

BHA Betting Policy

INTRODUCTION

The British Horseracing Authority (the “**BHA**”), in line with its values, is committed to the highest standards of integrity, credibility and accountability. The BHA’s position as regulator of British horseracing means that its employees may be privy to information that could be used for private gain. The BHA and its employees must be able to demonstrate that their actions and behaviour are beyond reproach on matters relating to the integrity of the sport. To address these matters, the BHA places restrictions on the betting activity its employees can undertake to protect them and the BHA from the risk, actual or perceived, of bias, lack of objectivity or impropriety.

This policy outlines the restrictions on betting activity imposed on those working at the BHA. It applies to BHA Board Directors and all employees of the BHA (whether temporary, fixed-term, permanent or seconded staff) (together collectively referred to in this policy as ‘**BHA employees**’).

RESTRICTIONS

Worldwide restriction

BHA Board Members together with Handicappers, IT employees with administrator privileges, and the line manager and/or Executive(s) responsible for those teams, are subject to the following restriction:

You shall not:

- a) bet or instruct or enable any person to bet on your behalf, either directly or indirectly, on; or
- b) provide to any other party any information acquired, or which may reasonably be perceived to be acquired, by virtue of your position as a BHA employee, which could be used to inform a betting decision in relation to,

any horserace staged in any jurisdiction worldwide, or other horseracing-related betting market.

General employee restriction

All other BHA employees, are subject to the following restriction:

You shall not:

- a) bet or instruct or enable any person to bet on your behalf, either directly or indirectly, on; or
- b) provide to any other party any information acquired, or which may reasonably be perceived to be acquired, by virtue of your position as a BHA employee, which could be used to inform a betting decision in relation to,
 - a. any horseracing staged in Great Britain or Ireland, or
 - b. any horserace in any jurisdiction in which a British or Irish-trained horse is a declared runner.

Antepost Bets

All BHA employees are expressly prohibited from placing any antepost bets (i.e. bets struck before the final declarations have been made) on any horserace stages in any jurisdiction worldwide.

Please note that responsibility for complying with this policy lies with all those to whom it applies. For further information and examples on what activity is/is not permitted, please refer to **Annex 1**, the Racing2Learn BHA employee betting policy module, or alternatively please discuss with your Line Manager.

COMPLIANCE & AUDITING

The BHA’s Director of Integrity and Regulation is responsible for monitoring compliance with this policy.

In order to support compliance, if the Director of Integrity and Regulation, having discussed the matter with the Head of People and Culture, considers there are reasonable grounds to believe that an employee may have breached the policy, the Head of Integrity may conduct an audit of such employee’s betting accounts. As part of this process, the Head of Integrity may disclose the names and date of

birth of any BHA employee(s) to betting operators and exchanges to request that they check for any restricted gambling activity. The betting operator(s) will be asked (i) whether the employee has any betting accounts and, if so (ii) whether the employee has placed any bets on any horseracing markets. No other employee data (for example, in relation to non-racing related betting activity) will be sought from any betting operator.

REPORTING OBLIGATIONS

The BHA expects all BHA employees to raise any concerns relating to potential breaches of this policy by other BHA employees and BHA employees should not feel that they need substantive proof or evidence of wrongdoing before making such a report. This is important to:

- ensure the problem does not get worse or widen;
- ensure the matter is properly investigated;
- protect others; and
- maintain the integrity of the BHA and British horseracing.

All BHA employees should immediately report to the Head of Integrity any information whatsoever, irrespective of the level of perceived reliability, in relation to:

- potential breach by other BHA employees of this policy;
- the availability to other BHA employees of information not required to carry out their role; and
- potential breach by any participants of the rules on betting in the Rules of Racing.

In the event that a BHA employee is concerned that the Head of Integrity is involved in suspicious activity this should be reported to the Director of Integrity and Regulation.

Where a BHA employee wishes to remain anonymous, a report can be made through the following channels:

- [Whistleblowing Report Form](#), where it concerns the actions or activities of BHA employees; or
- [RaceWISE](#), where it concerns wrongdoing relating to a potential breach of the Rules of Racing.

However, BHA employees should bear in mind that where an anonymous report is made it will not be possible for those investigating the report to contact them and the investigation may be hindered as a result.

BREACH OF THIS POLICY

Any BHA employees who are suspected to have breached this policy may be subject to disciplinary action. Disciplinary action will be conducted in accordance with either:

- **BHA Board Members** - the Disciplinary Procedure contained at Annex B of the BHA Director Code of Conduct; or
- **all other BHA employees** - the BHA's [Disciplinary Policy and Procedure](#).

The Head of Integrity shall consider any alleged breach of this policy and shall be solely responsible for determining, after appropriate consultation with the Head of People and Culture, whether any variations to the formal disciplinary procedure are appropriate in the circumstances.

