

Sports Integrity in Australia: legislating into a position of strength

Australia has recently conducted a review of its 'Sports Integrity Arrangements.' The resulting report was presented to the Commonwealth Government in March 2018 and was made publicly available on 1 August 2018¹. This date is significant, because, in the same announcement, the current federal Minister for Sport, Bridget McKenzie², launched the new National Sports Plan for Australia and a name change for the Australian Sports Commission (now Sport Australia)³. Known as the 'Wood Review,' the 340 page report and its 52 recommendations are proclaimed to be "the most comprehensive analysis of Australia's sports integrity arrangement ever undertaken"⁴. Catherine Ordway, Senior Consultant at Snedden Hall & Gallop and Senior Fellow at the University of Melbourne, outlines the state of integrity in Australian sport in light of the findings of the review and its recommendations, the new strategic plan for sport, and discusses how the proposed legislative changes might contribute to broader anti-corruption strategies in Australian sport.

Protecting sports integrity through legislation

Following a eight month review into Australia's sports integrity arrangements, instigated by the former federal Sports Minister, Greg Hunt⁵, a range of recommendations have been provided for the government to consider⁶. Led by the Honourable James Wood AO QC⁷, the panel consisted of David Howman CNZM⁸ and Ray Murrighy⁹. The panel was assisted by adjunct panel members Jo Setright¹⁰, and The Honourable Dr Annabelle Bennett AO SC¹¹. The ensuing report (referred to as 'the Wood Review') identified five key themes:

1. a stronger national response to match fixing;
2. an Australian Sports Wagering Scheme;
3. enhancing Australia's anti-doping capability;
4. a National Sports Tribunal; and
5. a National Sports Integrity Commission.

The federal Minister for Sport, Bridget McKenzie¹², launched the new strategic plan for sport in Australia, Sport 2030: National Sports Plan ('the Plan'), together with a name change for the Australian Sports Commission (now Sport Australia) on 1 August 2018¹³. The Plan replaced the Government's strategic plan for sport, the Winning Edge (2012-2022)¹⁴. The Winning Edge emphasised

the need for good governance and defined this through its Mandatory Sports Governance Principles ('MSGP,' updated June 2015). MSGP Principle 3 is 'Sport transparency, reporting and integrity'¹⁵. Recognising perhaps that this Principle did not go far enough, one of the four key priority areas of the Plan is: 'Safeguarding the integrity of sport - A fair, safe and strong sport sector free from corruption'¹⁶. Sport Australia seeks to be "an exemplar of sports integrity" and to demonstrate leadership in "the national approach for a safe, ethical and inclusive sport industry"¹⁷. The Government has formed a Sports Integrity Review Taskforce to develop and implement its response to the Wood Review. The Plan envisages that Sport Australia will support the Sports Integrity Review Taskforce in this role, continue to encourage sports organisations to implement best practice governance, and establish Sport Safe Australia¹⁸. In 2016, University of Melbourne academic, Hayden Opie and I¹⁹ outlined a number of possible approaches to mitigate the risk of corruption in sport. Proposed, in effect, as a range of 'tools in the toolbox' to strengthen the integrity of sport, on-field and off-field, under the heading 'Solutions: anti-corruption strategies and their application to sport,' we discussed the following ideas:

1. Leadership: ethical decision-making
2. Partnerships: information-sharing

- and inter-agency collaboration
3. Good governance: transparency and accountability (including gender equity)
4. Awareness and education
5. Sport industry regulatory frameworks
6. Early warning systems
7. Whistleblowing and reporting systems
8. Integrity units, officials and networks
9. Legislation and the role of penal measures
10. Asset protection: athlete welfare; and
11. Research and facilitation of new ideas and approaches.

The following will examine a selection of the Wood Review recommendations, focusing on the ninth solution proposed above, namely, bolstering current legislative provisions as one of the 'tools' to combat threats to the integrity of sport.

Australia's international obligations

As a founding member of the United Nations ('UN') in 1945²⁰, Australia ratified the UN Conventions against Transnational Organized Crime ('UNTOC') in 2004²¹ and the following year, against Corruption ('UNCAC')²². Professor Nikos Passas drafted the Legislative Guides for the implementation of the UNCAC and the UNTOC. Together we previously considered the capacity for these Conventions to protect sports integrity²³. Countries such as Australia have a responsibility in implementing these Conventions, to

enact legislation to combat corruption, including for the sports industry.

