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“Keep Crime Out Of Sport”

STUDY VISIT 3

FINAL REPORT





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Introduction to Report

This was the third 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 co-organised by ARJEL, representatives from Cyprus, Hungary and Poland were exposed to the functioning of the platform as well as a particular focus on alerts and monitoring of bets.

Country current situations

A. Cyprus

Between 2010 and 2016 Cyprus Football Association received approximately sixty -nine (69) files from UEFA regarding suspected games. Sixteen (16) of them refer to the period between August 2016 and October 2016, whilst for the 2015 – 2016 season the files for suspected games reached the total number of twenty one (21). Regarding 2013 -2014 football season the CFA received eight (8) files, the 2012-2013 football season ten (10) files, whilst the 2010 the files received reached the number nine (9). Additional files receive in between.

Even though the situation went out of control the CFA continued business as usual by

The situation was so bad that in September 2016 that the Guardian published an article *“Car bombs, corruption and illegal betting – how football in Cyprus spiraled out of control”*, were the General Secretary of Federbet, Mr Francesco Baranca wrote in an e-mail, *“We consider Cyprus one of the dirtiest leagues in the world. We also consider Cyprus as sorts of ‘school’ of match fixing with a lot of players exporting the virus when they move to another league.”*

There was a general denial of the situation.

Last September, during the Strasbourg conference, Cyprus suggested to the UEFA delegate as a solution to ban Cypriot football clubs from all UEFA competitions in order to the CFA to focus internally on cleaning up the sport and come back stronger.

The above suggestion brought positive results regarding the situation established in Cyprus the last few years regarding Match Fixing.

At the beginning of November, UEFA delegation has visited Cyprus and “threatened” the officials of the Cyprus Football Association that unless they take harsh measures towards match fixing, then UEFA will band all Cyprus clubs from all UEFA Competitions.

As a result of the above, the federation set up strict rules and fines in order to put pressure towards its affiliated clubs.



Legislation

Even though the problem created within the sport, partially by sports people including footballers, officials, referees, coaches and player agents, on the other hand, match fixing used as a vehicle by non sports people for money laundry.

Among the reasons for match fixing flourishing in Cyprus was the very late reaction of the CFA. It took the federation almost six years in order to take preventing measures including fines, whilst the state legislation wasn't helpful in order to confront this type of criminal activity.

On November 2016 the Minister of Justice and Public Order prepare and circulated among the major stakeholders a new legislation regarding the Manipulation of Sports Competitions for discussion.

According to the Constitution the monitoring of telephone conversations or the opening of bank accounts are prohibited unless you attain in advance a court warrant. In addition, the most significant weapon against corruption, the wiring tapping, is strictly prohibited.

In the new legislation is included the establishment of National Platform which will be consisted by five members as follows:

- Chairman – an ex high esteem judge
- Cyprus Sports Organisation – Member
- Police – criminal investigator
- National Betting Authority
- The fifth member will be invited accordingly from the federation that its sport is involved in match fixing.

Furthermore, the NP will be responsible for the education and/or training of major stakeholders such as athletes, coaches, referees and police. In addition the NP will have the right to evaluate rules and regulations set by the federations regarding match fixing.

Even though Cyprus has not signed the convention yet, there are significant evidences, such as the new legislation circulated to the stakeholders for discussion, that the state is willing to overcome practical obstacles and finally sign it.

- According to article 11(q) of the Law, amongst the Authority's competences is "to follow the developments with regard to unlawful betting, to draft statistical studies and to prepare suggestions to combat the same", although it does not have the specific power for combating match-fixing.

PREVENTION

- It should be stressed that an updated ISP Blocking List has been updated, following the licensing of Class B (online) betting, reaching a total number of 2463 websites.



- Prevention of match-fixing is also planned by the Authority through the future development of a national risk assessment methodology, which will be based on the results of a research into risk factors and the examples of other jurisdictions that have already adopted and implemented risk assessment methodologies.

DETECTION

- Any suspicious activity related to match fixing or sports manipulation in general is reported to the Authority or/and the Cyprus Police by the licensed bookmakers (betting companies). The Authority has the power to investigate each case to the point that falls within its competences, in order to collect the relevant information and consequently forwards the information to the Cyprus Police to proceed with further investigation. It should be stressed that any reports or complaints received by the Authority are submitted directly to the Cyprus Police through an exchange of letters/emails.
- Finally, according to article 11(d) of the Law, the Authority has the power to carry out suitable inspections and in general to supervise Class A and Class B bookmakers, licensed authorised representatives and holders of licensed premises in order to ascertain that they are complying with the terms of their respective licences, the provisions of the Law, the Regulations and the regulations and directives issued.