In circumstances where the formal disciplinary procedure under the BHA's Disciplinary Policy and Procedure is warranted, the Head of Integrity shall be appointed as the Investigation Officer and, if necessary, can establish an Investigation Panel to provide support to investigate the allegation and establish the facts promptly. The Head of Integrity shall prepare a report detailing its findings and recommendations to a member of the BHA Executive Team before any matters proceed to a formal disciplinary hearing.

RESPONSIBLE GAMBLING

The BHA recognises that gambling is a legitimate leisure activity and BHA employees may place bets permitted events, in line with their relevant restriction, outside their working hours. The BHA encourages all BHA employees to gamble responsibly and is committed to providing appropriate support for any

BHA employees wishing to seek help should their gambling become a problem.

BHA employees who are experiencing problems with gambling should seek help. If you need to talk to someone about your or someone else's problem gambling, please contact any of the below:

1. [BHA Employee Assistance Programme](#) – 0800 389 0285
This service is completely confidential, and no member of the BHA is ever told who has used the service or what the call was regarding.
2. [GamCare](#) - 0808 8020 133
GamCare is a registered charity that provides confidential telephone and online support and counselling to anyone affected directly or indirectly by problem gambling.
3. [GAMSTOP](#)
GAMSTOP prevents customers from using gambling websites and apps run by companies licensed in Great Britain, for a period of their choosing.
4. [Gambling Therapy](#)
Gambling Therapy provides online, multi-language, support, and advice.

REVIEW OF THIS POLICY

The BHA shall conduct periodic and qualitative reviews of this betting policy from time to time.

Annex 1 – Explanatory Notes

1. What is meant by ‘*information acquired, or which may reasonably be perceived to be acquired, by virtue of your position as an employee of the BHA*’?

This should be considered by a BHA employee on a case-by-case basis but generally includes all information that is collected, used, produced or otherwise retained by a BHA employee in the course of carrying out their duties that is otherwise not in the public domain. BHA employees should be mindful that given the range of betting markets available on horseracing, information available on BHA systems could be manipulated by those looking to exploit it for financial gain and so care should be taken to assess the significance of any data before it is disclosed to any third party.

For the avoidance of doubt, any information accessible by a BHA employee on the Racing Administration System or other company systems should not be shared with any third party unless it is necessary to fulfil their duties. This includes the dissemination of information that may otherwise be available to other external users of the system (e.g. entry, confirmation, and declaration information).

Please consult your Line Manager and/or the Head of Integrity for further clarification if required.

2. Am I permitted to bet on Point-to-Point racing or Arabian Racing?

BHA employees are not permitted to bet on Point-to-Point races or Arabian races that take place in any jurisdiction in which the BHA employee is prohibited for placing thoroughbred horseracing bets as both events are held under the regulatory authority of the BHA in Great Britain.

3. What is meant by other horseracing-related betting market?

This includes markets other than those relating to the result of a race (e.g. whether a fixture may be abandoned, state of the going etc.) and all special markets offered by betting operators (e.g. trainer/jockey championships, who will be the next retained rider of any owner/trainer, where a horse may retire to stud, first stallion to sire a classic winner, leading first-season sire etc.).

5. What should I do if I mistakenly place a bet?

In the event that a BHA employee mistakenly places a bet on any horseracing market they should immediately inform the Head of Integrity with the details of the incident and leave the bet open (i.e. do not use any cashout option).

4. Am I permitted to participate in external sweepstakes/fantasy horseracing competitions?

BHA employees are not permitted to enter any formal competition in which an entry fee is payable as this is a form of bet. For the avoidance of doubt, BHA employees are not permitted to enter the main Tote 10tofollow competition.

Fantasy competitions with no entry fee (e.g. ITV7/Telegraph Fantasy Racing/Tote 10tofollow free league) or sweepstakes (e.g. Grand National sweepstakes) where each entrant pays the same fee for a randomly allocated horse and any stake money is pooled for the prizes are permitted.

6. Can I discuss betting on horseracing with friends, family or other third parties?

Absolutely, the restriction relates solely to your personal gambling activity and the sharing of any inside or confidential information (as described under Note 1). This policy is not intended to limit engagement with others about the sport. However, BHA employees should be mindful that their actions and behaviour need to be beyond reproach on matters relating to the integrity

of the sport and so care should be taken to consider as to how any statement will be used by the third party and how this could be perceived by others, including statements made on personal social media accounts.

7. Am I allowed to take part on preview panels to discuss my personal views on races (e.g. Festival Panels)?

As stated above, the new restriction is not intended to prevent employees from discussing their views on the sport or acting as an ambassador for the BHA. However, where an employee receives any payment or benefit in kind for taking part in such a panel, this should be recorded under the BHA's Gifts and Anti-bribery policy, irrespective of the amount given.