



Gambling and Anti Match-Fixing Policy

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Interpretation

(a) In this policy:

Authorised Provider means any person who is authorised to provide services to Pony Club WA or its Members.

Competition means any equestrian competition or event run by Pony Club WA or any of its Members in accordance with Pony Club WA rules and guidelines or otherwise in the ordinary course of Pony Club activities

Framework means the Pony Club WA Framework for Ethical Behaviour and Integrity.

Member means a Member Club, or an Individual Member as defined in the constitution of Pony Club WA Inc.

Participant means any person, other than a Member, participating in a Competition in any capacity including, but not limited to, athletes, coaches, officials, employees or volunteers of Pony Club WA, Authorised Providers, parents/guardians of Participants, administrators, selectors and team support personnel.

Prohibited Conduct shall have the meaning given in clause 5.1.

(b) This policy is to be read with the provisions set out in the Framework and all capitalised terms not defined here shall have the meaning given in the Framework.

1. Introduction

- 1.1 Pony Club WA recognises that whilst betting may be a legitimate pursuit in certain circumstances, sport must safeguard against illegal or fraudulent betting and match-fixing. Fraudulent betting on sport and the associated match-fixing is an emerging and critical issue globally, for sport, the betting industry and governments alike.
- 1.2 Pony Club WA and its Members have an obligation to address the threat of match-fixing and the corruption that flows from it.
- 1.3 Pony Club WA has zero tolerance for illegal gambling and match-fixing.

2. Purpose

The purpose of this Gambling and Anti Match-Fixing Policy is to:

- (a) protect and maintain the integrity of the sport of Pony Club in Western Australia;
- (b) protect against any efforts to impact improperly the result of any Competition;
- (c) establish uniform rules and a consistent scheme of enforcement and penalties;
- (d) educate Members about the potential risks associated with gambling and match-fixing;
- (e) ensure Participants and Clubs are aware of their responsibilities with regard to safeguarding the integrity of Pony Club; and
- (f) adhere to the National Policy on Match-Fixing in Sport as agreed by Australian Government.

3. Application of Policy

This policy applies to any Participant or Member, directly or indirectly, involved in any Competition that attracts or is likely to attract a betting market whether domestic or overseas.

4. Education

4.1 For the purposes of clause 10 of the Framework, Pony Club WA will monitor any activity and implement a gambling and anti-match-fixing education strategy if required.

4.2 Any education requirements for Participants or Members shall be published on the Pony Club WA website and may be amended from time-to-time.

4.3 All employees and volunteers of Pony Club WA, its Members and Authorised Providers may also be required to complete a gambling and anti-match-fixing education program as directed by Pony Club WA.

5. Prohibited Conduct

5.1 For the purposes of the Framework, a Participant or Member to whom this policy applies is prohibited from engaging in any of the following conduct, directly or indirectly, alone or in conjunction with another or others:

- (a) betting, gambling or entering into any other form of financial speculation on any Competition, or on any incident or occurrence in a Competition;
- (b) communicating in any way, including by using a mobile phone, computer or other device, information that might give another person an unfair advantage if they were to engage in gambling related to that information, other than as required as part of acquitting official duties; or
- (c) participating (whether by act or omission) in match-fixing or attempted match-fixing by:
 - (i) deliberately underperforming or 'Tanking', or over-performing or 'Stacking', as part of an arrangement relating to betting on the outcome of, or any contingency within, a Competition;
 - (ii) deliberately fixing, or exerting any undue influence on any occurrence within any Competition, as part of an arrangement relating to betting on the outcome of, or any contingency within, a Competition;
 - (iii) inducing or encouraging any Participant or Member to deliberately underperform as part of an arrangement relating to betting on the outcome of, or any contingency within, a Competition;
 - (iv) providing information that is considered to be information not publicly known, such as team selection or its member's configuration (including, without limitation, the team's actual or likely composition, tactics, or the form of individual athletes or their riding or injury status), whether for betting purposes or not, other than in connection with bona fide commitments;

