play betting. Although this is respected, it cannot be denied that a reduction of markets on offer would correspond with match-fixers becoming more restricted in their endeavours.

In considering a change in the law regarding the services that a gambling company provides, it is important to keep in mind the possible conflicts with European law. Art 56 of the Treaty on the Functioning of the European Union⁸⁷ prohibits restrictions on gambling companies to provide services to other Member States. *Customs and Excise Commissioners v. Schindler*⁸⁸ confirmed that gambling is an economic activity that falls under the scope of this provision.⁸⁹ Whereas UK laws could govern activity within the UK, it seems gambling operators are protected somewhat from any restraint on their business within the EU.

In December 2014, the UK government published a response to corruption in sport. As a part of its 'Pursue, Prevent, Protect and Prepare' method, The Plan⁹⁰ details three steps to apply to sport⁹¹ in order to attempt to uphold its integrity, with the second step being of significant interest:

- *DCMS to set out the measures the UK is taking to combat corruption in sport including consideration of ongoing international initiatives.*
- *The Gambling Commission and DCMS to implement the Sports Betting and Integrity Action Plan.*
- *Gambling Commission's improved reporting mechanism for sports corruption to contribute to the Home Office's proposed single reporting mechanism.*

The Plan, for the first time, brings together all of the UK's plans against corruption.⁹² The emphasis on sport cannot be taken for granted.⁹³ The Plan aligns policies and draws together recommendations from existing strategies in order to increase the success of past attempts. The government are demonstrating proactivity, and although insisting that Britain is not in a desperate state,⁹⁴ have shown that they are learning from the mistakes of other nations. It is yet to be discovered whether the three steps will be fulfilled initiating a full implementation of *The Parry Report*, or whether the direction will fall to the bottom of the priority list alongside other pleas for action.

While there is not a wealth of intelligence available, it is necessary to speculate the next move towards implementing The Plan in regards to sport. It should be noted however, that the process so far has been consistently slow, and the author is under no doubt that this will remain to be so. As has been continually advised, public awareness should be increased, with each relevant sporting body promoting their steps in order to increase activity. The author can only hope that with the help of the EU Work Plan for Sport 2014-

⁸⁵ Gambling Commission, 'Protecting Betting Integrity' (October 2013) [3.6]

[<http://www.gamblingcommission.gov.uk/pdf/Protecting%20betting%20integrity.pdf>]

⁸⁶ *supra* (n81), 4

⁸⁷ Consolidated Version of the Treaty on the Functioning of the European Union [2008] OJ C115/13

⁸⁸ Case C-275/92 *Customs and Excise Commissioners v. Schindler and another* [1994] ECR I-1039

⁸⁹ *Ibid*, 622

⁹⁰ *supra* (n18), 36 [4.58]

⁹¹ There are other elements of The Plan not under the sport heading that also apply to match-fixing. See: intelligence [sections 3.0-3.2], data [section 3.3], money laundering [sections 4.59 & 6.4-6.7], asset recovery [section 6.2] and organised crime [section 6.18]

⁹² Gambling Commission, 'What is the UK Anti-Corruption Plan?' (January 2015) [<http://www.gamblingcommission.gov.uk/Licensing-compliance-enforcement/Intelligence/UK-anti-corruption-plan.aspx>]

⁹³ A key theme of The Parry Report was the aim for sporting bodies to work together. This is effectively what The Plan is looking to achieve, by forcing awareness across the board by all that are involved in combatting corruption

⁹⁴ In comparison to other countries; *supra* (n18) 6

2017,⁹⁵ in which the Council of the European Union has declared that sport should be supported by EU action,⁹⁶ resources will be provided that accelerate the process.

Added hindrance for corruption in sport appears to come from the media. It is alleged that match-fixing in the media has shown an ingress of exaggeration and inconsistent reporting.⁹⁷ If considered as a point of convergence, the media has the potential to destroy efforts to prevent match-fixing. There will be those who gather the opinion that the threat of match-fixing is not seemingly as bad as portrayed, do not believe the allegations regarding the full extent of harm and therefore do not grant the issue with the seriousness it deserves.

Serby wrote in 2012 how the Anti-Corruption and Security Unit (ACSU)⁹⁸ did not take action upon the 'biggest form of corruption'⁹⁹ in sport, where players Salman Butt, Mohammad Asif and Mohammad Amir were involved a trial alongside their agent, Mazhar Majeed, for alleged spot-fixing in the 2010 Lord's Test against England. After their convictions, uproar broke with newsagents publishing pictures of people burning effigies of the three players in the streets, and anger emerged towards both the criminal justice system and the failure of the cricket world to stamp out corruption.¹⁰⁰ The fact that it took the 'Fake Sheikh' Mazher Mahmood¹⁰¹ to expose them, highlighted a gap in the ability of SGBs to act where they had the responsibility to do so. Where in this case the blame has frequently been passed from the ACSU to the Board of Control for Cricket in India [BCCI],¹⁰² it is clear that these bodies are not as effective as they should be. Although individual bodies exist, their powers and performance should be assessed.

As evidenced, the response to *The Parry Report* has been varied. Although it may be said that public awareness levels could have been higher, it is assumed that the relevant bodies' knowledge of *The Parry Report* was prominent due to the fact that Sutcliffe commissioned the report.¹⁰³ It is also assumed that during The Panel's research, the sporting bodies investigated¹⁰⁴ may have been asked to provide information on how they operate.¹⁰⁵ Media publication was also wide¹⁰⁶ and news of which should have travelled via word of mouth of those involved. The slow approach to action could be due to a lack of awareness or understanding, or that the task may seem impossible due to the global reach. Fears exist that each body believes they are not capable of addressing the whole problem, whereas *The Parry Report* purposely demonstrates the importance of implementing small changes, together. It is recognised that these things take time, however the progression made in five years has not been as substantial as might have been reasonably expected.

QUESTIONNAIRE DESIGN.

⁹⁵ Resolution of the Council and of the Representatives of the Governments of the Member States, meeting within the Council, of 21 May on the European Union Work Plan for Sport (2014-2017) [2014] OJ C183/12

⁹⁶ *Ibid*, 1

⁹⁷ Instances highlighted can be found here: Scott Ferguson, 'What Shits Me About Match-Fixing 'Journalism'' (2 December 2013) (online) [<http://www.sportismadeforbetting.com/2013/12/what-shits-me-about-match-fixing.html>]

⁹⁸ Located within the International Cricket Council (ICC) and pursues the three objectives of investigation, education and protection; see: ICC, 'Anti-Corruption Review' [<http://www.icc-cricket.com/about/46/anti-corruption/overview>]

⁹⁹ *supra* (n27), 1, 10; Sky Sports News Interview of Aftab Gul (Mon 13 December 2010, 7:30pm)

¹⁰⁰ Robert Brown, 'Corruption in Sport - A Case Study (The Trial of Professional Cricketers in London in November 2011)' (September 2012) (online) [http://www.corkerbinning.com/downloads/CB_article_corruption_insport_RB_sept_2012.pdf]

¹⁰¹ Former undercover journalist for News of the World

¹⁰² Qaiser Mohammad Ali, 'When the BCCI "Turned Ostrich": Board "Failed to Act on Damning Spot-Fixing Report before Scandal"' *Daily Mail* (25 May 2014) (online) [<http://www.dailymail.co.uk/indiahome/indianews/article-2638487/When-BCCI-turned-ostrich-Board-failed-act-damning-spot-fixing-report-scandal.html>]; Board of Control for Cricket in India [<http://www.bcci.tv/>]

¹⁰³ *supra* (n1), 6

¹⁰⁴ *supra* (n1), 27- in relation to education; *supra* (n1), 21- in relation to rules presently in operation

¹⁰⁵ *supra* (n1), 25; asterisk note implies this

¹⁰⁶ Articles include: 'Rick Parry's Gambling Review Demands Longer Bans for Sporting Cheats' *The Guardian* (1 February 2010) (online) [<http://www.theguardian.com/sport/2010/feb/01/gambling-review-longer-bans-sporting-cheats>]; 'Rick Parry Calls for Sports Gambling Unit to be Set Up' *BBC Sport* (1 February 2010) (online) [http://news.bbc.co.uk/sport1/hi/front_page/8490962.stm]

This section will outline the research design and strategy employed and will focus on an assessment of the reliability and validity of results created in light of the proposed research guidelines, i.e.:

- To assess the current awareness of match-fixing from a dual prospective;
- To research the implementation of *The Parry Report's* recommendations within SGBs in the United Kingdom

These guidelines were formed from the theory that the overall awareness of match-fixing is low, and that *The Parry Report* has not been fully implemented. Their clear, precise nature was ensured in order to promote focussed results for detailed analysis of the specific areas.

