

The Danish Gambling Authority's guidance on the reporting of the combat of match-fixing

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Introduction

This guidance mainly concerns section 14 on reporting in Executive Order No. 43 of 17 January 2025 on the prevention and fight against match-fixing. The Executive Order was issued pursuant to Consolidation Act no. 1303 of 4 September 2020 on gambling section 12 (4) (hereinafter referred to as the Gambling Act).

This guidance is intended for licence holders. The guidance reviews the requirements for licence holders to report to the Danish Gambling Authority of knowledge, suspicion or reasonable grounds for suspecting that an event is being exploited for match-fixing. In addition to providing guidance on the obligation to report, the guidance also instructs the licence holder on how to report and what documentation to attach.

Guidance on the obligation to report

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1.1 When does an obligation to report arise

A licence holder is obliged to immediately report to the Danish Gambling Authority if the licence holder has knowledge, suspicion or reasonable grounds to suspect that a bet or event is or has been linked to match-fixing. This obligation follows from section 14(1) of the Executive Order on the prevention and combat of match-fixing (hereinafter the Executive Order).

Reports must be made immediately. This means that the licence holder must report to the Danish Gambling Authority as soon as knowledge, suspicion or reasonable cause arise to suspect that match-fixing has taken place. However, a report must be made only when there is sufficient suspicion. This means that the licence holder must report as soon as the internal processes are completed. Internal processes mean the stage from the licence holder becoming aware of facts indicating match-fixing, to the investigation and clarification of whether there is at least reasonable cause to suspect match-fixing. It is a prerequisite that the licence holder prioritises the processing and the investigation is not delayed. In situations where reasonable cause to suspect match-fixing arises before the relevant event has been concluded, the licence holder should carefully weigh the considerations of internal investigations against the need for prompt reporting. In such cases, a prompt report to the Danish Gambling Authority must be given special importance — even if the internal investigation has not yet been completed.

Section 14(1) of the Executive Order states that the obligation arises when there is knowledge, suspicion or reasonable cause to suspect that either a bet or an event is related to match-fixing. This means that the obligation to report applies if there is a suspicion against an event being exploited, and therefore the licence holder does not necessarily have to have received stakes on the bet from Danish players in order to be subject to the obligation to report.

In this regard, the Danish Gambling Authority will receive a report of any knowledge, suspicion or reasonable cause to suspect that an event that takes place or has taken place in Denmark or events involving a Danish individual athlete or Danish sports club will be exploited for match-fixing.

The obligation to share this knowledge in particular stems from the increased likelihood of Danish jurisdiction in such cases, and the fact that the Danish Gambling Authority, as a member of the National Platform for the Coordination of Prevention and Combating Manipulation of Sports Competitions, has an obligation to assist sport and the police with the initial investigations into events organised in Denmark. The Danish Gambling Authority is of the opinion that the consideration of reporting on other events in which the licence holder has not received a stake on the suspicious bet must depend on a concrete assessment of whether;

- the licence holder has an expectation that the event will usually attract a lot of interest from customers in Denmark,
- a suspicion that the event has been exploited across multiple jurisdictions; or
- the licence holder has previously reported to the Danish Gambling Authority regarding one or more participants in the suspected event.

It also follows from section 14(2) of the Executive Order that the obligation to report applies regardless of whether the licence holder chooses not to accept stakes on the bet, on the basis of an assessment. This means that the licence holder must immediately report any knowledge, suspicion or reasonable presumption where a player from Denmark has attempted to place a bet with the licence holder which is rejected by the licence holder. For example, the licence holder may choose not to accept the bet because the licence holder does not have the opportunity to offer the bet a player requests or because the player's wish has given rise to a suspicion of match-fixing.

