

Action Plan of the National Commission to fight sports competition fixing and betting fraud.

2020-2021



1 Introduction

The growing importance and constant evolution of sports competition fixing and betting fraud proves the need for an effective focus on the fight against these practises to adopt an eminently pragmatic approach, one that takes into account the constant new challenges arising in both spheres of activity.

The National Commission to fight sports competition fixing and betting fraud (hereinafter, the National Commission, or NC), created by Order PCI/759/2019, of 9 July, does not just represent a formal channel for dialogue between public authorities, sports entities and gambling operators, but is also a common space for collaboration amongst all its members, as well as an essential structural element in the fight against these kinds of fraudulent practices. This multidimensional focus is, without doubt, a key aspect when it comes to determining the way in which the National Commission can achieve its objectives.

The aim of this Plan is to give the coordinated response of all the National Commission members and determine the essential guidelines for action that must be put in place to make progress in the fight against this blight.

Therefore, the fight against sports competition fixing and betting fraud must be addressed from the greatest possible number of perspectives, and that is why this Plan revolves around four different areas of work, the purpose of which is to address the entire spectrum of action that may be taken in this matter.

In short, this Plan is designed as the tool that will allow the National Commission to progress towards achieving its specific aims and, definitively, the ultimate purpose for which it was set up, which is to contribute to ensuring clean sports competitions and safe betting markets. This is all without prejudice to the ever-open possibility that the Commission may create projects, lines of work or specific recommendations that transcend, or go further than, those expressly arising from this document.

2 Objectives and areas of action

Article 2 of Order PCI/759/2019, of 9 July, provides that the purpose of the National Commission is to prevent and combat sports competition fixing and betting fraud with coordinated action from all of its members.

This purpose translates into the various functions taken on by the National Commission's Plenary Session and Standing Committee, which are expressly set forth in articles 6 and 7 of Order PCI/759/2019, of 9 July, which act jointly to ensure that said purpose is achieved.



In accordance with this approach, this Action Plan establishes a total of 21 specific measures, to be rolled out during 2020 and 2021, which are structured based on the following areas of action:

- **Analysis and diagnostics area:** The measures taken in this line of work aim to lay the foundations for objective knowledge, which is shared by all the Commission's members, which may be passed on to other public or private stakeholders, and to society itself as a whole.

In this area of work, which covers a total of eight different actions, the Action Plan focuses on the need to improve knowledge about the phenomenon of sports competition fixing and betting fraud, with a view to strengthening prevention of these types of fraudulent practices. To do so, it is essential to study and analyse the various facets of this complex phenomenon from an all-encompassing perspective, with the ultimate aim of firming up solid foundations that enable stakeholders to reinforce the current legal, operational and institutional framework.

- **Outreach and awareness area:** Sportspeople, trainers and other participants in sports activities, as well as all important players within the scope of the betting sector, should have expert knowledge about the current legal framework, the limitations they are subject to and the risks and threats in this field.

Therefore, the initiatives planned for this area will promote outreach and awareness of the phenomenon, with a total of four initiatives directed mainly at these groups.

- **Control and monitoring area:** the aim of the four measures included in this specific area of action is to improve current monitoring and control activities, strengthening the channels that transmit information and the joint work of all the parties and entities involved in the fight against sports competition fixing and betting fraud.
- **Study of current regulations and operations area:** The five measures included under this section highlight the relevance of ensuring that the current legal framework fits the existing reality as precisely as possible. Constant updating is particularly important in this case, given that we find ourselves in a context of constant change, a situation which is also exacerbated by the fact that this phenomenon is strongly linked to technological evolution.

Therefore, the Plan proposes analysing the regulations that most directly affect the issue, to detect areas for improvement, or which can be modernised or adapted, so as to permit progress and improvement in terms of fighting and preventing tampering with sports competitions and betting fraud.

At the end of this document, APPENDIX I includes a graphic showing the distribution of the various proposed measures across the different areas comprising the Work Plan.



3 Plan Implementation

All the measures included in this action plan are intended to be taken during 2020 and 2021.

For a better view of the timeline for the plan's implementation, APPENDIX II attached is a timetable showing the time frames for implementing the measures.

