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Safeguarding Sports Integrity against Crime and Corruption: An Australian Perspective*

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Introduction

Preserving the integrity of sport has become a major concern for sports bodies and law enforcement agencies alike worldwide and the transnational nature of threats to sport integrity has made the task all the more challenging. The growing involvement of organised crime syndicates in match-fixing, illegal betting and distributing prohibited drugs among athletes has grown alarmingly in Asia, Europe, Latin America and the US. In February 2013 following the biggest ever investigation, European Police Office (Europol) in a shocking exposé revealed that around 380 suspected matches including the World Cup, European Championship qualifiers and Champions League were fixed by an organised crime syndicate in Asia, involving around 425 match/club officials, players and criminals across 15 countries.¹ Deeply concerned with growing corruption and criminal activities in football, Fédération Internationale de Football Association (FIFA) and International Police Organisation (INTERPOL) signed a 28 million Euros 10-year agreement in May 2011 to curb and prevent Asian based match-fixing and illegal betting in sports (Media release, 2011).ⁱ

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Australia is no exception to this trend of growing corruption and involvement of organised criminal identities in sports. In February 2013, a startling report of the Australian Crime Commission (ACC), ‘Organised crime and drugs in sport: New generation performance and image enhancing drugs (PIEDs) and organised criminal involvement in their use in professional sport’, revealed “the involvement of organised criminal identities and groups in the distribution of new generation PIEDs” (Australian Crime Commission, 2013). The report was a consequence of a 12-month investigation conducted by ACC with the support of the Australian Sports Anti-Doping Authority² and the Therapeutic Goods Administration (TGA). It concluded that organised crime syndicates posed a serious threat to the integrity of sports in Australia.

In 2011, the President of the International Olympic Committee (IOC), Jacque Rogge, identified gambling-related corruption as the biggest single threat to the integrity of international sport. The ACC report highlighted that Australian sport is not immune from this corruptive influence. Moreover, the threat posed is not confined to sport. By utilising online gambling platforms, recognised international crime syndicates have the capacity to launder money and engage in assorted secondary criminality of a financial nature that includes identity theft, economic conspiracy and fraud. According to the ACC’s conservative estimate serious organised crime costs the Australian community up to \$15 billion each year (Lacey, 2012). Shane Neilson, National Manager, Australian Crime Commission argues that globalisation, increased cross-border movement of people, goods and money, international markets and rapidly developing technology facilitate organised crime. Groups offend in one jurisdiction, launder in another, and enjoy the proceeds in a third country (Neilson, 2011).

In the above context this paper has been divided into seven broad segments. The first provides a brief overview of the meaning of ‘integrity’ in the context of sporting events. The second segment discusses instances of match-fixing in four Australian sporting codes: the National Rugby League (NRL), Australian Football League (AFL), A-League Football and cricket. The third segment identifies the key patterns and variants of sports corruption in Australia. The fourth segment traces the involvement of transnational and organised crime syndicates in the Australian sporting domain. The fifth segment traces the altering priorities of the law enforcement agencies and their growing focus on crime and corruption in sport. The sixth segment examines the evolving national policy on the development of codes of conduct and anti-match-fixing measures in Australia. And the last segment offers recommendations and suggestions for preserving integrity in sport, from the Australian perspective.

Overview and Meaning of ‘Integrity’ in Sport

Cheating in, and the fixing of, sports events have a history that is almost as old as organised sport. Modern sports organisations have developed quite sophisticated, if

² ASADA was established in 2006 by the Australian Government to eliminate doping in sport in Australia. It also spearheads anti-doping efforts at the international level in collaboration with National Doping Organisations, the World Anti-Doping Agency and other stakeholders.

largely private, self-regulatory mechanisms in identifying cheats and fixers. In particular, the manner in which international sport, as directed by the World Anti-Doping Agency, monitors, internally prosecutes and sanctions those who take prohibited performance enhancing drugs is instructive as to how sport might deal with the integrity threat posed by illicit, online gambling and match-fixing. In addition, the relationship between gambling and sport has a long history. The manner in which the oldest organised professional sport, the horse racing industry, monitors, internally prosecutes and sanctions those associated with gambling-inspired corruption is again highly instructive as to how sport deals with betting-led conspiracies (Glesson review of sports betting regulation in the state of Victoria, 2011).

This institutional history is the combination of cheating and betting in sport, based on inside information supplied by officials or players and placed upon online and offshore gambling platforms. It poses a significant integrity threat to modern sport and also reveals certain regulatory vulnerabilities within international sport. Today certain sports betting platforms are being used as a conduit for transnational financial crimes, cross border money laundering and associated economic criminality or fraud.

In this context what does then “integrity” threat in sport imply? Borrowing from the Australian Sport Commission’s definition of the “Essence of Australian Sport, integrity in competitive sport has four essential elements: fairness; respect; responsibility; and safety(The Australian Sports Commission, 2012). Put simply, integrity in this regard concerns an “on-field” respect for the core values of fair and open competition in the game or event in question. “Off-field”, integrity extends to the procedural fairness of investigative procedures, tribunals and other forums in which allegations against sports professionals are considered. In the context of modern professional sport, however, integrity has, for sports governing bodies, a meaning that extends beyond the above and this is related to modern sport’s business model and branding.

Revenue streams – gate receipts, associated merchandising, sponsorship and, crucially, TV and media rights deals – in the world’s and Australia’s leading sports leagues remain relatively robust with the primary financial stability threat tending to be internal (in the form of spiralling player wages) rather than external (in the form of the global economic downturn); nevertheless, sports governing bodies across the world are acutely aware that this “robust” business model is based fundamentally on an implied contract of trust and confidence with its spectators and sponsors. Further, that contract or bond is predicated on supporters and sponsors believing in the “controlled unpredictability” of what occurs on the sport field. Accordingly, if that trust is undermined because, for instance, supporters and sponsors suspected that players’ actions are motivated for nefarious reasons, then consumers and sponsors will quickly move their money elsewhere and thus destabilise that sport’s financial viability. In this, leading sports governing bodies are aware that in today’s highly competitive sports market (epitomised by the various codes in Australia) there are a number of alternatives for this support and money.

Similarly, the integrity threat emerges where doubts or suspicions arise about, for example, an unusually slow run rate in cricket or a high number of dropped balls in the field; a decision by a player to take a tap rather than a kick at goal in rugby; a tennis or snooker result that is at odds with the form or ranking of those involved;

idiosyncratic positional moves by a coach; or the inconsistent decision-making of a referee during the course of a game. Although all of the above may be underpinned by perfectly rational explanations, recent gambling related events suggest that on occasion certain happenings on the pitch may be driven by a more sinister rationale or, at the very least, warrant the suspicion of betting-led conspiracy influencing the behaviour of players.