The Danish Gambling Authority shall be reported in the event that:

- A player with a licence holder places a bet on a betting market that the licence holder has reasonable cause to suspect is manipulated. This means that the Danish Gambling Authority must be informed if the licence holder has actually received stakes on the specific market which the licence holder has reasonable cause to suspect has been subject to match-fixing. This would mean, for example, that the licence holder is not obliged to report to the Danish Gambling Authority of a presumption that a particular yellow card in a foreign football match has been fixed if the licence holder has only received bets on other betting markets on that event, such as over a certain number of goals. Thus, there must be a connection between the market in which the licence holder has a presumption of match-fixing and the markets on which the licence holder has actually received bets from players from Denmark.
- The licence holder has not completed a bet that a player in Denmark has wished to bet on.
- The licence holder has offered a betting market to players in Denmark on an event that takes place or has taken place in Denmark, or the event is attended by a Danish individual athlete or Danish sports club and the licence holder at least has reasonable cause to believe that the event has been subject to match-fixing.
- If the licence holder has offered a betting market to players in Denmark and the licence holder has knowledge, suspicion or reasonable cause to believe that the new knowledge may be relevant to qualify a previous report to the Danish Gambling Authority, this shall be reported regardless of whether the licence holder has received any stakes from Denmark.
- Regardless of whether or not the licence holder has received stakes, the licence holder must share their knowledge, suspicion, or reasonable cause for suspecting that an event has been exploited for match-fixing across multiple jurisdictions.

When the licence holder reports to the Danish Gambling Authority, the licence holder must also be aware of whether the matter must also be reported to the Danish Financial Intelligence Unit in accordance with the obligations of the Anti-Money Laundering Act. A report to the Danish Gambling Authority does not meet the obligation to report under the Anti-Money Laundering Act. You can read more about reporting to the Danish Financial Intelligence Unit in the Danish Gambling Authority's guidance on preventing money laundering and terrorist financing, which can be found on the Danish Gambling Authority's website.

1.2 What should the licence holder do after reporting

When a licence holder has made a report of potential match-fixing, the following assessments shall be carried out in accordance with the Executive Order:

1.2.1 Limiting the scope of match-fixing

It must be assessed whether it is still possible to limit the extent of match-fixing by refusing to accept stakes, in accordance with section 10 of the Executive Order.

1.2.2 Investigation of suspicion

If the report has been preceded by an internal investigation, the licence holder must immediately initiate an investigation into the circumstances surrounding the suspicion, knowledge or reasonable cause for suspecting that match-fixing has taken place, in accordance with section 11 of the Executive Order.

1.2.3 Retention of winnings

Section 12 of the Executive Order states that winnings may not be paid if the bet is under investigation for match-fixing and it cannot be ruled out that the player may have had

knowledge of it. However, the winnings must be paid if a retention could harm an investigation.

1.2.4 Customer due diligence and risk assessment

The licence holder must also consider whether additional customer due diligence procedures are needed under section 8 of the Executive Order. In addition, it must be assessed whether the knowledge gained affects the risk assessment of the sport, the betting market or the specific customer relationship. This can lead to increased monitoring of the player, the betting market, the sport or the athlete.

For further guidance, please refer to the **Danish Gambling Authority's guidance on preventing and combating match-fixing**.

1.3 Cause of suspicion

The obligation to report arises when there is knowledge, suspicion or reasonable cause for suspecting that a bet or event is related to match-fixing. The lowest level of suspicion with an obligation to report is where there is reasonable cause to suspect that a bet or event is related to match-fixing.

A reasonable reason to suspect a link to match-fixing will often result from the identification of deviations from the licence holder's expectations of customer relationships, turnover in a given betting market/event, or deviations from expected odds developments or large fluctuations. The licence holder's risk assessment may be involved as a tool to identify deviations or risks. An example of this could be the fact that the licence holder has identified a number of high-risk events in its risk assessment of their gambling products and services. For example, the licence holder has subsequently adapted its gambling system with a series of thresholds that enable the licence holder to identify and react more quickly to deviations in high-risk events.