From an operational point of view, certain measures will be specifically implemented or developed by some of the National Commission members, due to their special affiliation with the measure to be carried out. For other measures, it makes more sense for them to be developed by one of the specific Working Groups already created by the National Commission's Plenary Session.

On the other hand, it should be borne in mind that several of the measures will be finalised once they are expressly submitted to the National Commission Plenary Session, for their recognition, while others will run out on their own once their planned path is automatically completed.

It should be specifically highlighted that the measures put forward in this Plan may, as appropriate, give rise to specific recommendations from the Commission, arising from the results obtained in each area of action that this Plan is divided into. These recommendations, which, as such, do not form a specific part of the Plan, may, if appropriate, be understood to be a corollary of the lines of work started up in this Plan.

All of this is without prejudice to the fact that, in addition, during the years the Plan is carried out, and as a result of the need to adjust the Commission's aims and actions to changes which may occur over time, such initiatives, plans or recommendations as are considered appropriate may be pursued, beyond the initiatives expressly provided for in this document.



WORK PROGRAMME

Area	Measure	Leader	Estimated date
Analysis and diagnostics	1. Carry out an analysis of the risks of sports competitions or events centred on the world of sport being fixed.	Analysis and diagnostics Working Group	2021
	2. Carry out a study of betting markets at the national level.	DGOJ	2020
	3. Update existing analyses of the risk of fraud and criminality in the betting world.	DGOJ	2020
	4. Update the recommendations for managing fraud in sports betting provided for in the 2018 DGOJ Technical note on fraud management.	DGOJ	2021
	5. Study the level of knowledge about the phenomenon of sports competition fixing amongst sportspeople, members of technical bodies, managers and other people linked to the world of sport.	Analysis and diagnostics Working Group	2021
	6. Carry out a study of the prevalence of betting sportspeople in Spain.	Analysis and diagnostics Working Group	2021
	7. Carry out a study of the profile of gamblers in betting markets at the national level.	DGOJ	2021
	8. Carry out a study of the payment methods used in the gambling industry.	DGOJ	2020
Outreach and awareness	1. Create a web site for the National Commission and define its corporate image.	DGOJ	2021
	2. Promote the organisation of a training and awareness workshop on sports competition fixing and betting fraud.	DGOJ/Outreach and awareness Working Group	2021
	3. Design and distribute outreach material about the National Commission and on any matters that may be of interest to Commission members.	Outreach and awareness Working Group	2021
	4. Promote educational and awareness actions carried out by various members of the National Commission relating to the world of sport and betting.	Outreach and awareness Working Group/DGOJ	2021



WORK PROGRAMME

Area	Measure	Leader	Estimated date
Control and monitoring	1. Start up the sports betting Alert System.	DGOJ	2020
	2. Annual memorandum from the National Commission about the risks analysed and detected on betting markets and in the various sports competitions.	Analysis and diagnostics working group	First half of the relevant year
	3. Boost sports competition monitoring and follow-up activities, paying particular attention to the lower levels.	DGOJ	No time frame
	4. Design or, as appropriate, improve secure channels for transmitting information about sports competition fixing.	Regulatory and operational studies working group	2020
Study of current regulations and operations	1. Analyse the current legal regime with respect to sport	Regulatory and operational studies working group	2021
	2. Analyse the current legal regime with respect to the gambling industry.	DGOJ/Regulatory and operational studies working group	2021
	3. Analyse sports entities' regulations on competition fixing.	Regulatory and operational studies working group	2021
	4. Draw up a guide so that sports entities and associations can prepare detection and reporting protocols in the event of sports competition fixing.	Regulatory and operational studies working group	2021
	5. Analyse the best practices carried out by sports entities and gambling operators.	Open to any interested entity	No time frame



4 Details of the actions

4.1 Analysis and diagnostics area

MEASURE 4.1.1 – Carry out an analysis of the risks of sports competitions or events centred on the world of sport being fixed.
Objective
Prepare an analysis enabling detection of the main vulnerabilities that may induce sports competition fixing.
Justification
<p>Objective knowledge about the risks associated with sports competition fixing in the world of sports is an absolute prerequisite for decision making and taking effective prevention measures. Therefore, it is necessary to provide principles and generic guidelines on risk management in this area.</p> <p>There are currently various general and specialist methodologies and best practice guides which may be used to carry out this analysis. Amongst the generalists, we would point out the non-certifiable ISO 31000 global standard, which provides risk management methodology, principles and guidelines. The ISO 31000 reference framework, along with its principles and processes, could, amongst other equally valid approaches, enable sports entities who want to adopt to establish true risk management governance.</p>
Execution
The “Analysis and diagnostics Working Group” will carry out a study profiling the risks of tampering based on some recognised standard. The report on conclusions will be presented to the Commission Plenary Session during 2021 so that they may consider it.



