

Dear Ms McDonald

Thank you for your letter of 1 December, 2015 inviting Racing Australia to make a submission to the Environment and Communications Legislation Committee in its consideration of the Interactive Gambling Amendment (Sports Betting Reform) Bill 2015.

Racing Australia has decided to submit to the Committee its submission to the Commonwealth Review into the Impact of Illegal Offshore Wagering dated 18 December, 2015.

I trust that aspects of the submission will be of interest to the Committee in its consideration of the Bill.

Kind regards

Peter McGauran  
Chief Executive Officer

Racing Australia





# **Commonwealth Review Impact of Illegal Offshore Wagering**

**Submission**

**by Racing Australia**

**16 November, 2015**

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## 1. EXECUTIVE SUMMARY

This submission supports the view that illegal offshore wagering is significant and is an unacceptable threat to the integrity of racing and sport. The threat relates to the potential corruption of racing (and other sports) arising from online gambling provided by offshore unregulated wagering operators who lack any form of regulatory accountability and have suspected links to organised crime.

The exclusion of wagering services from the general prohibition under the Interactive Gambling Act 2001 (Cth) ought to be redefined so that it would be legal for a wagering operator to provide wagering services to an Australian customer where the wagering operator either holds:

- a wagering licence issued under relevant State or Territory legislation; or
- a race fields approval (or sports equivalent) under relevant State or Territory legislation with respect to the relevant race or sporting event.

This proposal is designed to manage and mitigate the threat to integrity of racing (and sports) posed by unregulated offshore wagering by requiring operators to comply with regulation that provides for the scrutiny of suspicious betting transactions by the relevant on-shore regulator or racing (or sports) authority.

If however an offshore wagering operator decides to remain outside Australia's regulatory framework and continues to provide prohibited online wagering services to Australian customers, then a raft of responses are required to counter the threat to integrity and the level of criminality that may be involved.

Deterrence and enforcement includes:

- strict liability offences for principals and associates of illegal offshore operators;
- civil penalties and take down notices, register of illegal offshore operators and movement alert lists to be administered by the Australian Communication and Media Authority;
- enforcement of criminal provisions by Australian Federal Police;
- blocking of financial transactions between Australian customers and illegal offshore operators;
- blocking access to websites operated by illegal offshore operators;
- reviewing existing anti-money laundering legislation and programs; and
- a national approach on Federal and State legislation directed at conduct that corrupts or would corrupt a betting outcome with the intention of obtaining a financial advantage or to cause a financial disadvantage.

To support the above initiatives, there ought to be established a new Sports Integrity and Anti-Corruption Unit within the Australian Federal Police and a national Sports Integrity Commission. The role of the proposed Commission would be to facilitate the sharing of information and intelligence concerning integrity risks between sports and racing bodies on one hand and law enforcement bodies on the other. These bodies are designed to provide real substance to enforcement and effective intelligence sharing.

In relation to in-play online betting, we submit that no action be taken to repeal the existing prohibition. Rather it is proposed that the prohibition is extended to in-play betting on racing events and strengthened to eliminate loop-holes currently being exploited by certain Australian based operators to circumvent the existing prohibition.

## 2. ILLEGAL OFFSHORE OPERATORS

The growth of illegal betting in Asia has led to global expansion of the operators, the consequent spread of criminal involvement in racing and other sports betting markets, as well as being a driver for other criminal problems such as sports corruption and money laundering.

The largest illegal betting companies are in Asia having become global due to their betting revenue scale and range of international sports on which they take bets.

Illegal betting exchanges that operate from parts of Asia are of great integrity concern because of their focus of betting on thoroughbred horse racing around the world (including Australian racing), the background of the operators in criminality, and the danger that unregulated betting exchanges pose by facilitating bets on horses to lose.

The growth and success of illegal and loosely regulated betting operators in the past ten years has been due to the same factors that have benefited the legal wagering industry, which are the trend of customers moving from cash, to phone betting, to Internet betting, and now to mobile betting with smartphones and other devices.

Illegal betting operators have websites with a strong user interface that customers find easy to use. Their websites are simple, uncluttered, and have key links for customers to reach quickly, most importantly customer support hotlines in multiple languages.

This illegal betting growth has led to an illegal betting market that is globally huge. Sizing the illegal markets is not an exact science, but there are credible studies that provide a good indication of the scale of the markets.