Specifically relating to sport, Australia has also ratified the Council of Europe ('CoE') Anti-Doping Convention in 1994²⁴ and the UNESCO International Convention Against Doping in Sport in 2006²⁵, resulting in the creation of the Australian Sports Anti-Doping Authority ('ASADA') discussed below. As a long-standing UNESCO Member State²⁶, Australia has participated in the World Conferences of Sports Ministers ('MINEPS'). The May 2013 MINEPS V adopted a range of recommendations calling on UNESCO Member States to enact legislation to protect the integrity of sport from the threat posed by transnational organised crime, doping, the manipulation of sports competitions and corruption²⁷. While also non-binding, it is indicative of the growing concern that the UNESCO International Charter of Physical Education, Physical Activity and Sport (1979) was revised in 2015 to include a reference to the importance of protecting the integrity of sport for the first time²⁸.

UNESCO does not have a convention covering match-fixing, however the Council of Europe Convention on Manipulation of Sport Competitions has been prepared by the Enlarged Partial Agreement on Sport²⁹. Australia has been one of the non-Member States assisting the Council of Europe to draw up the Convention³⁰. Opened for signature in the Swiss city of Macolin in 2014, it is known as the Macolin Convention. The Convention requires another two states to ratify so that it can be entered into force³¹. It would therefore assist the global work against match-fixing, and the national strategy, if Australia became a signatory. As will be discussed below, the Wood Review recommends that Australia becomes a signatory.

Australian sports integrity legislation

The Wood Review notes that while there are significant gaps in the sports integrity framework, there is also duplication throughout the Australian sporting ecosystem, which includes ASADA, Sport Australia (including the Australian Institute of Sport), the National Integrity in Sport Unit and Office of Sport, the Australian Sports Foundation, the State and Territory sport departments and institutes, Play by the Rules and the integrity units of the professional clubs, national sports organisations and peak bodies including the Australian Olympic Committee and the Australian Paralympic Committee.

The most comprehensive of the Wood Review recommendations relates to the establishment of a new umbrella body, the National Sports Integrity Commission ('NSIC') and a National Platform for information sharing³². It is anticipated that the NSIC would need to be established as a statutory authority, or equivalent, as the Wood Review recommends that both ASADA and the NSIC be accorded 'status as a law enforcement agency'³³. It has previously been noted that not being designated as a law enforcement agency has severely hampered ASADA's ability to fully function, as it means that it was not permitted to receive and share intelligence with domestic and international regulatory, sporting and law enforcement bodies³⁴.

It is intended that the NSIC should have three primary areas of focus³⁵:

- 1. Sports Wagering Regulation as part of a proposed Australian Sports Wagering Scheme:** As a law enforcement agency, the NSIC would have the power to collect and use 'sensitive information' and material alleging criminality. It is not stated whether the additional phrase 'including oversight as to sports' implementation and adherence to appropriate integrity policies' is limited to the wagering context, or more broadly relates to governance³⁶.
- 2. Intelligence:** The NSIC will be responsible for information gathering and both operational and strategic intelligence functions. Investigations are to be referred to either the appropriate law enforcement agencies in criminal matters, or to sporting organisations for code of conduct issues³⁷. What is not clear, as WADA found in attempting to restore trust following the doping scandal in Russia³⁸, is where the NSIC should refer matters when corruption within the sporting organisation is alleged.
- 3. Policy and Program Delivery:** Recommendation 49 suggests that the NSIC should become 'responsible for centrally coordinating sports integrity policy functions previously executed by a number of different organisations including [Sport Australia], the Goods Sports Program (through the Alcohol and Drug Foundation) and the National Integrity of Sport Unit'³⁹. It appears to be envisaged that the NSIC will partner with a range of organisations to enhance existing outreach and education programs and assist 'sports in implementing policies and

appropriate practices in responding to possible integrity breaches⁴⁰.'

While the Wood Review acknowledges that 'sports integrity' is much broader than match-fixing and doping⁴¹, it is not specified whether the converse of '[...] The manifestation of the ethics and values which promote community confidence in sports' is 'sports corruption' as outlined by the UNCAC, for example, and therefore would fall within the NSIC's jurisdiction. The Wood Review states that the NSIC's 'monitoring, intelligence and investigations' function relates to 'possible doping activity and manipulation of sports competitions **and related corruption** [emphasis added]'. Beyond what will remain the remit of on-field referees, judges and umpires⁴², fully extended, the NSIC's scope could include all other on-field cheating, beyond doping and match-fixing, including classifications (whether via age, weight, gender and para-sports)⁴³, and athlete protection against abuse and exploitation (whether financial, legal, physical, sexual or emotional for example)⁴⁴. However, the Wood Review does not clarify whether, beyond protecting the sports gambling industry, which dominates the Wood Review⁴⁵, the NSIC will have the power to investigate off-field corruption where it cannot otherwise be referred⁴⁶.