MEASURE 4.1.2 – Carry out a study of betting markets at the national level.

Objective

Carry out a study of the online betting market in Spain which will include, amongst other aspects, variables that supplement the information currently included in the Annual gambling memorandum from the Directorate-General for the Regulation of Gambling.

Justification

The evolution of betting markets since the appearance of remote gambling has been extraordinary across the entire globe. Traditional betting markets (with a limited number of operators, centred on the pool betting segment, mainly directed at the football markets and with approximately 70% return to player) have, after the appearance of online gambling, given way to a very different environment.

Currently, betting markets have a much higher number of operators offering this form of gambling. Their main product is fixed-odds betting, they offer many more types of bets and bettable events, and the rate of return to player is substantially higher than that of past decades.

In this context, it is appropriate to supplement the information available in the Annual memorandum from the Directorate-General for the Regulation of Gambling with new variables to enhance knowledge about the sector.

Execution

The Directorate-General for the Regulation of Gambling, using data from the Internal Control System and those which are directly collected from gambling operators at the national level, will prepare a report on national betting markets which it will present to the Commission Plenary Session for its consideration.

The study should be available in 2020 for the Commission Plenary Session to consider.



MEASURE 4.1.3 – Update existing analyses of the risk of fraud and criminality in the betting world.

Objective

Update the risks of fraud and criminality linked to betting using the analysis of the risk of fraud in gambling at the national level, prepared in accordance with the Gambling Policy Board guidelines of 12 September 2017.

Justification

The massive evolution of the betting market has also brought with it a transformation in the risks associated with the games of chance segment, as various studies have indicated, from very different points of view¹.

On 12 September 2017, within the Action plan for Working Groups for 2017 and 2018, the Gambling Policy Board authorised the performance of an analysis of fraud in gambling activity. To address this task, on 12 January 2018 a Working Group was set up consisting of representatives from the National Police Headquarters, the Directorate-General for the Regulation of Gambling and various autonomous communities. The analysis carried out, based on the ISO 31000 standard, is complete and covered all the types of fraud existing in gambling markets at the national and regional level.

It should be specified that the analysis was exclusively of the betting market, with a view to obtaining a better understanding of its nature and environment more specifically.

Execution

The Directorate-General for the Regulation of Gambling, using data from the Internal Control System and those which are directly collected from gambling operators at the national level, will prepare a report on national betting markets which it will present to the Commission Plenary Session for its consideration in the last quarter of 2020.

¹ These studies include the French Institute for International and Strategic Affairs (2017). Preventing criminal risks linked to the sports betting market: final report; Asser Institute (2015). The odds of Match Fixing.



MEASURE 4.1.4 – Update the recommendations for managing fraud in sports betting provided for in the 2018 DGOJ Technical note on fraud management.

Objective

To update the analysis of betting fraud risk management made in 2018 by the DGOJ to include possible means for improving or developing it.

Justification

Objective knowledge about situations on betting markets that are particularly susceptible to a risk of fraud and automation of the responses that should be offered in the face of those risks facilitate the response of gambling operators in these types of situations.

With this aim, in 2018 the DGOJ prepared a Technical note on fraud management in gambling operators², offering a global response to the various risks that may arise in the gambling sector, one of which was precisely fraud in bets linked to sports events. In that section, the DGOJ analysed the main types of fraud in sports betting, the most appropriate structural measures for prevention and detection in each case, the qualified risk scenarios to be taken into account, and the possible actions to be taken to manage any alerts, depending on the case.

Now that a reasonable time has passed since the Technical note was drawn up, the DGOJ should update its content with regard to fraud management in bets linked to sports events.