In sum, it is the credibility or integrity of the brand that is of the utmost importance to sports bodies and thus the associated anxiety of leading sports bodies, as led by the International Olympics Committee (IOC) through its Founding Working Group (FWG) on the Fight against Irregular and Illegal Betting in Sport established in March 2011 (Founding group, 2013). This can create pressures for organisational cover-up or minimisation strategies that render the industry and regulators potentially complicit in the wrongdoing. Analogies abound from the world of sport about the corrosive impact that (lack of) integrity issues can have on a sport's brand and goodwill and, as a corollary, on the difficulties a sport can have in trying to regain that trust and confidence of supporters and sponsors. The regulatory corruption that has led to the demise of professional boxing as a mainstream sport is noteworthy (Anderson, 2007). The allegations of corruption surrounding the administration of the Indian Premier League (IPL) have seen turnover figures for that cricket tournament decline markedly in the last year. The reputational difficulties that athletics and professional cycling have with regard to doping continue, despite recent progress in cleaning up the sports in question. The shocking doping confessions of the ace cyclist Lance Armstrong is a case in point. The International Cyclist Union (ICU) has asked Armstrong to return \$4 million earned from the seven Tour de France titles and also stripped him of those titles (O'Keefe, 2012).

Key Australian Match-fixing Cases

Rugby League

Two minutes into a NRL game between the North Queensland Cowboys and the Canterbury Bulldogs in August 2010, the Bulldog's Ryan Tandy was penalised for a delaying offence. Ordinarily, the Cowboys would have taken a kick at goal but elected to tap the ball and eventually scored a try. Irregular betting patterns involving significant amounts of money were identified by betting operators on a Cowboys' penalty goal to be the first scoring play. An investigation by the NSW Casino and Racing Investigation Unit has led to four arrests including Ryan Tandy and his agent. The charges were based on economic conspiracy and obtaining money by deception and, in the player's case, relate to providing false and misleading information to a parallel investigation by the New South Wales Crime Commission. In December 2011, Tandy was found guilty on the "knowingly providing false evidence" charge and received a six month, non-custodial sentence.

Australian Football League (AFL)

In July 2011, Heath Shaw a player with leading AFL club Collingwood was suspended for eight matches and fined Aus\$20,000 after being involved in a betting scandal also involving Collingwood captain Nick Maxwell. Shaw and a friend bet A\$10 each on Maxwell kicking the first goal of a league game against Adelaide,

knowing that Maxwell was to start the game not in his usual position but in the forward line. Shaw also passed the information to friends who also laid a series of minor bets. Maxwell was fined A\$ 5,000. Three members of Maxwell's close family also placed bets. There was evidence that betting odds in the markets on Maxwell scoring came in from 100-1 for the first goal to 25-1.

In early 2013 press reports again put the spot light on AFL over the alleged use of PIEDs by some players. The AFL and ASADA interrogated the Melbourne Football Club 'Demons' doctor Dan Bates based on the exchange of mobile text messages with Stephen Dank, a sport biochemist, who also ran the club's supplement programme in 2012, over his possible role in arranging PIED for some players (News Limited Network, 2013). Similarly, Essendon, another Melbourne based club has also been mired in an alleged doping scandal. As a result the club's high performance manager Dean Robinson Essendon was suspended who once noted the existence of the 'seedy underworld of the sport' (Clark, 2013). Essendon is also conducting its own investigations and the club coach James Hird is expected to dispose before ASADA and acknowledge having received two injections from Dank, for 'health reasons'. Hird is reportedly 'absolutely shocked' at the scandal describing it as a 'terrible disturbing situation' (Dampney and APP). The Fox Sports News commentator Mark Robinson believes, "Criminal figures, criminal gangs, organised criminal gangs are infiltrating sporting codes, including the AFL". Dean Robinson was closely associated with Stephen Dank, who is alleged to have injected calf blood in some of the Manly players in the National Rugby League during his tenure with the club. ASADA is currently continuing the investigations in close cooperation with both the AFL and NRL (ASADA media statements, 2013).

A-League Football

The February 2013 EUROPOL exposé of widespread match-fixing done by the Asia based organised crime syndicates, in over 380 football games, also allegedly included an A-League match played in 2012 in Melbourne, involving as much as A\$40 million in legal and illegal betting from Asian agencies. The Football Federation Australia and Victorian Police denied any such possibility. However, the Victoria Police Deputy Commissioner Graham Ashton struck a note of concern over potential match-fixing in Australia. He said, "Any sport that is attracting significant betting offshore is at a major risk. This thing is coming down the highway and we have to be prepared" (Gatt, 2013).

Cricket

The 75-page International Cricket Council (ICC) cricket 2011 report prepared by Sir Paul Condon, director of the ICC Anti-Corruption Unit revealed that the ICC had failed to take any substantive action against two top Australian test players, Shane Warne and Mark Waugh, who were allegedly paid by Indian bookies (Report on Corruption, 2001). In the 1990s the Indian subcontinent saw match-fixing cases proliferating with the arrival of cell phones, live telecasts and computerisation in which the Australian cricketers have been implicated. The Indian Central Bureau of Investigations (CBI) which investigated the match-fixing allegations of the 1990s revealed that the one bookie had paid \$20,000 to Mark Waugh for providing 'information about pitch, weather, team strategy, and morale prior to Australia's

matches (CBI's report, 2000). The report also mentions Dean Jones being offered \$40,000 by the bookies, but refusing after allegedly sensing having been seen by Alan Border, the captain, meeting the bookie Mukesh Gupta. Now Asian betting syndicates are also allegedly betting on Big Bash cricket matches (premier league) in Australia (Gatt, 2013). According to press reports Australian junior cricketers aged between 15-19 are also at risk of corruption and could be groomed by overseas bookies. However, Cricket Australia spokesman Peter Young denied having any evidence of the practice within Australia but acknowledged that Cricket Australia's Anti Corruption Unit head, Sean Carroll was aware of such grooming practices overseas (Dowsley, 2013).

