Funded by the European Union and the Council of Europe

EUROPEAN UNION

COUNCIL OF EUROPE

CONSEIL DE L'EUROPE

Implemented by the Council of Europe

Paris 14-15 November 2016 KCOOS (2016) 19

"Keep Crime Out Of Sport"

STUDY VISIT 1

FINAL REPORT

INDEX

ANNEXES

Introduction to Report

This was the first study visit in a series of four planned for the project. Countries were selected based on objective application criteria including having participated at regional seminars. At this study visit to the French national platform organized by ARJEL, representatives from The Netherlands, Lithuania, Germany and Switzerland were exposed to the functioning of the platform as well as a particular focus on alerts and monitoring of bets.

MONDAY 14 NOVEMBER 2016

Presentation of project KCOOS up to now. Reference to introductions and conclusions of all RS (in annex)

Brief country reports

Germany

- A long way is still left to go. The convention has been signed. The ministry is responsible for implementation of the convention. Regulatory systems and law enforcement are controlled by lander. They are increasingly in contact with relevant stakeholders internationally to be able to progress. A lot of prevention takes place within football in particular. The Landers recently agreed to amend the treaty on licences for gambling in order to improve it. In early 2017, there will be a new law: two criminal offences have been introduced: on sports betting fraud and on the manipulation of sports competitions. They are still collecting ideas for the national platform.

Lithuania

- They have signed the convention and have made a cooperation agreement between state authorities since April 2015. This cooperation is difficult. In July 2015 the Recommendations
- for Lithuanian Sport Organisations aiming to assist them in the fight against matchfixing were published. In November 2015, they joined the Europol Focal Point for Sports Corruption. Since January 2016 they have a National Sectoral Anti- Corruption Programme in the area of Sport and its Implementation plan, which include the matchfixing issues. In Spring 2016, there were initial actions to revise the national law. Consequently, on the very last day of the spring 2016 session the Lithuanian Parliament unanimously adopted the three very important Laws for the sport sector, which will come into force on 1 January 2017. Ultimately Lithuania criminalized the *Match-Fixing* activities. Namely, the Criminal Code was supplemented by Article 182^1 "Manipulation of Sports Competitions", the Law on Physical Education and Sport, as well the Law on Criminal Intelligence were supplemented by the new provisions creating the State level system of legal resistance against the Manipulation of Sports Competitions in Lithuania.
- Some challenges faced include the systematic non recognition of this phenomenon therefore leading to no prioritisation effectively at national level. There is no national platform and especially no agreement on its form and who should lead. The main stakeholders do not

cooperate effectively. Multilateral agreements are needed for preventative actions. No decision has been taken on strategic, operational advisory functions of a potential platform. There is no appropriate public monitoring as there is the question of who should lead the effective one . The situation within the EU is troubling.

- By the end of 2016/start of 2017 there will be roundtables to agree on the model for a national platform. Hopefully by the end of 2017 they will have a National platform. It has been included in state plans for 2018 to ratify the Convention.

The Netherlands

- They face the challenge of discussions in parliament to provide licences to betting operators. A new law should enter in 2018. The national platform has 2 levels. The big platform is chaired by the ministry for sports and the ministry for justice; the more operational platform is chaired by the prosecutor's office and includes the regulatory authority, the tax authorities and the police to facilitate exchange of inside information.

Switzerland

- Comlot (authority for online and offline lotteries and sports betting) would lead the future platform.There is a bill in parliament whose content takes the Macolin convention into account and would allow the criminalisation of matchfixing related to betting. The convention should be ratified and the law enter into force around the same time in 2019. The process is rather slow.
- The national platform structure would be an interface between stakeholders. Each stakeholder should recognise and define its responsibilities. Cost is an issue.
- The national platform structure would be an interface between stakeholders. Each stakeholder should recognise and define its responsibilities. Cost is an issue.

Actions taken by ARJEL (presentation in annex)

- Conflicts of interest
- Sport list: French particularity. Risk assessment undertaken based on vulnerability of sports competition manipulation on which bets should be taken. The list ensures that benefits of bet-related match-fixing remain lower. The limitation of the competition has no effect on market dynamics. There has been a large growth of the market in the last year.
- The betting right pursues a **double objective**:
- creating a **dialogue between operators and competitions organisers** in order to detect and deter betting related manipulations;
- **Financing initiatives** namely aiming at combatting manipulations.
- **ARJEL is in charge of controlling operator's obligations within the betting right contacts,** while the commercial part of the contracts (the percentage of the right itself) is left to negotiation between sports and betting operators (in average 1%).
- In all of the countries here, all betting operators implement risk analysis to adapt the offer. And 2. Detection – on the prohibition of competition stakeholders.
- The monitoring system is based on the information from related bets
- With regard to the list of authorised bets: competition (in football, bets are on the 1st two

leagues. In cup competitions, many other teams are involved so here bets are only allowed after a certain stage of the tournament); types of bets: no bets on negative actions and no bets on things like lottery.

- Monitoring of the sports betting market: control aspects, technical regulations, etc.
- When a competition has been authorised, the system works in two parts On sports bets::
    - After the match; all stakes related to a competition; different types of controls
        - Automated control/ more specific control if the match is a bigger match
        - Cross-checking files to ensure athletes do not bet on their own match and not on any of their leagues either.
    - Before the match:
        - Based on proposed odds
        - By French and foreign operators
- ARJEL collects all data in real time from operators and transfers it to a frontal and then the vault. ARJEL has access and carries out controls on matches.
- Stakes post-match:
    - All data from the vault is used to try to build indicators for anomalies.
    - Some are descriptive to help with analysis. Others are more specific.
    - From the control software, dashboards are created.
- Example of football: Dashboard is created every Tuesday and Friday. All these ideas are founded on the basis that the betting patterns are regular.
- Cross-filing system: analysis at the end.
- Only federations and organisers can ask for athletes to be questioned about whether they have placed bets and if so, whether they have done this on their own competition/sport (which is prohibited). The system of questioning only targets licensees.
- FDJ is trying for a land-based system to identify bettors but this is difficult.
- There are tools within ARJEL to analyse odds that have evolved from just analysing past events to now analysing live events and even future events. An independent tool for recording the odds has been developed. Given the quantity and mass of events, data needed to be controlled. The tool:
    - Classification criteria can be adjusted
    - Offers and odds can be noted
    - Many types of alerts can be recorded
    - Researches all types of similarities in orthography of any team or etc. name.

TUESDAY 15 NOVEMBER 2016

Presentation of the French National Platform (presentation)

Many actions take place within and outside of the national platform (in parallel); such as the recent French NOC meeting on integrity in the Sport Movement.

Roundtable of country situations in national platform development

- **Switzerland** is not very advanced. At law enforcement level, the competence to investigate (at federal or state-canton level) has still to be defined. To admit the federal jurisdiction, match-fixing cases should be necessarily put in relation to transnational organized crime, money laundering or corruption. . There is also the issue of finding time in the agenda. The regulatory authority, though, may be able to act as an interface between the different sectors. In addition, the scope of authorized sports betting is limited in the current situation.
- **Lithuania** is already discussing the actors and possible structure of the National Platform.
- **Germany** is just starting out in this process. Information channels are extremely important.
- **The Netherlands** has a national platform for a few years now. The particular issue is that online providers want to be part of the National Platform, but are currently still illegal because of the legislation still going through legal channels to allow more than just one provider to practice in the country.

Short points:

Match-fixing is mostly cheating to lose. This is its particularity, for example, compared to doping (cheating to win).