- (v) ensuring, or unduly influencing, that a particular incident, that is the subject of a bet, either does or does not occur; or
- (vi) facilitating, assisting, aiding, abetting, encouraging, covering-up or being complicit in any other way in respect of conduct that is prohibited under this policy,

(together, **Prohibited Conduct**)

5.2 For the avoidance of doubt:

- (a) any bets placed by a betting syndicate or group, such as a 'Punter's Club', of which a Participant or Member is a member, shall be treated as if the bet was placed by the Participant or Member as an individual; and
- (b) betting, gambling and financial speculation includes, but is not limited to any payment or reward, whether monetary or not, on or to influence or effect, the occurrence of an incident or outcome.

5.3 Any attempt or any agreement to act in a manner that would culminate in Prohibited Conduct shall be treated as if the relevant Prohibited Conduct had occurred, whether or not the Prohibited Conduct actually occurred as a result of the attempt or agreement to act.

5.4 If a Participant or Member knowingly assists or is a party to 'covering up' Prohibited Conduct, that Participant or Member will be treated as having engaged in the Prohibited Conduct personally.

6. Reporting Process

All instances of Prohibited Conduct must be reported to Pony Club WA Board Chairperson and/or CEO.

7. Investigations

7.1 Investigations into behaviour that may constitute Prohibited Conduct will be conducted by Pony Club WA.

7.2 An independent investigator may be appointed to conduct or assist with an investigation if necessary.

8. Information sharing

8.1 Pony Club WA may share personal information relating to Participants or Members with law enforcement agencies, government agencies or other sporting organisations to prevent and investigate match-fixing incidents.

8.2 In sharing such information Pony Club WA will remain bound by the legal obligations contained in the *Privacy Act 1998* (Cth).

9. Monitoring by Betting Operators

- 9.1 Pony Club WA will work to ensure the ongoing integrity of the Competitions for our Members to protect our Members and Authorised Providers.
- 9.2 Members to whom this policy applies must declare to Pony Club WA all their business interests and connections with Betting Operators
- 9.3 Pony Club WA will, from time to time, request that Betting Operators monitor and conduct regular audits of their databases and records to monitor the incidents of suspicious betting transactions (including single or multiple betting transactions or market fluctuations) that may indicate or tend to indicate that Participants or Members have engaged in Prohibited Conduct.
- 9.4 To enable the Betting Operators to conduct such audits, Pony Club WA may, from time to time and subject to any terms and conditions imposed by Pony Club WA (including in relation to confidentiality and privacy), provide to Betting Operators details of Participants and Members for the purposes of assisting Betting Operators in detecting Prohibited Conduct.
- 9.5 Pony Club WA will request that Betting Operators provide the Board of Pony Club WA with written reports on incidents of suspicious betting transactions (including single or multiple betting transactions or market fluctuations) that may indicate or tend to indicate that Participants or Members have engaged in Prohibited Conduct.
- 9.6 All requests for information or provision of information by Pony Club WA or a Betting Operator shall be kept strictly confidential and shall not be divulged to any third party or otherwise made use of except where required by law or where information is already in the public domain other than as a result of a breach of this policy and all Pony Club WA contracts agreements with Betting Operators must contain provisions to this effect. For the avoidance of doubt, any information gathered by or reported to Pony Club WA may be used to enforce this policy.

10. Sponsorship

- 10.1 Pony Club WA acknowledges that betting is a legal activity, and recognises that Betting Operators may wish to enter commercial agreements to promote their business.
- 10.2 Pony Club WA will not enter any commercial agreements (including in relation to sponsorship) with Betting Operators.
- 10.3 Members may not enter into any commercial arrangement with a Betting Operator.
- 10.4 A Member shall not be permitted to promote a Betting Operator at any Competition.

Approved by Board: 27 November 2017	Review Date: November 2020
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