Key Patterns and Variants of Sports Corruption

In Australian sports the following patterns and variants of corruption are discernible:

1. Evolving sophistication of the betting market

Traditional forms of gambling fixes, for example, a boxer 'taking a dive' or the 'nobbling' of the favourite in a horse race, appear somewhat quaint to the contemporary eye. In horse racing, for instance, the fix had to be quite elaborate: the horse in question had to be interfered with physically; the money placed on the favourite or backing another horse or both had to be put on in a conspiratorial manner so as not to attract the suspicions of an irregular betting pattern by the relatively small and highly risk aware bookmaker community; and finally the fix had to be effective, in the sense that the favourite had to lose.

Contrast this with today's online betting environment. The 'where, when and what' a gambler can bet on is virtually unlimited. Wireless and telecommunication developments mean that a customer can, and on various multimedia platforms, incessantly bet and do so from home or in the sports bar or at the event itself. This flexibility and anonymity lends itself to betting conspiracies. Moreover, while in the traditional form of betting, the punter gambled on the final outcome of the event i.e., who might or might not win, the various different in-play forms of betting now available mean that punters can engage in bets on much more defined aspects of the game itself such as spot-bets or spread-betting (pertaining to just one particular aspect, such as the first free kick, foul or a penalty in soccer and first no ball or a boundary in cricket, and not the final outcome of the match).

The match-fixing cases discussed earlier and the investigations of Declan Hill and others suggest that if a third party can convince a player to do something particular at a specific time in a game, which need not necessarily impact on its final outcome (and thus cause no great moral hesitancy for the player), this inside information can be used to the advantage of that third party on betting exchanges (Hill, 2008). Again it must be stressed that, although bets of the kind outlined appear somewhat "exotic" in nature, a quick perusal of online betting exchanges and spread betting facilities illustrates that the combination and category of bets available to the modern punter are bewilderingly broad. Put simply, no matter how exotic a bet appears, there is nearly always a market online for the customers' money.

2. Vulnerable players

Player education and awareness, supplemented by strict enforcement action and sanctions against wrongdoing, is a central preventative measure in dealing with this activity. Players are sometimes unaware that seemingly innocuous information, such as positional or tactical changes for a forthcoming game, may be used to the betting advantage of third parties (leave the footnote).

Players also need to be educated as to the undue influence that might be placed on them for such information, whether it is through a commercial agent or their wider social network. Matters such as the profiling of vulnerable players (like those from countries where corruption is already a facet of everyday life) and the regulation of sports agents is important here. The proper regulation of sports and financial accountability is essential in the wake of entry of private equity into sport and ownership of individual clubs by private entities.

Elite players in well-paid leagues, for example the English Premier League, are unlikely to be targeted in this regard, unless they have a gambling problem or related debts. These players are well paid but players further down the league or working in semi-professional leagues may be more susceptible. Further, note that in a league that has salary caps where, although leading players are well paid, the remainder of the team may not be, the resulting inequality might heighten the vulnerability of the latter to illicit betting approaches.

3. Vulnerable games

Sports that attract high betting volumes, such as football, may be targeted by illicit betting syndicates in an attempt to hide otherwise irregular betting patterns in the general weight of money bets on the particular game or event.

Episodic games, such as tennis or snooker, where an individual player can exert a significant amount of control over whether a particular set or frame is won or, more likely, lost, have been known to have resulted in betting-related conspiracies.

Similarly, games where there is little at stake, for example, so-called “dead rubbers” or games between teams who are untroubled by the play-offs but safe from relegation, can be vulnerable.

4. Referees

As some case studies also demonstrate a referee can control the point spread in a high scoring game and thus aid those who bet on spread-betting or points handicap betting markets. In a relatively low-scoring game, such as football, one decision (the award of a penalty kick) can decide or materially change the outcome of a game – and there have been celebrated examples of this. In Germany in 2005 a scandal was reported based on the confessions of a second division referee, Robert Hoyzer, who confessed to fixing and betting on matches in league and cup football matches which led to a large scale review of match-fixing in that sport.

Overall, in games as diverse as cricket, rugby and boxing how the referee “calls” a game can be of the utmost importance and therefore protecting referees who, in professional sport are usually the least paid person on the pitch, is critical.

5. Poor regulatory ethos

Where a sport’s central governing authority is weak or sets a poor example, this may lessen the impact that its integrity regulations have on participants and open that organisation to targeting by criminal syndicates. The Secretary General of Interpol, Ronald K Noble, noting that corruption in international football is “widespread”, argued that a key challenge in addressing the problem was that “public confidence in FIFA’s ability to police itself is at its lowest” (Noble, 2011). In August 2011, Transparency International published a document entitled “Safe Hands: Building Integrity and Transparency at FIFA” in which it sets out an “integrity audit” agenda for FIFA (Transparency International, 2011). The recommendations include the creation of a multi-stakeholder group, an independent investigation of the past and a ‘zero tolerance’ policy towards bribery.

Similarly, in a recent review of corruption in Britain by Transparency International (UK), a survey ranked sport as the second most corrupt sector in British society – political parties were ranked first; parliament third (Transparency International, 2011). In Australia, however, notwithstanding the growing concern with corruption in sport, the history of enquiries of drugs in sports by ASADA and the current legislative and regulatory gaps, international policing agencies, such as the INTERPOL perceive the country’s international image as positive and admirable. Dale Sheehan, director, capacity building and training at INTERPOL said that Australia’s betting regulations, law enforcement and executive response mechanism are considered of a high standard for preserving integrity in sport (Sheehan, 2013).

Sports bodies also have to reconcile their integrity anxiety relating to gambling with the heavy amounts of sponsorship accepted by such bodies from online betting companies. In addition, there may be a potential conflict of interest in a betting company sponsoring a club or league on which it takes bets (Liga Portuguesa, 2009).

Vulnerability of Professional Sport in Australia to Transnational and Organised Crime

In 2011 the Australian Crime Commission published a report entitled, ‘organised crime in Australia’ which illuminated the contemporary manifestation of organised crime in Australia. The report although did not reflect sufficiently upon organised crime involvement in sports, it did list ‘sports and fitness’ as one of the impact areas of organised crime. The report revealed that PIEDs were being used by body builders and elite athletes. The report also said these drugs were:

readily available through social networks of like-minded individuals, individuals within legitimate business such as gyms, sporting clubs and fitness centres, forged prescriptions, compliant doctors and pharmacists, thefts from medical sources (such as hospitals), the veterinary industry and Internet sales...Because of inconsistencies in the legal status of PIEDs internationally, these substances are readily

available overseas and are relatively cheap compared with the illicit market price in Australia (Australian Crime Commission, 2011, 69).

