

// 2019 NT Sports Bookmaker Forum

Tuesday, 8 October 2019

Vibe Hotel Darwin Waterfront, Darwin

The Northern Territory Racing Commission (the Commission) held its bi-annual Bookmaker's Forum at the Vibe Hotel Darwin Waterfront on 8 October 2019.

25 representatives from the vast majority of NT licensed wagering operators travelling from all over Australia to attend.

Key note speakers were engaged to present at the forum, which included:

Jason Whybrow from National Integrity Sports Unit (NISU) presented on safeguarding the integrity of Australian sports



Mr Whybrow spoke about safeguarding the integrity of Australian sports with reference to the Australian Sports Wagering Scheme. He advised the Government released its response to the Wood Review in February 2019 and implementation work is ongoing.

The key pieces of work that the Department is implementing are:

- Macolin Convention – the Council of Europe's Convention on the Manipulation of sporting Events. The convention was signed on 1 February and ratification work is progressing.
- National Match-fixing Legislation. Drafting in consultation with stakeholders has commenced.
- Enhancements to the Australian anti-doping capability – progressing as a priority.
- Planning for the establishment of Sport Integrity Australia - a new agency for all integrity of sport matters. Progressing as a priority with a planned commencement 1 July 2020.
- The National Sports Tribunal. Legislation has passed and CEO recruitment underway. Planned commencement March 2020

- Scoping work for the Australian Sports Wagering Scheme. Stakeholders are involved in the early design consultation.

He advised consultation opportunities are ongoing across affected stakeholders and will continue as legislation and policy are developed.

The NISU, through its joint initiative with the Australian Criminal Intelligence Commission, the Sports Betting Integrity Unit, continues to work closely with sports, law enforcement, bookmakers and international partners on a range of integrity threats and intelligence products.

Jamie Nettleton from Addison’s Lawyers presented on the recent developments and regulators interventions in those matters



Mr Nettleton spoke about the recent cases involving Wynn Resorts, Crown Resorts and Sports Alive and how the investigation findings relate to a Sports Bookmaker or Betting Exchange Operator licence and meeting the requirements under the *Racing and Betting Act 1983* (the Act)

He spoke about three main lessons that Wagering Operators can take away from these three cases such as: understanding that suitability requirements extend

beyond the grant of a licence, having a strong and independent compliance function and maintaining communication with regulators.

Evan Pearce from CQR (Cyber Security Professionals) presented on cyber security and IP addressing



Mr Pearce mentioned that Cyber attacks against customer accounts are an ongoing issue, particularly in industries where there is a financial component. Investigations into reported account compromises require time and resources, and the resulting fraud can lead to reputational damage and financial losses. Attacks are often focused against organisations and customers with the weakest security, as this allows greater automation and reduces attacker effort.

Common attacks which are observed include password guessing (dictionary attacks and credential stuffing), phishing, and malware on customer devices. Credential stuffing occurs when customers use the same password for multiple sites; usernames and passwords from unrelated data breaches can be used to attack an organisation’s web site or mobile application.

Strong passwords and the use of two-factor authentication (e.g. SMS or mobile app codes) assist in protecting against password guessing attacks. Phishing and malware attacks are difficult to prevent, but the impact can be reduced by monitoring for unusual activity and providing customers with out-of-band alerts for unusual or high-risk activities.

He advised that if organisations are concerned that stronger security will dissuade customers from registering, lower-impact options include offering incentives to enable stronger protections, or only requiring stronger protections above certain thresholds (e.g. account balance or transaction volume).

The presentation also provided an overview of IP addressing, and the ways in which IP addresses can both change rapidly and be shared by unrelated individuals. Although IP addresses are a valuable data point when investigating reported incidents, they cannot provide conclusive evidence that two requests were made by either the same or different individuals.

David Smith from bet365 presented on customer complaint handling

Mr Smith mentioned that bet365 place significant value on great customer service, training staff to ensure they are able to handle customer complaints or queries and delivering outcomes to the satisfaction of their customer.

He advised ongoing training includes Personal Development Plans for all staff, additional knowledge and experience being rewarded through their tiered Job Banding program along with their Quality Control bonus structure. They have strong internal audit reporting to ensure correct procedures are followed and any necessary follow ups result in additional training.

He spoke about the complaints handling procedure from initial customer contact through to conclusion, touching on Responsible Gambling being an immediate consideration during all customer contact.

Mr Smith spoke about their 3 step Internal Complaint procedure which sees a complaint given a full and thorough review by three different members of their staff, including at manager level, before a complaint is escalated externally. He mentioned that this level of quality control ensures they can be confident in their decision making.

He advised their final complaint step is a defence submission to the Commission and that all cases submitted by the Commission are dealt with by Senior Management who give the complaint a full, independent review whilst also acting as a final audit ensuring bet365 has acted fairly and within their rules and terms and conditions.

This presentation showed how important customer service is to bet365, how robust their internal complaints handling procedures are and that they never defend a submission lightly and if they do it is because they've exhausted all reasonable resolution avenues.

Jodi Kirstenfeldt from Licensing NT presented on betting disputes from a regulators point of view and some of the challenges



Ms Kirstenfeldt spoke about the roles and responsibilities relating to the Commission and the functions of Licensing NT and the Gambling and Racing Team.

In relation to betting disputes and claims she spoke about the legislative requirements of Wagering Operators, what matters are dealt with by Licensing NT under delegation and what matters the Commission deals with.

A 3 year comparison of disputes was provided which showed a 156% increase in gambling disputes (2015 to 2018) and a 55% increase in gambling disputes from 2017 to 2018.

Ms Kirstenfeldt also spoke about the dispute lodgement process and touched on the NT Code of Practice for Responsible Online Gambling 2019.

Interactive Sessions with Commission Members

The Commission then held an interactive session with attendees and discussions were had about the increase in gambling disputes, increases in breaches and issuing of fines, the review of the *Racing and Betting Act 1983*, changes to Licence Conditions, and Declared Sporting Events.

Networking Event

A networking event was held thereafter which provided for Commission members, Licensing NT staff and wagering operators to develop and maintain professional relationships.



Alastair Shields, Chairperson



Attendees of the Forum