It is important to note the following points within each country to assess the level that the manipulation of sports competitions occupies nationally:

- Funding
- Prioritising by police forces
- Protection of personal data with national platforms and betting operators
- Prevention and education sources
- Coexistence and coordination of criminal and disciplinary proceedings
- Qualification of the prejudice

Brainstorming session

National Platforms

- Functioning of the French NP:

- Each service comes to the table with its own means
- There is a secure exchange of information.
- Each member of the NP needs to find its interest/philosophy for being part of the NP. (Switzerland and The Netherlands strongly agree with this; this is more problematic in Germany- in Germany, just like, though, in the French NOC, there is no one dedicated person to deal with this topic so actors deal with various topics and unless tasks are very clear, this may lead to nonclarity and overlap).
- The problem of resources (i.e. people working fulltime on this topic) can be solved by the existence of the T-MC Secretariat within the CoE that works fulltime on this topic to facilitate the progress of each country. In addition, the secretariat is coordinating the development of networks of platforms and stakeholders in order to facilitate exchange of information and functioning nationally and transnationally, thus hopefully eventually lightening burdens.

➢ Composition of National Platforms:

- Should members of pre-existing stakeholder networks be chosen as a national platform contact, for their sector? For example, from Europol, Eurojust, FIU network, Interpol, CPJ, European Association of gaming regulators when they are controllers too, the Council of Europe regulatory network of regulatory authorities, CCEP (Council of Europe Consultative Committee of European Prosecutors), etc.
- A network database has started to be built through KCOOS, when countries had to name a main national contact, as well as to find relevant people to fill in the various stakeholder questionnaires. A follow up will be sent in the next weeks.
- France has also created a network of points of contact for this issue in all its embassies. This could be a way to facilitate the choosing of members for the platform.

➢ During major events:

- For events like at the Euro 2016, a specific operational group was set up, every morning the group updated each other and the international and other national actors on all topics. For the Euro 2016, ARJEL worked together with German authorities, among others it was especially the Ministry of the Interior and Sports Saxony-Anhalt (one of the federal states) which organised German information channels (within i.e. the German Federal Office of Criminal Investigation); the German federal ministry of the Interior was not involved. The same will be the case for the 2017 handball world championships and the ICE hockey world championships.
- ARJEL found the cooperation with the German side (especially with the Ministry of the Interior and Sports of Saxony-Anhalt) very useful. ARJEL asked if the cooperation could be reinstalled for the 2017 Handball World championship in January 2017 and the Ice hockey championships in may 2017.
- How can we increase monitoring? Share the risk analysis with national platforms and then stakeholders: regulatory authorities, betting operators, and the international federation of the event.
- To disseminate faster the information to countries to notify the hosts of alerts during the Handball Championships, the Council of Europe secretariat may be used.

- An emergency scheme will also be developed and communication with the press should be developed.

➢ Speaking of types of bets

- In France there is a restricted list. So far, out of 20 proposable bets, betting operators usually offer 2-10 bets.
- In France, betting on the halftime score is possible but NOT on who will win at halftime. In Germany, it is possible to bet on who is winning at halftime, but only before the match. . In Switzerland, there are no bets at halftime (until now, on the practical level, it could be offered). In Lithuania, there is no limit to bet offers. In The Netherlands, there is a prohibition law on negative actions, but they can bet on "who is leading at halftime?".
- In France, there is proportionality between precision and size of bet. They have authorized and banned bets. ARJEL establishes the list of authorized bets based on "types of results. There is no separation here of live or pre-game bets.

Education

- Prevention and education are very important; the French NP has a role of raising topical issues and raising awareness. For example the meeting on integrity that took place on 14 Nov organized by the French NOC allowed for the creation of closer links and building of trust. This led to an effective review of the French central service for the prevention of corruption. A yearly report from this service will also be released by Jan/Feb 2017.
- In file matching, athlete education is very important and it is possible to depend on unions for this.

Receiving requests from a sports federation:

- It is filed within the disciplinary service.
- Since 2012, the French Sports Code requests federations to include articles on the prohibition of sports betting. In addition, the French particularity of 'file-matching' (technical regulatory model *"croisement des fichiers")* allows ARJEL to do its job.
- In France, federations can and have a legal obligation to implement a disciplinary system for athletes and also referees and certain elected officials. Thus federations include a general disciplinary regulation; a doping regulation and specific legislation. Decisions for appeals are within a restricted deadline. In France, before the appeal, federations, clubs, sports can do conciliation. Sometimes cases can go to criminal and other courts, for example fraud in illegal sports betting.

Manipulation of Sports Competitions is NOT only betting-related

- In France in 2011, two articles in the criminal code sanction the manipulation of sports competitions linked to sports betting. But the MSC can have other effects as well, including economic and commercial, that are NOT linked to betting. The CoE convention has a more general definition. The sports corruption text is aligned with general corruption offence and has been insufficiently drafted: it refers jointly to offenders AND bets. So ONE actor is hard to prosecute under this article (e.g. in tennis or horseracing). So instead, articles on damages and embezzlement are invoked.
- In Germany, a new draft bill by the Federal Government is currently before parliament. It provides for the introduction of two new criminal offences: (1) "sports betting fraud" which will cover agreements to manipulate results of sports competitions upon which a sports bet is to be placed; (2) "manipulation of professional sports competitions" which is designed to criminalize agreements to manipulate high-level professional sporting events and which is applicable irrespective of whether or not the manipulation is linked to betting
- In Lithuania, there are regulatory norms. In the criminal code, negotiation was hard on this topic. It is abstract and non-specific. The law only refers to professional athletes. However, only 10% of athletes in LT are professional, so the law allowing investigators to act in this domain is very limited.
- In Switzerland, the draft bill has a link clearly to sports betting. There are no current legal provisions other than this. Not a lot of knowledge on legal and illegal bets. Law enforcement has tried using fraud articles but the tribunal has struck this down in a recent case, saying that even though the defenders confessed, the act was against a machine and not a human being, situation that was not covered by the legal provision. Since more recently, a provision on private corruption could potentially be used. The compliance with the Convention and entry into force of national draft bills will only take place by 2019. There is also the issue of defining the competent authority. For example, in law enforcement, is this a federal or cantonal issue to lead cases (jurisdiction issues).
- In The Netherlands, there is no specific legislation. It is hard to prove; existing law has so far sufficed.

Connections between sporting and criminal procedures

- In France they are completely independent from each other, regardless of whether it is an administrative, criminal or civil procedure. In a recent football case, the league acted versus the club independently of civil proceedings. Sometimes disciplinary decisions may be included within legal proceeding files, but this would usually just be for additional information. In the Sports Code, the Federations are required to have an Ethics and Disciplinary Code and an independent Ethics Committee.
- Links need to be fostered between international sport organisations and international law enforcement as well as international prosecution services.

- Concrete case example including Whistleblowing: a table tennis player was contacted by another player to lose a set for 2000 Eur.
    - Chain of contact:
        - The player notified the Federation who then told the French TT ARJEL who then told the Police.
- An official note was produced which is the first step of the investigation. This process is very quick – a matter of days. mails and phone calls ensued.
- Where is the obligation to report? The National Directorate for Technical matters within the Ministry for Sports has an obligation to (under article 40 of the Procedural Criminal Code) inform about an offence committee. All federations have these directorates.

Conclusions

Feedback from countries

- Lithuania: this is a very good working model and the study visit presented a great opportunity to discover first hand other systems in detail. The possibility of sharing information on monitoring should be explored. A means for sharing costs should also be developed. Advised to refer to CK Consulting's project.
- Germany enjoyed the mix and the concrete discussions on problems. This was a good experience and it is very helpful to find the next steps for finding a way to implement the national platform.
- Switzerland found the information useful and benefitted from the exchange of information; a lot of information was collected to continue with reflections in order to organize an effective future national platform.
- The Netherlands found out that there are not many differences between its regulatory system and that of France. This assists with pushing legislation on licenses and developing conditions for licenses for online providers. The Netherlands is trying to develop criteria for recognizing suspicious gambling.

Closing points

- It is important to remember that the first point of contact, notably with transnational issues and for example notifying a host country about alerts related to sports manipulations with competitions taking place in that country.
- National points of contact have been developed for most countries of the CoE as well as among stakeholder sectors; this has been taken onboard by the T-MC Secretariat and will be useful for enhancing cooperation.
- The Council of Europe has a dedicated Secretariat dealing with sports manipulations; this means that they work fulltime on this topic.
- Next step for participating countries is to review answers from KCOOS and other parallel project questionnaires, as well as outputs and information from all regional seminars, and to consider next steps.
- The next step is to closely coordinate with the Secretariat, which does not simply exist as a database, but as an international political institution, with operational actors who have the tools and expertise to facilitate the implementation and coordination of measures to fight match-fixing and sports manipulations.
- Comments welcome for developing he handbook tool for June 2017.