The Wood Review notes the arguments made around the importance of sport autonomy⁴⁷, however examples both in Australia and internationally abound that demonstrate the inadequacy of the criminal law in holding those responsible for corruption in sport to account⁴⁸. In the absence of a national anti-corruption body, the NSIC needs both self-initiating and responsive powers⁴⁹ to investigate and regulate behaviour including: vote-rigging, extortion and bribery (e.g. in the awarding of event hosting rights or player transfers), fraud and misappropriation of membership organisation funds (e.g. through property, procurement, staffing, salary cap breaches, expenses and remuneration), pork barrelling and sports development grants processes, nepotism, media rights, sponsorship and ticketing impropriety, or poor accountability and governance. I would therefore also expand the whistle-blower protections recommended, beyond ASADA, to include any sports corruption issues⁵⁰.

Recommendations to amend the anti-doping legislation

In compliance with its obligations under, first the Council of Europe, and

continued

then later, the UNESCO, anti-doping conventions, Australia has enacted legislation aimed at what has been coined as ‘cheating to win⁵¹.’ Australia is believed to be one of only two jurisdictions in the world that establishes its national anti-doping organisation, ASADA, through an act of Parliament⁵². However, in line with the World Anti-Doping Agency (‘WADA’)s position, Australia does not consider it appropriate to criminalise doping in sport, and it is not addressed in the Wood Review⁵³.

Perhaps in anticipation of a bill being passed providing civil law immunity for WADA ‘including its directors, officers and employees’ for ‘any decision (and resulting activity) made in connection with its mission to fight doping in sport internationally’ by the Canadian parliament in Quebec (where WADA is based)⁵⁴, the Wood Review recommends extending this immunity, already applicable to ASADA, to the national sporting organisations ‘in their exercise of Anti-Doping Rule Violation functions⁵⁵.’ A number of commentators have queried whether provisions like this, that effectively make organisations less accountable, in an environment where athletes already feel powerless, are necessary or proportionate⁵⁶.

A similar impost is sought by the Wood Review in recommending that the ASADA Act be amended to exclude the right held by other members of the community in policing investigations ‘to claim privilege against self-incrimination when answering a question or providing information to ASADA⁵⁷.’ This exclusion was rejected by the Parliament in previous rounds of amendments, and the protections against “non-direct or derivative use’ are unlikely to satisfy the chorus of

objections led by the Australian Athlete’s Alliance, lawyers and academics⁵⁸. The self-incrimination exclusion currently applies to persons within ASADA’s jurisdiction in relation to the production of ‘documents and things,’ and the Wood Review argues that athletes and athlete support personnel are already denied this right through the contractual arrangements with their national sporting organisations⁵⁹. One possible scenario where this amendment could be of benefit to its detractors, however, is where third parties could be compelled to provide evidence that serves to support or exonerate another person.

Match-fixing legislation

Taking on board the mounting evidence that Australian sport, primarily in the men’s professional codes, was at risk of manipulation instigated by organised criminals, the Commonwealth Government took decisive action⁶⁰. Without authority to enact national legislation under the constitutional external affairs power⁶¹, the next best solution was to encourage the States and Territories to enact harmonised legislation. In June 2011, the Australian Council of Sport and Recreation Ministers adopted the National Policy on Match-Fixing in Sport (‘the Policy’)⁶². Respondents to the Wood Review commended Australia’s “proactive approach” and described its sports integrity system as a global “shining light⁶³.” As required by the Policy⁶⁴, by November 2011 the Attorneys General met to discuss appropriate sanctions, and agreed that the gambling-related match-fixing behaviour defined in the Policy would attract ‘a maximum of 10 years imprisonment⁶⁵.’