Methodology

Two separate self-completion questionnaires were created in order to collect both quantitative and qualitative data. One set of questions was directed towards the general public (Questionnaire A)¹⁰⁷ and the other towards a sample of SGBs compiled from Sport and Recreation Alliance members¹⁰⁸ (Questionnaire B).¹⁰⁹ A master document was created for the purpose of this investigation. This document includes the contact details of each SGB and was used as a reference when distributing Questionnaire B. The general public sample was collated through both social media methods and the dispersion of the questionnaire to friends and family and flexibility was applied to numbers.

Pilot Study

Upon completion of the draft questionnaires, the study was piloted¹¹⁰ using three members of the general public: two to be representative of Group A, and one individual to serve as a SGB.¹¹¹ The importance of a pilot study is significant in relation to identifying operational problems that may occur, the feasibility of a study, and in assessing the performance of the research method and technique. Although it is well recognised that a pilot study has a multitude of benefits, the author is of the belief that this can cause data manipulation through the redesign of questionnaires in order to produce the results that are sought. As this can happen subconsciously upon adaptation, it is important to remain true to the recommendations given. The questionnaires were modified as a result of the pilot study proposals:

- Firstly, an option of 'I am not sure' was added to question 4 of Questionnaire A. Upon receiving an incorrect answer to this question, it was considered that this added option would enable the separation of those respondents who were guessing because they believed they knew the correct meaning, and those that genuinely did not know but were providing guesses anyway. It was also asserted that those who did not know the answer may have left the question unanswered, resulting in missing data.
- A definition of 'inside information' was inserted into the wording of question 12 as a result of a pilot study participant asking what it involved. It was accepted that the majority of participants may not hold this knowledge, and that the validity of results would benefit as a result of the brief explanation.¹¹² However, the response that 61% do not think the use of inside information is match-fixing, does not tie in with current match-fixing rules. The validity therefore may not have been heightened by the definition. Furthermore, it is not possible to say whether the 17% rating for 'not

¹⁰⁷ Appendix A

¹⁰⁸ supra (n15)

¹⁰⁹ Appendix B

¹¹⁰ Pilot study began 16 March 2015

¹¹¹ A SGB was not used as it was recognised that the sample size may be limited. It was not considered useful towards the final analysis to eliminate a SGB from the sample that was willing to participate

¹¹² 'a person having a particular knowledge about a certain sport, team or athlete'

sure', was due to confusion or attitudes. Although opinions given on lifetime bans show strong opinions,¹¹³ the general public may not feel so strongly about this issue. A revision of the question to include a scenario for deeper understanding is suggested in any repeat of this study.

- Considerations were made about whether to elaborate the question assessing the amount of SGBs that had read The Plan.¹¹⁴ This was decided against due to the fact that the true assessment was how proactive and forthcoming SGBs are in relation to combatting match-fixing. An elaboration of what The Plan comprised may have caused inaccurate responses due to both its importance regarding sport and pressure of not compromising the reputation of SGBs.¹¹⁵
- Other minor adjustments include the instruction to select the option of SBIU as well as entering into the text box¹¹⁶ and the addition of 'considerable amount of' to question 8,¹¹⁷ due to the response received stating 'it depends how much it is!'

Questionnaire Method

Upon 'going live' with Questionnaire A, the first method of distribution used was a tweet containing the link¹¹⁸ inviting people to participate.¹¹⁹ After strong opinions emerged within responses, the initial tweet was followed up with a second,¹²⁰ stating the positive response. This was employed as a technique to increase response rates through the build-up of curiosity. Distribution methods that followed were two posts submitted to LinkedIn, and messages to friends and family over a two week period.¹²¹ Both questionnaires were created through Qualtrics (the industry-leading provider of Online Survey Software).¹²² The software is provided to students of Staffordshire University to use for academic research projects. The use of Qualtrics eliminates the likelihood of human error in processing data, indeed the unpredictable sample size could have created a bombardment of data requiring both coding and organisation. By using the software however, statistical analysis can be easily carried out by creating instant reports from results, which in turn reduces the chance of unreliable results through error. Without this facility, the time-limited nature of the research could have led to problems for the whole project.

The use of two questionnaires was to ensure that research questions were answered from different angles. The purpose of ecological validity is to ensure that results are reflective of the 'real world'. The use of two questionnaires ensures that the test is approximated to both the 'real world' and contextualised to each sport within Group B. Specifically, both questionnaires assess the awareness of the respondent, with Questionnaire A focussing on the opinions related to match-fixing, and Questionnaire B, the facts. The author believes that it was necessary to tailor questions to individual groups who have varying levels of understanding and experience of match-fixing, alongside the methods used to prevent it.

Both questionnaires have an option for a response of 'I am not sure.' This has only been included in those questions where absolutely necessary, as it is presumed that it has the ability to promote laziness in

¹¹³ Answers provided to Question 9 of Questionnaire A

¹¹⁴ i.e. 'that was released in December 2010 by the government which includes reference to sport and The Parry Report'

¹¹⁵ This is discussed in more depth in the results section

¹¹⁶ It was reported that typing into the text box an answer without selecting the SBIU option resulted in an error message appearing

¹¹⁷ Question 8 previously read 'If somebody offered you a considerable amount of money to fix a sporting result, what would you do?'

¹¹⁸ Qualtrics automatically creates a link for distribution of completed surveys using the software program

¹¹⁹ 24 March 2015

¹²⁰ 31 March 2015

¹²¹ The questionnaire remained open to access until 20 April 2015

¹²² Qualtrics: [<http://www.qualtrics.com/>]; data reliability is expected to be high due to Qualtrics' status in the industry

answers.¹²³ This was taken advantage of throughout, however incorrect guesses were made in answering question 4 of Questionnaire A¹²⁴ instead of selecting this option. This shows on the contrary that some individuals would prefer to guess rather than admitting that they do not know the answer. The option of 'not applicable' given in Questionnaire B,¹²⁵ was not taken advantage of by any respondent. This demonstrates conflict with the original assumptions that respondents would have preferred to have that option. It should be recognised however that this option may have been taken advantage of if the response rate was higher.

This leads into a key, general disadvantage of using a self-completion questionnaire. The reliability is inherently affected by the fact that it is not possible to know exactly who is completing the questionnaire, and what tools they are using (if any) to guide their answers. Respondents may wish to seek help in order to avoid entering any 'incorrect' answers. It is therefore difficult to establish a causal direction from the resulting data.¹²⁶ As the questionnaire may be valid, the respondents have to be taken at face-value. An element of trust must exist when employing this method in that the respondents are those who the questionnaire is addressed to. Confidence in the validity and reliability of the results can however be achieved thorough triangulation with other responses within the questionnaire.

This uncertainty is applicable to both postal and e-questionnaires and could have been avoided by the use of an observational interview technique. However, due to the nature of the samples, an interview technique would not be feasible. Group B is extremely geographically dispersed and the interviewers' financial means and time are not attainable. Those governing bodies that required a postal questionnaire¹²⁷ did have financial implications, however the cost was minor in comparison to the travel expense of meeting the participants in person. The flexibility to numbers regarding Group A in particular also warrants the use of a self-completion questionnaire as opposed to an interview method. Participants are much easier to recruit for a questionnaire, and it is also of high convenience for all.

Minor necessary edits to questionnaires were put into effect to those sent out through the post. Clear instructions on how to respond to questions were implemented for example 'please circle', and it was stated where more than one answer was required. The reasoning for these edits was to ensure confidence when answering. Where questionnaires distributed on a mass scale require the instructions mentioned to enable the data gathered to be scanned in effectively, it is thought that clear instructions prevent uncertainty and therefore increase response rates and decrease the chance of missing data.

Another considerable advantage of using the questionnaire method is the absence of interviewer effects. The researcher is limited in the ways he/she can influence the answers of the respondent, therefore the survey will be more likely to return valid results. Due to the nature of this study, the social-desirability bias incurred is lower than that of an interview due to there being less pressure to give answers that place the governing body or individual in a positive light. For example, it may be viewed as irresponsible to answer question 10 of Questionnaire B by stating that there are no preventative measures in place. Also, asking what a member of the public would do if they had a match-fixing proposition may promote unreliable results due to not wanting to admit face-to-face they would be tempted to take the money. It is hoped that the anonymity ensured in this study¹²⁸ will cause participants to divulge true and accurate information. It should be recognised however that due to the controversial topic, participants (in particular those from Group B) may submit information that is not true. This can have a serious effect on the validity levels of the research as the results will not

¹²³ Jon A Krosnic, *Response Strategies for Coping with the Cognitive Demands of Attitude Measures in Surveys* (1991) 5 Applied Cognitive Psychology 220

¹²⁴ 'What does SBIU stand for?'