Overall summary

- The feedback showed that this type of event is seen as one of the most operational types of events.
- Many bilateral exchanges took place between the participants and stakeholders.
- Country assessment reports were carried out prior to the visit which led to very pertinent questions and we look forward to the follow up reports in 2 weeks and then in 2 months.
- It appeared that French participants of the national platform also had a lot to learn from the visitors.
- There was interesting exchange in terms of specific legislation.
- There was general support for the idea of thematic and stakeholder networks
- There is still some work to be done for countries and stakeholders to have the reflex of contacting the national platform in case of an alert; this is all the more important when considering alerts raised in a country other than that where the competition in question is taking place.

Next deadlines

2 week follow-up report: 30 November 2016

3 month progress report: 17 February 2017

ANNEXES

Annex I: The French National Platform by Charles Coppolani, President of ARJEL

France signed the Council of Europe Convention on the manipulation of sports competitions in 2014. The position of the French authorities: no need to wait for the ratification of the Convention to start implementing it. On 28 January 2016– Launch of the National Platform following an Agreement by the Minister for Sports and ARJEL

Organisation of the French national platform

General meeting under the presidency of the Minister of Sports (at least once a year)

Chairmanship of the national platform: Minister for Sports

2 Boards:

- Directorate for Sports chairs the Coordination and prevention Board of the platform
- ARJEL chairs the Monitoring Board of the platform

Annual plenary session will enable to provide reports on the actions undertaken by the Boards.

Coordination Board

- Ministry of Sports
- CNOSF(in charge of integrity delegates)
- ARJEL
- Française des Jeux
- Anti-corruption Agency (AFAC)
- Police (SCCJ)
- Justice (Prosecutor)
- Tracfin.
- Budget directorate.

Operational and Monitoring Board

- ARJEL
- Police
- Sports events organizers and/or CNOSF
- Ministry of Sports
- Française des Jeux
- Also invited to the board:
- Athletes representatives
- Anti-corruption agency

Missions of the National Platform (article 13 CETS 215 Macolin Convention)

- Coordinate the fight against manipulation of sports competitions, in order to protect sport integrity and ethic, in accordance with the principle of the autonomy of sport,
- Collect and disseminate information relevant to the fight against manipulation of sports competitions to competent organizations and authorities,

- Receive, centralize and analyze information on irregular and suspicious bets placed on sports competitions and, where appropriate, issue alerts;
- Transmit information on possible infringements of laws or sports regulations in force to public authorities or to sports organizations and/or sports betting operators, in compliance with personal data protection laws and standards;
- Co-operate with all relevant organizations and authorities at national and international levels, including national platforms of other States.

Security of Communication and Protection Measures

- Data echanges within the platform comply with personnal data protection laws and regulations. Personnal data exchanges are strictly limited to the extent of the declared purposes pursued by the exchanges.
- An internal regulation of the platform – *currently under drafting* – will specify the technical means to implement in order to:
  - ensure security, reliability and integrity of exchanged data,
  - availability and integrity of the data exchange systems,
  - identification of the users.
- The platform endeavours to effectively protect whistleblowers in compliance with national and international legal instruments.
- Implement any tool enabling the detection of betting related manipulation of sports competitions on the French sports betting market;
- Centralize and analyse information related to irregular and suspicious sports betting on sports competition held on the French territory;
- Issue alerts, where appropriate;
- Cooperate with national and international stakeholders taking part into the detection of betting related manipulations of sports competitions.

Co-ordination Board

Annual meeting

Observe and assess manipulations, establish recurring typologies and disseminate relevant information
Organize meetings to share information on themes and concrete issues to improve the fight against this type of criminal behaviors;
Develop a knowledge & information sharing and circulation system between stakeholders
Assist, advise and guide whistle-blowers ;
Recommend any relevant legal evolution ;
Set up network of focal points within all structures and Ministries involved

Small groups working on various subjects

Objectives:
Outline the general context
Issue recommendations
Improve legislation
For example :
Whistle-blower protection
Sports club vulnerability
Training sessions with sport association, athletes & referees

May 30th: 1st meeting of the Coordination Board

Operational Board

Missions of the operational Board.

- Implement any tool enabling the detection of betting related manipulation of sports competitions on the French sports betting market;
- Centralize and analyse information related to irregular and suspicious sports betting on sports competition held on the French territory;
- Issue alerts, where appropriate;
- Cooperate with national and international stakeholders taking part into the detection of betting related manipulations of sports competitions.

Missions of the Coordination and Prevention Board chaired by the Directorate for Sports (Ministry for Sports)

- Observe, identify and assess the extent and evolution of manipulations, sets repeating typologies and mutualize relevant information, in complement to the annual work of the Central Service of Corruption Prevention (Ministry for Justice) with regards to national corruption;
- Organizes meetings between relevant stakeholders enabling all actors involved in prevention and fight against manipulation of sport competitions to exchange and share information on concrete themes and issues in order to improve the fight against those criminal behaviors:
- Organizes a system enabling to share and circulate information among stakeholders in charge of detection of manipulations, namely the Monitoring Board;
- Ensures an advisory and orientation mission for whistle-blowers;
- Proposes all relevant legal evolutions;
- Sets a network of contact points in all structures and Ministries involved – those contact points being entitled to gather and share information related to sports betting.

Missions of the Monitoring Board chaired by ARJEL

- Implement any tool enabling the detection of betting related manipulation of sports competitions on the French sports betting market;
- Centralize and analyse information related to irregular and suspicious sports betting on sports competition held on the French territory;
- Issue alerts, where appropriate;
- Cooperate with national and international stakeholders taking part into the detection of betting related manipulations of sports competitions.

Actions of the Monitoring Board chaired by ARJEL

- National sports betting market risk analysis upstream of the monitoring = guidance of the French platform action
    - 2 levels
        - Sport list drafted by ARJEL
        - Analysis of the potential risks of the competition at stake (matches at risk) by the national platform with the sport movement/competition organizer (e.g.: for EURO 2016, risks analysis with UEFA began as of the qualification of the participating teams in December 2015)
    - Prior risk analysis = good management and policy tool
- Detection of betting related manipulations of sports competitions both online and offline
    - ARJEL monitors the French online sports betting market
    - The administrative partnership between ARJEL and FDJ enables real time exchanges to obtain an exhaustive view on the national sports betting market, both online and offline.
- Building on preexisting cooperation networks established by ARJEL (ESSA, IOC, foreign betting regulators) and FDJ (Global Lottery Monitoring System) for the detection of betting related manipulation of sports competitions
- Monitoring on a wider scale because information can come not only from detection on the French betting market but also from all stakeholders, whether members of the platform or part of the cooperation networks of the members, or else (press).
    - Such information may have consequences on the French sports betting regulated market.
    - Integrity of betting operations is a mission of the betting regulator.
    - The missions of the Monitoring Board are implemented in compliance with ARJEL missions.
- Confirmed alerts are forwarded to the Prosecutor.
- The Central Service for Races and Games (specialized police service) and the National Financial Intelligence Unit (Tracfin) participating in the national platform are in charge of the fight against fraud. The Central Service for Races and Games is the national contact point of EUROPOL. TRACFIN is part of the European network of the National Financial Intelligence Units (FIU.NET).

10 May 2016: Integrity Delegates' Meeting

A meeting was organized with integrity delegates of sports federations before the Olympics. On this occasion, an integrity delegate was designated within the France Olympic team for Rio 2016.

