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ONLINE FANTASY SPORTS IN INDIA: A GREY AREA

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THE CONCEPT OF FANATSY SPORTS

With the proliferation of internet into the lives of mankind in the 90s, the rules of the world we live in experienced a massive change. Initially viewed as a medium of garnering education and occupation, the service has now proved to be a one stop destination for entertainment. The internet has introduced the society to a plethora of games with the tap of a finger. Fantasy Sport is one such sport that has become immensely popular.

Fantasy Sport is ancillary to a real life sport experience. The users of the game assume the role of managers or owners. They own a team of players who compete against each other during a time frame and knock each other down. The one with the maximum number of cumulative points emerges as the winner. Online fantasy gaming offers a plethora of gaming experience from football to kabaddi. With the digital India campaign under the Modi Government and economical data prices, the fantasy sport sector is emerging to be a lucrative business.

Fantasy sports has experienced an unprecedented wave of popularity like never before in the last decade. Previously, the game was restricted to only a few forms of sports. Competitions were played in tournaments and on free-to-play basis. With the emergence of online fantasy sports, sports enthusiasts across the country are now provided with the comfort of selecting and managing their own virtual fantasy teams. The game has now spread its wings across several sectors such as football, basketball and even kabaddi. The game can now be accessed on a pay-to-play basis as well¹. Fantasy sports differ from other sports in terms of the engagement that it offers to the spectator. The spectator has an option to build his own team consisting of the players.

With the intrusion of the web into our lives, the game can be played on a website or an app.

¹ KPMG, *The Fantasy Sports Market in India*, The evolving landscape of Sports Gaming in India, 1.6, (2019), <https://assets.kpmg/content/dam/kpmg/in/pdf/2019/03/online-gaming-india-fantasy-sports.pdf>

Fantasy sports is offered by several companies in India. These include Dream11, MyTeam11, My11circle, Halaplay². The creation of a team requires knowledge about the teams, their players, their performance and regular interaction with the games. It further elevates the status of sports fans from being mere spectators to being participants. It is a platform for avid sport enthusiasts.

A study conducted by ESPN suggests that participation in a fantasy sport increases the television viewership of sports.³ This in turn increases the potential of advertising over the internet and television.

HISTORY OF FANTASY SPORTS IN INDIA

The fantasy sports journey in India started with ESPN launching its ‘Super Selector Fantasy Sport’ in 2001. It allowed people to register for free. Several other popular tournaments were introduced such as English Premier League, UEFA Champions League, ICC events, and IPL, in which people were provided with the opportunity to draft their teams.

KEY REASONS BEHIND THE POPULARITY OF FANTASY SPORTS

The key reasons behind the popularity of fantasy sports in India can be summarized as follows:

Sports League

The introduction of sports league into the sporting arena changed the dynamics of the space. It provides around the clock entertainment for the viewers. Instead of a scenario of only being engaged with one sport, it provides a host of avenues of entertainment for the audience. Along with being an excellent source of entertainment, it successfully secures audience participation. With the emergence of a geographical team structure, it has been capable of making the sport more personal. There is a sense of pride associated with each team leading to the immense popularity of these leagues amongst audiences.

² KPMG, *The Fantasy Sports Market in India*, The evolving landscape of Sports Gaming in India, 1, 8 ((2019), <https://assets.kpmg/content/dam/kpmg/in/pdf/2019/03/online-gaming-india-fantasy-sports.pdf>

³ Nesbit T, King K. *The Impact of Fantasy Sports on Television Viewership*. *Journal of Media Economics*. 2010;23(1):24-41. https://www.researchgate.net/publication/227620976_The_Impact_of_Fantasy_Sports_on_Television_Viewership

Some of the popular sports league are⁴:

NAME OF LEAGUE	GAME PLAYED	YEAR OF INCORPORATION
Indian Super League	Football	2014
Pro Kabaddi League	Kabaddi	2014
Pro Wrestling League	Wrestling	2015
Pro Volleyball League	Volleyball	2019

Growth in Digital Infrastructure

The number of internet subscribers in the last couple of years has seen a massive leap from its initial count of 368 million in September 2016 to 560 million in September 2018. 86 per cent of these subscribers were broadband subscribers⁵. The average data usage per user has also escalated. The availability of data at affordable prices has further amplified the popularity of sports.