According to the report most PIEDs trafficked into Australia from Hong Kong, Thailand, Eastern Europe, the United Kingdom, India, The People's Republic of China, South Africa, the United States and Canada' (Ibid). The report stated that organised crime cost Australia between 10 and 15 billion dollars annually with an overall social cost exceeding A\$8 billion' (Ibid, 3).

The 2013 ACC report has delved deeper into the involvement of organised crime in sports in trafficking of PIEDs and illicit drugs based on the 12 month investigation in conjunction with ASADA. The report observed that organised criminal identities supplying PIEDs by exploiting their interaction with professional athletes, pose a serious threat to the integrity of Australian professional sport. The report said, 'Relationship between athletes and organised crime identities can be exploited by criminals to corrupt the athlete and give a form of social status to the criminal, in the same way that the steroid market has been used by organised crime to corrupt law enforcement officers' (Ibid, 31). According to the report, organised criminal groups involved in match-fixing are increasingly targeting sub-elite athletes because they are easier to exploit and also draw lower levels of scrutiny from integrity authorities. These criminal groups would develop their relationship with athletes over the years and then exploit it for match-fixing, says the report (Ibid). The report has identified four key threats to the integrity of professional sport in Australia. *First*, organised criminal infiltration of unregulated markets; *second*, infiltration through legitimate business, contractors and consultants; *third*, illicit drug use and criminal associations; and *fourth*, differing levels of integrity oversight in professional sport in Australia (Ibid).

Organised crime identities are also involved in gambling and can potentially use sports and illegal betting for laundering the proceeds of their crime further. Australian Transaction Reports and Analysis Centre (AUSTRAC), the agency in Australia tasked with anti-money laundering and counter-terrorism financing responsibilities, closely monitors movements of money through gambling, including gambling on sport. It lists betting accounts as one of the most common methods of money laundering and gaming in general as a sector that is closely monitored. Cash still remains the most prominent in the money laundering process. The nature and medium of gambling is often cash and methods of money laundering include 'structuring' of transactions, i.e. moving smaller amounts of money which fall under the cash transaction threshold of A\$ 10,000. Exchanging cash into foreign currency is also popular. An emerging form of money laundering technique is 'cuckoo smurfing', which involves moving money through an unrelated third party account, often without the third party knowing the full extent of transaction which can potentially be used in sport as well (Australian Transaction Reports and Analysis Centre, 2008, 7). The Australian Crime Commission (ACC) submission to the Australian Parliament's Joint Select Committee into Gambling Reform on 23 June 2011 concluded that "Online gambling is an identified money laundering risk and increasingly is also acknowledged as a risk for revenue and taxation fraud" (Australian Crime Commission Submission, 2011,4).

Australia, like many countries has increased its compliance of financial institutions, particularly since 9/11, and the Financial Action Task Force (FATF) anti-money laundering and counter-terrorist financing standards are being developed and adopted. Simultaneously, the globalisation of financial markets and the development of information technology have gradually boosted the criminal economy and expanded possibilities for organised crime. FATF recognises that the sporting industry is one of the many sectors that is attractive for criminals for money laundering (Financial Action Taskforce Report, 2009).

In a recent review by FATF on money laundering in the football sector, FATF highlighted that in order to facilitate such activities international crime syndicates were establishing their own online gambling platforms on which to take a wide variety of bets (Ibid). Unlicensed betting operators operating online and offshore have caused problems for the proper regulation of the industry in the UK, other EU states, and United States and in Australia breaches of the *Interactive Gambling Act 2001* (Cth) have been brought to the attention of the Australian Federal Police with increasing frequency.

The ACC 2013 report claims that the threat to Australian sport from organised criminal groups is now assuming systemic characteristic. As mentioned earlier, associating with a local sports star sometimes provides a medium for criminal elements to enhance their social, community and business status and thus engender them with an air of legitimacy. Further, as online betting in Australia grows rapidly – from an industry worth a little over A\$ 100million in the mid-1990s to one that is projected to reach A\$ 3billion by the end of this decade – the systemic risks increase, as aggravated by the online nature of the industry. As with any financial service offered online, the danger is that at the margins of the industry, it can be difficult to police and regulate effectively, if at all, given the offshore, relatively anonymous nature of such activity and the huge resources needed to trace money flows through various identity theft and customer identification traps.

Sports, Crime and Fraud Linkage: From Law Enforcement's Blind Spot to High Priority

Law enforcement responses to gambling led corruption in sport within Australia have historically been reactive and have been given low priority. It was reported in 2011 that the Australian Federal Police had failed to act on 15 complaints since 2009 of criminal breaches of the *Interactive Gambling Act 2001* (IGA) because it had considered them to be of low priority (Smith, 2011).

Fraud and corruption investigations have also traditionally not had the same level of commitment of police resources or the level of expertise as have other types of organised crime investigations and often involve jurisdictional issues. This is not unique to Australian law enforcement. Gambling led corruption in sport investigations are basically fraud related investigations. As noted by the 2006 Fraud Review in the UK, most police agencies do not prioritise fraud or include it in their strategic planning. There are a number of reasons for this, not the least jurisdictional and multiplicity issues (Burton, Johnston and Frimpong, 2008, 243).

Until recently there was a lack of intelligence concerning the links of organised crime and gambling led sport corruption in Australia. Whilst it was recognised, through overseas events, that gambling led corruption could be a serious organised crime issue, it was viewed that this was more of an ‘international’ problem, particularly in places where betting was legally prohibited and that as a result, there was a large underground market.

With limited attention given by public policing, nationally or internationally, monitoring and intelligence gathering has remained largely within the domain of sport controlling bodies and regulators. Police would become involved only on a reactive basis to particular incident/s of gambling led corruption. There was also a high level of suspicion and lack of information sharing between law enforcement and the sports controlling bodies.

A Growing Priority

In recent years, like other places in the world, the traditional view and priorities of Australian law enforcement agencies have changed, including those relating to gambling led corruption in sport and its relevance to and potential impact upon organised transnational crime. Similarly, with rapid advancement in technology, cyber-crime and online fraud has also been seen strategically as a priority issue. The proliferation of online betting and gambling and the rapid development of exotic or spot betting have exposed sport to vulnerabilities of transnational and organised crime involvement. Police agencies in Australia now recognise the threat in the light of the emerging instances of gambling led corruption in sports in Australia. In February 2013 the Victoria Police created a Sporting Integrity Intelligence Unit and a specialised squad to investigate the allegations of organised crime in sport (Premier of Victoria, 2013).