Execution

The DGOJ will update the section relating to fraud management in bets linked to sports events provided for in the Technical note on fraud management in gambling operators and will present it to the National Commission in 2021.

² See <https://www.ordenacionjuego.es/es/noticia-tecnica-fraude-operadores-juego>



MEASURE 4.1.5 – Study the level of knowledge about the phenomenon of sports competition fixing amongst sportspeople, members of technical bodies, managers and other people linked to the world of sport.

Objective

Assess the level of knowledge, involvement and awareness of the problems with sports competition fixing of the most directly affected parties³.

Justification

An analysis of the level of knowledge, involvement and awareness of the phenomenon and the problems associated with sports competition fixing by sportspeople, members of the technical teams, managers or other people linked to the world of sport is a significant indicator that may, in the future, serve to determine the need to promote future learning, outreach, regulatory or other type of actions.

Execution

The “Analysis and diagnostics Working Group” which, in accordance with the guidelines set by the Group, will include the presence of the sports federations taking active part in carrying out this measure, will design a questionnaire with questions that can calibrate the level of knowledge, involvement and awareness about the problem of sports competition fixing. This questionnaire will be sent, preferably over the internet, to the various federations so that it can be filled in by the sportspeople and other people linked to the world of sport.

The results will be analysed by the Working Group, which will draw up a report based on the results obtained after the questionnaires are sent out. The report on conclusions will be presented to the Commission Plenary Session during 2021 so that they may consider it.

³ This work shall be done using the concept provided for in the Council of Europe Convention on the Manipulation of Sports Competitions as a reference: “an intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for others”.



MEASURE 4.1.6 – Carry out a study of the prevalence of mental disorders caused by gambling addiction among sportspeople.

Objective

Carry out a specific study analysing the levels of prevalence of mental disorders caused by gambling addiction among sportspeople to all types of gambling.

Justification

With the aim of gaining more suitable knowledge about the corruptibility risk level that sportspeople may exhibit in the field of sports competitions, it is necessary to analyse the group's level of association with the sports betting segment and, more specifically, the indices of prevalence of mental disorders caused by gambling addiction among sportspeople. This matter is relevant because, as some studies carried out in jurisdictions in our surroundings show, the level of prevalence seems to rise if we refer to professional athletes as compared to the levels observed if the population as a whole is analysed⁴.

Given that in Spain there is no specific study analysing the relationship of sportspeople with gambling, it would be appropriate to analyse the matter in depth to see if conclusions can be drawn that are similar to those in other environments or if, on the contrary, there are specific features that make the existing situation in Spain unique.

Execution

The Analysis and diagnostics Working Group will prepare a questionnaire that will be distributed to the various sports federations so that they can distribute them to the sportspeople to be filled in (preferably over the internet). After the results are analysed, a report of conclusions will be prepared and presented to the Commission Plenary Session for its consideration. The study should be available in 2021.

⁴ Grall-Bronnec, M., Caillon, J., Humeau, E., Perrot, B., Remaud, M., Guilleux, A., Rocher, B., Sauvaget, A., & Bouju, G., (2016). Gambling among European professional athletes. Prevalence and associated factors. *Journal of Addictive Diseases* 35(4), 278-290).



MEASURE 4.1.7 – Carry out a study of the profile of gamblers in sports betting markets at the national level.
Objective
Carry out a study of sports betters in Spain, with the aim of getting to know the various profiles of the participants in the betting segment in more detail.
Justification
<p>Since 2015 the Directorate-General for the Regulation of Gambling has regularly drawn up a study of the online gambler's profile, which synthesises their level of activity, the games they gamble on, their level of expenditure and the relationship between expenditure and the return to player. These regular reports provide much-needed insight into gamblers on the national gambling market in Spain⁵.</p> <p>Given this dynamic, the study should focus exclusively on sports betters, which will enable us to better understand the various profiles of the participants in the sports betting segment.</p>
Execution
<p>The Directorate-General for the Regulation of Gambling will prepare a report about the gambler profile and will submit it to the Commission Plenary Session for consideration.</p> <p>The study should be available in 2021.</p>

⁵ To see the gambler profile for 2018, which is the most recent one published by the DGOJ, see the following link: <https://www.ordenacionjuego.es/es/informe-jugador-online>



MEASURE 4.1.8 – Carry out a study of the payment methods used in the gambling industry.