The ease of accessibility to internet at affordable prices and the heightened speed of connectivity has brought sports from the field to the fingertips of the user. In a life marred by constant stress, competition and hunger for success, the ease of being a part of one's favorite sport without having to manage time from busy schedules to visit fields has significantly contributed to the popularity of fantasy sports.

Increase in Investment

The increase in investment has also been a factor in amplifying the reach of the sports in India. The interest of the investors in the market also provides an impetus to the service providers to put out their best performance.

Strong Support Technology

Online Fantasy sports could not have been what it is today without a digital infrastructure. An infrastructure that is hassle free and aligns the consumer and producer demands is the need of the hour. The supporting technology for fantasy sports has also contributed significantly to the popularity of online fantasy sports in India. The companies offering online fantasy are constantly updating their technologies to reach a wider audience. For instance, Support and

⁴ KPMG, *The Fantasy Sports Market in India*, The evolving landscape of Sports Gaming in India, 1,6((,2019), <https://assets.kpmg/content/dam/kpmg/in/pdf/2019/03/online-gaming-india-fantasy-sports.pdf>

⁵ KPMG, *The Fantasy Sports Market in India*, The evolving landscape of Sports Gaming in India, 1,7,(,2019), <https://assets.kpmg/content/dam/kpmg/in/pdf/2019/03/online-gaming-india-fantasy-sports.pdf>

assistance is also provided on various YouTube channels in understanding the game, drafting a team and earning cumulative points.

Online Money Transaction

Fantasy sports also gain popularity on the transaction front. It provides the user the opportunity to engage in digital transaction, thereby providing transparency and openness in terms of its money transaction.

Self Regulation

The Fantasy sports space has been constantly trying to provide a consumer friendly atmosphere by incorporating transparency into its working. Efforts to introduce self regulation is one such step. The Indian Federation of Sports Gaming (IFSG) is a self regulatory body that was formed in 2017. It strives to ensure the protection of consumer interest along with creation of best practices in the standardized form in the sports gaming industry.

Thus, the growth in online fantasy sports is the product of an umbrella of factors.

THE QUESTION OF LEGALITY OF ONLINE FANTASY SPORTS

The question of legality of online fantasy sports can be answered by understanding the difference between 'game of skill' and 'game of chance'. The foundation of the debate lies on whether the game involves an element of skill. The state list enshrined in the Constitution of India does not accord recognition to fantasy sports. However, Gambling and betting are state subjects under list II Entry 34 of the Second Schedule. The states are entitled to pass legislations regulating the matter.

The thin line of difference between a game of skill and a game of chance is determined by the dominating element in the game. Where the dominant element is based on skill; it is termed as a game of skill and where the results of the game are dominantly determined by an element of chance, it is a game of chance.

The recent emergence of the internet and the avenues provided by it has left complex matters outside the purview of laws made in the pre-internet era. The most remote piece of legislation governing the concerned subject matter is the Public Gambling Act, 1897. Due to its introduction prior to the era of the internet, online gaming does not find any mention in the Act.

A number of states such as Bihar, Chhattisgarh, Madhya Pradesh, Punjab, and Uttar Pradesh have adopted the Act. Other states have enacted their own legislations that govern the gambling space.

Online gaming has been addressed by the states of Sikkim and Nagaland with the introduction of Sikkim Online Gaming (Regulation) Act, 2008 and the Nagaland Prohibition of Gambling and Promotion and Regulation of Online Games of Skill Act, 2015. Operators have been expressly allowed to offer fantasy gaming sports by the state of Nagaland. Thus, in the absence of a uniform piece of legislation to govern the matter, the body of judgments delivered by the judiciary pertaining to Fantasy Sports can act as a guiding light.

In order to better understand the distinguishing factor between a game of skill and a game of chance it is relevant to take note of the explanation appended to Section 2(7) of the Mysore Act which defined game of skill and game of chance. Game of chance refers to a game that has a combination of chance and skill combined or a pretended game of chance or a game of chance and skill combined. However, it exempts from its purview any athletic game or sport. However, it was held in *M.J. Sivani v State of Karnataka*⁶ that any game cannot be a game of skill alone. In a game whose outcome is massively determined by skill there has to be a certain element of chance. The outcome of a game played by a highly skilled player is also determined by a certain element of luck. There is no mathematical formula to ascertain the percentage of chance or skill in a game. The test is to determine which one is strongly preponderant.