Ronald Noble, Secretary General of Interpol, stated in a speech in 2011 at the 1<sup>st</sup> Meeting on Combating Irregular & Illegal Sports Betting that “When widespread, illegal and irregular betting will create a shadow economy possibly enormous in size and depth. In Asia alone, illegal betting is estimated to provide revenues for almost US\$500 billion.”

In a study in 2014, the Université Paris I Panthéon-Sorbonne and the International Centre for Sports Security (ICSS) stated that “The estimated volume of the global market (legal and illegal) of sporting bets is somewhere between €200 and €500 billion, more than 80% being illegal bets.”

Research by the Hong Kong Jockey Club of both open and closed source information has found that the global illegal betting market is likely to be as big as USD500 billion in transactions, with Asia the major driver of that business. This is substantially larger than the legal regulated betting markets.

Asian illegal betting operators have a secretive agent system for customer management. Customers, depending upon their betting investment, work through a local agent who in turn works through master agents and super master agents who provide credit and commission based on their knowledge of the customer and his betting investment. In

certain Asian jurisdictions there is evidence that these practices foster loan sharking, money laundering and sports match fixing.

The traditional banking system and the anti-money laundering controls do not apply to illegal bookmakers.

Of particular concern as a potential driver for corruption in horse racing are Asian betting exchanges. The betting exchange concept is well established. Customers bet against each other, not against a bookmaker, and the exchange charges the winner a commission. Customers can place a 'Lay' bet against a runner/player/team, which is a bet on a runner / player / team to lose.

The largest betting exchanges in Asia not only offer betting on horse racing from around the world (including Australian racing) but also in-running bets on races, as well as spread betting on foreign exchange prices, stock market indices, and commodities prices. The risks to racing, sports, and other businesses from such an unlicensed, illegal business operating 'dark markets' on this range of products ought to be of grave concern to governments and racing/sporting bodies.

In summary, illegal and unlicensed bookmaking websites are expanding from a strong base in Asia; criminal groups control illegal bookmaking operations in Asia; and illegal betting has become a transnational organized criminal problem. This problem is relevant to racing authorities in Australia and around the world as it is a threat to the sport and consumers.

Acknowledgement: material provided by the Hong Kong Jockey Club for Racing Australia.

### **3. LEGISLATIVE AND REGULATORY PROPOSALS**

#### **3.1 Measures adaptive and proportionate to the threat**

The threat posed by illegal wagering offshore operators is present and capable of evolving to more dangerous manifestations because of the intrinsic features posed by that threat which are summarised as follows:

- Unregulated Asian wagering operators are expanding to specifically target Australian thoroughbred racing via websites that Australian consumers apparently find accessible and attractive while being unable to distinguish between these operations and those of legitimate regulated operators.
- The estimated scale and size of unregulated Asian wagering operations give rise to a “shadow economy” that is opaque and secretive and which we are reliably informed are substantially larger than legally regulated markets.
- Organised criminality is intrinsic in the activities and structure of unregulated Asian wagering operations as demonstrated by way of loan sharking, money laundering, drug trafficking and the opportunity for race or sports match fixing.
- Unregulated wagering operations (whether organised from Asia or elsewhere) pose an integrity threat given the objective of transnational organised crimes to cloak themselves in seemingly legitimate activities but which facilitate opportunities for corruption.

The legislative measures that are required to maintain the integrity of racing to the highest standards expected by the Australian public must be adaptive and proportionate to the threat. In our submission, the threat relates to consumer welfare and the potential corruption of racing (and other sports) arising from online gambling provided by offshore unregulated wagering operators, who lack any form of regulatory accountability and may have suspected links to organised crime.

The legislative measures herein proposed are consistent with previous proposals, which have largely proceeded from the principles of harm minimisation and consumer protection. They also include additional measures that are designed to address the transnational organised criminal threat posed by unregulated offshore wagering.

#### **3.2 Alignment of on-shore regulatory frameworks**

The blanket prohibition on interactive gambling services under the Interactive Gambling Act 2001 (Cth) (**IGA**) has an exclusion for all wagering services irrespective of whether the wagering operator is based on or offshore. This exclusion is provided in section 8A of the IGA which provides that betting on animal racing or a sporting event is excluded from the general prohibition under the IGA in relation to online internet gambling services that are provided to Australian customers (see section 5(3) of the IGA). Thus, the IGA allows for



online wagering services, irrespective of whether or not the provider of such services is licensed in Australia.