Objective

Prepare a study of the various payment methods used in the gambling industry with a view to gaining suitable knowledge about the total volume of transactions which may be channelled towards illegal gambling on offer in Spain.

Justification

One of the most common mechanisms for masking sports betting fraud linked to sports competition fixing is running gambling operations in entities that, as they do not have a licence issued by the DGOJ, are offering illegal gambling in Spain, without the protective and regulatory framework offered in the regulated gambling environment.

Therefore, it is of interest to find out the volume of financial transactions that might be channelled into the illegal remote gambling market for the purpose of adequately measuring the problem that this type of gambling on offer involves in Spain.

Execution

After the relevant analysis and assessment process for the data on financial transactions made to the illegal gambling market by various payment methods, the Directorate-General for the Regulation of Gambling will prepare a report of conclusions which it will submit to the Commission Plenary Session for its consideration.

The study should be available in 2020.



4.2 Outreach and awareness area

MEASURE 4.2.1 – Create a web site for the National Commission and define its corporate image.
Objective
A web site will be created to publicise the National Commission's activities, and any other interesting initiatives at the national and international level that aim to prevent and fight sports competition fixing and sports betting fraud; a specific corporate image will also be created for the Commission.
Justification
To make known to the general public, via a single access point on the internet, the actions carried out in the field by the National Commission itself, which will facilitate visibility and knowledge of the actions carried out by the Commission and will also serve to raise awareness and disseminate on the web site any initiatives of interest that may be carried out.
Execution
The Directorate-General for the Regulation of Gambling will propose a corporate image model for the National Commission, which must be agreed by its members. The Directorate-General for the Regulation of Gambling will design and put in place the National Commission's web site, which must be available in 2021.



MEASURE 4.2.2 – Promote the organisation of a training and awareness workshop on sports competition fixing and betting fraud.

Objective

A training and awareness workshop will be held for the purpose of bringing together, in one event, the main stakeholders in the field with the aim of sharing, and making known, the current scenario of sports competition fixing and betting fraud.

Justification

This measure makes it possible to bring together the main stakeholders in the sector in a single event, with the aim of sharing and making known the current situation in the field.

This multi-disciplinary approach (regulators, betting operators and providers, sports federations and entities, and renowned experts, amongst others) allows us to increase the possibilities of improving knowledge about betting fraud and sports competition fixing, while also promoting contact between all the stakeholders involved in these phenomena, increasing synergies and opportunities to improve all of their levels of protection.

Execution

The Directorate-General for the Regulation of Gambling will sponsor the workshop, and all the members of the National Commission will take part.

Prior to definitive development of the programme, the Directorate-General for the Regulation of Gambling will seek proposals from the “Outreach and awareness Working Group” and on as many points as are needed for the workshop to be efficiently organised.

The workshop will be held during the first half of 2021.



MEASURE 4.2.3 – Design and distribute outreach material about the National Commission and on any matters that may be of interest to Commission members.

Objective

Outreach material about the National Commission and on any other matters coinciding with the aims it has been given will be prepared and distributed.

Justification

It is appropriate to give visibility not just to the actions taken by the National Commission, but also to its aims, by designing and distributing publicity material of various types (leaflets and pamphlets, etc.).

Execution

The “Outreach and awareness working group” will design the content of the outreach material, which will be distributed by the stakeholders and entities that are related to the aims pursued by the Commission.



MEASURE 4.2.4 – Promote training and awareness actions carried out by the various members of the National Commission.

Objective

The members of the National Commission will promote training and awareness actions intended to prevent sports competition fixing and betting fraud. Other members of the Commission may take part in such actions, voluntarily, to round out and enhance their content.

Justification

It is necessary for each one of the members of the National Commission to take on a specific commitment with a view to promoting, on their own initiative, training and awareness actions intended to promote greater knowledge about the phenomenon of sports competition fixing and betting fraud.

Execution

The members of the National Commission will, throughout the period this plan is carried out, start up awareness strategies which they will inform the National Commission Plenary Session about as they are being planned or carried out.