SANCTIONS

- Although, according to the current legislation, the Law does not provide the opportunity to the Authority for imposing administrative sanctions, the Authority will obtain the right to apply administrative sanctions, following the adoption of the amendments upon the current draft legislation which is currently under discussion for ratification in the House of the Parliament of the Republic of Cyprus. Following the discussion and final ratification of the amended law, the Authority will have the right to impose administrative sanction and penalties, when the conditions of the licence or/and the law are violated.

Challenges

The challenges we will face in order to combat match fixing are:

- The processes of the implementation of the Convention on the Manipulation of Sports Competitions.
- The amendment of the current legislation.
- The integration of the domestic legislation with the articles of the Convention.
- The coordination and cooperation of the stakeholders which are involved in this issue in order to work in parallel and in the same direction.
- The restrictions and/or prohibitions stated in the articles of our Constitution.

- The establishment of the National Platform and reaching an agreement with major stakeholders, such as the Ministry of Justice, the Ministry of Sports, the National Betting Authority and the Police, in order to nominate the primary stakeholders that should participate at the National Platform as well as the way it will operate.
- Setting up a secure telephone line (red line) or a website where the public can report an incident of match fixing.
- Establishing educational programs for youths and the athletes in order to be aware of match fixing
- The Law, defines betting in Cyprus as any type of bet on sporting events or other events in which a number of physical persons participate, and which are carried out land-based and online. The conduct of slot machine gaming, online casino, games of chance, poker, betting exchange, spread bets and betting services on dog racing are strictly prohibited by the Law.

B. Hungary

First of all, we would like to emphasize, that in our opinion the idea of the National Platform (NP) is a real, effective tool in the protection of the sport integrity, also in national and international level. In Hungary we have already involved into the discussions the following participants: Ministry of Sport, Hungarian National Bureau of Investigation (HNBI) and the Hungarian National Lottery (it is the only legal, state owned company who is allowed to organise sport betting in the territory of Hungary). The before mentioned participants have already agreed / achieved the followings:

- Hungary signed the KCOOS treaty in November, 2016
- The Hungarian National Lottery is an active member in the EL (European Lotteries), WLA (World Lotteries Association) and in GLMS (Global Lottery Monitoring System), continuously receiving and sending information both in operative and strategic level. The company runs a monitoring system, which allows detecting the suspicious activity in the field of sport betting.
- The Hungarian National Lottery signed the sport integrity ethical codex of the EL.
- The HNBI is an active member of the EUROPOL Serious Organised Crime Department (Analytical Work File) – Sport Corruption Unit (focal point) since 2015.
- Hungary participated in the regional KCOOS conference in Zagreb. (September 2016)
- The Hungarian National Lottery participated in the ISC Sport Integrity conference (December, 2016, Genova)
- The above mentioned participants hold a kick off meeting about the planned Hungarian National Platform in 10th of January, 2017.
- Hungary is going to participate in the study visit by the French National Platform (18-19, January, 2017, Paris)
- During Q1-Q2 of 2017, we would like to involve more participants into the discussions. (Prosecutor Office, sport associations, gambling commission)

- The final conception of the Hungarian NP is planned to be ready during Q3-Q4 of 2017.

C. Poland

Corruption in sport is a phenomenon ethically and socially adverse as it violates the fundamental values promoted by sport, such as fair play and respect for other competitors. The manipulation of sports competitions is a form of sports fraud which distorts the unpredictable nature of sports competitions.

Measures preventing corruption in sport are necessary in view of the large scale and dynamic development of this undesired phenomenon including, in particular, match-fixing. This is confirmed by the experiences of Poland and other countries. Corruption in sport is closely associated with the globalization and commercialization of sport. This is also visible on the Polish market. The value of sports sponsorship in our country increased from 0.2 billion PLN in 2001 to 3.8 billion PLN at the end of 2013.¹ This growth, however, is connected with specific threats, some of which arise from sport's regular infiltration by criminal groups.

The issue of corruption in sport, with particular emphasis on match-fixing, was the main priority of the Polish Presidency of the EU Council in the second half of 2011, which ended, inter alia, with the adoption of conclusions on match-fixing. The conclusions were the first EU-level document focused on the issue. They constituted a specific political declaration which identified match-fixing as a threat and indicated the directions of intervention, including the necessity to implement preventive measures and to develop cooperation and exchange of information between all stakeholders, including law enforcement authorities, public authorities and the sports movement. The document also emphasized the necessity to commission studies on the manipulation of sports competitions in order to determine the scale of the phenomenon, the existing problems and their possible solutions, and to introduce effective and dissuasive sanctions, both criminal and disciplinary ones, for corruption in sport.