However, there is a disconnection between the IGA and the regulatory framework in the States and Territories. This is a twin form framework which provides for: (a) State and Territory licensing of Australian based wagering operators; and (b) racing industry approval of both Australian and offshore operators which publish or use race fields.

Under this framework of wagering licensing legislation and race fields legislation only on-shore licensed and/or race fields approved operators may conduct wagering. To the extent that this is done on racing, the operator must: (a) pay product fees to the relevant Australian racing authority; and (b) enter into integrity assurance arrangements with that authority to provide for the monitoring and disclosure of suspicious betting transactions.

There is a serious issue of unintended consequences, where wagering activities which are comprehensively regulated under the States and Territories may be conducted online under a regulatory void because of the offshore location of the operator, due to the breadth of the exclusion of all wagering services from the general prohibition with respect to online gambling under the IGA. This is a serious policy flaw, which if left unaddressed, implicitly condones the position that unregulated off shore operators may determine the conduct of their activities when transacting with Australian customers in relation to gambling matters with no regard of Australian values or public policy concerning integrity and harm minimisation.

To align the IGA with the State and Territory regulatory framework, it is proposed to amend the IGA to narrow the definition of the “excluded wagering service” so that it would be permitted for a wagering operator to provide wagering services to an Australian customer only where the wagering operator either holds:

- a wagering licence issued under relevant State or Territory legislation; or
- a race fields approval under relevant State or Territory legislation with respect to the relevant race fields.

This proposal is designed to manage and mitigate the threat to integrity posed by unregulated offshore wagering by providing the opportunity for the offshore operator to submit themselves to arrangements that allow for the scrutiny of suspicious betting transactions by the relevant on-shore regulator or racing authority.

If however an offshore wagering operator decides to remain outside Australia’s regulatory framework and continues to provide prohibited online wagering services to Australian customers, then there needs to be a range of responses to meet the challenge of contravention from offshore, that may be scaled on a case by case basis to address the nature of the threat to integrity and the level of criminality that is involved.

### 3.3 Deterrence and enforcement under the IGA

There is considerable scope to streamline and strengthen the deterrence and enforcement provisions under the IGA. In this regard, recommendations 4 to 7 of the Final Report (2012) of the Review of the Interactive Gambling Act 2001 by the Department of Broadband, Communications and the Digital Economy (Report) are generally supported. Specifically, these measures include the following:

- (i) **Strict liability offences for principals and associates of illegal offshore wagering operators:** the IGA to be amended to include a provision for a “principal” or “associate” to be issued with a notice requiring them to cease to cause the illegal offshore operator from providing the wagering service to Australian customers with failure to comply being a strict liability offence.

The term “principal” would encompass the meaning referred to in the Report, relating to a director, principal or other person acting in an official capacity of the illegal offshore wagering operator, and ought to be expanded to include the concept of a “shadow director” being a person who has control or influence in the management of the operator.

In addition to the approach taken in the Report, a further term “associate” is proposed in this submission to include a person who facilitates offshore wagering transactions with an illegal offshore wagering operator and who receives a financial benefit for providing services that facilitate such transactions. We believe that this approach is vital to ensure that the secretive pyramidal structure that some illegal offshore wagering operators use to conduct their operations by means of a series of agents is not immune to the full force of the law. It is also designed to target on-shore wagering operators who may covertly conduct wagering transactions with illegal offshore wagering operators as either agents of such operators or on their own behalf in the conduct of their wagering businesses.

Further, Racing Australia considers that restrictions and associated penalties should also be extended to include the persons placing the bets.

Gambling legislation in most, if not all, Australian States and Territories contains longstanding provisions making it an offence for a person to make a bet with another person whom the person making the bet knows (or would be reasonably expected to know) is not a legal bookmaker licensed in Australia or is not a person who is authorised under the Law of a State or Territory to conduct totalizator betting.

These provisions were included in the various statutes as a means of combating illegal starting price betting and it has been argued that they should now also be extended to include persons betting with illegal offshore wagering operators. In fact, in at least one Australian State (New South Wales) legislation has been enacted to provide for an offence where a person bets on an Australian Thoroughbred race, harness race or greyhound race with an unlicensed person who is outside the State, including outside Australia (the legislation does not prohibit

betting with a legal bookmaker (WSP) which is defined as a person who has a license issued by another State or Territory).

The introduction of this legislation in New South Wales coupled with an extensive advertising campaign had a positive impact in curtailing punters betting with overseas operators.