These measures may include specific information campaigns via sports organisations, preparing documents, organising forums of all the stakeholders involved to roll out specific informative measures, and all types of dissemination actions that may contribute to awareness about the malpractice of this behaviour.



4.3 Control and monitoring area

MEASURE 4.3.1 – Launch of the sports betting Alert System

Objective

This measure is aimed at launching the sports betting Alert System, which is the telematic, interactive cooperation network which will be the backbone of permanent cooperation in the control of the betting market and to which all entities licensed by the Directorate-General for the Regulation of Gambling, as the body in charge of managing the platform, will have access.

Justification

The purpose of the Alert System will be to protect participants in the betting market from fraudulent practices which, as they alter the results of a sports event, end up seriously distorting their participation in the game. It will also have the purpose of monitoring and controlling the sports betting segment, with a view to ensuring public order and protecting the regulated gambling market.

This system of cooperation, which is an indispensable and essential addition to the Commission itself, aims to prevent fraud and rigging in the sports betting market, benefiting not just the betters and participants in gambling, but also the actual regulated market at the national level.

Execution

Once the Alert System is created, the Directorate-General for the Regulation of Gambling will authorise sign up to it by subscription or putting in place the relevant means of collaboration with the entities concerned.

The Alert System will be managed by the DGOJ and will be accessible over the internet for all those who have signed up to the system.

It is expected that the System should be operational in 2020.



MEASURE 4.3.2 – Annual memorandum about the risks analysed and detected on betting markets and in the various sports competitions.

Objective

To inform the Commission about the work carried out via the sports betting Alert System managed by the Directorate-General for the Regulation of Gambling.

Justification

It is necessary for the Directorate-General for the Regulation of Gambling to inform the members of the National Commission periodically about the work carried out via the sports betting Alert System.

The Commission may evaluate the activity carried out during the period and also put the conclusions reached in drawing up the Memorandum to use, which may require later action to be taken.

Execution

The analysis and diagnostics working group will be in charge of preparing the annual Memorandum, which it will present to the Plenary Session during the first half of the year following the one when the data and information needed to prepare it were collected.



MEASURE 4.3.3 – Boost sports competition monitoring and follow-up activities, paying particular attention to the lower levels.

Objective

Draw up an Annual Plan, choosing which competitions should be monitored, either due to their special features or because they show a greater risk of being fixed.

Justification

This measure is intended to boost monitoring and control of sports competitions, from a point of view that is fundamentally centred on the environment of the bets placed on these competitions, and which pays particular attention to competitions which exclusively or mainly star young people.

Execution

In this case, a 2 stage procedure is considered to be the most suitable:

The Directorate-General for the Regulation of Gambling, depending on the analysis of existing risks, will prepare a list of the competitions to be specifically monitored during a specific period, paying particular attention to competitions for participants who are essentially young people (under 21s, under 20s, etc.).

Using the list, the DGOJ will closely monitor the competitions selected during 2021.



MEASURE 4.3.4 – Design or, as appropriate, improve secure channels for transmitting information about sports competition fixing.

Objective

Design and define reference points that anyone may go to in order to transmit information that may be relevant in relation to sports competition fixing.

Justification

Early information about possible rigging is essential to alert the various stakeholders involved and to be able to prevent or mitigate the direct or indirect effects of the rigging, both in the sport and in the betting environment.

Therefore, it is necessary to create a suitable environment of trust and security for those wanting to collaborate in the persecution of these unsporting practises, ensuring proper receipt of the information by the relevant authorities.

Creating information channels that ensure confidentiality makes it easier for the information to be found out at the appropriate time.

Execution

The “Regulatory and operational studies working group” will design the main guidelines to be adhered to by the various secure channels for information transmission that will be started up, not just by members of the Commission, but also by any other entity or institution that has the prevention of sports competition fixing or betting fraud amongst its purposes. It will ensure that said channels guarantee anonymous, confidential communications. The aforementioned analysis should be concluded in 2020.

The members of the Commission will, where necessary, adapt their information transmission channels to the guidelines.