¹²⁵ Questions 7 & 8

¹²⁶ Alan Bryman, *Social Research Methods* (4th edn, OUP 2008) 60

¹²⁷ British Inline Puck Hockey Association, online contact form defective: [<http://bipha.co.uk/contact/>]; Scottish Volleyball Association, no e-mail or contact form supplied on site

¹²⁸ See Appendix A

represent an accurate resemblance of match-fixing awareness, concerns and implemented procedures within the sporting community. Amongst others,¹²⁹ question 10 discussed above is applicable to this issue. If a SGB has no procedures in place, respondent fears may exist that the governing body's credibility may be affected if this is confessed. Attempts to eradicate this include promoting the anonymity of results, however, it can be predicted that due to the nature of the subject, respondents may manipulate the results.

Due to the sample size, interviewers would have to be recruited to help with data collection. These enlisted personnel may interview in a different order or in different ways, including tone of voice, appearance and level of seriousness, which all have the ability to affect the consistency of results through interviewer variability. It should be highlighted that this advantage arising due to not being able to influence the results also amounts to a potential limitation of the data collected. If a respondent does not understand a survey question, the inability to add clarification could result in a lower level of returned data. Similarly, not being able to probe for further information when necessary could have the same effect. Furthermore, the inability to adapt questions based on individual answers creates a less personal experience and also limits the amount of data received. It is evident that an interview schedule has the ability to be adjusted in order to promote the best performance of the participant and to return a higher level of results. If this method was utilised in this study, a balance between the amount of probing used whilst being aware of interviewer effects would have to be established. The maximum data returned from a self-completion questionnaire is likely to be that which is specifically asked for. A questionnaire research method is quicker to administer than an interview method. Although it is recognised that return times apply to the postal method, it would still be significantly more time efficient than face-to-face interviews as regards travel and time taken for each potential interviewee.

Other disadvantages of the research method include:

- long or repetitive questions could promote 'respondent fatigue';¹³⁰
- a self-completion questionnaire is not appropriate for some respondents;
- there is a greater risk of missing data;
- respondents can scan through the questions enabling the questionnaire to be read as a whole.¹³¹ This may influence subsequent answers.

E-Questionnaire Method

*'Surveys are the most implemented online research methodology in social research.'*¹³²

It is necessary to not only consider the merits and restrictions that the questionnaire method presents, but to also evaluate its effectiveness when paired with the use of the internet and social media. Aside from the inevitable concerns that arise with the use of these tools including those of hacking, fraud and nuisance e-mails, there are many advantages of using these highly fruitful systems. The key areas where the use of an e-questionnaire is advantageous stem from those already suggested, but enhance their favour. An e-questionnaire causes the method to be even more economical in terms of both time and money, as there are no printing fees, the link is compiled automatically and can be distributed to a mass sample size in seconds and the data can be collated very quickly. Where it is recognised that certain social media sites present

¹²⁹ Questions 7, 8, 9 & 11

¹³⁰ This can be evidenced by either missing data (evaluated in the results section) or providing an answer of 'no' when asked to give reasons for ratings

¹³¹ Although alternative remedies are provided e.g. Scott Smith, '4 Ways to Ensure Valid Responses for Your Online Survey' (*Q Insights*, 22 April 2013) [<https://www.qualtrics.com/blog/online-survey-valid-responses>], this was essentially a software limitation

¹³² Hewson et al, *Internet Research Methods: A Practical Guide for the Social and Behavioural Sciences* (SAGE 2002)

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limitations regarding who can access posts,¹³³ options exist that outweigh these.¹³⁴ This advance to the questionnaire method enables the researcher to communicate freely to a high volume of people, as opposed to if the internet were to be eliminated from the process.

The aforementioned disadvantage of distance within face-to face interviews is eradicated by the use of an online method. As it is believed that the internet is a necessary tool in day-to-day life,¹³⁵ it can be assumed that access is widespread.¹³⁶ Where the population has a high rate of internet use, the Web makes possible fast and effective surveys.¹³⁷ It does not matter where in the developed world a potential participant may be based; they can be contacted easily via the internet, whether this be e-mail, social media or applications such as iMessage. Convenience for respondents aside from distance is aided by having the questionnaire at their disposal, accessible via a live link. There will be a higher amount of people willing to complete the questionnaire using this method as opposed to having to arrange an interview with researcher(s).

Questionnaire Design

Select individual approaches will now be discussed to demonstrate practices used with the aim to increase the value of research. The use of a single indicator Likert-type scale was employed¹³⁸ to investigate attitudes using a simplistic, effortless way to respond to the posed questions. The resulting data of a Likert scale is easily amenable to factor analysis, enabling the levels of attitudes to be evaluated. This method was particularly used in the first and second questions of each questionnaire in order to gain interest from the outset and to provide a gentle introduction to the questions that follow. It is believed that this use promotes engagement.¹³⁹ An example is shown in *Figure 1* below.

Q1. How important do you consider sports betting integrity to be?

Not important Extremely important

0 1 2 3 4 5 6 7 8 9 10


Slide to select 

Figure 1: Question 1 of Questionnaires A & B

¹³³ Privacy settings exist on twitter whereby if you opt to have a 'protected' account, your posts are prevented from being shared to others

¹³⁴ i.e: the Retweet option on Twitter

¹³⁵ 'Mobile and Internet Services Now "essential" to Consumers' *Ofcom* (23 July 2014)
[\[http://media.ofcom.org.uk/news/2014/essential-comms-services/\]](http://media.ofcom.org.uk/news/2014/essential-comms-services/)

¹³⁶ Office for National Statistics, 'Internet Access – Households and Individuals 2014' (7 August 2014)
[\[http://www.ons.gov.uk/ons/dcp171778_373584.pdf\]](http://www.ons.gov.uk/ons/dcp171778_373584.pdf)

¹³⁷ Don A Dillman, Jolene D Smyth & Leah M Christian, *Internet, Mail and Mixed-Mode Surveys: The Tailored Design Method* (4th edn, Wiley 2014) 354

¹³⁸ Questions 1 & 2 of both Questionnaire A and Questionnaire B

¹³⁹ Likert Scales are universally understood and do not require strong opinions

There are many elements to consider in order to decipher the importance of sports betting integrity. By only offering a single indicator, this could be avoiding a number of fundamental aspects,¹⁴⁰ for example the importance regarding the success of gambling companies, the importance of upholding the spirit of sport or even the importance of the suggestion that an underpaid sportsman often accepts match-fixing bribes. The analysis of data collected is to be discussed in the following section, however, it is key to highlight here that although the use of a single indicator Likert-type scale may be effective for interest and data volume, it may have the potential to not reflect the true state of affairs of the people using it.¹⁴¹ This may therefore have an effect on the validity of results.

Issues also arise when evaluating both reliability and validity for Group A in the sampling technique. The contacts available to one researcher will differ to another. Results may therefore provide a different representation of the overall sample. For example, during the employment of respondents, those with a considerable wealth of knowledge on the topic may become a part of one researcher's participants, whereas of another, the majority of respondents may carry less understanding. This could seriously affect the results, in particular those questions that are relied upon to demonstrate the levels of importance,¹⁴² awareness of reporting techniques¹⁴³ and how match-fixing offences should be dealt with.¹⁴⁴ Relying on results from a random sample to demonstrate that this represents the general public's standpoint may sincerely affect the validity of research. The reliability is also affected as the technique may not yield the same results when used again in similar conditions. Although there are some measures available to avoid leaving the sample to chance yet simultaneously gaining the largest participation possible, attempts made to ensure respondent diversity¹⁴⁵ are hoped to provide a thorough representation of the overall sample.

There were no serious ethical implications to this project. Informed consent, privacy and confidentiality were ensured through the cover page¹⁴⁶ supplied in both questionnaires. Participation was also described as being voluntary and a contact was provided for any further information required. No element of deception, pain or risk factors were caused.

RESULTS & ANALYSIS

It is necessary to assess the two sets of results in both an independent and combined manner in order to form an accurate analysis.

Questionnaire A

The actual sample size of Group A was determined by the responses to the survey, so the percentage of response rates is not relevant. However, with regard to the actual sample size of **70**, an assessment of answers to individual questions can be presented to display missing data. The replicability of a cross sectional design is high when samples, the questionnaire(s) and procedures used in collecting research are revealed. It should be highlighted therefore that the uncertainty regarding sample A becomes disadvantageous when making this assessment. It may be asserted that measuring a sample size of 70 for representation of the whole general public may not be adequate. However, in order to aid validity, respondents were employed from a range of

¹⁴⁰ Robert T Dillon, *The Practice of Questioning* (Routledge 1990) illustrates how closed questions may result in inaccurate data

¹⁴¹ *supra* (n126), 166

¹⁴² Questionnaire A, question 1

¹⁴³ Questionnaire A, question 6b

¹⁴⁴ Questionnaire A, question 8

¹⁴⁵ *infra* (n147)

¹⁴⁶ Appendix A

backgrounds.¹⁴⁷ The varying range of opinions and knowledge was ensured to increase likeness levels of the overall sample.