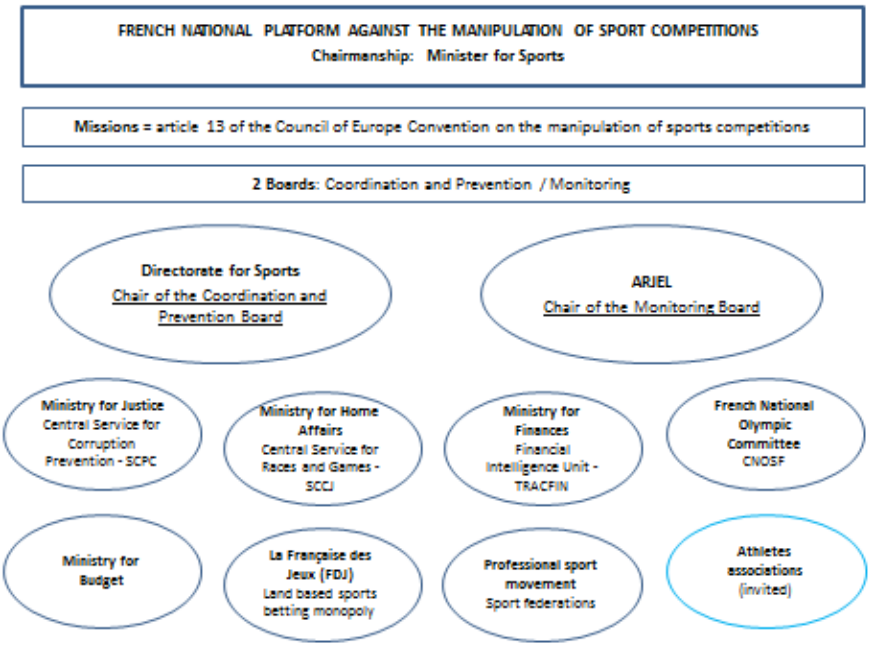
20 May 2016: 1st Meeting of the Operational Board

This meeting aimed at preparing the monitoring of major sporting events to come: Roland Garros, Euro 2016, Tour de France, Olympic Games.

16 September 2016: 2nd Meeting of the operational board

This meeting was organized for the monitoring of sports competition during the season 2016-2017.

Annex II: Diagram of the French National Platform layout



Annex III: Specific actions of a betting regulatory authority: ARJEL

ARJEL actions – as the French Online Gaming Regulator - with regards to the fight against online betting related manipulations of sport competitions

- ARJEL is the French Online Gaming Regulatory Authority, namely in charge of online sports betting regulation. Landbased sports betting in France is under the monopoly of La Française des Jeux – state-owned, controlled by the Ministry for Budget.
- As a betting regulatory authority, one of ARJEL missions is to ensure the integrity of online sports betting operations which can be altered by manipulations of sports competitions.
- The mission of the regulator is not to fight directly against the manipulations because such a fight is primarly of the responsability of the sports' authorities.
- Not all manipulations are linked to sports betting. Good governance of sports is a key factor.
- ARJEL works closely with the French Ministry for sports and the French sports movement (federations, competitions organizers).

ARJEL implements prevention and detection actions and supports sports disciplinary actions

- The French regulatory framework comprises several measures aiming at preventing, detecting and sanctioning manipulations of sports competitions.
- ARJEL implements prevention measures relating to prevention of conflicts of interest, risk analysis and the betting right (I)
- ARJEL ensures the detection of online betting related manipulation of sports competitions online (II)
- ARJEL supports the disciplinary actions of sports (III)

I. Prevention - *Conflicts of interests*

- ARJEL ensures that no conflicts of interests exist between the licensed sports betting operators and the sports competitions' organizers
- in case of capitalistic links between the operators and the organizers of the competitions on which those operators offer bets
- in case of partnership/sponsorship agreements between operators and competition organizers
- French regulation also prohibits licensed operators' owners, managers, corporate officers and staffs to place for themselves, directly or through a third party, stakes on the betting products they offer.
- In parallel, French sports federations shall enact rules aiming at preventing conflicts of interest between competitions stakeholders and sport betting operators and communication of insider information by competition stakeholders.

- Risk analysis: the sport list

- A risk assessment perspective of match-fixing entails the evaluation of the vulnerabilities of the competitions on which authorized sports bets can be taken. Bets should not be taken on those competitions that entail vulnerabilities in terms of manipulation.
- The rationale is to ensure that benefits which could be found by competition organizers or stakeholders in betting related match-fixing remain lower than what they could lose while manipulating the competition. Idea = manipulation of sports competitions is a market
- As a gambling regulatory authority, ARJEL can prevent bets to be placed on competitions the organization of which entails higher match-fixing risks: ARJEL drafts a sport list in concertation the relevant sports federations. The list aims at characterizing a fair sports betting offer on which licensed operators can propose bets and ensures prior information of competition organizers.
- ARJEL is currently reviewing the selection process of the listed competitions to shape selection criteria mostly of economic nature, such as media coverage of the competition or financial interest of the athletes.
- Characterizing a fair sports betting offer has no real consequences on the economy of the sector because the majority of bets are placed on the biggest sporting events: in France, notwithstanding the limitation of the offer, there are extended possibilities to bet and the online sports betting sector is booming (+ 30% in turnover in 2015 compared to 2014, i.e. +19% in GGR).

-The betting right

- According to the betting right (also called the ownership right of the sports competition organizer), sport betting operators shall obtain the organizers' authorization before proposing bets on their competitions.
- The betting right pursues a double objective:
  - creating a dialogue between operators and competitions organisers in order to detect and deter betting related manipulations;
  - financing initiatives namely aiming at combatting manipulations.
- ARJEL is in charge of controlling operator's obligations within the betting right contacts, while the commercial part of the contracts (the percentage of the right itself) is left to negotiation between sports and betting operators (in average 1%).
- The typical operators' obligations within contracts are
  - real-time monitoring of suspicious betting activity – volume, spreading and level of stakes;
  - real-time information of ARJEL in case of suspicious betting pattern;
  - detection measures;
  - information of the competition organizer on any dereferencing of betting products.

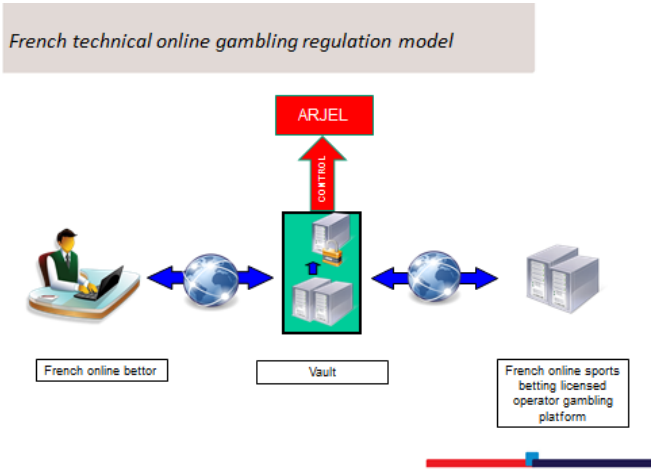
II. Detection – *Online betting related manipulations of sports competitions*

- ARJEL monitors the French online sports betting market to detect anomalies and deter betting related match-fixing attempts on competitions of the sport list
    - The French technical online gambling regulation enables ARJEL to access real time all elementary betting operations occurring on the French sports betting operators' gambling platforms: it enables ARJEL to implement an analysis of the stakes.
    - ARJEL has also developed its own odds analyzing tool (called Mascote)
- Information exchanges complement ARJEL monitoring of the French online sports betting market:
    - With online sports betting operators, whether licensed in France or not – Partnership ARJEL/ESSA
    - With national and international sport movement
        - Partnership ARJEL/IOC - IOC information system (IBIS)
        - French National Olympic Committee organizes the network of the federations' integrity delegates namely in charge of dealing with betting related manipulations;
    - With foreign sports betting regulators
        - Counterparts ARJEL entered bilateral cooperation agreements with;
        - Members of the European Union Expert Group on Gambling Services;
        - Members of the Network of National regulators of the sports betting market of the Council of Europe;
        - Members of regulators' international associations (GREF, IAGR)