For example, there will be reasonable cause for suspecting match-fixing if the licence holder identifies a trend in odds that does not reflect the likely outcome of the event or if the licence holder identifies a player where the deposit could be viewed as suspicious, for example, on the basis of a significant deviation from previous gambling behaviour. A significant change in gambling behaviour may be, for example, that the player switches from betting on top football to mainly betting on singles on events the licence holder has defined as high-risk and for significantly larger amounts than previously.

Likewise, there may be reasonable cause to suspect match-fixing if the total stakes placed from Danish players significantly exceed what might be expected for the event or market and at the same time can see significant odds fluctuations from the global gambling market. A duty to report requires that this behaviour cannot be justified by information such as injuries or team line-ups.

1.4 Exception to data protection rules

The duty of disclosure and the right of access for data subjects pursuant to the Data Protection Regulation do not apply in cases where the licence holder reports to the Danish Gambling Authority of information relevant to prevent or combat match-fixing, cf. section 12(3) of the Gambling Act. This means that the licence holder does not have to inform a player, athlete or sports club that they have reported to the Danish Gambling Authority about suspicious activity.

The license holder can draw the player's attention to the exception, e.g. when establishing the customer relationship or when receiving a stake on a bet, the licence holder may inform the player of the restriction of the person's right to access information where there is a suspicion of match-fixing, when the licence holder reports to the Danish Gambling Authority, and a licence holder may inform the player that the licence holder are obliged to share gambling transactions with the Danish Gambling Authority.

Instructions on how to make a report

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2.1 Language selection

It follows from section 14 (3) of the Executive Order that the notification is made digitally and that there is freedom of choice in relation to reporting in Danish or English. The report shall contain a description of the facts and evidence thereof.

2.2 Submitting reports via Stopmatchfixing

Reports are sent to the Danish Gambling Authority via the Stopmatchfixing reporting channel. The reporting channel can be found on the Gambling Authority's website under the contact tab → Report suspicion of match-fixing.

Here, the licence holder will find a contact form where the report can be made.

2.2.1 Filling out the contact form

The licence holder must send the report by filling out the form and, if applicable, filling out the Danish Gambling Authority's Excel template. The Excel template can be found on the Gambling Authority's website along with this guide in the section COMPANIES AND ASSOCIATIONS → Match-fixing.

2.2.2 Anonymity

The first question the licence holder must answer is if they want to report anonymously. The licence holder must opt out of the request for anonymity. After that, fill out the field with the name. The name must contain, at a minimum, the name of the licence holder and a contact email.

If the licence holder wants the Danish Gambling Authority to communicate with a specific employee regarding the case reported, the email and telephone number of the employee must be filled out so that the Danish Gambling Authority can correspond using Bluewhale.

2.2.3 The report deals with

The next field is a description of what the report is about. The licence holder must select the category that the licence holder assesses is most relevant to the report.

2.2.4 Description of (potential) infringement

Thereafter, the licence holder shall state as precisely as possible the facts on which the report is based.

Example of report stating facts

Before the start of the match, we received a deposit from a customer of DKK 10,000 for a victory in the table tennis match between A and B in the Fixers Cup tournament. The gambling account has been dormant for a year, and the behaviour differs significantly from the history we have on the customer prior to the hibernation period. Here, the customer typically placed deposits in the range of DKK 50-300 per bet and we have not previously received stakes from the player on table tennis.

Our suspicion is further strengthened by the fact that the odds development leading up to the start of the match was unusual, as the odds on victory for A dropped from the opening odds of 2.8 to 1.7 before the start of the match. A won the game 3-1. We chose to suspend our offer on the match after the 2nd set.

2.2.5 Appendix (file)

If the licence holder's report relates to bets placed by players in Denmark, a completed Excel template shall be attached to the report. If the licence holder has other supporting documents relevant to the report, this shall also be attached here.