Table 1 (below) shows a breakdown of figures alongside the percentage returned for each question.

Question no.	Amount answered	%
1	50	71.4
1a	27	38.6
2	47	67.1
2a	23	32.9
3	47	67.1
4	48	68.6
5	47	67.1
6	45	64.3
6b	40	57.1
7	41	58.6
8	35	50
9	46	65.7
9a	34	48.6
10	46	65.7
10a	36	51.4
11	43	61.4
12	46	65.7
13	46	65.7
Average	41.5	59.3

Table 1: Group A - individual question responses

The questions shown with a response rate of fewer than 40%¹⁴⁸ correspond with those that requested further information, confirming reasons for views presented in the respective questions. The low response rate can be expected due to the nature of the question as respondents may have either viewed this as optional, did not wish to spend time entering qualitative data, or simply did not have reasons for their ratings.¹⁴⁹ What is interesting however is that, although qualitative reasoning was required, the questions asking specifically 'why?'¹⁵⁰ produced considerably more responses than those asking: 'are there any reasons for this view?'¹⁵¹ This may be due to the fact that stronger opinions exist regarding these questions, however it should be considered that the way a question is directed may have an effect on the volume of returned data. Also, with the former suggesting more of a requirement than an optional response, this may have caused participants to respond.

There are certain suggestions to be made in the attempt to increase the amount of returned data for individual questions posed to Group A. It may be reasonably assumed that not everybody taking part in the questionnaire

¹⁴⁷ A diverse range of age, gender, levels of interest in sport and those from both legal and non-legal backgrounds

¹⁴⁸ 1a, 2a

¹⁴⁹ Other reasoning includes respondents not wanting to spend time entering qualitative data

¹⁵⁰ Questions 9a & 10a

¹⁵¹ Questions 1a & 2a

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may know about match-fixing. Although the subject area was mentioned upon distribution, respondents were encouraged to take part regardless of their level of knowledge.¹⁵² Supplying a brief definition of match-fixing prior to question 2 may have been helpful in not only assisting the respondent, but through supplying them with a base knowledge, effective in the aim of increasing the level of ecological validity. It is respected that the return rate for this question is above average, however the reduction in dubiety at this early stage of the questionnaire could have provided a contagion effect towards other questions. Respondents may be more likely to answer questions where options are provided. By supplying a range of bodies to choose from, participants may have been further enticed to provide an answer to question 6b.¹⁵³ This was deliberately chosen to be an open question however,¹⁵⁴ producing qualitative results, in order to truly assess what the general public assume to be the stance on the reporting of match-fixing approaches. Supplying options may have prompted the respondent to answer in a particular way, in choosing the option that they view as the most likely from those given. Instead, this question returned results that provided added justification for answers given. For example, 'it is not a police matter I am certain' and 'the police, could we trust the governing body?'

Question 7 (Figure 2) returned inconclusive numbers in response to the individual ranking options. These are expressed in Table 2. It was asserted prior to the publication that the added option of 'other' would have been advantageous. However, software limitations occurred in relation to the styling of the question. It is recognised that an explanation of how to use the ranking system may have been of use, with confusion being a possibility for the return figures. It is also respected that due to the narrow margin, the inconsistency in total responses could be due to human error.

Q7. Who do you consider the most responsible to take action regarding the prevention of match-fixing? Please rate 1-3.

	1	2	3
The government	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sports Governing Bodies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Gambling Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Figure 2: Question 7 of Questionnaire A

Answer	1	2	3	Total responses
The Government	12	12	17	41
Sports Governing Bodies	22	4	15	42
The Gambling Commission	5	23	12	41
Total	39	39	44	

Table 2: Demonstration of figures in response to Question 7 of Questionnaire A

¹⁵² As previously discussed, this was in order to raise validity

¹⁵³ Who (if any) would you consider the relevant body to report this offer to?

¹⁵⁴ A text box could not be provided within the same question. This would have had to have been a 'part a' stating 'other', ultimately causing confusion and/or prompting missing data

Although there have been instances mentioned where questions should have been supplemented with definitions or further instructions, occurrences did arise where questions should have been awarded more depth. Question 9¹⁵⁵ was unfortunately assigned this limitation. A lifetime ban for one match-fixing offence, (for example the use of minor inside information) may not be proportionate, whereas for another (involving serious fraud) the severity of the ban may be justifiable. The imprecise nature of the question could also suggest to those new to the subject that it could also be asking whether a person should be eligible for a lifetime ban for betting on a sport or competition that they are involved in.¹⁵⁶ Some members of the actual sample may have felt underestimated here. This demonstrates where a balance is needs to be attained when creating questions for such a diverse sample. Furthermore, a follow up question with what the respondent supposes the ban should be if not for a life-time duration¹⁵⁷ would perhaps be more likely to increase the data returned and aid analysis when discovering opinions on length of suspension. Multiple factors affecting this topic should have caused the questions to be more exploring.¹⁵⁸

Questionnaire B

Questionnaire B was issued to **98** SGBs¹⁵⁹ and **32** responses were returned. Although it is recognised that 33% may be a low response rate, this was expected due to the highly incriminating topic. It is believed that the results gathered may still hold the possibility of being triangulated to show the representation of the overall sample sought; SGBs in the United Kingdom. While the results returned may have been from a small scale sample, in areas, they suggest what is widely predicted. A wealth of rich data was therefore supplied, and the external validity of results returned for Group B can be reflected.¹⁶⁰

Table 3 (overleaf) shows a breakdown of figures alongside percentages returned for each question:

¹⁵⁵ *Do you think those guilty of match-fixing should be eligible for a lifetime ban?*

¹⁵⁶ Due to question 5 previously asking 'Do you think that sportsmen/women should be allowed to place a bet on their own sport?'

¹⁵⁷ Created in the form of a filter question, only displaying the convergent question if question 9 was answered 'No'

¹⁵⁸ Dependent on the sport and athlete's age, what may seem a short ban could be capable of essentially ending an athlete's career

¹⁵⁹ 96 via online communication, 2 via postal method (in the first instance)

¹⁶⁰ Missing data can also be used to reflect this. Refusals of SGBs to reveal information may be reflective of the overall attitudes of SGBS towards discussions of how they are combatting match-fixing

Question no.	Amount answered	% of overall sample (n=98)	% of actual sample (n=32)
1	14	14.3	43.8
1a	8	8.2	25
2	11	11.2	34.4
2a	10	10.2	31.3
3	15	15.3	46.9
4	14	14.3	43.8
5	10	10.2	31.3
5a	5	5.1	45.6
6	10	10.2	31.3
7	5	5.1	45.6
8	6	6.1	18.8
8a	0	0	0
9	10	10.2	31.3
10	10	10.2	31.3
10a	10	10.2	31.3
11	9	9.2	28.1
11a	2	2	6.3

Table 3: Group B question responses

It is important to demonstrate instances where missing data is evident because it is appropriate for its absence.¹⁶¹ Question 8a within Questionnaire B embodied a filter question, whereby it only displayed if question 8 was answered in the affirmative. The respective amount of possible answers that should be allocated to this question therefore should be 6. No response submitted from 6 respondents becomes more justifiable as opposed to none submitted from 32, or in consideration of the overall sample, 98.

There is evidence within Questionnaire B of data missing at random. Through the assessment of individual questionnaires, it is clear that SGBs have specifically chosen the questions to answer disclosing the information asked for.¹⁶² An example can be provided through a questionnaire submitted that had all questions completed, apart from the last, question 11.¹⁶³ Whilst this is another example where the supply of another option choice may have increased response rates, it also provides evidence for the privacy retained by SGBs. Whether the true answer is 'yes' or 'no', this question may have provided SGBs with a subject for reflection regarding urgency.

Table 3 demonstrates that the highest response rates returned were for those applying to questions 1, 3 and 4. Although question 1 and 3's figures can be expected from reasons previously discussed, question 4 was not predicted to be within this category. This is because the weighting of the answers within this question is striking. This is demonstrated in Figure 3 (overleaf).