Earlier in 2011, the ACC’s strategic intelligence assessment had also found significant vulnerability of the sector to infiltration and exploitation by organised crime and some links between organised crime and individual sports and individuals. The ACC provided several briefings to partner law enforcement agencies, major sporting bodies and regulators and government (ACC Annual Report, 2011-12, chapter 2). A number of converging vulnerabilities in the sector were identified. Convergences include the exponential growth of the online wagering market, the appeal of ‘spot betting’, inconsistent approaches to market monitoring and surveillance, the continued internationalisation of sport, and the natural attraction the sports and leisure market has for organised crime (Lacey, 2012). An additional \$A3.6 million was allocated by the government in the 2013-14 budget for the ASADA and National Integrity in Sports Unit (NISU) to help with the current investigations and also help strengthen integrity systems in various sporting codes. The government currently invests \$A169 million in high performance sports system through the Australia Sports Commission and with another \$A 1.76 million for ASADA and \$A 1.7 million for NISU through 2014-15 it seeks to further safeguard the integrity of sport in Australia (Senator Kate Lundy, 2013).

National Policy on the Codes of Conduct and Anti-Match-fixing Measures in Sport in Australia

Several sports organisations at the national and international levels, in light of emerging integrity threats, are already implementing sophisticated risk assessment strategies to address the problems of corruption in sport. Many of these strategies are based on those which were first established in the horse racing industry and typically combine programmes that have three central elements: education, investigation and sanctioning.

Dedicated player education programmes; codes of conduct; moral clauses in player contracts; anti-corruption compliance and investigative units; and lengthy sanctions are essential to the anti-corruption policy of any leading sports governing body. In Australia's highly regulated horse racing industry, requirements that jockeys do not bet, statute-based investigative units and lengthy sanctions, epitomised by the "warning-off" penalty, are well established, as is the fact that administrators within racing's integrity units provide specialised advice, and even personnel experienced in compliance matters, to other sports.

The horse racing industry was also among the first to reach out to the licensed betting operators, entering into memorandums of understanding with them so that both early warning could be provided on a potential race-fix and further investigation facilitated. In April 2013 the Racing Victoria also approved of several initiatives for integrity enhancement in the industry. These include *jockey betting declaration* which prohibits them from betting on thoroughbred racing anywhere in the world in the previous season; *form analysis declaration* which requires the jockeys to identify persons that they will call upon to provide professional advice on form analysis, speed maps and race tactics, to get annual license renewal; and new *stand down powers* via its Local Rule 72 C which provides the stewards with an express power to stand down a person from further participation who has been charged with a serious offence that may be detrimental to sports integrity and image (Further Victorian Integrity, 2013).

The mutual benefits of the relationship between sporting codes and the law enforcement agencies remain central to the effective policing of match-fixing. As was seen to good effect in the Ryan Tandy case study outlined earlier, where substantial bets are taken on unusual, exotic bets, this can alert the receiving operator and that information can be passed onto the rest of the betting community and to the sports authorities in question. It is in the licensed betting operators' interest that their industry is not taken advantage of by match-fixers, as much as it is in the interest of sport itself.

In June 2011, all Australian sports ministers endorsed a National Policy on Match-Fixing in Sport (Australian Government Department of Regional Australia, 2012). Under the policy, Commonwealth and state governments agreed to pursue:

- I. nationally consistent approach to deterring and dealing with match fixing in Australia;
- II. information sharing arrangements and highly efficient networks between governments, major sports, betting operators and law enforcers;
- III. consistent code of conduct principles for sports; and

- IV. active participation in international efforts to combat corruption in sport including an international code of conduct and an international body.

In September 2011, Sports Ministers endorsed a model to give effect to this policy. The model incorporates the following elements:

- I. sports organisations can apply to the relevant state regulator to become a sports controlling body (SCB);
- II. SCB can enter into integrity agreements with betting agencies which provide for information exchange, a return of revenue to the sport and a right of veto on bet types; and
- III. All sporting organisations receiving government funding will be required to meet integrity benchmarks as agreed under the national policy.

Individual state and territory governments are pursuing this national agenda in developing the proposed nationally consistent criminal offences and sanctions as per the national policy. Australia is a federal system in which the responsibility for criminal law and policing is shared across the Commonwealth, States and Territories. The federal agencies have limited jurisdiction, confined to the fields of legislation competence granted under the Constitution. With no general power to enact national criminal laws (unlike other federations, such as Canada), the federal parliament can only enact national criminal legislation where the Commonwealth Constitution confers that power by a head of power, either expressly or by implication. Thus federal drug law, for example, is based on the combined power of the federal parliament to regulate imports and exports (customs power), and also to implement international treaties including the various UN treaties on drugs to which Australia is a signatory. The States individually or collectively can also refer its powers in the criminal law field to the Commonwealth Parliament under the Constitution, but this is rarely done, exceptionally reserved for dealing with matters on which there is an urgent consensus, such as measures to counter terrorism in the wake of the 9/11 and Bali bombings (Bronitt, 2010, 81).

The upshot of this patchwork model is a general lack of harmonisation in law enforcement approaches across Australia, inconsistent and inadequate policy responses particularly in relation to criminal activity that crosses internal jurisdictional borders. Attempts to promote uniformity through law reform (such as a Model Criminal Code) have been met with varying levels of enthusiasm. The issue of sports corruption has shared a similar fate, until recently, with only New South Wales referring the matter to its Law Reform Commission for consideration in 2011, which released a Report finding that the present law in NSW was inadequate and recommending (i) the adoption of new offences dealing with cheating and corruption in sport; and (ii) the desirability of adopting a national uniform approach.

The latter recommendation was given recent impetus with the launch of the *National Policy on Match-Fixing in Sport 2011* following a meeting of the Australian Sports Ministers. As a result, the Standing Committee of Attorneys-General established a Standing Council of Law and Justice working group to develop a proposal and timetable for a nationally consistent approach to criminal offences relating to match-fixing. On 18 November 2011, Australian Attorneys-General at the Standing Council

on Law and Justice supported the development of consistent national match-fixing offences with a maximum penalty of 10 years imprisonment. As noted by the New South Wales Law Reform Commission this penalty is in line with general fraud offences (New South Wales Law Reform Commission, 2011). Offences will include corrupting the betting outcome of an event and also using inside information about an event for betting purposes.

As part of the National Policy, the Australian Government has already established NISU which will be a non-regulatory body focused on implementation of the National Policy, including a number of integrity measures and processes. Such a unit could also liaise and be the conduit between Sports Controlling Bodies and Law Enforcement, overcoming some potential conflict of interests and inherent suspicions.