The enactment of similar legislation in the other Australian States and Territories, or the enactment of Commonwealth legislation making it an offence under the IGA for a person in Australia to place an online bet on Australian racing events with an illegal overseas operator, would bring to the attention of the public the undesirability and risks of betting with unregulated overseas operators.

Should the Review be of a mind to include such recommendations in its report, then consideration should also be given to extending these provisions to persons betting on Australian Sporting events with unlicensed overseas operators.

While such a measure might seem radical, it is argued that no single measure will by itself address the problem and that it will take a full suite of initiatives to be effective in combating the threats posed by unlicensed/unregulated overseas operators.

The case of BetJack is instructive in relation to the need for this approach. While BetJack was essentially an unregulated offshore wagering provider, the entity's operations were apparently conducted on-shore, and targeted at Australian consumers, with a call centre located in Queensland and a website available at a .au domain name. During its operations, there were many reports that BetJack's customers were being exploited notwithstanding statements made at the time by racing authorities that BetJack was not approved under their respective race fields' legislation. This case study raises important questions in relation to harm minimisation and the need to inform Australian customers of the risks of wagering with unregulated offshore wagering operators. The demise of BetJack resulted in customers suffering significant financial loss. It remains the subject of investigation and legal proceedings.

- (ii) **Civil penalties and take-down notices:** the IGA to be amended for the Australian Communication and Media Authority (**ACMA**) to deal with the provision of prohibited gambling services hosted in Australia by issuing infringement notices (in addition to criminal enforcement that is the responsibility of the Australian Federal Police (**AFP**)) and take down notices, both of which are to be supported with enforcement processes by application to the Federal Court.
- (iii) **Register of illegal offshore wagering operators:** the IGA to be amended to provide for procedures for ACMA to inform illegal offshore wagering operators of their breach of Australian law, their liability for penalties (both civil and criminal) and other related sanctions (principal's liability and the movement alert list) and publication of the name of the illegal offshore wagering operator on the register of

prohibited service providers. By making offshore wagering providers aware of their breach of Australian law, it gives them the opportunity to comply with the Australian regulatory regime. If this opportunity is not taken, then the register provides a “watch list” for Australian racing authorities to refine their integrity programs with this information and to co-ordinate their activities with Australian law enforcement agencies.

- (iv) **Movement Alert List:** the IGA be amended to provide for ACMA (in conjunction with other relevant Australian Government authorities, such as AFP and Border Protection) to include the names of principals and associates of illegal offshore wagering operators on the Movement Alert List. The purpose of this measure is provide a deterrent should such persons take the risk of entering Australia, in which case, they would be subject to the processes that may make them liable to the penalties and sanctions that are proposed in this submission.
- (v) **Enforcement of existing criminal provisions in the IGA:** we note that section 15 of the IGA provides that a person is guilty of an offence if: (a) the person intentionally provides an interactive gambling service; and (b) the service has an Australian customer link. Under the above submission to narrow the “excluded wagering service”, to apply to Australian licensed wagering operators or those operators who hold a race fields’ approval with respect to the relevant racing event, section 15 would have application to illegal offshore wagering providers. We believe that this provision would have greater enforcement teeth when coupled with the submission below to establish a dedicated sports and racing integrity unit in the AFP.

### 3.4 Blocking websites and financial transactions relating to illegal offshore wagering

In addition to the recommendations made in the Report, the following further steps ought to be taken in recognition of the threat posed to the integrity of racing (and indeed other sports) by the transnational organised criminal aspects of illegal offshore wagering.

We believe that these further measures are required and appropriately adapted to the threat and the real risk that the embedded nature of organised crime in the structures and organisation of certain Asian illegal offshore operators is unlikely to result in those operators being willing to submit themselves to on-shore regulation. With regard to this probable outcome, which recognises the potential deleterious outcomes for the integrity and funding of racing (where wagering turnover may not flow back on shore), as well as the harm to the Australian public of international organised crime in general, further protective measures are highly desirable.