However, as set out in the Wood Review and by other commentators,

standardised legislation throughout Australia hasn’t been enacted⁶⁶. For this reason, the Wood Review’s first recommendation is that Australia ratifies the Macolin Convention⁶⁷. Following the ratification of the Macolin Convention, national legislation can create consistency within Australia and in a coordinated global response. The Wood Review recommends that, in line with current legislation in New South Wales: ‘offences relating to the manipulation of sports competitions and related corruption be introduced by the Australian Government and inserted into the Criminal Code Act 1995 and that harmonisation of Commonwealth and state and territory offence provisions be encouraged⁶⁸.’ There would appear to be no reason to delay signing the Macolin Convention once the Government has completed its response to the Wood Review later this year. In the meantime, Australia will be represented at the Council of Europe’s third ‘International Conference on the fight against the manipulation of sports competitions - Promoting and Implementing the Macolin Convention’ in Strasbourg in September 2018⁶⁹.

Next steps

Sport Minister McKenzie anticipates that the Government will provide its response to the Wood Review by the end of 2018⁷⁰. The Wood Review is certainly comprehensive, and its recommendations provide a range of solutions that will strengthen current legislative provisions. However, as I have outlined above, in order to be fully prepared to address the range of sports corruption issues that have presented internationally, the recommendations contained in the Wood Review do not go far enough.

1. <http://www.health.gov.au/internet/main/publishing.nsf/Content/the-review-of-australias-sports-integrity-arrangements#W2FYqyIV59w.linkedin>
2. https://www.aph.gov.au/Senators_and_Members/Parliamentarian?MPID=207825
3. <http://www.bridgetmckenzie.com.au/Media/Media-Releases/ID/1175/National-Press-Club-Address-Shooting-for-Success>
4. <http://www.health.gov.au/internet/main/publishing.nsf/Content/the-review-of-australias-sports-integrity-arrangements#W2FYqyIV59w.linkedin>
5. <http://www.health.gov.au/internet/ministers/publishing.nsf/Content/health-mediarele-yr2017-hunt076.htm>
6. <http://www.health.gov.au/internet/main/publishing.nsf/Content/the-review-of-australias-sports-integrity-arrangements>
7. Former Judge of the Supreme Court of New South Wales and former Chairperson, Law Reform Commission of New South Wales.
8. Former Director-General, World Anti-Doping Agency and current Chair, IAAF Athletics Integrity Unit.
9. Former Racing New South Wales Chief Steward.
10. Head of Legal, Business Affairs and Integrity at the Football Federation Australia (‘FFA’), nominated by the Coalition of Major Professional and Participation Sports, of which the FFA is a member.
11. Chancellor of Bond University and a Court of Arbitration for Sport arbitrator, nominated by the Australian Olympic Committee, Australian Paralympic Committee and Commonwealth Games Australia.
12. https://www.aph.gov.au/Senators_and_Members/Parliamentarian?MPID=207825
13. <http://www.bridgetmckenzie.com.au/Media/Media-Releases/ID/1175/National-Press-Club-Address-Shooting-for-Success>
14. McKenzie, B (2018).
15. https://www.ausport.gov.au/ais/australias_winning_edge/mandatory_sports_governance_principles/sport_transparency_reporting_and_integrity
16. <https://www.ausport.gov.au/nationalsportsplan>
17. Sport Australia also used this phrase in the position advertisement for the role: ‘Australian Sports Commission - Deputy General Manager, Safe & Ethical Sport.’
18. National Sport Plan (2018) pp44-47. Sport Safe Australia is one of the recommendations from the report by the Royal Commission into Institutional Responses to Child Sexual Abuse (2017).
19. Ordway, C. and Opie, H. (2016) ‘Integrity and Corruption in Sport,’ in Schulenkorf & Frawley (eds) Critical Issues in Global Sport Management, Routledge, pp38-65.