In 2011, the federal Minister for Sport in Australia, and his state and territory counterparts, had various meetings and correspondence with Malcolm Speed, the former chief executive of the International Cricket Council (ICC) and now chairman of the Coalition of Major Professional and Participation Sports, a union of chief executives from the Australian Footy League (AFL), National Rugby League (NRL), Australian Rugby Union (ARU), Cricket Australia (CA), Tennis Australia (TA) and Netball Australia (NA). The policy that has emerged from this initiative is based largely on the model that exists in Britain and in the state of Victoria. It is five fold in nature.

- I. The adoption of codes of conduct by sports;
- II. The possibility that federal funding of sports would be made contingent on sports bodies implementing appropriate anti-corruption policies and practices;
- III. That legal and licensing arrangements would be developed between betting companies and sports bodies that include obligations to share information and veto bets, as overseen administratively by a newly established NISU;
- IV. That agreement would be pursued on achieving nationally consistent legislative arrangements and specifically with regard to a criminal offence of cheating at gambling, which would assist in targeting those involved in such conspiracies but who do not come within the regulatory remit of a sports body.
- V. A commitment on behalf of all parties to continue to pursue an international solution and further international co-operation in the area.

The policy is a welcome development though still in its early stage. Moreover, problems can be envisaged in terms of obtaining, for example, a national consensus on the legislative framework (Consultation Paper, 2011). In this regard three additional points are noteworthy about the proposal.

First, central to the policy will be to appropriately fund the NISU which has been created in 2012 to safeguard integrity in sports in Australia. The NISU type institutions are likely to be quite resource intensive, requiring a diverse body of expert personnel from law enforcement agencies (economic crime units) and those with

experience in sports administration (compliance units) and the betting industry (integrity units). A long-term, stable funding model would be central to NISU's credibility and operational effectiveness. To promote sustainability, sports bodies should be given the right to exploit betting rights to their sport and that part of the revenue raised by sports bodies from the betting industry in this regard would then be siphoned off to fund the NISU. Moreover, assets confiscation under proceeds of crime legislation, which relate to sports corruption, could be earmarked to the funding of NISU.

Another problem is that without clear legislative powers to investigate and gather evidence (by telecommunications interception or controlled operations) the NISU would operate merely as a 'feeder' of intelligence to the relevant federal, state and territory law enforcement agencies. Its personnel would cultivate close working relations with law enforcement officials and provide the essential expertise needed to prepare compelling briefs of evidence, but the lack of its 'own motion' powers to investigate and prosecute limits its likely regulatory impact. The operation of NISU should be premised on full cooperation from betting industry, in terms of supplying information on irregular betting patterns, and it would also have to have certain accountability mechanisms imposed on sports bodies to ensure that the information supplied to them by NISU would always be properly pursued, irrespective of the consequences it might have for the sport in question. Without full compliance (from the betting industry) and accountability (from the sports industry) it is unlikely that law enforcement agencies such as the ACC would feel comfortable in, or be permitted to, supply any sensitive data or information that they might have, and thus the effectiveness of any putative NISU would be limited.

The solution preserving integrity in sport generally lies in greater international and regional cooperation between sports bodies and law enforcement agencies. Nevertheless, it is only when a country has its own "house in order" can it contribute materially and with due moral authority at the international level. In this, the recent national initiatives are of the utmost importance and ensure that Australia plays an influential role in the international resolution of this problem, and potentially in the formation of a World Anti-Corruption Agency.

Moreover, it must be stressed that in countries such as Australia and the UK, where sports industries such as horse-racing are deep-rooted, have an important cultural education role to play in enriching the debate on preserving sports integrity. In many jurisdictions, such as in continental Europe, sports administrators do not have an intuitive or cultural understanding of betting and this may be resulting in leading sports bodies underestimating this integrity threat. In contrast, the integrity threat emanating from drugs in sport is clear to all and thus a settled ethical stance on it among all stakeholders was achievable, as manifested in the establishment of the World Anti-Doping Agency. The ethical stance towards, even the understanding of, gambling and the associated risks to integrity, is not widely appreciated. For instance, there are problems in many countries in Asia where integrity threats originate from betting's illegal and thus unregulated status, due to cultural reasons, making it difficult for the authorities to legalise it for better regulation.

Conclusion and Recommendations

Corruption in sport needs to be recognised as part of an overall National Anti Corruption Plan rather than simply an aspect of sport governance or integrity or organised crime strategy. The problems of international corruption, organised crime and self-regulation have been identified by the Transparency International (TI) in its recent review of corruption in UK sport. These risk factors equally apply to Australia, as identified in this chapter. It is of interest that even in the UK, where the matter of corruption and crime in sport appears to be well-regulated, and a sports betting integrity unit is already in operation, TI nevertheless recommended “a full independent enquiry into corruption in UK sport commissioned by the UK governing bodies of major sports, with a view to setting up a coordinated response to corruption across all UK sports” (Corruption in sport). Building on that TI recommendation, research should be conducted as a matter of priority into sport’s vulnerability to gambling-led corruption and informing a coordinated and more effective response by sport and relevant government agencies in an effort both to underpin the integrity of sports events and undermine the illicit, online behaviour of criminal syndicates.

Second, does the close relationship between betting and sport lend itself to corruption? The answer to this question is no, or rather not *necessarily* so, and certainly not always. These common features, which have also been referred to in other research—notably the research commissioned by the EU Sports Platform, *Examination of Threats to the Integrity of Sport* (2010)—can assist sports governing bodies both in identifying and isolating their regulatory vulnerabilities to the threat and in instigating preventative and investigative mechanisms to address the problem (Oxford Research, 2010).

Third, it is recognised that there is need for strong partnerships between industry, sports authorities and law enforcement. Coordination, collaboration and information sharing between the number of law enforcement and monitoring agencies, sporting controlling bodies and other stakeholders, including gambling industry and NISU will be crucial in controlling gambling-led corruption in sport. Too often agencies can work in a silo or at the best bi-laterally without partnerships across all agencies and stakeholders. The threat of organised crime infiltrating this sector identified by the ACC, has been the catalyst for some recent and rapid developments in law enforcement of gambling led corruption in Australia. The nature of professional sport in the modern era regularly crosses international boundaries. The collaboration needs to extend globally. Having officers and staff who can champion this work is always beneficial with emerging types of crime such as gambling led corruption.