II. Strategic framework

The need to implement educational activities relating to corruption in sport including, in particular, match-fixing, arises out of numerous recommendations and guidelines of the EU. They are included primarily in the frequently recalled Council conclusions on combating match-fixing (2011/C 378/01), in which the EU Council calls on the Member States educational programmes, for example based on the experience of former sports people in order to improve the awareness of athletes and sports officials regarding the risks associated with the manipulation of results and to prevent them from engaging in such activities.

Activities to prevent corruption in sport are also provided for in Poland's national strategic documents. The *Governmental Programme Against Corruption* for the period 2014-2019 includes task no. 16: *to*

¹ Pentagon Research, *Summary of sports sponsorship in Poland in 2013*.

strengthen the measures against corruption in sport; the implementation of the task has been entrusted to the Minister of Sport and Tourism.

Furthermore, *The Sport Development Programme until 2020* - the country's strategic document which sets out directions for the development of sport, pays attention to the issue of corruption in sport and the necessity to prevent this phenomenon by implementing educational measures. The document indicates, as a priority, *counteracting negative phenomena in sport and promoting positive values developed by sport*. This priority covers, among others, the intervention direction: *to fight corruption and match-fixing in sport*. The main activities within this direction of intervention include:

- the continuation of education projects addressed to young football players and students
- educational activities relating to the prevention of corruption in sport, addressed to managers of sports clubs and Polish sport associations

The fight against corruption, in particular against the manipulation of sports competitions requires appropriate, effective and dissuasive sanctions, both criminal and disciplinary ones.

Therefore, the Act of 25 June 2010 on Sport provides for criminal liability for crimes against the principles of fair sports competition, including, in particular, crimes relating to corruption in sport. The Act indicates such crimes as bribery in sport; corruption in sport in connection with sports betting, influence peddling and bribery for influence-peddling.

The amendment to the Act, which entered into force in 2015 introduced, in addition, the penalization of corruption acts which alters the course of a sports competition (e.g. the number of yellow cards in a football match) rather than only the result of a sports competition.

The amendment of the Act is in line with the provisions of the Council of Europe Convention on the Manipulation of Sports Competitions, drawn up in Magglingen on 18 September 2014.

In addition, the betting market in Poland is regulated by the Gambling Act of 19 November 2009 and the amendment to it, which provides for solutions enabling the implementation of

- effective mechanisms ensuring the state's control over the gambling market. The said
- amendment aims e.g. to eliminate the grey betting market in Poland.

IV. Educational activities

Given the need to properly organise preventive measures against corruption in sport, coordinated by the Ministry of Sport and Tourism, as well as to implement the relevant strategic documents the Minister of Sport and Tourism adopted the programme against corruption in sport, entitled *Don't be a pawn in the game!*, which covers the period 2015-2020.

1. Presentation of KCOOS (in annex)

KCOOS has arrived at the 1 year mark, having involved 42 countries in questionnaires, 32 countries in regional seminars and so far 10 countries in study visits.

2. Presentation of the French national platform (presentation in annex)

Three topics of focus since the establishment of the platform in January 2016

- Fight against the manipulation of sports competitions
- Control of operations
- Principles applied by the French NP
- The NP worked during Euro 2016. It enabled proactivity and action on suspicious activity. There was a lot of communication and exchange and permitted a development of a coordinated approach.
- At the national financial prosecutor's office, since 2014: intervene on any file in France, part of our domain on corruption and MSC. France saw the need to have a specialized prosecutor in this domain. Some files in work already: recognition of international aspect of the issue. They can be useful to engage in national cases but also to provide information internationally.

3. Fight against the manipulation of sports competitions (ARJEL's role – presentation in annex)

One of the main missions of ARJEL is to control the online bets, so that they are not subject to manipulations.

Another mission is to certify operators; fight against excessive betting (protect players) and fight against illegal offers.

ARJEL does not fight against MSC (this is for the sport regulatory entities); and all cases of MSC are not linked to online betting it is important to keep in mind that all online bets are not linked to manipulation.

The good governance of sport is an important factor. ARJEL works closely with the ministry of sport and the sport movement nationally.

The system of regulation has three types of measures:

- Prevention of MSC (conflict of interest, risk analysis and the betting rights)
 - Detection of cases of manipulation
 - Sanctions (helping the sport movement with disciplinary actions they may engage)
- I- Prevention: conflict of interest
The law prohibits capitalistic links between operators and competition organisers (for competitions which have bets from those operators).

- II- The sports list is established in collaboration with sport federations; everyone including competition organised should be kept well informed of the bets placed on the competitions that they are organising.