Games of skill and games of chance have been differently treated all across the world. India is no exception to this. Anti gambling legislations have exempted games of mere skill from their purview. The term 'mere skill' has been interpreted by the Supreme Court to mean 'preponderantly of skill'⁷. It was also observed that games of skill are not similar to 'gambling' and are entitled to constitutional protection.

Thus, a game of skill can be summarized as:

- One in which the outcome of the game is dependent on a substantial degree of skill

⁶ (1995) 6 SCC 289

⁷ *State of A.P. v K.Satyanarayana* AIR 1968 SC 825

State of Bombay v. R.M.D. Chamarbaugwala AIR 1957 SC 699.

- Irrespective of there being a degree of chance, the game should be preponderantly of skill.

Whether a game is that of chance or skill is entirely dependent on the varied facts and circumstances of each case. The Indian judiciary has followed the U.S. Court's footprints while ascertaining the nature of the games by adopting the "dominant factor test 'or 'predominance test'. As the name suggests, the test is applied to decide the dominating element in a game.

Since there is a dearth of laws on the question of legality of online fantasy sports, the answer to the question can be determined by studying the judgments delivered by the judiciary in depth. The test was applied to decide whether Rummy is a game of skill. The Supreme Court answered the question in affirmative. It was observed that the game involves skill in memorizing the falling of cards and in building rummy⁸.

In *M/s Gaussian Networks Pvt Ltd. v. Monica Lakhanpal and State of NCT*, Suit No 32/2012, The Delhi District Court was approached under Order 36 Rule 1 to decide certain issues with regard to games of skill. The petitioner was the owner and operator of an online gaming website. The question for consideration was whether there was any restriction on the petitioner in allowing its users to play games of skill for stakes. The court disregarding the exemptions provided by several legislations with regard to games of skill observed that online games of skill are not entitled to constitutional protection of trade and commerce afforded by article 19(1)(g) of the constitution.

However, as the observation was made under O36 R1, it remained binding only between the two parties. The order was challenged in the Delhi High Court but only to be withdrawn later.⁹

The same was reiterated in *Dominance Games Pvt. Ltd. & Ors. v. State of Gujarat*¹⁰

The Madras High Court in *The Director General of Police v. Mahalakshmi Cultural Association*¹¹ held that rummy would amount to gambling if played with stakes. A special

⁸ *State of Andhra Pradesh v K. Satyanarayan and Ors* AIR 1968 SC 825

⁹ *M/s Gaussian Networks Pvt Ltd. v. Monica Lakhanpal and State of NCT*, Suit No 32/2012, Delhi District Court.

¹⁰ Special Civil Application No. 6903 of 2017.

¹¹ 2012 3 Mad. L.J. 561

leave petition and several intervention applications were filed against the judgment delivered by the High Court in the Supreme Court. The intervention applications filed by Online Rummy Operators was disposed off by observing that the observation of the Madras High Court was restricted to brick and mortar establishments and had nothing to do with Online Rummy or Online Rummy Operators. Granting the permission for withdrawing the writ petition filed in the High court, the Supreme Court held that the prosecution did not allege that rummy was being played. It merely held that a popular local game was being played for stakes. Since the writ petition was dismissed, the observations of the Madras High court no longer hold validity.

Online Fantasy Sports were held to be games of skill by the Supreme Court due to the following reasons¹²:

- The selection of a team consisting of athletes requires considerable skill
- The team cannot consist of players from a single real team
- An assessment of players needs to be made on the basis of statistics
- Choosing a captain and a vice captain requires considerable skill.
- The user needs to overlook his personal bias towards his favorite player so that he does not undermine the value of the player who does not belong to his favorite team.
- Regular interaction with the game is required
- Considerable skill is required to understand the strategies of the game and its operational restraints.
- Fantasy cricket determines its winner on the basis of runs scored, wickets taken, catches taken, stumping caused.

Although it was held in the landmark judgments of Dr. K.R. Lakshmanan v. State of Tamil Nadu¹³ and the K. Satyanarayana case that rummy is game of skill i.e. there is a requirement of a certain amount of skill to play it making it a valid and legal game, the Satyanarayan judgment was interpreted differently in 2012. The Madras High Court in Director General Police of, Chennai v. Mahalakshmi Cultural Association¹⁴ observed that rummy played with stakes would amount to gambling.

¹² Shri Varun Gumber v UT of Chandigarh & Ors. 2017 CrLJ 3827

¹³ 1996(2) SCC 226

¹⁴ W.A.No. 2287 of 2011, Madras High Court.