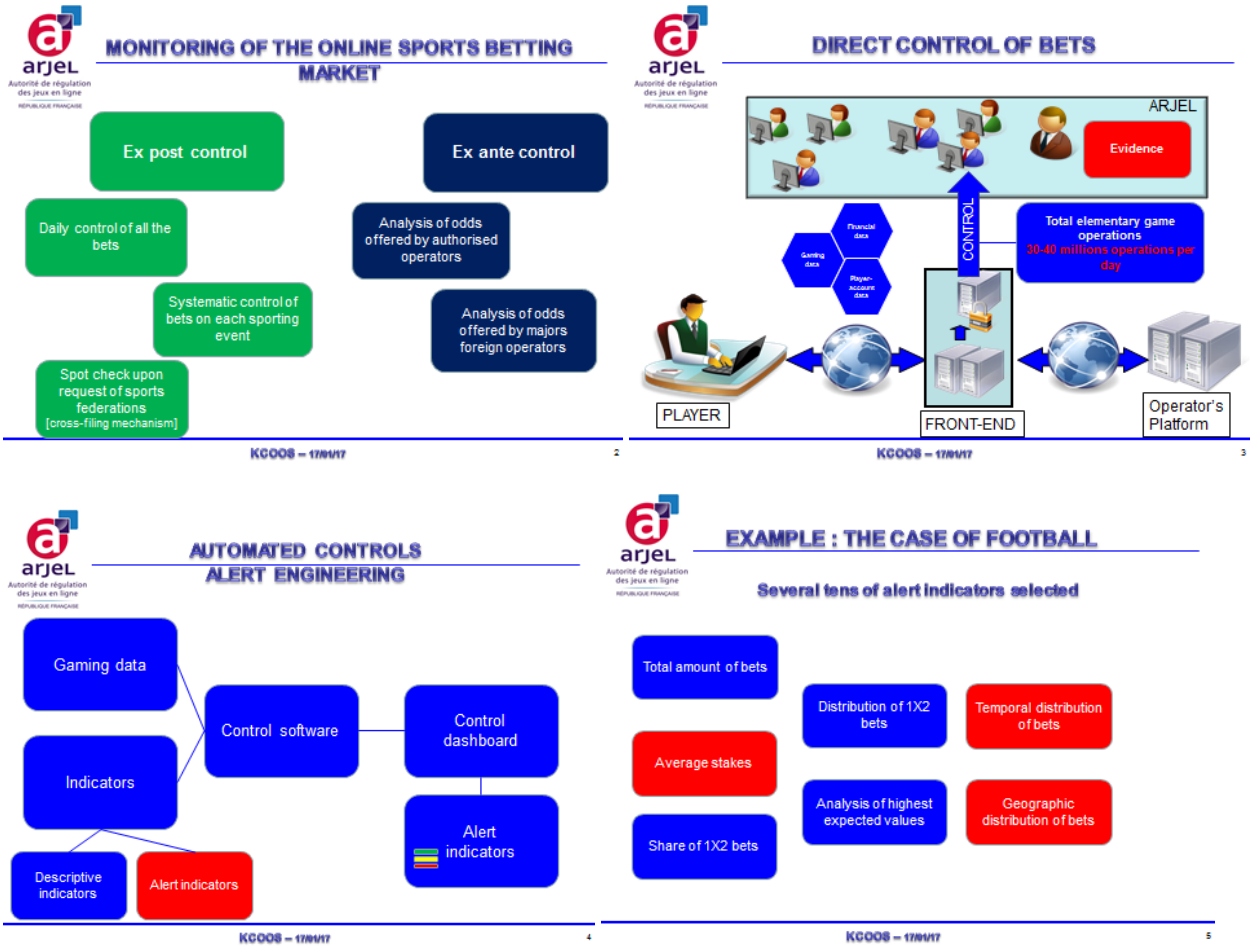
II. ARJEL supports sports disciplinary actions

- Since the entry into force of Law No 2012-158 dated 1st February 2012, French sports federations shall enact rules aiming at prohibiting competition stakeholders from placing, directly or indirectly, stakes on bets offered on the competition they participate in
- On demand of the sports federations, ARJEL implements a cross-filing mechanism, compliant with the rules and regulations related with the protection of personal data, enabling to control the prohibition for competitions' stakeholders to bet on their own competitions.
    - This mechanism enables the comparison of the gambling data hold by ARJEL pursuant to the French online gambling technical regulation with the data on competition stakeholders provided by the sports federations.
    - Positive results in breach of the aforementioned prohibition can ground disciplinary sanctions.

Annex IIIa: French Technical Online Gambling Regulation Model



Annex IIIb: Monitoring of the online sports betting market



Funded
by the European Union
and the Council of Europe

EUROPEAN UNION

COUNCIL OF EUROPE
CONSEIL DE L'EUROPE

Implemented
by the Council of Europe

EXAMPLE : AUTOMATED MONITORING Football

arjel

Team 1	Team 2	Date	Competition
REALBETIS	REALMADRID	24-janv.	ESPAGNELIGA
OL	OM	24-janv.	LIGUE1
JUVENTUS	ASROMA	24-janv.	ITALIESERIE
MALAGACF	FCBARCELONA	23-janv.	ESPAGNELIGA
PARISSG	ANGERSSCO	23-janv.	LIGUE1
SRENNAIS	GFCAJACCIO	22-janv.	LIGUE1
ARSENALFC	CHELSEAFC	24-janv.	ANGLPREMIER
STADEREIMS	ASSTETIENNE	24-janv.	LIGUE1
OGCNICE	FCLORIENT	23-janv.	LIGUE1
ASMONACO	TOULOUSEFC	24-janv.	LIGUE1
ATLETICOMADRID	SEVILLAFC	24-janv.	ESPAGNELIGA
HAMBURGERSV	BAYERNMUNCHEN	22-janv.	BUNDESLIGA
LILLEOSC	ESTROYESAC	23-janv.	LIGUE1
CLERMONTFOOT	LEHAVREAC	25-janv.	LIGUE2
RAYOVALLECANO	CELTAVIGO	23-janv.	ESPAGNELIGA
MANUNITED	SOUTHAMPTONFC	23-janv.	ANGLPREMIER
ASNANCY	NIMESOLYMPIQUE	22-janv.	LIGUE2
NORWICHCITY	LIVERPOOLFC	23-janv.	ANGLPREMIER
FCNANTES	FCGBORDEAUX	23-janv.	LIGUE1
EAGUINGAMP	BASTIA	23-janv.	LIGUE1
INTER	CARPI	24-janv.	ITALIESERIE
EVERTONFC	SWANSEACITY	24-janv.	ANGLPREMIER
FCMETZ	USCRETEIL	22-janv.	LIGUE2
ACAJACCIO	SBRESTOIS29	25-janv.	LIGUE2
MONTPELLIERHSC	SMCAEN	23-janv.	LIGUE1
ACFFIORENTINA	TORINOFC	24-janv.	ITALIESERIE
FCSCHALKE04	WERDERBREMEN	24-janv.	BUNDESLIGA
RCLENS	DIJONFCO	23-janv.	LIGUE2
LEVANTEUD	UDLASPALMAS	25-janv.	ESPAGNELIGA
EMPOLIFC	ACMILAN	23-janv.	ITALIESERIE
ATHLETICBILBAO	SDEIBAR	24-janv.	ESPAGNELIGA
CRYSTALPALACE	TOTTENHAMHOTSPUR	23-janv.	ANGLPREMIER