2.3 Guide on how to fill out the Excel Template

Table 1. How to fill out the Excel template

Column	Title	Description
A	Licence holder - Brand	Enter the name of the licence holder in this field. If the licence holder uses more than one brand, please specify the brand: Licence holder — Brand. If suspicious behaviour is identified across multiple brands, then information from each brand must be filled out.
B	SpillerInformationIdentifikation	Enter the SpillerInformationIdentifikationsnummer you use to report game data to the Danish Gambling Authority. If the employee is not familiar with SpillerInformationIdentifikationsnummer it can be omitted.
C	Customer's first name(s)	Insert the customer's first name. If multiple first names all are inserted.
D	Customer's last name	Insert the customer's entire last name.
E	Birthday DD/MM/YYYY	The date of birth must be indicated only by the use of numbers. A date of birth on 1 January 1990 shall be stated as follows: 01/01/1990
F	Address	If the licence holder has received address information from the customer, insert the street name, house number, floor, door. The licence holder is not required under the gambling legislation to obtain address information. However, this may be part of a customer onboarding or have been obtained as part of customer knowledge. If no information is available, the field is left blank.
G	City	In connection with the address, indicate the city name of the customer if registered. If no information is available, the field is left blank.
H	Postal code	Following columns F and G, enter the postal code of the address at which the customer lives. If no information is available, the field is left blank.
I	Phone number	Phone number of the customer is entered here. The licence holder is not required under the gambling legislation to obtain phone number. If no information is available, the field is left blank.
J	E-mail	E-mail for the customer is entered here. The licence holder is not required under the gambling registration to obtain email. If no information is available, the field is left blank.
K	Time of account creation	Time of customer creation at the brand. Indication of the time of account creation must be done using numbers. The date of account creation with brand on 1 January 2015 shall be indicated as follows: 01/01/2015.
L	Identification and documentation information Yes/No	The licence holder indicates in the field whether the licence holder has obtained identification or documentation information on the customer, which the Danish Gambling Authority will be able to obtain from them. This can be, for example, a driving licence, medical card, photo documentation or statements from banks or public authorities.

M	IP address/location at registration/creation	Specify the IP address or location as registered at the time of creation. There is no obligation to register IP address. If no information is available, the field is left blank.
N	IP Address/ gambling premises	Enter the IP address or address of the gambling premises where the bet(s) that are being reported have been placed.
O	SpilTransaktionIdentifikation	Unique identification of a player's gambling product purchases used for reporting data. If the employee is not familiar with the SpilTransaktionsIdentifikationsnummer, fill in field R-AA.
P	BegivenhedsIdentifikation	Specify the ID used for data reporting of the event. If the employee is not familiar with the number, fill in field T.
Q	UdfaldsIdentifikation	Enter the ID used for data reporting of outcomes to the Danish Gambling Authority. If the employee is not familiar with number fill out field U.
-	R-AA only needs to be filled out if the employee has not filled in the field O.	
R	Sports	Specify the sport or sports, e.g. football or tennis.
S	Competition	Specify competition or competitions. If FC København plays against Odense Boldklub in the Superligaen, then the Superligaen will be entered in this field.
T	Event	This is where the event or events are entered, e.g. FC København v Odense Boldklub.
U	Betting market	Here you enter the betting market that is being bet on, e.g. 1x2 or first scorer.
V	Choices	In this field enter the player's choice, e.g. 1 or FC København.
W	Betting Type	The field indicates whether the bet was a single or part of a combination bet, e.g. 3-fold or 7-fold.
X	Time of the start of the event	To be specified as follows: DD/MM/YYYY HH:MM:SS CET.
Y	Stake in DKK	Stake is stated in DKK. State the total stake if the suspicious bet is part of a combination bet.
Z	Odds decimal	For example, odds are stated as 2.65.
AA	Winnings in DKK	The winnings are stated as what is paid back to the customer = deposit + profit. State the total winnings if the suspicious bet is part of a combination bet.
AB	Bets Paid Out	The answer here is YES or NO to whether the winnings have been paid into a bank account.