¹⁶¹ Jason W Osborne, *Best Practices in Data Cleaning* (SAGE 2013)

¹⁶² Some SGBS sent e-mail replies making referrals to information online on their match-fixing procedures

¹⁶³ This question was viewed, therefore the questionnaire was not closed down before the question displayed

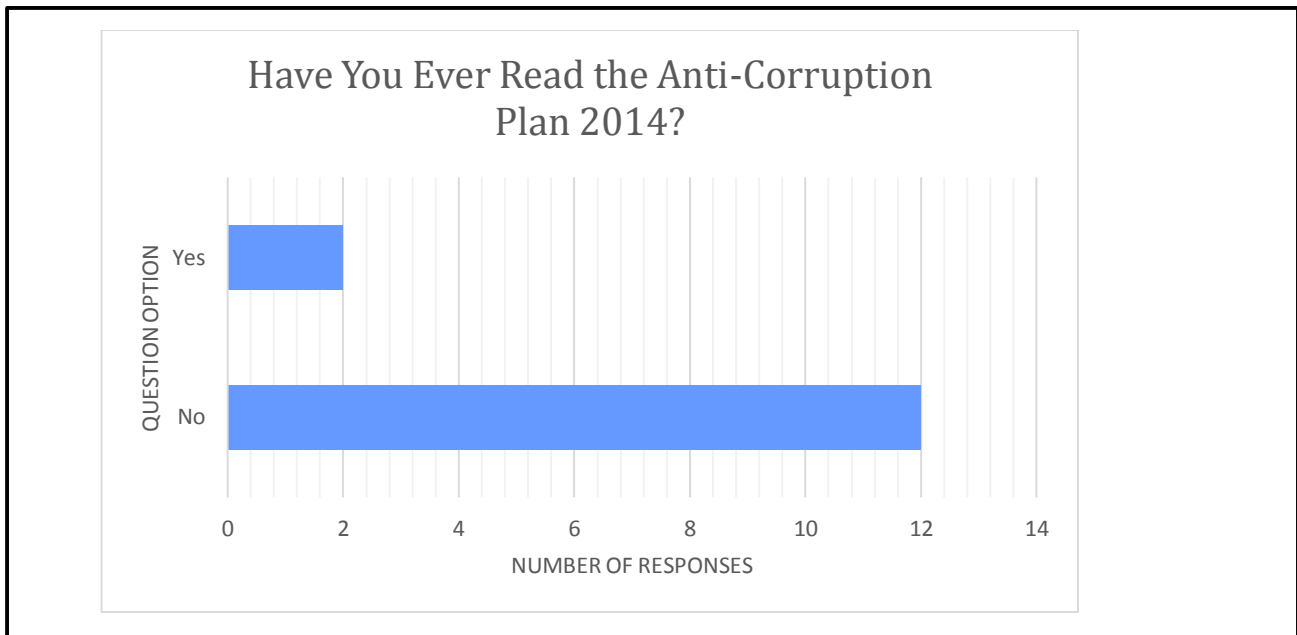


Figure 3: Weighting of Answers within Question 4 of Questionnaire B

For the reasons mentioned above concerning reputation, the admission of not reading or being aware of such a document would not be anticipated. Answers would therefore have been expected to have amounted to missing data, or predominantly have been in the affirmative. The Plan referred to however, although of importance, may not have been accessed by Group B due to the small part relating to sport. It is also a very recent publication in comparison to the age of other insights available. These honest answers show validity of results. Further validity is established through the demonstration of the weighting of question 7 and 8, as they reflect those of question 4.

Figure 4 (below) demonstrates this:

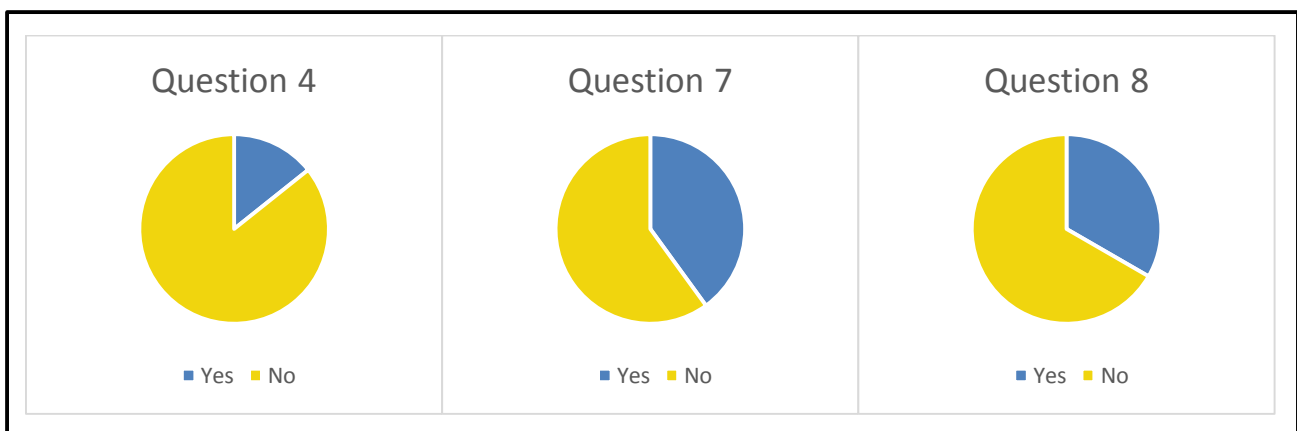


Figure 4: The Weighting of answers for Questions 4, 5 & 6 of Questionnaire B

See also *Table 4* for a comparison with other question responses.

Question No.	Yes %	%	No	%	Total	% of overall
7	2	40	3	60	5	5.1
8	2	33.3	4	66.6	6	6.1
8a	0	0	0	0	0	0
9	4	40	6	60	10	10.2
10	2	20	8	80	10	10.2
11	1	11.1	8	88.8	9	9.2

Table 4: A Comparison of the weighting of answers within Questionnaire B

The low response rate of questions 5a and 11a can be justified by reasoning discussed within this section relating to Questionnaire A.¹⁶⁴ In particular, *Figure 5* shows that where the average rating of concern is low (question 2), the confidence of SGBs is high that their members are aware of the consequences (question 5). In addition, the average rating of confidence in reporting suspicions of match-fixing (question 6) is lower than the confidence in members being aware of the consequences.

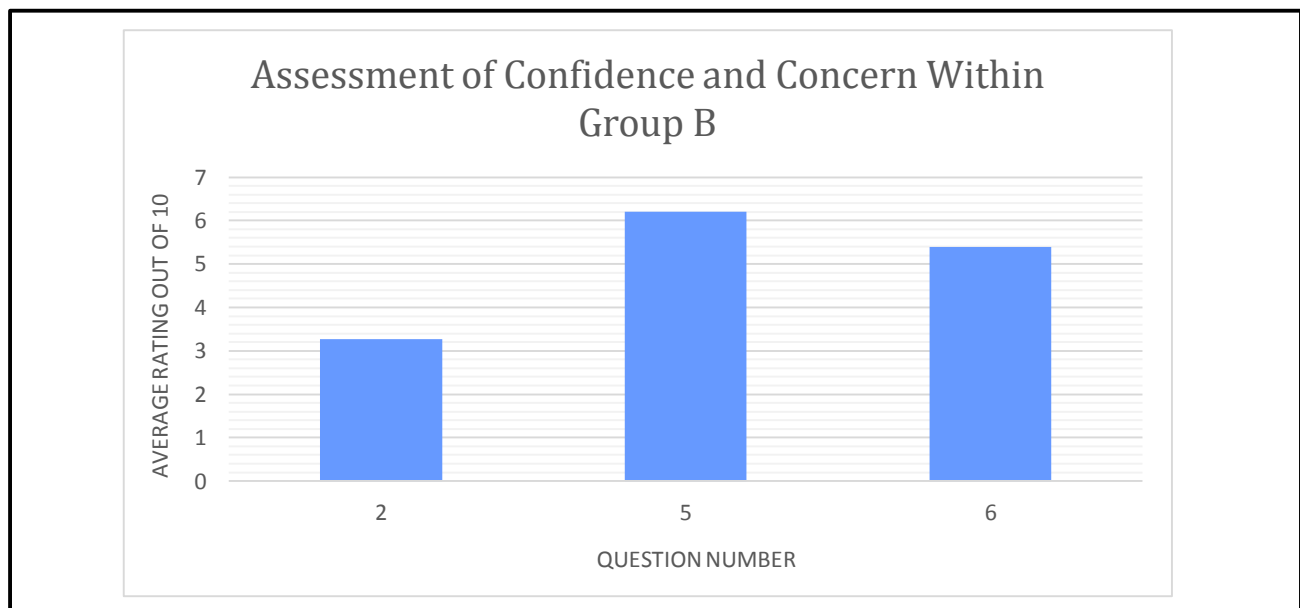


Figure 5: A comparison of questions within Questionnaire B demonstrating confidence and concern

Reasoning was not requested for ratings supplied in question 6, due to fears of respondent boredom as a result of the volume of qualitative data sought. It is recognised that elaborative comments would have been advantageous in relation to the analysis of this issue. This would have resulted in further knowledge of procedures that are in place regarding education; leading to a deeper assessment of which recommendations of *The Parry report* have been implemented, and how far. Qualitative responses from questions 2a and 5a however can be studied in the quest of seeking reasoning for the ratings in the corresponding questions.