KCOOS – 14/11/16 6

EXAMPLE : AUTOMATED MONITORING Football

arjel

Equipe 1	Equipe 2	somme totale misée	Mise moyenne des paris simples	% Paris simples	%de paris 1N2/ paris simples	% Max Vainqueur/1 N2	% de paris live	Nb Mises >500€	Cote moyenne	Matchs simultanés
REALBETIS	REALMADRID	1 290 445 €	28,96 €	57,47%	70,29%	95,92%	21,32%	206	1.79	1
OL	OM	722 437 €	11,54 €	66,56%	66,39%	56,68%	23,59%	55	3.44	1
JUVENTUS	ASROMA	534 806 €	12,41 €	28,64%	66,83%	87,44%	18,66%	24	2.17	1
MALAGACF	FCBARCELONA	529 817 €	24,75 €	45,40%	77,23%	94,83%	16,84%	66	1.72	15
PARISSG	ANGERSSCO	476 450 €	11,71 €	51,93%	50,01%	78,42%	19,99%	42	2.72	2
SRENNAIS	GFCAJACCIO	375 293 €	13,34 €	66,07%	72,32%	76,00%	26,31%	45	2.61	4
ARSENALFC	CHELSEAFC	332 543 €	12,22 €	55,63%	61,22%	67,81%	27,68%	31	2.88	3
STADEREIMS	ASSTETIENNE	282 094 €	11,96 €	54,61%	72,34%	62,81%	27,65%	17	2.78	3
OGCNICE	FCLORIENT	277 293 €	12,46 €	44,63%	70,93%	86,25%	21,81%	16	2.34	5
ASMONACO	TOULOUSEFC	269 674 €	11,41 €	57,16%	61,15%	76,17%	21,58%	16	2.45	2
ATLETICOMADRID	SEVILLAFC	248 484 €	14,23 €	49,65%	60,79%	81,96%	39,51%	21	2.10	1
HAMBURGERSV	BAYERNMUNCHEN	242 723 €	18,19 €	45,07%	47,42%	83,67%	20,40%	22	1.85	4
LILLEOSC	ESTROYESAC	202 582 €	9,56 €	32,06%	70,69%	69,17%	14,58%	6	2.18	5
CLERMONTFOOT	LEHAVREAC	197 194 €	11,70 €	61,45%	53,34%	62,24%	30,35%	14	2.74	2
RAYOVALLECANO	CELTAVIGO	183 353 €	17,48 €	73,49%	45,71%	70,32%	43,50%	18	3.18	1
MANUNITED	SOUTHAMPTONFC	182 234 €	13,22 €	44,10%	74,39%	86,17%	27,09%	17	2.19	15
ASNANCY	NIMESOLYMPIQUE	163 249 €	10,89 €	37,88%	54,81%	59,00%	26,45%	10	2.32	5
NORWICHCITY	LIVERPOOLFC	161 977 €	13,78 €	68,28%	48,71%	81,44%	42,80%	15	2.41	1
FCNANTES	FCGBORDEAUX	158 634 €	9,66 €	48,19%	71,78%	52,94%	15,51%	20	3.00	5
EAGUINGAMP	BASTIA	157 096 €	10,09 €	44,64%	70,39%	60,76%	31,55%	18	2.88	5
INTER	CARPI	155 999 €	16,88 €	32,22%	59,80%	97,18%	21,33%	9	1.60	6
EVERTONFC	SWANSEACITY	152 881 €	14,54 €	56,72%	51,00%	59,56%	43,11%	13	2.45	3
FCMETZ	USCRETEIL	152 019 €	12,88 €	39,29%	71,97%	83,17%	28,51%	12	2.10	5
ACAJACCIO	SBRESTOIS29	145 870 €	10,03 €	59,91%	59,91%	46,16%	37,22%	10	2.96	1
MONTPELLIERHSC	SMCAEN	131 250 €	8,49 €	40,92%	79,82%	40,32%	19,34%	14	3.01	5
ACFFIORENTINA	TORINOFC	123 245 €	13,91 €	52,18%	51,10%	92,20%	33,95%	8	2.07	2
FCSCHALKE04	WERDERBREMEN	108 581 €	13,81 €	45,77%	48,53%	65,65%	40,15%	7	1.93	1
RCLENS	DIJONFCO	98 528 €	11,68 €	68,45%	65,26%	44,39%	46,54%	7	2.83	3
LEVANTEUD	UDLASPALMAS	94 424 €	9,60 €	50,03%	51,27%	36,93%	32,04%	3	2.93	2
EMPOLIFC	ACMILAN	94 366 €	11,32 €	57,04%	62,06%	60,95%	47,24%	5	2.60	1
ATHLETICBILBAO	SDEIBAR	91 654 €	10,97 €	56,95%	28,58%	58,53%	38,46%	8	2.60	2
CRYSTALPALACE	TOTTENHAMHOTSPUR	86 820 €	12,08 €	41,88%	70,51%	80,61%	29,30%	5	2.33	15

KCOOS – 14/11/16 7

MATCH CLERMONT – LE HAVRE

arjel
Autorité de régulation des jeux en ligne
RÉPUBLIQUE FRANÇAISE

Total				
	Somme	Nombre	Moyenne	Pourcentage
Total des mises	197194,42 €	60814	3,24 €	
Total des mises sur des paris simp▸	121177,86 €	10361	11,70 €	61,45 %
Total des mises sur des paris com▸	76016,56 €	50453	1,51 €	38,55 %
Cumul des paris simples sur le vai▸	64641,09 €	5623	11,50 €	53,34 %
LEHAVREAC	9338,73 €	1027	9,09 €	14,45 %
NUL	15070,81 €	1588	9,49 €	23,31 %
CLERMONTFOOT	40231,56 €	3008	13,37 €	62,24 %
Cumul des paris combinés sur le v▸	47768,84 €	38883	1,23 €	62,84 %
CLERMONTFOOT	29851,05 €	21020	1,42 €	62,49 %
LEHAVREAC	5615,83 €	6269	0,90 €	11,76 %
NUL	12301,96 €	11594	1,06 €	25,75 %
type de resultats (paris simples)				
VAINQUEUR	76657,05 €	6045	12,68 €	63,26 %
PMPMA	14474,34 €	915	15,82 €	11,94 %
SCORE	4889,15 €	1065	4,59 €	4,03 %
PRPPX	4532,18 €	417	10,87 €	3,74 %
S1PMA	4388,51 €	320	13,71 €	3,62 %
1N2M1	4084,80 €	349	11,70 €	3,37 %
1N2MX	3295,35 €	407	8,10 €	2,72 %
EDSMA	1847,76 €	199	9,29 €	1,52 %
SOPMA	1143,38 €	70	16,33 €	0,94 %
NPPMA	1051,72 €	55	19,12 €	0,87 %

KCOOS – 14/11/16 8

MATCH CLERMONT – LE HAVRE

Mises les plus importantes

arjel
Autorité de régulation

Opérateur	Date	Adresse IP	Type	Choix	Cote	Mise
	2016-01-25 20:50:57		VAINQUEUR	1 OU NUL	1,12	2000
	2016-01-25 14:34:32		VAINQUEUR	CLERMONT N	1,23	1906,4
	2016-01-25 21:11:27		PMPMA	Moins de 1.5	1,55	1325,71
	2016-01-25 13:17:22		VAINQUEUR	Clermont ou Match nul	1,28	1052
	2016-01-25 20:24:34		VAINQUEUR	1 OU NUL	1,28	1000
	2016-01-25 18:27:32		VAINQUEUR	1 OU NUL	1,33	982
	2016-01-25 20:57:33		SOJMA	F Diedhiou Premier buteur	4,6	500
	2016-01-25 20:04:49		PMPMA	Plus de 2.5	2	500
	2016-01-25 21:35:57		NPPMA	Plus de 2,5 buts	1,8	500
	2016-01-25 19:31:14		VAINQUEUR	CLERMONTFOOT	2,2	500
	2016-01-25 19:43:18		VAINQUEUR	CLERMONTFOOT	2,15	500
	2016-01-25 14:14:50		VAINQUEUR	CLERMONTFOOT	2,25	500
	2016-01-25 20:44:50		SOPMA	Clermont Quelle equipe marquera le 1er but?	1,65	500
	2016-01-25 20:02:20		VAINQUEUR	CLERMONTFOOT	2,2	500
	2016-01-21 15:33:48		VAINQUEUR	NUL	3,05	480
	2016-01-25 19:32:53		S1PMA	OUI	1,72	400
	2016-01-25 20:48:58		VAINQUEUR	CLERMONTFOOT	2	400
	2016-01-25 21:30:07		VAINQUEUR	CLERMONTFOOT	2,15	400
	2016-01-21 07:59:09		VAINQUEUR	NUL	3,1	373
	2016-01-25 18:46:06		VAINQUEUR	CLERMONTFOOT	2,3	360,91
	2016-01-25 19:58:05		VAINQUEUR	CLERMONTFOOT	2,25	336
	2016-01-25 19:43:29		PMPMA	PLUS DE 0,5	1,35	316,26
	2016-01-25 16:28:01		VAINQUEUR	LEHAVREAC	3,5	300
	2016-01-25 20:53:39		NPPM1	+ DE 0,5	2,5	300
	2016-01-25 14:54:12		PMPMA	Plus de 2,5 buts	1,98	294,25