20. https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/BriefingBook43p/engagementun
21. Australia ratified the UNTOC on 27 May 2004: https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-12&chapter=18&clang=en
22. Australia ratified the UNCAC on 7 December 2005: <https://www.unodc.org/unodc/en/corruption/ratification-status.html>
23. <http://www.track.unodc.org/Pages/allEvents.aspx?index=51>
24. Australia ratified the CoE Anti-Doping Convention on 5 October 1994, https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/country/AUT?p_auth=fkpBXXK8Q
25. Australia ratified the UNESCO Convention on 17 January 2006, <http://www.unesco.org/eri/la/convention.asp?KO=31037&language=E>
26. Australia joined UNESCO on 4 November 1946, http://www.unesco.org/eri/cp/ListeMS_Indicators.asp
27. <http://www.unesco.ru/en/?module=news&action=view&id=398> The Declaration of Berlin appears in full on the Australian Department of Health website: <http://www.health.gov.au/internet/main/publishing.nsf/Content/declaration-of-berlin-mineps-v> Although concerns were expressed at the time that the Declaration did not commit any of the Member States to 'concrete action.'
28. <http://unesdoc.unesco.org/images/0023/002354/235409e.pdf> and http://portal.unesco.org/en/ev.php-URL_ID=13150&URL_DO=DO_TOPIC&URL_SECTION=201.html
29. <https://rm.coe.int/factsheet-on-epas-activities-in-2018/16808b1c43>
30. Wood Review p69.
31. Chart of signatures and ratifications of Treaty 215, Council of Europe Convention on the Manipulation of Sports Competitions, Status as of 6 September 2018 states that 3 Member States have ratified, https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/215/signatures?p_auth=KIMM5tXx
32. Wood Review p10.
33. Wood Review pp15, 18, 107 and 130, 172. At p178 there is a reference to the 'National Platform' being designated as a 'law enforcement agency,' which would only seem to be necessary if the Platform does not sit inside the NSIC.
34. See, eg: 'Doping: Review of Australia's national anti-doping agency: parts 1 and 2,' v9(6), Jun and v9(7), Jul 2011; 'Doping: Working with Law Enforcement: A Strategic Approach,' v9(10), Oct 2011; 'ACC report: why ASADA needs teeth,' v11(3) Mar 2013 in *World Sports Advocate*.
35. Wood Review p11; pp172-3; p176-185.
36. This phrase only appears on p11 Wood Review.
37. Wood Review p172 para 7 - The proposed new NSIC Joint Intelligence and Investigations Unit is to be responsible for: 'intelligence collection and analysis for the broad range of sports integrity issues; liaison with domestic and international law-enforcement agencies and criminal intelligence commissions; and referral services.' Wood Review p172 para 8 - the proposed new Strategic Analysis Unit is to be responsible for: 'conducting open-source threat identification and analysis.' It is not clear if it is limited to gambling. Wood Review p172 and p179 Recommendation 43: The Australian Criminal Intelligence Commission Sports Betting Integrity Unit is to be transferred into the NSIC.
38. <https://ssrn.com/abstract=2836388> [last accessed 7 Sept 2018].
39. Wood Review p185.
40. Wood Review p11. Noting that while the NSIC will be assisting sports, the regulation function also requires the enforcement of integrity policy.
41. Wood Review p28. While p37 Key Finding 6 states that 'Equally important is the ability of governments and the sport sector to adequately respond to other integrity issues in the sporting sphere including: harassment, bullying and discrimination; child protection; health and safety issues; accreditation of athlete support personnel; regulation and supply of performance and image enhancing drugs, including in sporting and dietary supplements; gender issues; and corruption of new and emerging sports without identifiable controlling bodies (for instance, e-sports).' It has not been specified whether the NSIC would have jurisdiction for these issues.
42. Except that behaviour such as hits behind the play, high tackles, professional fouls, ball tampering etc, could be expected to come within the NSIC's jurisdiction if there was a gambling motivation to the conduct.
43. Wood Review p171 Key finding 4 states that 'Australia needs an independent, central, national body with the expertise and reach to monitor issues across the sports integrity continuum [...] This includes monitoring and developing responses to new and emerging issues including the ongoing accreditation of athlete support personnel; supply and use of performance and image enhancing drugs; gender issues in sport; wagering on emerging sports without a controlling body (such as e-sports); child protection; and player welfare issues, particularly at junior level.'
44. Eg: p53 and Athlete and Official Vulnerability, Wood Review pp58-59.
45. It is telling that the section titled; 'Why does integrity in sport matter?' opens with a quote from the then IOC President, Jacques Rogge, from 2011 stressing the importance of integrity for "the legitimate sports gambling industry" creating an ironic paradox when presented together with Rogge's 2010 statement that: "Cheating driven by betting is undoubtedly the biggest threat to sport after doping." Wood Review p29.