Fourth, law enforcement resources are finite and local law enforcement agencies have many competing priorities, often dictated by government, media and the general community. The importance of the integrity of sport nationally and internationally is vital in an industry worth billions of dollars. In today’s economic times, many things are about efficiencies and the focus law enforcement has tended to be very much on frontline policing and community perceptions of safety. Having said that, organised crime has become an enduring priority for law enforcement and governments. It is important to recognise how the markets for organised crime are elastic and crime groups are adaptive moving from established markets in illicit drugs to exploiting new opportunities such as corruption in sport. The threat of organised crime infiltrating

professional sport and impacting on its integrity will ensure that gambling led corruption in sport is not merely a niche area of law enforcement. Leveraging off partnerships with sport controlling bodies, regulators and such bodies as the NISU could ensure an effective law enforcement response. The possible future establishment of a World Sport Anti-Corruption Agency or similar body would also facilitate a global response and raise the profile of this issue in the global community, including the law enforcement community.

Fifth, combating gambling-led corruption should also focus on all parts of the corruption process and the enablers of the crime. As coined by David Lacey, Executive Director, ACC, ‘corrupters who corrupt the corruptible’, corruption involves three actors/events - the corrupters, the act of corruption and the enablers being the corruptible (Lacey, 2012). The corruptible can often be the professional athletes, referees and officials. A recent media report in Australia reported that sports betting by AFL players have reached troubling levels (Ralph, 2012). The combination of easy access to betting websites, 24 hour televised sport and high incomes is blamed for the escalating issue. Target hardening of players and officials through education and awareness focused on the potential ‘corruptible’ should be a priority strategy. A NISU in collaboration with Sport Controlling Bodies is best placed to implement these strategies. Partnerships such as FIFA and Interpol provide funding for implementation of these education and prevention strategies.

Sixth, Michael Jeh, founder of *Life Skills* professional sports consultant organisation, in his interview (October 29, 2012) with Inspector Jason Saunders (one of the authors of this chapter) shared that many professional sport controlling bodies provide significant resources to educating athletes and run programmes aimed at strengthening life skills of sportspeople with the view to encourage a better conduct from them on and off the field. Jeh, a former cricket professional, who played for the Oxford Blue, now provides life skills training to young athletes in Australia. He is currently engaged in a training programme with the Australian Rugby Union. He said that the focus to date on these types of programs has been on drugs and alcohol and lifestyle choices. These programs could incorporate more about gambling led corruption and the corruption process. As gambling led-corruption is financially motivated, financial affair management of athletes would be an important part of life skills training, assisting athletes to maximise their returns on their legitimate income. This type of proactive work by the sporting industry can prevent the corruptible being corrupted by the corrupters. This will also alleviate the use of finite law enforcement resources.

References

Anderson, J. (2007). *Legality of boxing*, London: Routledge.

Australian Crime Commission, ‘Submission to the Australian Parliament’s Joint Select Committee into Gambling Reform’, Reference 11/106554, Canberra, 24 June 2011.

Australian Crime Commission. (2011). *Organised crime in Australia 2011*. Commonwealth of Australia. Canberra. Retrieved July 29, 2012, from <http://www.crimecommission.gov.au/sites/default/files/files/OCA/2011/oca2011.pdf>.

Australian Crime Commission. (2012). *ACC Annual Report 2011-12*. Retrieved July 3, 2013, from http://www.crimecommission.gov.au/sites/default/files/files/annual_reports/1112/ACC_AR_2011-2012.pdf.

Australian Crime Commission. (February 2013). *Organised crime and drugs in sport: New generation performance and image enhancing drugs and organised criminal involvement in their use in professional sport*. Commonwealth of Australia. Retrieved February 17, 2013, from <http://www.crimecommission.gov.au/sites/default/files/files/organised-crime-and-drugs-in-sports-feb2013.pdf>.

Australian Government Department of Regional Australia, Local Government, Arts and Sport. (2012). *Media release: National policy on match-fixing in sport*. Retrieved May 9, 2012, from http://www.regional.gov.au/sport/programs/files/national_policy_match-fixing.pdf.

Australian Sports Anti-Doping Authority (ASADA). (March 20, 2013). ASADA Media Statements: Organised crime and drugs in sport. Retrieved March 27, 2013, from http://www.asada.gov.au/media/organised_crime_and_drugs_in_sport.html.

Australian Sports Commission. The essence of Australian sport. Retrieved November 8, 2012, from http://www.ausport.gov.au/__data/assets/pdf_file/0011/312869/A4_brochure_7_05-V5.pdf.

Australian Transaction Reports and Analysis Centre (2008), *Money laundering methodologies, Typologies and case study reports*. Canberra. Retrieved June 3, 2012, from http://www.austrac.gov.au/files/typ_2008_mlm.pdf.

Bronitt, S. (2010). The criminal law of Australia. In M. Dubber & K. Heller (eds), *The handbook of comparative criminal law* (pp.49-96). Stanford: Stanford University Press.

Button, M., Johnston, L and Frimpong, K. (2008). The fraud review and the policing of fraud: Laying the foundations for a centralised fraud police or counter fraud executive? *Policing*. 2:2. 241-250. Retrieved November 3, 2012, from <http://policing.oxfordjournals.org.libraryproxy.griffith.edu.au/content/2/2/241>.

CBI's report on cricket match-fixing and related malpractices. (October 2000). *Central Bureau of Investigation*. New Delhi. Retrieved July 4, 2012, from <http://www.rediff.com/cricket/2000/nov/01bet.htm>.

Clark, J. (February 6, 2013). Fox footy expert Mark Robinson believes organised crime infiltrating AFL and more is to be revealed'. *Fox Sports*. Retrieved February 6, 2013, from http://www.foxsports.com.au/afl/afl-premiership/fox-footy-expert-mark-robinson-believes-organised-crime-infiltrating-afl-and-more-is-to-be-revealed/story-e6frf3e3-1226571909062?from=public_rss#.UXC8SrWmjLk.

Dampney, J. and APP. (April 12, 2013). Drugs allegations “a terribly disturbing situation”, says Demetriou. *AFL News*. Retrieved April 17, 2013, from <http://www.afl.com.au/news/2013-04-12/terribly-disturbing-situation>.

Dowsley, A. (February 16, 2013). AFL players caught on phone taps with drug dealers. *Herald Sun*. Retrieved February 17, 2013, from <http://www.heraldsun.com.au/news/law-order/afl-players-caught-on-phone-taps-with-drug-dealers/story-fnat79vb-1226579152457>.