KCOOS – 14/11/16 9

MATCH CLERMONT – LE HAVRE

Espérances de gains les plus importantes

arjel

Opérateur	Date	Id	Ip	Type	Choix	Cote	Mise	Live
	2016-01-25 17:22:28			SCORE	Egalite 4 - 4 Score exact	351	10	0
	2016-01-25 21:39:15			VAINQUEUR	NUL	13	200	1
	2016-01-25 21:54:05			VAINQUEUR	NUL	30	85	1
	2016-01-25 14:34:32			VAINQUEUR	CLERMONT N	1,23	1906,4	0
	2016-01-25 20:57:33			SOJMA	F Diedhiou Premier buteur	4,6	500	1
	2016-01-25 20:50:57			VAINQUEUR	1 OU NUL	1,12	2000	1
	2016-01-25 10:28:08			1N2MX	1 / 2	22	100	0
	2016-01-25 21:11:27			PMPMA	Moins de 1.5	1,55	1325,71	1
	2016-01-25 13:36:21			SCORE	Le Havre 4 - 1 Score exact	90	22,4	0
	2016-01-25 21:39:02			VAINQUEUR	LEHAVREAC	100	20	1
	2016-01-25 10:27:38			1N2MX	2 / 1	19	100	0
	2016-01-25 15:14:15			SCORE	3 - 2	34	50	0
	2016-01-21 15:33:48			VAINQUEUR	NUL	3,05	480	0
	2016-01-25 13:17:22			VAINQUEUR	Clermont ou Match nul	1,28	1052	0
	2016-01-25 18:27:32			VAINQUEUR	1 OU NUL	1,33	982	0
	2016-01-25 20:15:02			1N2MX	Clermont/Le Havre	26	50	0
	2016-01-25 20:24:34			VAINQUEUR	1 OU NUL	1,28	1000	0
	2016-01-25 09:33:39			SCORE	Autre score	60	20	0
	2016-01-21 07:59:09			VAINQUEUR	NUL	3,1	373	0
	2016-01-25 21:06:54			1N2M1	CLERMONTFOOT	5,75	200	1
	2016-01-25 14:14:50			VAINQUEUR	CLERMONTFOOT	2,25	500	0
	2016-01-25 19:31:14			VAINQUEUR	CLERMONTFOOT	2,2	500	0

KCOOS – 14/11/16 10

Tours-Grenoble (Ligue 2 - 29/04/11)

Ensemble des Paris (Simples et Combinés, S/C)				
	Somme (€)		Nombre de Paris	
S	38 853,40 €	81,04%	1574	18,12%
C	9 091,38 €	18,96%	7113	81,88%
Total	47 944,78 €	100,00%	8687	100,00%

MISE MOYENNE (Paris simples) 24,68€

Ensemble des Paris en 1N2				
	Somme (€)		Nombre de Paris	
S	34 224,60 €	81,52%	1263	17,87%
C	7 760,61 €	18,48%	5805	82,13%
Total	41 985,21 €	100,00%	7068	100,00%

MISE MOYENNE (Paris simples 1N2) 27,09€

Tours-Grenoble (Ligue 2 - 29/04/11)

Part des Paris 1N2 par rapport aux Paris Simples		
	Somme (€)	Nombre de Paris
1N2 (%)	87,57%	81,36%

Répartition des paris Simples en 1N2				
	Somme (€)		Nombre de Paris	
A	6 432,06 €	18,79%	779	61,68%
B	27 148,20 €	79,32%	349	27,63%
Nul	644,32 €	1,88%	135	10,69%
Total	34 224,58 €	100,00%	1263	100,00%

MISE MOYENNE (1) 8,25€

MISE MOYENNE (2) 77,80€

Tours-Grenoble (Ligue 2 - 29/04/11)

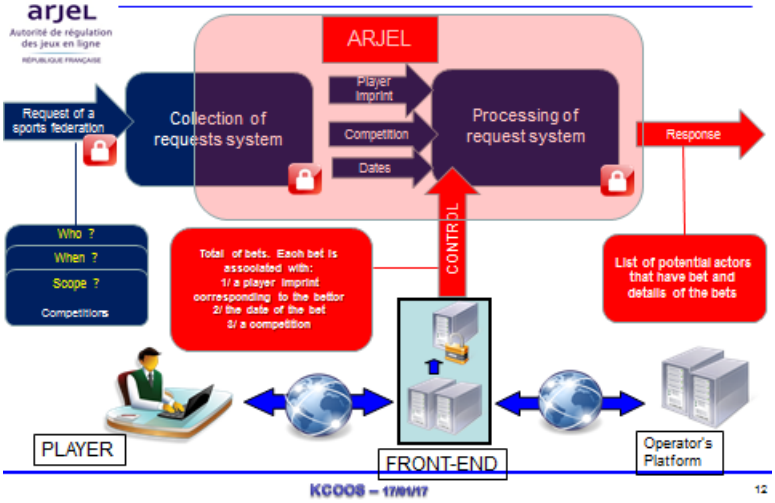
Top 10 IP	
IP	Mises (€)
xx.xx.xx.xx	2030.3
xx.xx.xx.xx	1400
xx.xx.xx.xx	1000
xx.xx.xx.xx	600
xx.xx.xx.xx	600
xx.xx.xx.xx	571.42
xx.xx.xx.xx	545
xx.xx.xx.xx	500
xx.xx.xx.xx	500
xx.xx.xx.xx	500

Top 10 Comptes joueurs		
Opérateur	CJ	Mises (€)
B	xxxxxxx	1400
C	xxxxxxx	1090
A	xxxxxxx	1000
C	xxxxxxx	827
B	xxxxxxx	600
D	xxxxxxx	571.42
C	xxxxxxx	545
A	xxxxxxx	500
D	xxxxxxx	500
B	xxxxxxx	500

Tours-Grenoble (Ligue 2 - 29/04/11)

Opérateur	Date et Heure du pari			Cote	Mise
B		Resultat	B	4	1400
C		Resultat du match	B	3.2	1090
C		Resultat du match	B	3.9	827
A		1N2	B	4	750
B		Resultat	B	4	600
D		1 X 2	B	3.6	571.42
B		Resultat	B	4	500
D		1 X 2	B	3.76	500
B		Resultat	B	4	500
B		Resultat	B	4	400
E		1 N 2	B	3.6	400
D		1 X 2	B	3.76	400
B		Resultat	B	4	360
C		Resultat du match	B	4	345
C		Resultat du match	B	4.6	300
D		1 X 2	B	3.6	300
B		Resultat	B	4	300

CROSS-FILING MECHANISM



Annex IV: Exchange of experience case studies with the French national platform, during Euro 2016 and Rio 2016

Coordination Board

Annual meeting

- Observe and assess manipulations, establish recurring typologies and disseminate relevant information
- Organize meetings to share information on themes and concrete issues to improve the fight against this type of criminal behaviors;
- Develop a knowledge & information sharing and circulation system between stakeholders
- Assist, advise and guide whistle-blowers ;
- Recommend any relevant legal evolution ;
- Set up network of focal points within all structures and Ministries involved

Small groups working on various subjects

Objectives:

- Outline the general context
- Issue recommendations
- Improve legislation
- For example :
  - Whistle-blower protection
  - Sports club vulnerability
  - Training sessions with sport association, athletes & referees

May 30th: 1st meeting of the Coordination Board

Adaptive Risk Analysis

Cost of manipulation

How much for fixing this match?