4.4 Study of current regulations and operations area.

MEASURE 4.4.1 – Analyse the current legal regime relating to the prevention of and the fight against sports competition fixing in the world of sport
Objective
Analyse the current legal framework for sports, comparing it to sporting reality to identify possible areas for improvement or modernisation connected to the aims this Plan is based on.
Justification
<p>This measure intends to perform an all-encompassing study of sports legislation to try and analyse the phenomenon from a cross-cutting point of view that enables identification of specific, relevant points which allow for progress in terms of preventing and fighting sports competition fixing.</p> <p>The intention is to help to ensure that the regulatory regime applicable to sport is suitable, by reviewing the current legislation to assess if there are possible areas for improvement.</p>
Execution
<p>The “Regulatory and operational studies working group” will carry out an analysis of the current legal framework and will prepare a report of conclusions which will be presented to the Commission Plenary Session for its consideration.</p> <p>The study should be available in 2021.</p>



MEASURE 4.4.2 – Analyse the current legal regime with respect to the gambling segment.

Objective

Analyse the current applicable legal framework for sports betting to identify areas for improvement in the regulations.

Justification

This involves reviewing current legislation to assess if there are possible areas for improvement that would enable progress in terms of preventing sports betting fraud.

Amongst other aspects, which are currently already subject to regulation, this analysis will include: the scope of the subjective prohibitions provided for in paragraphs d), e) and f) of article 6.2 of the LRJ, the powers to intervene in the offer provided in the gambling operators' betting schedules, the prohibition on betting on events featuring exclusively, or mainly, minors, as provided for in the Resolution of 11 July 2019, etc.

Possible means of improving current legislation will also be analysed, taking comparative regulation and the evolution of the betting ecosystem in Spain as a reference.

Execution

The Directorate-General for the Regulation of Gambling will carry out an exhaustive analysis of the current legal framework and draw up a report of conclusions which, in the first instance, will be submitted to the "Regulatory and operational studies Working Group" for its consideration and analysis and, subsequently, to the National Commission Plenary Session for its consideration.

The study should be presented to the National Commission plenary session in 2021.



MEASURE 4.4.3 – Analyse sports entities’ regulations on competition fixing.

Objective

Sports entities’ regulations on competition fixing will be studied and analysed to identify, if appropriate, possible areas for improvement in relation to the aims of this Plan.

Justification

Sports regulations can include a highly diverse set of cases in relation to the fight against sports rigging and sports betting fraud.

Therefore, it is considered necessary to have up-to-date knowledge about applicable legislation in the various types of sports which may be bet on, to give a response to the new threats arising in a changing environment.

Execution

The “Regulatory and operational studies Working Group”, which may be joined, voluntarily, by the sports federations whose regulations are to be analysed, will study the content of the relevant sports regulations and prepare a report of conclusions that, as appropriate, will propose the regulatory improvements needed with a view to achieving the aims of this Plan.

The report of conclusions, including all the aforementioned content, will be presented to the National Commission plenary session for consideration in 2021.



MEASURE 4.4.4 – Draw up a guide so that sports entities and associations can prepare detection and reporting protocols in the event of sports competition fixing.
Objective
A guide will be prepared for the purpose of offering the guidelines needed to help detect sports competition fixing and report this type of behaviour via the appropriate channels. The guide is meant for all types of sports entities or associations.
Justification
This initiative is based on recognition of the importance of the sports entities and associations including amongst their guidelines for action a specific protocol indicating what they should do in the event of detecting a sports event is fixed, and what steps they should take to give account of the circumstances.
Execution
<p>The “Regulatory and operational studies Working Group” will draw up a guide during the second half of 2020 with a view to disseminating it amongst the various federations and professional leagues.</p> <p>The members of the National Commission will undertake to give visibility to the document via their web sites, or on such other media they consider to be appropriate.</p> <p>The guide will be presented to the Plenary Session in 2021.</p>



MEASURE 4.4.5 – Analyse the best practices carried out by sports entities and gambling operators.

Objective

The best practices put in place by the various members of the Commission, or by other stakeholders related to the worlds of sport or betting, will be studied and analysed to prevent sports competition fixing and betting fraud.

Justification

There are many entities and bodies in Spain that are already working efficiently in the area of preventing sports betting fraud and sports competition fixing.

There is no doubt that each one of the entities carrying out its activities in this environment has, in one way or another, put in place a set of practices which would be of particular interest for all the members of the National Commission.