46. At p9 of the Wood Review there is a reference to: 'those other forms of manipulation that are directed towards securing other sporting advantages [where] a role might be preserved for monitoring of such activity by the proposed NSIC.'
47. Wood Review pp56-57.
48. Many examples, including: 1. The failure of the German prosecutors to finalise their investigation into the broadcasting deals entered into by the International Handball Federation President, Moustafa, allowing for his fourth re-election: See summary in Ordway, C. Presentation, Crime and Sport Research Conference (2012) University of Canberra, published by Play the Game, Knowledge Bank, 23 April 2012, <http://www.playthegame.org/news/news-articles/2012/new-in-knowledge-bank-threats-to-sporting-integrity-doping,-match-fixing-and-corruption/>; Handball Planet, Dr Hassan Moustafa Re-elected for IHF President (2017, 11 Nov) <http://www.handball-planet.com/dr-hassan-moustafa-re-elected-for-ihf-president/> 2. FIFA granting of the hosting rights for the men's World Cup to Qatar and Russia despite evidence of corrupt behaviour by both winning and losing bids, eg: Blake, H., & Calvert, J. (2015). 'The ugly game: The Qatari plot to buy the World Cup,' Simon and Schuster. and in Australia eg: Mersiades, B. (2018) 'Whatever It Takes: The Inside Story of the FIFA Way,' Powderhouse Press.
49. http://playthegame.org/fileadmin/documents/Good_governance_reports/AGGIS_Final_report.pdf
50. <https://itunes.apple.com/au/podcast/the-ticket-abc-news/id898138253?mt=2&i=1000417159773>
51. I've used the expressions 'cheating to win' and 'cheating to lose' frequently in publications and in media interviews, including, eg: Nehme, M. and Ordway, C. 'Governance and Anti-Doping: Beyond the Fox and the Hen House,' 'Doping in Sport and the Law' (ed by Haas and Healey) (2016) Hart Publishing, pp207-231, and it was pleasing to see it was also picked up in the Wood Review at p41.
52. The second nation is New Zealand: <https://drugfreesport.org.nz/what-we-do/about-doping-in-sport/history> The first national anti-doping organisation for Australia was the Australian Sports Drug Agency ('ASDA') established via the ASDA Act 1990. ASDA was replaced by the ASDA Act 2006, and the National Anti-Doping Scheme regulations <https://www.legislation.gov.au/Details/C2006A00006> The ASDA Act was most recently amended on 1 July 2018 to remove the Advisory Group: <https://www.legislation.gov.au/Details/C2006A00006>
53. <http://www.theage.com.au/sport/wada-against-jail-terms-for-athletes-20141116-11o25a.html> See also <https://epublications.bond.edu.au/cgi/viewcontent.cgi?article=1003&context=slej>
54. <https://www.wada-ama.org/en/media/news/2018-06/quebec-assembly-protects-wadas-mission-to-fight-doping-in-sport>
55. Wood Review Recommendation 19 p115; p15, 106, 113.
56. <https://globalsportmatters.com/science/2018/08/14/has-wada-helped-or-hurt-the-anti-doping-movement/>
57. Wood Review p107 and p129-130.
58. The submission by the Australian Athlete's Alliance to the Wood Review has not been published, but is referred to in the Wood Review. See also Crocker, A. (2014) 'The Integrity of Sport and The Privilege Against Self-Incrimination - Is ASADA Playing by the Rules?' https://www.monash.edu/_data/assets/pdf_file/0006/139803/schwab-paper.pdf
59. Wood Review p129.
60. The keynote presentation by Declan Hill to the 2009 Australian & New Zealand Sports Law Association Conference based on his book, Hill, D. (2008). 'The fix: Soccer and organized crime' has been credited as being enormously influential. See for example, Opie, H. & Lim, G., (2017). 'The Australian legal framework for countering match-fixing' pp. 59-74 at p60 and Ordway, C. (2017) 'Police and investigative cooperation on match-fixing' pp. 171-186 at p175; both chapters in Steele, S., & Opie, H. (eds) 'Match-Fixing in Sport: comparative studies from Australia, Japan, Korea and Beyond.'
61. Section 51(xxix), <https://www.legislation.gov.au/Details/C2013Q00005>
62. <http://www.health.gov.au/internet/main/publishing.nsf/Content/national-policy-on-match-fixing-in-sport>
63. Wood Review p67 (the European Sport Security Association and Sportradar respectively).
64. National Match-Fixing Policy (2011) s.3.4.
65. <https://lawsocietynt.asn.au/about-Isnt-news/363-standing-council-on-law-and-justice-18-november-2011-.html>
66. Wood Review p103-15; Opie, H. & Lim, G., 'The Australian legal framework for countering match-fixing' pp. 59-74 in Steele & Opie (eds) (2017) 'Match-Fixing in Sport: Comparative Studies from Australia, Japan, Korea and Beyond.'
67. Wood Review p8, 13, 65 and 70.
68. Wood Review p9 - other forms of manipulation (eg: tanking/avoiding relegation not related to gambling) remains regulated by the sport integrity codes.
69. <https://www.coe.int/en/web/sport/conference-2018>
70. McKenzie, B (2018).