

SUMMARY OF RECOMMENDATIONS

There are six primary recommendations in this Report which are as follows:

R1. A Stakeholder Integrity Forum should be established to operate as an advisory group with a stated objective of keeping corruption out of the sport. The Forum will provide a means by which the BHA can consult and achieve buy-in from the sport for integrity initiatives, and to identify areas for further improvement and development as far as the integrity of the sport is concerned, and it will provide visibility on the implementation of the recommendations set out in this Report.

R2. It is recommended that the BHA establishes a renewed focus on the protection of the participants that seek to comply with the Rules, and formalises this in the development of a new BHA Integrity strategy. However, the BHA must not lose sight of the current aims of prevention and deterrence through proactive and intelligence-led monitoring, investigation, prosecution, and issuing significant but proportionate sanctions for serious breaches of the Rules. This will require a modern and refreshed approach to participant education on integrity matters.

R3. The BHA, working closely with stakeholders, should review the structure, composition, and processes of the Disciplinary Panel, Licensing Committee, and Appeal Board as a matter of urgency, to identify and implement a practical and legally robust solution which generates greater confidence amongst the sport's participants.

R4. With regard to the investigation, case management and disciplinary process, it is recommended that the BHA, in particular:

- produces a formal investigation charter and guidance note and provides this to any person – whether a suspect, a witness, or a complainant – involved in an investigation, at the outset of their involvement.
- produces a formal code of conduct for case management and disciplinary inquiries for all parties to comply with during an Inquiry, covering areas such as disclosure.
- revisits its policy (for the more serious cases likely to result in disqualification or a lengthy suspension, or other high profile cases at the BHA's discretion) of publishing disciplinary charges very shortly after the point of charge. Such publication should be delayed until after the persons charged have received the charges and the evidence and had an opportunity to provide an initial response to those charges to the BHA.
- establishes a formal procedure for alternative disposal of matters outside of the full Disciplinary Panel procedure, to include a fast track for minor or admitted offences, formal cautions, and agreed sanctions.
- reviews the penalty guidelines with a particular focus on the lower level fines for minor rule breaches, and give consideration to an alternative approach.

R5. It is recommended that the BHA generally, and the Integrity department in particular, identifies ways to better inform the media, the racing and betting public, and the sport's participants on an on-going basis as to what is being done to protect the integrity of the sport.



R6. It is recommended that the BHA Integrity team continues to build on its impressive range of partnerships with other organisations across the betting industry, other racing jurisdictions, other sports, and other regulators, formalising those relationships by way of information sharing agreements and MOUs where necessary to further develop its efforts to gather intelligence and evidence.

Supporting Recommendations:

STRATEGY

It is recommended that the BHA should:

a) establish revised and specific risk/threat assessments which flow from its strategy to help drive strategic decisions and focus resources.

FAIRNESS

It is recommended that the BHA should:

a) engage with the Chair of the Disciplinary Panel with a view to establishing a set of guidelines as to the acceptable timeframe within which a Disciplinary Panel would be expected to produce a decision and reasons following an Inquiry, and for such guidelines to be published.

b) continue its discussions with Sport Resolutions, and also introduce the relevant stakeholder representative bodies to Sport Resolutions with a view to establishing formal partnerships potentially offering Racing's participants access to pro-bono legal advice and representation in the event that they become subject to a BHA investigation or disciplinary proceedings and cannot afford representation themselves.

c) review its own internal procedures for assessing the quality of rides which might form part of a corruption case prior to charges being issued, and ensure that there is sufficient internal oversight in place.

ENGAGEMENT WITH PARTICIPANTS

It is recommended that:

a) the BHA Integrity team becomes more visible as far as the participants are concerned, to include increased presence on racedays and at the racing schools and seminars. This might include advance notice of some visits being published, and might be extended across other BHA teams.

b) all forms of communication between the BHA and the sport's participants be reviewed and updated where necessary to ensure they are modern and appropriate.

OPENNESS



It is recommended that the BHA:

- a) promotes better the existing methods for the racing and betting public to contact its Integrity team directly, and considers whether alternative routes need to be established.
- b) Carries out a public integrity survey on an annual basis to provide a benchmark against which to assess future performance.

PARTICIPANT EDUCATION

It is recommended that the BHA:

- a) dedicates specific resource to taking responsibility for coordinating and participating in the delivery of Integrity and Regulation education in line with the Department's strategic objectives in this area.



INTELLIGENCE COLLECTION/PARTNERSHIP WORKING

It is recommended that the BHA:

- a) creates a partnership with an expert consultancy firm to ensure that it has access to the latest and best quality advice for innovation in intelligence collection, to include technical capability.
- b) re-launches the confidential reporting line “Racestraight” and online reporting form – with a revised message referring to the aim of “protecting your community”, which links to the strategic developments outlined elsewhere in this Report.

INTERNAL PROCESS IMPROVEMENT

It is recommended that the BHA:

- a) adds new senior level resource within the Integrity, Legal and Risk department to ensure greater management, enhancement and oversight of investigative and licensing processes, and to ensure greater accountability for performance in line with new established service levels and key performance indicators.
- b) requests the Head of Integrity (Operations) to review the day to day monitoring and analysis of betting and racing in the light of the recent appointments to the existing roles of Betting Investigator and Intelligence Administrator. Once the development of new betting data monitoring software is completed this will have some impact upon the resourcing solution for the future.
- c) makes further procedural changes within its Integrity team to ensure more structured, focused, timely and better managed processes, these will include:
 - A set of Licensing process improvement initiatives
 - A review and consideration of changing the format of tasking and case review meetings.
 - To establish formal decision-making criteria for investigations and better recording of decisions.
 - To achieve earlier Compliance/Counsel involvement in investigations to advise, assist and challenge the investigative team.