¹⁶⁴ See Pages 34 & 35

Regarding question 2a, 9 of the 10 answers provided show reasoning for why concern has been rated low. The most prominent justification provided is that match-fixing is not seen as an issue in the individual sports. Examples include:

- 'I am aware that match-fixing exists within cricket in particular, but suspect it is not prevalent at the top level'
- 'Minimal betting on angling matches'
- 'Softball and baseball are completely amateur sports in this country, no one bets on them. Match-fixing is simply not an issue'
- 'There is no match-fixing as it is an amateur sport'
- 'Individual sports have a high risk and there is a lot of betting on golf. Having said that, the amateur side, for which we are responsible, has limited risk'
- 'It's never happened'

These responses show that the amount of betting attributed to an individual sport is reflected by the levels of concern awarded. Where this is considered a justifiable approach, it should be appreciated that where a betting market exists, a possibility of match-fixing exists. The relaxed approach of SGBs to this account could leave them open to fixers that they aren't detecting, and indeed will never do so if procedures are not implemented. The response: 'it is not an issue in our sports so people would never think about it' should amount to a high level of concern of the respondent, not a rating of '5'. If 'people' are not thinking about it, it may therefore not be monitored as much as it should be. It is not a coincidence that this respondent's answer to question 11 showed that they do not plan to implement any further match-fixing policies.¹⁶⁵ While it is respected that much consideration will not be awarded to an issue that is not considered to be important, the assessment of it should be made clear. Unless it can be proven that there is no possibility entirely of a breach of integrity, relevant procedures should be implemented in order to monitor any suspicions.

Further evidence for this relaxed approach can be provided through a response to question 2a. The statement: 'it has never happened' was used to provide justification for a rating of '0' for concern. Unless the respondent does not know for sure that this is the case, concern should not be completely absent.

Issues arise in relation to internal validity when deciding how far certain factors are related. Whether or not confidence and concern within the questions posed can be associated should be considered in the light of the results analysed. It would be assumed that where SGBs are confident that their members are aware of the consequences of match-fixing, the concern that it exists within their sport would be low. However, external factors have not been considered within this presumption. To provide an example, if concern is high that match-fixing occurs, this may logically result in strict procedures implemented to act upon this concern. As a result of this, confidence may be high that members know where to report suspicions and are aware of the repercussions. Confidence may therefore not be high as a result of low concern, but due to other factors such as the above. The variation of factors attributed to concern may not be responsible for the result of ratings given regarding confidence. The policing of integrity within the respective league or event is also a factor to be considered. A sportsperson may have high awareness of the consequences (resulting in a high level of confidence for the SGB), but also be in the knowledge that their SGB does not police it effectively, ultimately creating concern for the SGB.

Findings in relation to this category are demonstrated in *Figure 6* below:

¹⁶⁵ This trend is also evident through other responses

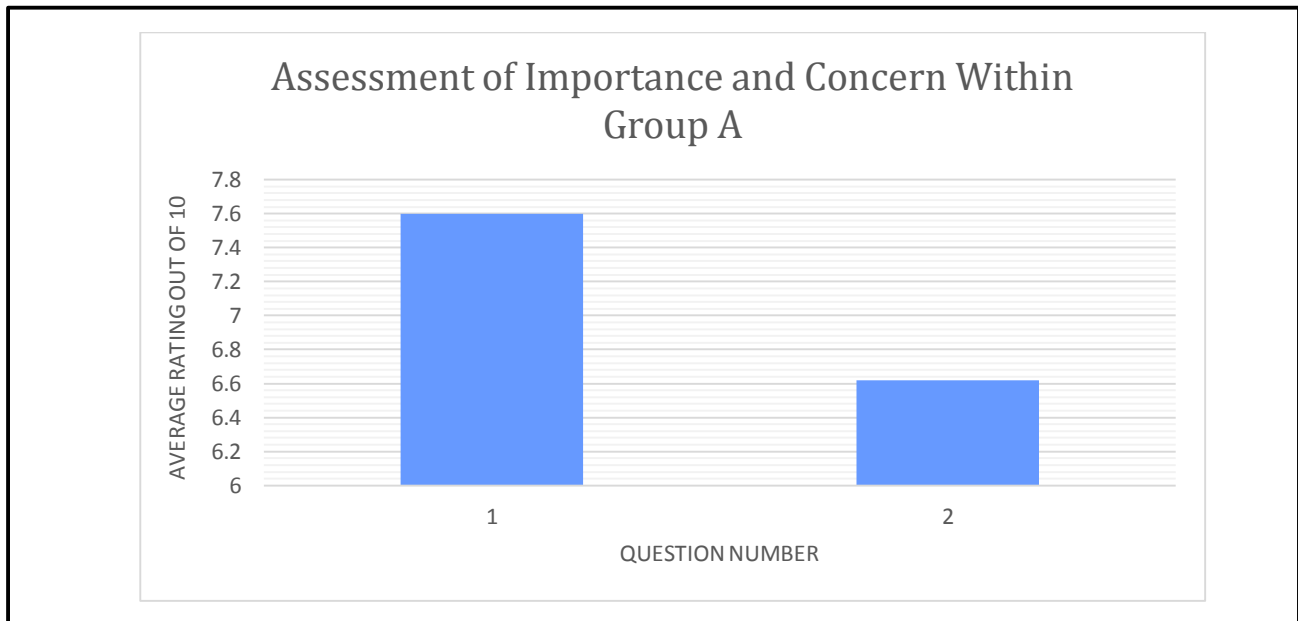


Figure 6: A demonstration of views on importance and concern within Group A

A disadvantage of the research method used¹⁶⁶ is that you cannot probe for further information if you feel a respondent's answer may be useful. The lack of reasoning for the wide range of ratings of both questions 1¹⁶⁷ and 2¹⁶⁸ from Questionnaire A show the effects of this disadvantage. Although both questions were followed up by asking the respondent to provide reasoning, this was not always answered usefully.¹⁶⁹ It would have been beneficial to have the reasons for both extreme ends of the scale¹⁷⁰ for analysis. If these answers were given in an interview, provision in the schedule would be made to explore the rationale for those submissions. The same applies to those questions of a similar nature within Questionnaire B.¹⁷¹

COMPARING AND CONTRASTING THE RESULTS

In reflection of the proposed findings of this study and the literature review, evidence can be provided to either confirm the theories made or to highlight discrepancies.

At the start of the research, the author's predictions were that the general public:

- will be lacking in awareness of *The Parry Report*;
- favour harsh sentences for match-fixing offences;
- are unsure of how and where to report suspicions of match-fixing;
- believe that the police should be responsible for the fight in combatting match-fixing;
- believe that the government should supply the funding;
- are confused in regards to the relevant bodies that exist to regulate match-fixing;
- do not consider education programs for athletes effective.

¹⁶⁶ As opposed to an interview technique

¹⁶⁷ *How important do you consider sports betting integrity to be?*

¹⁶⁸ *How concerned are you that match-fixing exists?*

¹⁶⁹ There were four instances where this was answered 'No', and many others skipping the option to supply further reasoning entirely; further examples of responses that lacked elaboration from Questionnaire A include question 5a and question 13, which were both answered with 'No'; an answer provided to question 14a was 'depends on importance'

¹⁷⁰ Answers to question 1 were submitted for ratings of both 0 and 10, and for question 2, ratings of both 1 and 10

¹⁷¹ Questions 2a, 5a & 11a

And that SGBs:

- have a high level of confidence in their members knowledge in both the consequences of match-fixing and the reporting procedures available;
- have varied levels of concern about match-fixing occurrences within their sport;
- will not, on the most part, have read The Plan;
- will not have implemented an acceptable amount of *The Parry Report* recommendations in relation to the time awarded to do so.

The majority of these predictions can be proven to be accurate. What follows is a brief recognition of a selection of correctly predicted findings, and a more in depth examination of those which conform to the surprises touched upon in the introduction to this project.