The legality of online gaming was again questioned in *Gurdeep Singh Sachar v. Union of India*¹⁵ The question was whether Dream 11 fantasy sports violates the Public Gambling Act, 1867 in any manner or not. The respondent referred to the earlier judgment given by the Punjab and Haryana High Court in *Varun Gumber v. Union Territory of Chandigarh*¹⁶ which labeled fantasy sports as games of skill. It was held that the game was entitled to constitutional protection accorded by Article 19(1)(g) of the Indian Constitution and is therefore, a legitimate activity.

SELF REGULATION OF ONLINE FANTASY SPORTS

Despite the huge popularity of online fantasy sports, the sector has not been regulated in India. The easy accessibility to internet and the advancement in technology has necessitated the self regulation of Fantasy sports. Self-regulation can be defined as a regulatory process undertaken by an industry-level organization as opposed to a governmental organization. It is responsible for setting and enforcing rules and standards relating to the conduct of firms in the industry. It is integral to the functioning of the global economy on the edifice of which the world lies upon. The Medical Council of India (MCI), the Board of Control for Cricket in India (BCCI), Advertising Standards Council of India (ASCI), etc., are leading examples of self-regulated bodies in India.

The blooming of Fantasy gaming in India has sparked an essential debate as to the legality of such games. The necessity of regulation of Online Fantasy sports was also discussed recently in *D Siluvai Venance v. State*¹⁷ when the Madras High Court had called for stricter regulations for online games. The court showed concern over the fact that youngsters seem to be increasingly attracted to fantasy sports. In this connection, a notice was sent to MPL ambassador Virat Kohli and My11Circle ambassador Sourav Ganguly. The notice was with regard to the promotion of online gaming apps. The court while observing the impact of online fantasy sports on the society, expressed that it was not against the concept of online fantasy sports but was in favour of a regulatory body in the sphere of online fantasy sports.

¹⁵ Criminal Public Interest Litigation Stamp No.22 Of 2019.

¹⁶ 2017 CrLJ 3827

¹⁷ 24 July 2020 (CrI OP (MD) No. 6568 of 2020)

The reasons for the need of self regulation of the online fantasy sports in India have been summarized below:

- **INNOVATION:**

The establishment of a self regulatory body involving representatives from several firms in the same industry provides an opportunity for growth and innovation in the online fantasy sports gaming area. The heightened knowledge and expertise of the representatives from the same industry will provide an opportunity for growth in the industry. Additionally, it will ensure the formulation of stringent rules so as to provide a transparent and fair atmosphere in the industry. The expertise of the representatives shall ensure that different opportunities for innovation within the industry be explored.

- **COMPETITION AS AN IMPEPUS TO BETTER PERFORMANCE**

Customer satisfaction is of paramount importance for the growth of any industry. All the firms involved in the business compete to provide maximum customer satisfaction and emerge as winners in business. This environment is best suited for self regulation. It is also recommended that a system of providing ratings be introduced in the industry. Higher the ratings, better the service. This would enable customers to make choices best suited to their interest. The availability of information amongst the consumers shall inspire confidence amongst them and build better avenues for the industry.

- **CREDIBILITY**

The success of any industry depends on the satisfaction of both the producers and consumers. The interest of the stakeholders, government and the consumers should be aligned. It must be ensured that the regulations should not be vague and ambiguous. The element of clarity should be omnipresent. Arbitrary and unfair regulations should be avoided.

Active participation of representatives of several firms shall act as a system of checks and balances. It would act as an effective method of ensuring that the interests of only a few stakeholders are not gratified and the complete growth of the industry is prioritized over personal considerations.

- **FASTER RESPONSE AND RESOLUTION OF DISPUTE**

Self regulatory bodies will ensure faster and efficient response to the need for change in regulation and for redressing grievances. Government regulation implies bureaucracy. The

involvement of bureaucracy brings along with it bureaucratic delays. Self regulatory bodies provide for a flexible mechanism. This results in a lower compliance cost.

Government resources are limited in nature. The presence of a self regulatory body in the online fantasy gaming area conserves such limited resources. Quicker responses to problems that might arise in the space would avoid stagnation of innovation and facilitate growth of the industry.

Self regulatory bodies can act as a platform for customer grievance redressal by ensuring prompt actions. This will in turn build the confidence of the customers in the industry.