In fact, based on knowledge of these practices, it should be possible to point to future recommendations, or development studies, with the aim of boosting and improving the prevention of fraud in this sector.

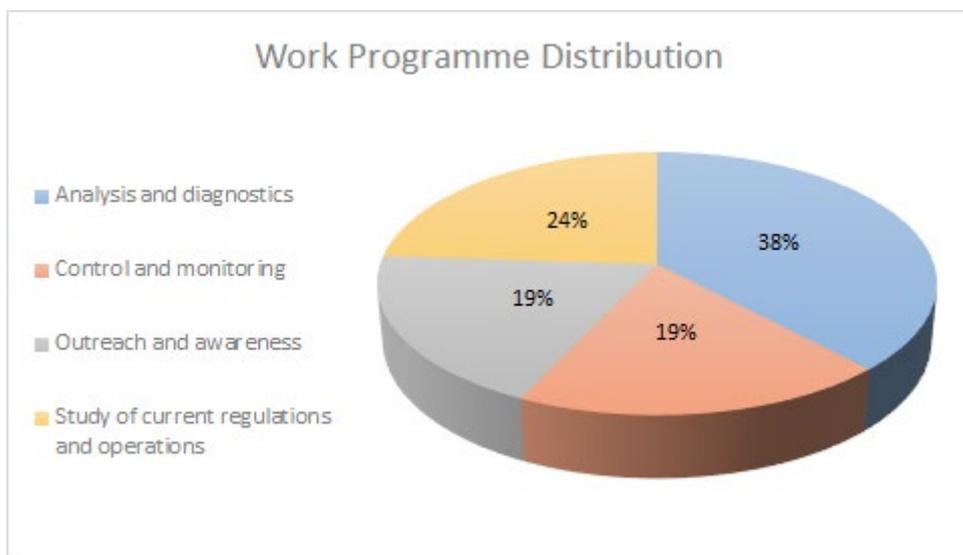
Execution

Entities interested in presenting best practices that may be being developed in their organisation to the National Commission should contact the Commission Secretariat to send their content and, as appropriate, present that content within the Commission Plenary Session.



APPENDIX I

WORK PROGRAMME DISTRIBUTION GRAPHIC





APPENDIX II

MEDIDAS	PERIODO																							
	2020												2021											
	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
Analysis and diagnostics	1. Carry out an analysis of the risks of sports competitions or events centred on the world of sport being fixed.																							
	2. Carry out a study of betting markets at the national level.																							
	3. Update existing analyses of the risk of fraud and criminality in the betting world.																							
	4. Update the recommendations for managing fraud in sports betting provided for in the 2018 DGOJ Technical note on fraud management.																							
	5. Study the level of knowledge about the phenomenon of sports competition fixing amongst sportspeople, members of technical bodies, managers and other people linked to the world of sport.																							
	6. Carry out a study of the prevalence of betting sportspeople in Spain.																							
	7. Carry out a study of the profile of gamblers in betting markets at the national level.																							
	8. Carry out a study of the payment methods used in the gambling industry.																							
Outreach and awareness	1. Create a web site for the National Commission and define its corporate image.																							
	2. Promote the organisation of a training and awareness workshop on sports competition fixing and betting fraud.																							
	3. Design and distribute outreach material about the National Commission and on any matters that may be of interest to Commission members.																							
	4. Promote educational and awareness actions carried out by various members of the National Commission relating to the world of sport and betting.																							
Control and monitoring	1. Start up the sports betting Alert System.																							
	2. Annual memorandum from the National Commission about the risks analysed and detected on betting markets and in the various sports competitions.																							
	3. Boost sports competition monitoring and follow-up activities, paying particular attention to the lower levels.																							
	4. Design or, as appropriate, improve secure channels for transmitting information about sports competition fixing.																							
Study of current regulations and operations	1. Analyse the current legal regime with respect to sport																							
	2. Analyse the current legal regime with respect to the gambling industry.																							
	3. Analyse sports entities' regulations on competition fixing.																							
	4. Draw up a guide so that sports entities and associations can prepare detection and reporting protocols in the event of sports competition fixing.																							
	5. Analyse the best practices carried out by sports entities and gambling operators.																							