- Athletes salaries.
- Financial health of the clubs.
- Monitoring by police, regulatory and sports authorities, as well as press.
- Penalties for match fixing.

Expected benefits

How much profit can I make?

- Number of bets taken on the competition in order to stay untraceable.

Other factors

- Game with little at stake.
- Players addiction to gambling.
- Strong ties between teams or players of different teams.
- Connections between players with organized crime.
- Big difference of level between opponents.

Level of alerts

Red

Orange

Yellow

Green

Euro 2016

As head of the Operational board, ARJEL was the contact point between the IOC and the French National platform against match fixing.

Case Study 1

Friday 17 June 2016 **All the matches of the day**	**Wednesday 22 June 2016** **Italy vs Ireland**
Saturday 18 June 2016 **Iceland vs Hungary**	**Sunday 26 June 2016** **France vs Ireland**

1- The first concerned the matches of Friday, 17 June 2016 (Italy, Sweden, Czech Republic, Croatia, Spain, Turkey) in which atypical odds were detected before the start of the matches: the favourites had gained between 0.2 and 0.3 points in the odds since the previous evening 8:30 p.m. until 12 midday the day of the match. All of these increases were postponed on lower odds on draws, which would make three drawn matches at these encounters suspect. The results of these matches were reassuring since none of these meetings did end in a draw. An operator de-listed the match at 7:41 p.m., 7 minutes before the end of the match, and 3 minutes before the Hungarian goal (at the 88th). It was a rare atypical act from this operator, which generally matches odds for as long as possible. However, investigations conducted internally revealed that it was a technical error of the set-up.

2. The second concerned the Iceland-Hungary match of Saturday, 18 June 2016. A French operator de-listed the match at 7:41 p.m., 7 minutes before the end of the match, and 3 minutes before the Hungarian goal (at the 88th). It was a rare atypical act from this operator, which generally matches odds for as long as possible. However, investigations conducted internally revealed that it was a technical error of the set-up.

3. The third concerned the Italy-Ireland match Wednesday, 22 June 2016 on the last day of group E matches. Indeed, Italy was already assured of finishing first in Group E before this match while Ireland had to win to hope for a qualification. Anomalies in the odds were noted on Mascote in "live-betting'.

Some operators stopped offering bets on goals by 15-minute increments from the 75th, just before the goal from Ireland. Unexplained declining peaks in the odds on Ireland during the first half were observed, while logically the odds should have risen with the score 0-0 at halftime. The day after the match, the analysis and coordination group finely analysed the match, which revealed that "fall peak" odds corresponded to a period of domination of Ireland, that Italy had procured clear chances while it had not aligned its standard team and that some defenders were under the threat of non-qualification for the knockout round against Spain if they got a yellow card. Ireland absolutely had to win to hope to qualify, the result of this match was considered by the analysis and coordination group as not disturbing.

Moreover, the explanation for the lack of availability on purpose in the last quarter of an hour might have originated from the desire of operators not to propose two or three identical bets entitled differently: indeed, in the case in question (i.e. 0-0 in the last quarter of an hour) the bet offer "goals per 15 minutes" is easily replaced by "could there be a goal in the match?" and "number of goals in the game" The group also found that the distribution of live bets and pre-match was normal and there was

no suspect significant upgrade in data collected from authorised operators before the odds downgrade. Finally, the absence of detection of an anomaly by the ARJEL partners, members of the Euro 2016 integrity platform (*see below*) and the absence of rumours on social networks have helped remove the last doubts about this match.

4. The fourth yellow alert concerned the France-Ireland match Sunday, 26 June 2016. A significant drop in the odds of "Ireland winner at halftime" was observed with a single licensed operator while the latter remained stable with the other approved and foreign operators. After contacting the operator, it turned out that it was a readjustment of RRP on this bet.

Since none of these yellow alerts were raised to orange level, they have not been transmitted to the national platform or to ARJEL's international partners.

Case Study 2

	Thursday 4 August	
Saturday 6 August	Thursday 11 August	Tuesday 16 August
Saturday 6 August	Monday 15 August	Tuesday 16 August
Monday 8 August	Tuesday 16 August	Wednesday 17

We recorded 10 alerts during the Olympic Games – all ended up being Green.

How can we improve the work of the National Platform?

- Enhancing the share of information with the other national platforms (and/or the national authorities in charge of the fight against match fixing)
- Building a network of the national platforms against match fixing
- Defining how to work with the Sports movement, betting operators

Annex V: Final Agenda

Strasbourg, 14 November 2016 KCOOS (2016) 16

"Keep Crime Out Of Sport"

Study Visit 1

Dates and working hours:
Monday 14 November 2016 14:00 – 17:15
Tuesday 15 November 2016 09:30 – 17:30

Paris, France
(ARJEL, 99-101 Rue Leblanc, 75015 Paris)

FINAL AGENDA

MONDAY 14 NOVEMBER 2016

13:30 – 14:00 *Arrival of delegations*

14:00 – 15:00 Introduction, Objective-setting and adoption of agenda (Cassandra Fernandes)

- Update of project progress
- Input of concerned countries in questionnaires and regional seminars
- Analysis of country assessments
- Tour de table of the Participants
- Adoption of the agenda

15:00 – 16:30 Presentation of ARJEL's action with regards to regulation and control of the French online sports betting market

- Welcome and presentation of ARJEL's views (Charles Coppolani, ARJEL Chairman) – 30 minutes
- Presentation of ARJEL monitoring tools of the French online sports betting market (ARJEL Directorate for controls and information systems) – 1 hour
  - Front-end: technical regulatory device enabling the analysis of the stakes
  - Mascot: internally developed soft-ware enabling odds monitoring (on-site demonstration)

16:30 – 16:45 *Coffee break*

16:45 – 17:15 Structure of the French national platform (Charles Coppolani, ARJEL Chairman)

19:30 – 21:30 *Dinner in the restaurant Le Café du Commerce*

TUESDAY 15 NOVEMBER 2016

9:00 – 9:30 *Arrival of participants*

9:30 – 12:30 Exchanges with the French National Platform (Tour de table)

- Missions and actions of the Monitoring Board – 1 hour
- Missions and actions of the Coordination and Prevention Board – 1 hour
- Return of experience on the French national platform actions in 2016 (e.g.: EURO 2016, Rio Olympic Games) – 1 hour

12:45 – 14:15 *Lunch in the restaurant La Cave de l'Os à Moelle*

14:30 – 17:00 Case-study: the outlining of a national platforms' network (Tour de table)

- Communicating and processing of information on the occasion of the next major 2017 European sporting competitions organised by one (handball) and co-organized by two jurisdictions (ice hockey)

17:00 – 17:15 Country Feedback (Tour de table of the delegations)

17:15 – 17:30 Creating a 'handbook tool' (Cassandra Fernandes)

Participating countries:

Lithuania, Germany, Switzerland, The Netherlands

Annex VI: Final List of Participants

GERMANY

1. Ms Jutta KELLER-HERDER (Ministry of Interior)
2. Ms Uta SCHÖNEBERG (Ministry of Interior and Sport of Lower Saxony / Niedersachsen)

LITHUANIA

3. Ms Ramune BISTRICKAITE (Department of Physical Education and Sports under the Government)
4. Ms Sandra **VITKEVIČIŪTĖ** (Gaming Control Authority under the Ministry of Finance)

SWITZERLAND

5. Mr Paolo GRASSI (Federal Ministry for Police, fedpol)
6. Mr Pascal PHILIPONA (Comlot, Swiss Lottery and Betting Board)
7. Mr Fabien ROUILLER (Comlot, Swiss Lottery and Betting Board)

THE NETHERLANDS

8. Mr Cor ROELEVELD (The Netherlands Gaming Authority)

FRENCH NATIONAL PLATFORM

9. Coordinators: Mr. Corentin Segalen and Mr. Christophe Vidal
10. All members of the National platform : Police, Prosecutor's office, TRACFIN, Sports Directorate, Members of ARJEL

KCOOS SECRETARIAT

11. Miss Cassandra Matilde FERNANDES (Council of Europe Sport Division)