- (i) **Financial transactions:** provide for legislative measures which mandate that financial institutions (including online payment facilitators that operate in Australia) must block financial transactions between Australian customers and illegal offshore wagering operators who have been placed on ACMA’s register of illegal offshore wagering operators. We understand that the financial institutions have previously raised concerns that this approach would be costly and open to avoidance by both

operators and customers. In our submission this approach requires a fresh assessment, given that similar measures have been successfully adopted in France, Singapore, Denmark and USA (see Appendix 1 of this submission for further details). Similarly, the Gambling Commission in Great Britain has arrangements with advertisers, payment service providers and online platforms such as Google and Facebook to disrupt the activities of unlicensed offshore wagering operators (see Appendix 1 of this submission for further details). Furthermore, in recent years with the threat to national security posed by international terrorism, new protective counter measures have been adopted, which may have application to this threat posed by international organised crime.

- (ii) **Illegal wagering websites:** provide for legislative measures which make provision for Internet Service Providers (ISPs) to block access by Australian customers to illegal wagering sites that are operated by or on behalf of any illegal offshore wagering operator who has been placed on ACMA's register of illegal offshore wagering operators. As mentioned above, an illegal offshore operator is liable to be placed on the register by ACMA where that operator does not hold a wagering licence in Australia or it is publishing and using race fields of a relevant Australian racing authority without its approval under its respective race fields' legislation.

Under the above proposed measures, it would be a criminal offence for the illegal offshore wagering operator (with accessorial liability attaching to any principal, officer or director of an illegal offshore wagering operator) to make provision for financial transactions in relation to any wagering transactions with the illegal offshore wagering operator.

Similar measures have been successfully adopted in France, Singapore and Denmark (see Appendix 1 of this submission for further details).

This approach would also be consistent with the model implemented pursuant to recent amendments to Australian copyright law by the Copyright Amendment (Online Infringement) Act 2015 (Cth), which now enables a copyright owner to apply to the Federal Court of Australia for an injunction requiring an Australian ISP or other carriage service provider to disable access to an online location that infringes (or facilitates the infringement of) that copyright and has the primary purpose of infringing (or facilitating the infringement of) copyright generally (whether in Australia or overseas). Similarly, section 313 of the *Telecommunications Act 1997* (Cth) requires carriers and carriage service providers (including ISPs) and their intermediaries to give Commonwealth, State and Territory officers and authorities such help as is reasonably necessary for, among other things, enforcing Australian criminal law and laws imposing pecuniary penalties. Such help has, in the past, included blocking web access.

### 3.5 Money laundering

Review existing anti-money laundering legislation and programs under the auspices of AUSTRAC to ensure that Australian financial institutions and online payment facilitators

have compliant programs that are capable of detecting and reporting suspicious financial transactions involving illegal offshore wagering operators.

### **3.6 In-Play Betting**

Arguments have been forthcoming from several quarters that an effective means of combating the threats posed by illegal overseas wagering operators is to allow Australian based operators to offer the same suite of products provided by the overseas operators. Specifically, this argument has centred on the provision of in-play betting.

Online in-play betting on sporting events is currently prohibited in terms of the Interactive Gambling Act. However, an anomaly exists in that the same prohibitions do not apply to betting on racing events or face to face or telephone betting on sporting or racing events.

The current prohibition which applies to all sporting events was included in the Interactive Gambling Act as a harm minimisation measure aimed at curtailing the level of compulsive gambling which could occur on sporting events played over long periods of time.

However, in-play betting also has the potential to damage the integrity of racing and sport. In fact, in horse racing it opens up avenues for collusion between jockeys and punters in order to either enhance the value of the bet or to increase the chances of the wager being successful. For example, pre-arranged signals might be given by a rider at a designated point in a race to indicate to a punter whether or not his mount is travelling sufficiently well to win. Alternatively an arrangement might be made to ride a horse in a certain manner so as to enhance the betting odds offered on an in-running market. These are but two examples and are by no means exclusive. No doubt similar integrity issues would occur in various sporting events.

As mentioned above the Government of the day had good and cogent reasons for prohibiting online in-play betting on sporting events. Those reasons are just as valid today as they were when the legislation was drafted and it would be negligent if they were repealed merely because illegal operators were offering the in-play product. To do so could be seen as the Government transferring its regulatory role to overseas operators.

Accordingly, it is recommended that no action be taken to repeal the existing provisions relating to online in-play betting on sporting events. Rather it is proposed that those provisions be extended to betting on racing events and strengthened to eliminate loopholes currently being exploited by certain Australian based operators to circumvent the prohibitions.

#### **4. CRIMINAL PROVISIONS AND ENFORCEMENT**

##### **(i) Cheating at gambling**

In recent years, most but not all, States and Territories have introduced measures in their respective criminal laws which prohibit cheating at gambling. Tasmania and Western Australia have not introduced specific provisions.