Financial Action Task Force Report. (July 2009). *Money laundering through the football sector*. Retrieved November 5, 2012, from <http://www.fatf-gafi.org/media/fatf/documents/reports/ML%20through%20the%20Football%20Sector.pdf>.

Founding group on fight for irregular and illegal betting calls for a universal monitoring system. (May 14, 2013). *International Olympics Committee*. Retrieved June 4, 2013, from <http://www.olympic.org/news/founding-group-on-fight-against-irregular-and-illegal-betting-calls-for-a-universal-monitoring-system/199073>.

Further Victorian integrity enhancements. (April 8, 2013). *Thoroughbred News*. Retrieved June 12, 2013, from <http://www.thoroughbrednews.com.au/Australia/default.aspx?id=65883>.

Gatt, R. (February 8, 2013). A-League fights off match-fix reports. *The Australian*. Retrieved March 11, 2013, from <http://www.theaustralian.com.au/sport/football/a-league-fights-off-match-fix-reports/story-fn63e0vj-1226573016528>.

Guardian Staff and agencies. (February 4, 2013). Europol: investigators identify 380 fixed football matches. *The Guardian*, Retrieved March 8, 2013, from <http://www.guardian.co.uk/football/2013/feb/04/europol-investigation-football-matchfixing>.

Hill, D. (2008). *The fix*. Toronto: McClelland & Stewart.

Lacey, D. (August 15, 2012). Corrupters who corrupt the corruptible. *Australian Crime Commission address to the national public sector fraud and corruption congress*. Retrieved November 12, 2012, from <http://www.crimecommission.gov.au/media/address-to-national-public-sector-fraud-corruption-congress>.

Liga Portuguesa de Futebol Profissional and Bewin International Ltd, formerly Baw International Ltd v Departamento de Jogos da Santa Casa da Misericórdia de Lisboa (2009) C-42/ECR I-7633, para 71. Retrieved September 12, 2012, from <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:62007J0042:EN:HTML>

Media Release. (May 9, 2011). FIFA makes historic contribution to INTERPOL in long-term fight against match-fixing. Retrieved November 24, 2012, from <http://www.interpol.int/News-and-media/News-media-releases/2011/PR035>.

- Neilson, S. (2011). Threats to the integrity of professional sports in Australia. *International conference on Combatting Serious Crime and Corruption in Sport, Centre of Excellence in Policing and Security*. Brisbane. July 27.
- New South Wales Law Reform Commission (2011) (NSWLRC 130). *Cheating at gambling*. Retrieved August 3, 2011, from http://www.lawlink.nsw.gov.au/lawlink/lrc/l1_lrc.nsf/pages/LRC_reports.
- New South Wales Law Reform Commission. (2011). *Consultation paper on cheating at gambling*. CP12. Retrieved October 3, 201, from <http://www.lawlink.nsw.gov.au/lrc>.
- News Limited Network (April, 19, 2013). AFL demands Melbourne tell truth after allegations emerge over links with Stephen Dank. *Fox Sports*. Retrieved June 7, 2013, from <http://www.foxsports.com.au/afl/afl-premiership/director-of-exercise-and-sports-science-australia-calls-into-question-the-qualifications-of-stephen-dank/story-e6frf3e3-1226623973899>.
- Noble, R. K. (July 20, 2011). On the right path. *The New York Times*. Retrieved November 11, 2012, from <http://www.nytimes.com/roomfordebate/2011/07/19/how-can-fifa-address-corruption-in-soccer/fifa-is-on-the-path-to-rooting-out-corruption>
- O' Keeffe, M. (October 26, 2012). Lance Armstrong asked to return nearly \$4M in Tour de France prize money by cycling's international governing body. *Daily News*. Retrieved November 7, 2012, from <http://www.nydailynews.com/sports/i-team/lance-asked-return-4m-tour-de-france-prize-money-article-1.1193242>.
- Oxford Research. (April 2010). *Examination of threats to the integrity of sport*. Retrieved October 12, 2012, from [http://www.eusportsplatform.eu/Files/Filer/examination %20 of% 20threats% 20to% 20sports% 20integrity.pdf](http://www.eusportsplatform.eu/Files/Filer/examination%20of%20threats%20to%20sports%20integrity.pdf).
- Premier of Victoria. (February 7, 2013). *New Victoria police sporting integrity intelligence unit*. Retrieved March 5, 2013, from <http://www.premier.vic.gov.au/media-centre/media-releases/5991-new-victoria-police-sporting-integrity-intelligence-unit.html>.
- Ralph, J. (2012). Sports betting by AFL players has reached troubling levels, key figures say. *The Advertiser*. Retrieved October 28, 2012, from [/sports betting-by-afl-players-has-reached-troubling-levels-key-figures-say/story-e6freck3-1226504893702](http://www.advertiser.com.au/sports/betting-by-afl-players-has-reached-troubling-levels-key-figures-say/story-e6freck3-1226504893702).
- Report on corruption in international cricket. (April 2011) *International Cricket Council*. Retrieved November 4, 2012, from http://www.icc-cricket.com/anti_corruption/condon-report.php.
- Review of sports betting regulation. (March 31, 2011). *Glesson review of sports betting regulation in the state of Victoria*. Retrieved October 4, 2012, from https://assets.justice.vic.gov.au/justice/resources/5c9236e3-f37e-440d-ae53-4dc5fbdef7ef/sports_betting_review_2011_report.pdf.

Senator Kate Lundy. (May 4, 2013). *Anti-doping and sports integrity funding boost*. Retrieved May 23, 2013, from <http://www.katelundy.com.au/2013/05/04/anti-doping-and-sports-integrity-funding-boost/>.

Sheehan, D. (2013). Transnational cooperation. *International working group meeting on "Preserving sports integrity: Combating crime and corruption"*. CEPS. Brisbane. June 5.

Smith, P. (2011). Rogue operators make battle to maintain integrity of sport more difficult. *The Australian*. July 16. Retrieved November 9, 2012, from <http://www.theaustralian.com.au/sport/opinion/rogue-operators-make-battle-to-maintain-integrity-of-sport-more-difficult/story-e6frg7t6-1226095581959>.

Transparency International (2011). *Safe hands: Building integrity and transparency at FIFA*. Retrieved June 11, 2012, from http://www.transparency.org/whatwedo/pub/safe_hands_building_integrity_and_transparency_at_fifa.

Transparency International (2013). Corruption in sport. *Transparency International UK*. Retrieved June 23, 2013, from <http://www.transparency.org.uk/our-work/corruption-in-the-uk/sport>.