*'It is vital that participants are fully aware of the relevant rules and regulations in their sport and for them to understand what is corrupt betting, inside information and match-fixing, and the penalties they face if transgressing their sports rules.'*¹⁷²

The average value that Group A awarded to the level of effectiveness of education programmes was 4.74. Unfortunately, this was a question where further reasoning was not requested. Although this clarifies the predictions, the standard deviation of 2.91 would have been interesting to justify. This low level of believed effectiveness highlights an inconsistency with *The Parry Report*. *The Parry Report* places emphasis upon the implementation of such programmes along with the continuous follow up of a member's knowledge.¹⁷³ Furthermore, answers provided by Group B show that education programmes are not actively carried out in all cases. Not only can education programmes act as a deterrent to a sportsperson, they can clarify exactly what is punishable. Although this study confirmed that not all SGBs believe in their importance, the aforementioned cases involving confusion on the part of the alleged can be prevented through this measure.

*'I think if you are caught fixing a sporting event, then there is no messing, out, you're finished. Get lost and get another job. I don't think you should give them a ban for two or three years.'*¹⁷⁴ -- Sir Geoff Hurst

A vote of 44:2 for the eligibility of a lifetime ban of those guilty of match-fixing strongly proves the presumption that the general public give credence to harsh sentences for this corruption. The arguments presented provided more detail than for any other question. Reasoning varied from deterrence, retribution and to protect the spirit of the sport. The two logical responses to the contrary state: 'depends on the reason... and lifetime ban for a one off offence is to [sic] harsh' and 'it's only like any other form of crime, there should be an adequate punishment for it'. Both of these opinions were considered in relation to the evaluation of the wording of this question in the research design section.

The focus on reviewing the definition of cheating in legislation within *The Parry Report*¹⁷⁵ implies that a criminal punishment is favoured. Although believed to be so, a lifetime ban does not always act as a deterrent for corrupt activity.¹⁷⁶ The fact that the general public would report match-fixing suspicions to the police¹⁷⁷ however, suggests that match-fixing is assumed to be criminal activity.

¹⁷² Sports Betting Group, 'Education and Communication': [<http://www.sportsbettinggroup.org/education.html>]

¹⁷³ supra (n1), 30

¹⁷⁴ Sir Geoff Hurst, Interview at the Hay Festival, (29 May 2014) via *The Telegraph* (30 May 2015) (online) [<http://www.telegraph.co.uk/culture/hay-festival/10863942/Sir-Geoff-Hurst-match-fixing-should-carry-a-lifetime-ban.html>]

¹⁷⁵ supra (n1), 8

¹⁷⁶ See discussions in the Introduction

¹⁷⁷ Evidenced through answers provided to question 6a

*'Match-manipulation: recognise it, resist it and report it'*¹⁷⁸

The variety of ways in which people would report a match-fixing offence was overshadowed by the preponderance of respondents opting for the police. Although one answer states: 'it is not a police matter I am certain,' it is clear that the general public believe that the police should carry some responsibility in the fight for upholding sport integrity. Whether or not this is because the police are the most commonly known body, it can be derived from this that the majority consider match-fixing as a crime. As well as the above, confusion is also evident regarding bodies that exist that regulate match-fixing through answers provided to question 4. Those such as 'sports betting index' and 'sports betting industry union' suggest a lack of awareness that the SBIU exists. 'The gambling commission integrity team' suggests the SBIU, but in a way that again, shows a lack of knowledge that it exists.

Due to equal votes, results did not show who the public hold the most responsible to take action against match-fixing. This is in direct conjunction with the Panel's views. *The Parry Report's* recommendations apply to the SBIU, the government, SGBs and betting organisations both individually and in working together. The support that the general public supplies to this assumption should be recognised by each body in the realisation that *The Parry Report* provides an excellent concept.

"Sport is vulnerable and will continue to be vulnerable to match-fixing unless further action is taken by Government – both in changing the law and in providing greater funding and support" -- Tim Lamb¹⁷⁹

By holding the belief that SGBs should fund match-fixing investigations over the government, the gambling commission and the gambling industry, the general public remarkably refrain from following the recent protests for funding to be supplied from taxation through the Act. Although appreciation of the changes in law may not be high in this respect and knowledge may not be present of the gathering of funds, this shows how adamant the general public are to hold SGBs accountable for integrity. Reasoning for this choice surrounded the amount of money that the particular sport held. Where the commercialisation of one sport may be huge, for example top-flight football, it is believed that they should make 'significant contributions.'

The Parry report's focus on The Code,¹⁸⁰ dictating measures which SGBs must implement, reflects beliefs that SGBs may be at the heart of ensuring integrity.

"In the past, players have told us they've had some concerns about reporting questionable approaches" – Graham Manou¹⁸¹

It is clear that there are a multitude of options available for a sportsperson to report any suspicions, occurrences or offers. However, this could add to an athlete's uncertainty regarding who to direct their report to at the soonest possible opportunity, and if that person is someone who they can trust. This may be an element of *The Parry Report* that is not entirely clear. Although it is stated that 'a dedicated whistleblowing line or clear communication channel'¹⁸² is needed within each SGB to report any 'illegal or unusual

¹⁷⁸ FIFA, 'Match-manipulation: Recognise it, Resist it and Report it' (17 October 2013) [<http://www.fifa.com/aboutfifa/organisation/footballgovernance/news/newsid=2198144/>]

¹⁷⁹ Supra (n27)

¹⁸⁰ supra (n1), 17

¹⁸¹ Daniel Brettig, 'Anti-Corruption Warning from CA' *ESPN Cricinfo* (19 October 2014) (online) [<http://www.espnricinfo.com/australia/content/story/790563.html>]

¹⁸² supra (n1), 31

approach,¹⁸³ and that ‘competitors or participants should know who to contact,¹⁸⁴ further guidelines are not issued regarding the dealings with information reported.

The code imposes the obligation to report under 2.5.¹⁸⁵ In order for this to be abided by, an athlete would want to possess the knowledge on exactly how their information is going to be dealt with to ensure their report will not be manipulated. This provides an example of how effective an education programme can be towards the clarity of every aspect of the recommendations.

‘Is it a concern for me and you who love the game? Certainly yes... once you don’t know any more if everyone is genuine out there, that is something absolutely disastrous’ -- Arsene Wenger, 2013¹⁸⁶

Just as highly differentiating answers within Group A were expected to occur due to the diverse sample, the same was expected of Group B due to the different sports involved. Differentiating levels in knowledge and interest will inevitably result in arguments for all options provided. The range of results collected through this study allowed for a wide analysis.

Apart from the level of betting within the sport, another factor attributing less concern is the ‘worldwide betting monitoring in place, player education and [the presence of] robust rules and regulations.’ The reliance on bookmakers and external rules does not always prove substantial, as in the recent case that has emerged. Delroy Facey has been labelled as the ‘most high-profile football player being convicted of this offence.’¹⁸⁷ The fact that these cases are happening in UK football league games today, the factors mentioned by the respondent above should not provide for a ‘reliant on others’ approach.

CONCLUSION

It is true that those found guilty of match-fixing offences are punished. This can be evidenced through the many cases reported including those referenced in this work. It can also be shown in this study through a response of ‘I have investigated and convicted three players for match-fixing.’¹⁸⁸ However, with justifiable fears that fixed matches are going undetected, a clear, distinct and accessible framework is needed which accurately and consistently governs match-fixing terrain. Not only are effective regulatory frameworks needed, but adequate policing of them also.

Although the general public have been shown to disagree, it is important to push forward the practice of education programmes, and from an early age. Cases have arisen where the athlete has not been of the belief that the conduct in question is unacceptable. Even Nasser Hussain OBE, a well-respected former England cricket International has stated that the conduct of Shane Warne and Mark Waugh was ‘not match-fixing at all in my book’.¹⁸⁹ This casual approach to what should be considered an offence needs to be corrected through education. It is also recommended that due to the beliefs that low wages are a considerable factor in the

¹⁸³ *ibid*

¹⁸⁴ *ibid*

¹⁸⁵ *supra* (n68)

¹⁸⁶ Chris Harris, ‘Wenger - Match-Fixing Is Global Concern’ *Arsenal.com* [<http://www.arsenal.com/news/news-archive/wenger-match-fixing-is-global-concern>]

¹⁸⁷ ‘Ex-Footballer Delroy Facey Jailed after Match Fixing Trial’ *BBC Sport* (29 April 2015) (online) [<http://www.bbc.co.uk/news/uk-england-32512704>]

¹⁸⁸ Group B, 7 April 2015, 9:18am

¹⁸⁹ Nasser Hussain, *Playing With Fire* (Penguin 2004) 274

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match-fixing motives,¹⁹⁰ those from financially weaker backgrounds should be targeted in such education programmes... and not just for athletes either. Referees do not get paid a substantial amount in comparison, and hold a great position to influence the game. Traders are also in a position to flutter with match-fixing activity.¹⁹¹

UEFA has introduced an education programme for young players. Positively, this is delivered through an electronic method.¹⁹² The fact that e-learning is recognised to be effective is a bigger step than may be appreciated upon first thought. UEFA's programme also marks the creation of a mobile phone application¹⁹³ entitled 'UEFA Integrity'. Not only does this contain a wealth of information and the latest integrity news, it also enables the user to have the ability to anonymously report suspicions of incidents of match-fixing and corruption to the Integrity Reporting Platform. This use of highly accessible measures should be encouraged, as they have the ability to administer the constant reminders needed. A one-off education programme, even if reviewed within months or years, is not satisfactory. Furthermore, UEFA's programme provides an example of where match-fixing is proactively following in the footsteps of the successful WADA approach.¹⁹⁴ DCMS are amongst attempts to learn from WADA,¹⁹⁵ albeit trailing behind regarding the time frame.