An example of this approach is the insertion in 2013 of section 195C of the Crimes Act 1958 (Vic) which penalises a person who knowingly or recklessly engages in conduct that corrupts or would corrupt a betting outcome with the intention of obtaining financial advantage, or to cause a financial disadvantage, in connection with the betting outcome.

Last year's successful prosecutions in relation to match fixing concerning the Southern Stars under the Victorian provisions was a result of effective co-operation between the Football Federation of Australia and Victoria Police. This match fixing was linked to unregulated offshore wagering and demonstrated that Australian sports are not immune from the type of criminality that is allowed to flourish in the unregulated environment. It is highly relevant to the success of this Victoria Police operation, and to the subsequent prosecution of the Crumps in relation to race fixing in harness racing in Mildura, that Victoria Police have established a dedicated capability in a unit that has specific responsibility with regard to sports and racing integrity issues.

While the cheating at gambling approach is welcome, there are variations in the legislation that have been implemented amongst the States and Territories. In our submission, there needs to be legislative uniformity and co-operation in relation to this approach across State and Federal jurisdictions to ensure that there is no soft target in Australia for penetration by either international or local organised crime to the detriment of the integrity of Australian racing and sport. Importantly, this approach ought to be considered and replicated in the Federal criminal law (with the co-operation of the States) to ensure that there are no gaps in Federal power when enforcement is sought to be made by the AFP, with respect to this approach, and any other responsibilities that fall to the AFP under the IGA.

##### **(ii) Australian Federal Police**

The above submissions in relation to the legislative measures that are required to protect Australia from the identified risks to the integrity of racing and sports that are posed by organised crime need to be investigated and enforced by an appropriately resourced AFP.

It is highly concerning that the AFP recently confirmed that it was not proceeding with an investigation into alleged breaches of the IGA by William Hill involving taking bets during the live play of sports. The AFP explained that this followed an evaluation of the matter in line with the AFP's case categorisation and prioritisation model.

In our submission, a new Sports Integrity and Anti-Corruption Unit of the AFP ought to be established, resourced and funded with the specific responsibility of investigating breaches of the IGA and the proposed cheating at gambling provisions where there is evidence of international and cross state sports match and/or race fixing activities.

**(iii) Intelligence, data sharing and analysis**

The major sports and racing authorities in Australia have invested in and resourced their respective integrity functions and programs as is their responsibility.

As a matter of first principles, the sports and racing authorities will direct their own priorities in relation to the enforcement of their rules and the management of integrity related issues.

However, as they are mostly private bodies, there are limits on the types of powers that they may be able to utilise for investigating threats to integrity and enforcing laws, particularly where these threats emanate from persons or organisations beyond their jurisdictional reach and who may be operating within sophisticated and significantly resourced organised crime circles. In these cases, it is important for sports and racing authorities to form partnerships with law enforcement bodies, whether State or Federal, who have the necessary enforcement and coercive powers and capabilities not available to sports and racing bodies. The Southern Stars case is on point, in that the relevant sports body was able to share its intelligence with Victoria Police, who in turn investigated and secured the convictions under the cheating in gambling laws.

What is lacking in this area is a standing arrangement where sports and racing bodies can share the intelligence that they have gathered in relation to suspicious betting transactions with a centralised body that can analyse this information and who in turn can share with them any information that it may receive from law enforcement agencies with respect to concerns or threats relating to integrity.

A national Sports Intelligence Commission ought to be established for purposes of:

- receiving and disseminating information for the purposes of analysing and identifying threats to the integrity of sports and racing;
- engendering programs and activities that disrupt the activities of would be match or race fixers;
- developing greater co-operation between sports and racing bodies with law enforcement agencies; and
- engaging with law enforcement agencies to identify risks and specific enforcement approaches to address the perceived risks and to co-ordinated action.

This proposed body would complement the functions of the AFP, State and Territory police and other relevant enforcement agencies (ACMA, AUSTRAC) who would retain their primary responsibilities for enforcement of the law under their respective duties. Appropriate protocols would need to be established, and indeed legislative reform is



likely to be required, to allow for the legal sharing of protected or sensitive information which may have been obtained by law enforcement agencies under surveillance. The purpose of this approach is to ensure that information that is received by this body can be made available to sports and racing authorities in managing the integrity of their respective activities.