ROLE OF THE GOVERNMENT IN SELF REGULATON

The presence of self regulation does not imply that there is an absolute absence of governmental role. The government has a multi faceted role to play. The role of the government as an advisor shall ensure that the issues pertaining to the sector are adequately addressed by the government. The efficacy of the regulations would also be put to test.

Online gaming cannot be termed as an unshared sector. It is subject to other legislations like those of Intellectual Property Rights, Information Technology etc. The participation of the government shall ensure adherence to these legislations.

GOVERNMENTAL ACTIONS TOWARDS FACILITATING TRANSPARENCY AND EFFICIENCY IN THE ONLINE FANTASY SPORTS ARENA.

Online Fantasy Sports Providers have resorted to television to promote their apps. In order to promote transparency and compliance to legislations, a meeting was conducted by the Ministry of Information & Broadcasting on November 18, 2020. The matter was discussed with several stakeholders such as All India Gaming Federation Advertising Standards Council of India (ASCI), Indian Broadcasting Foundation (IBF) News Broadcasters Association (NBA),

The meeting led to the formulation of guidelines by the Advertising Standards Council of India. The guidelines are here as under:

- Any advertisement with respect to gaming shall not represent any person below the

age of 18 years.

- Every gaming advertisement shall be accompanied by a disclaimer which reads as "This game involves an element of financial risk and may be addictive. Please play responsibly and at your own risk". The advertisement in question shall not represent online gaming for real money as a source of income or an alternative employment opportunity.
- The advertisement shall not represent the users of gaming activity as superior in terms of success to others¹⁸.

THE NITI AYOJ'S REPORT ON SELF REGULATION

A consultation was organized by the NITI Ayoj on September 14, 2020 that involved the participation of eminent persons at the helm of affairs of the industry and the illustrious personalities from the legal fraternity to discuss and deliberate about the impediments to growth for the industry and the measures that may be considered to best support the industry with a focus on compliance with the rule of law, good governance, fostering innovation and growth, and allowing the benefit of market forces to help India become a global leader for OFSPs. The consultation also considered the need for consumer protection and the public interest in the institution of a grievance redressal mechanism that addressed consumer disputes in an adequate, efficient, and affordable manner.

A unanimous agreement was achieved by the participants with regard to the following:

- That according recognition to Online Fantasy Sports has an element of public interest. This is distinct from the games of skill played offline. However, the recognition is limited to the extent of games of skill while constantly maintaining the difference between gambling and betting.
- The legal ambiguities and differential treatment to which Fantasy sports is subjected to should be ended by bringing in a uniform national level harbor for its operation.
- Principle based guidelines to be recognized by national and state level institutions.
- There must be a regulatory framework for governing fantasy sports owing to its dynamic and technical nature.
- The Government should accord recognition to a single purpose based self regulatory

¹⁸ Ministry of Information and Broadcasting, <https://pib.gov.in/PressReleaseIframePage.aspx?PRID=1678520>, last accessed on 25.03.2021 at 4:08 P.M.

body and shall have membership of OFSP operators who, in aggregate, should have at least 66% of the registered fantasy sports users in India as their registered users.

- The self regulatory body should be governed by an independent oversight board. The board should consist of persons of reputation with experience in governance, law and administration. The members of the self-regulatory organisation may elect or appoint them for fixed terms.
- The body shall be vested with the responsibility of overseeing the implementation of and adherence to the principles.
- The benefit of the safe harbor exemption shall be enjoyed by the OFSPs who are members of the body. However, it is subject to compliance to other norms and procedures.
- The self regulatory body should have an independent grievances redressal mechanism to address the disputes between OFSPs or the grievances of the customers that might arise. Reliance to the wisdom of the Hon'ble Supreme Court of India shall be placed in all respects. However, there shall be in place a cogent and effectively implemented uniform framework to support the judicial determinations. This shall result in reducing the burden on the courts along with achieving the objectives of public interest and consumer protection¹⁹.

CONCLUSION

Online Fantasy Sports has without an iota of doubt ushered in a new age of sports and technology in India. It will not be an exaggeration to state that Online Fantasy Sports might be the phenomenon that dominates the future. While this might act as harbinger of a prosperous future, it must also be remembered that the path should be ventured upon cautiously.

¹⁹ NITI Ayog, *Guiding Principles for the Uniform National Level Regulation of Online Fantasy Sports Platforms In India Draft for Discussion*, 1,6,7(2020), https://www.medianama.com/wp-content/uploads/FantasySports_DraftForComments.pdf