



# Independent Gambling Authority

A.B.N. 13 916 836 475

IGA REF: AUTH 11/0039

17 February 2011

Hon. James Wood AO QC  
Chairperson  
NSW Law Reform Commission  
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Dear Mr Wood

## Cheating at gambling

Thank you for your letter dated 13 January 2011, directed to the Authority's Presiding Member, inviting the Authority to make a submission in relation to the laws of its jurisdiction that may capture cheating at gambling.

Please note that the Authority's Assistant Director, Tina Stephenson has also discussed this reference with Lauren Judge, the senior project officer for this reference.

The Authority's board has noted the invitation to make a submission and has asked me to respond on its behalf, providing such information as it has and offering such further, formal and informal assistance as might assist you.

By way of background, one of the Authority's regulatory functions is the approval of betting contingencies for all lawful forms of wagering involving South Australians.

The approval criteria for these contingencies include integrity issues associated with bet types and the events to which bet types apply. This means the Authority must have regard to such issues as—

- the standards of probity applying to the contingencies;
- the available evidence of any past conduct of events to which contingencies relate;
- the likely nature and scale of betting operations in relation to the contingencies;
- whether betting operations in relation to the contingencies are lawful in another state; and
- the appropriateness of contingencies for betting operations or the particular betting operation concerned.

The Authority understands that the public policy driver of the integrity requirement is the protection of the betting public through ensuring that, to the greatest extent possible, the betting is fair. However, the Authority is also mindful of the potential for betting activity to have harmful impacts on the sporting bodies and players involved in the activity on which bets are taken.

While there are general laws in South Australia which might capture corrupt or dishonest behaviour which is related to or constituted by cheating, there are no provisions specifically directed to cheating in sport or in activities on which bets may be placed.

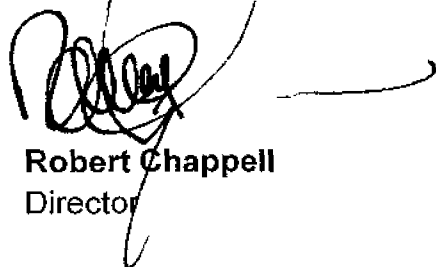
The Authority has approved a large body of betting contingencies since the commencement of the *Authorised Betting Operations Act 2000* in December 2001.

- There is a long-term project underway to revise the form of the notices of approval. Completion of this project will require fresh consideration of the integrity of the events on which betting takes place.
- The Authority looks at all aspects of a contingency type requested and will, at times, seek comment from the sport controlling body about the proposed bet type. Depending on the circumstances, the Authority will also seek assurances from the wagering agency requesting the approval of the contingency about how it will settle disputes.
- The Authority has approved a series of so-called "micro bets" which relate to an aspect of an event or sport but not necessarily the overall outcome. An example of this is 'time of the first goal' or 'number of sixes' a cricket player will get in a game.

Please note also that the Authority has used its power of direction over the major South Australian licensee (SATAB Pty Ltd) to ensure that information can be exchanged with major sporting bodies to support those bodies' integrity operations.

Should your Commission require further information, please contact Ms Stephenson or me, on [REDACTED]

Yours sincerely



**Robert Chappell**  
Director