As a signatory of the Code,¹⁹⁶ all bodies effectively give up their sovereignty regarding decisions made on doping offences. WADA also provides a 'one size fits all model' which has been criticised and even refused to be followed.¹⁹⁷ Its success however, cannot be undermined. WADA provides a level playing field which ensures that all bodies and individuals involved know where they stand with regulations and procedures.

Another Parry Report recommendation that has been followed is that of a whistleblowing hotline. Many individual hotlines exist. To ensure their effectiveness, regulation should be issued imposing rules for governance. This will ensure both the athlete and the (upgraded) SBIU of the confidentiality, validity and admissibility of evidence. Under this regulation, the formation of a reporting hotline should be a compulsory measure for all SGBs where betting is available on their sports.

Consistency in discipline is essential. The disparity in punishment between the lifetime ban of Hanse Cronje when contrasted with fines imposed on Shane Warne and Mark Waugh are not, in the author's opinion, justifiable. Therefore, the possibility of different boards within one sport having different rules should be eradicated. To use cricket as an example, it is recommended that the ICC should impose the disciplinary action, based on overarching framework supplied by the SBIU. This will ultimately be implemented using EU legislation. This minimum standard set by the EU should also leave sports personnel with no choice but to operate within a given time frame. It is important to recognise in this framework that players should be awarded for revealing information that helps investigations, just as WADA does.¹⁹⁸

¹⁹⁰ Discussed in the Introductory section

¹⁹¹ A McCarron 'Traders Using Inside Information' *SBC News* (14 July 2014) (online) [<http://www.sbcnews.co.uk/%3Fp%3D11123>]

¹⁹² UEFA, 'New UEFA Match-Fixing Initiatives' (24 November 2014) (online) [<http://www.uefa.org/protecting-the-game/integrity/news/newsid=2185621.html>]

¹⁹³ The app is available in seven languages on iPhone, iPad and Android devices

¹⁹⁴ WADA Prohibited List app and the ADAMS app used for Whereabouts recordings. See: WADA, 'Prohibited List' (14 November 2013) [<https://www.wada-ama.org/en/what-we-do/prohibited-list>]; WADA, 'WADA ADAMS Whereabouts App for Smartphones Now Available' (3 December 2013) [<https://www.wada-ama.org/en/media/news/2013-12/wada-adams-whereabouts-app-for-smartphones-now-available>] for further information

¹⁹⁵ Letter from Helen Grant to Tim Lamb (17 February 2014) [<http://www.sportsbettinggroup.org/docs/policy/30-07-14/Helen%20Grant%20match-fixing%20response%20-%20Feb%202014.pdf>]

¹⁹⁶ World Anti-Doping Code 2015 [<https://www.wada-ama.org/>]

¹⁹⁷ Howard Jacobs & Katy Freeman, 'FIFA's Fight against Doping: WADA Code Compliance and an Analysis of Testing Statistics' (online) [<http://www.lawinsport.com/articles/item/fifa-s-fight-against-doping-wada-code-compliance-and-an-analysis-of-testing-statistics>]

¹⁹⁸ A possible reduction of sanction is allowed where an athlete provides Substantial Assistance to investigations; see: World Anti-Doping Code 2015, 65

Strong recommendations exist for the involvement of bookmakers in the fight against corruption. The limitation of markets would be a step in the right direction towards prevention of spot-fixing in particular, however we are led back to the competition in business between betting companies. The option for alternative lines, methods and specific obscure markets such as those 'available upon request' form part of the appeal to punters, therefore it is extremely doubtful from a self-regulatory point of view that betting companies will implement restrictions themselves. Betfair, Ladbrokes and William Hill's involvement in *The Parry Report*¹⁹⁹ however suggests that they believe strongly in stamping out match-fixing. This is hoped to be reflected in future practices.

Where it is evident that betting operators' activity towards the fight in match-fixing is limited by possible detriment to their business, it is obvious that intervention is needed. The gambling industry is still growing rapidly,²⁰⁰ and firm controls have to be enforced before gambling companies become impassive. A model introduced by the French government ensures that in return for a gambling licence, betting companies agree to enter into integrity and funding arrangements. This is achieved through tax imposed on betting stakes. Some betting companies in the UK do not offer their services to France, presumably due to this cost. Through implementing this method, the UK could not only prevent betting companies making losses on fixing scams,²⁰¹ but raise funds for bodies such as the SBIU to support attempts to heighten sport integrity.

In the meantime, there are other methods to be explored. Primarily, gaps present within SGBS should be addressed. By way of example, betting on table tennis is rife, especially for obscure markets. The fact that Table Tennis England has a page dedicated to anti-doping²⁰² but not one for match-fixing should be corrected. Another option is 'mystery shopping' undercover operations. Although controversial in the case of 'Fake Sheikh,' undercover operations may be useful in providing the proof the 'corrupt payment' that the current law requires. Weaker suggestions such as the Singapore lie-detector test initiatives may not be considered due to reliability issues, but should be learnt from as these tests are believed to dramatically reduce match-fixing incidents.²⁰³

Inaccurate views on match-fixing come primarily from the media. If the general public have better knowledge on documents such as *The Parry Report*, the media would not be so powerful in this respect. The low levels of awareness shown through this study is most likely because its intended reach may not have been to the general public. It cannot be avoided that it would be ideal for the general public to be aware of what is being done to combat match-fixing, instead of being in the knowledge of speculative occurrences. Although issues with media governance exist, the SBIU should be responsible for communication to the public, as well as bodies within sport.

The Parry Report has been proven to be a useful document. The actions taken based on its implementation alongside the release of the Anti-Corruption Plan supports this. Where any doubts may have arisen about its effectiveness, it is hoped that The Plan's reference reprioritises the furtherance of the recommendations. Although The Plan is welcomed, four paragraphs is a small contribution, and it does not disclose the most effective ways in which the government can help further. The majority of improvements needed are those in which the government can make a positive effect. Just because the UK may be doing more than elsewhere in the world to fight corruption, this does not mean that we are doing enough. The view that the UK can now sit back on matters such as match-fixing should be reversed by the suggested means of The Panel revisiting their

¹⁹⁹ Representatives from each bookmaker are members of The Panel; supra (n1), 5

²⁰⁰ Laura James, 'Coates family's £2.3 billion fortune 'a good sign' for Stoke City' *The Sentinel* (26 April 2015) (online) [<http://www.stokesentinel.co.uk/Coates-family-s-2-3-billion-fortune-good-sign/story-26389165-detail/story.html>]

²⁰¹ supra (n28), 1, 7

²⁰² Table Tennis England, 'Anti-Doping Policy': [<http://tabletennisengland.co.uk/home-page/homepage-quick-nav/anti-doping-policy/>]

²⁰³ Kevin Carpenter, 'Match-Fixing - Scandals, Lessons & Policy Developments- Part 3' *LawInSport* (22 March 2013) (online) [<http://www.lawinsport.com/articles/anti-corruption/item/match-fixing-scandals-lessons-policy-developments-part-3>]

investigations. A follow up to the report is due, in assessment of action taken since 2010, and to impose further recommended action to ensure the fight continues. It is important that the final introduced framework is future proof, with a suggested annual review.

Although the awareness of the report is high amongst relevant bodies and some recommendations have been followed, a much larger appetite is needed to both further maintain efforts to tackle match-fixing. Progress since the report is undeniable, but the final piece of the puzzle is now needed. A strong alliance lying within the new SBIU could be created through deeper cooperation and an added help of funding. Under this alliance, it will be tough for any sportsperson to gamble with their future and avoid sufficient consequences. Match-fixing is an international phenomenon, and needs to be governed by the law as such. A highly successful match-fixer being allowed to continue his or her business in corruption due to a lack of strict laws is a serious problem.²⁰⁴ Whereas this is a global fight, our priority is to keep UK sport clean. Although the ideal situation would be eradicating this corruption at its source, education programmes, disciplinary procedures and a solid SBIU alongside the criminalisation of match-fixing will have a desirable effect.

Match-fixing: a gamble worth taking whilst poor governance remains.

²⁰⁴ supra (n8)

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