ARJEL has often been criticized because the sport list may slow down the betting market. The figures do not show this, quite the contrary. In 2015 the turnover increased by 30% and the GDR growth was 49%.

ARJEL regularly updates the list: including criteria for media coverage and financial stakes for athletes involved.

There is currently a law that is being discussed in the parliament. Two articles:

- a- Law on online games recognizes the concept of MSC. Now bets on competition in the case of risk of manipulation can be suspended (in line with the CoE convention)
- b- ARJEL can suspend bets on a competition as soon as there is evidence of manipulation.

In France there is the Right to bet: the right that a competition organiser can exercise vis-à-vis a betting operator. Before proposing bets on a competition, the betting operator must get the ok from the competition organiser. Two aims:

- a- Create a dialogue between operators and competition organisers in order to detect and prevent manipulations.
- b- The contract between the two allows financing of initiatives by the organiser to fight against manipulations of the competition.

ARJEL does not intervene in commercial negotiations.

- III- Detection

For example: cross-filing system. In case of suspicion, the prosecutor is contacted.

QUESTIONS

ONLINE and OFFLINE betting systems coordinate and are all part of the national platform in France (ARJEL + FDJ). For example, currently, the two have daily phone meetings to update each other during the Handball world championships. FDJ also has online sports betting licenced by ARJEL. Offline betting by FDJ is monopoly and supervised by the Ministry of budget.

4. Presentation: MONITORING THE ONLINE SPORTS BETTING MARKET (presentation in annex)

The monitoring system in France has different tools: different times are also monitoring. Initially the monitoring takes place on the basis of external data and this data is analysed. There is also the ex-poste control (before the competition but after an action has taken place). This is conducted on the basis of the data provided by French law.

The control of all bets in a day/match, etc.; as well as cross-file matching (at the request of federations); control of betting offers, etc. are all possible.

French regulation obliges operators to provide data of the bettors (financial, gaming and player account data). There is a front end system between the player information and the operator's platform which goes into a database that is only accessible by ARJEL. It is not sent by the operator – ARJEL collects it directly.

Advantages: all data is registered in real time; Problem: data recovered only on bettor's action; problem because there could be wins that could arrive without ARJEL noticing. (it is only registered when the bettor connects to the system). It can generate other problems (like in the cross-file matching system). The data cannot be modified before ARJEL receives it.

The difficulty of the model is that there are a number of operators (15). The quality of the data is very important (bad quality = hard to analyse). ARJEL has access to all data from the game, collected daily: all data and all the indicators (based on average bet of a player on a certain type of competition; the proportion of a type of bet on a competition; etc.). There are levels of alerts as well. Algorithms are launched which generate tables and charts and graphs to visualize the potential issues and manipulations. Data player can be retained up to 6 years following activity.

CROSS-FILING SYSTEM

This was established at the request of French federations to ensure that competition organisers were not betting on their own competitions.

Everything is anonymous. The names are not compared. It is coded. The codes are compared (that they receive from the federation) to ARJEL's own data on bettors. And the quality of the cross-filing depends on the reliability of the information on the member/client possessed by the federation. ARJEL does not have access to the personal data in itself because the system encodes the information before it arrives into the system. Only the federation can discover who the actual person is. It is a way to prevent hacking as well. The federation as a competition organiser only has access to the result of the cross-file match (the members/participants and the bettors not allowed to be betting on that particular competition).

MASCOTE (Moteur d'Analyse et de Suivi de la COTE – Analysis and monitoring mechanism for odds)

Monitoring odds. This mechanism complements the other one. The data about the odds is collected in real time (triggered by action done by player). The analysis of the stakes however is not in real time. The stakes analysis can trigger an in-depth analysis of the odds, which can in turn point to irregularity and then trigger another stakes analysis.

ARJEL has developed its own system for odds data collection and analysis. It is easy to collect data from operators for future events (for example, from website) but they do not keep all the information for past events. So a system was developed. It enables comparison of odds and takes into account all information about odds from operators, including text data. Specific alert thresholds have also been developed. So

indicators have been developed to detect anormal situations (for example, odds offered and then dropped just before an event, etc.).

5. Brainstorming and sessions on looking at different aspects of manipulation of sports competitions

a. Criminal infiltration in sport: Money laundering / EUROPOL

This is particularly an issue when we refer to club-buying issues. Of course, everyone heard about the case 'Ye'. In France, they have had some cases showing how exposed they are, notably with regard to clubs in the 3rd division. There are cases of bets not offered in France that are offered on French matches by operators in Asia for example. The manipulation is separate from the bets.

- Organised crime groups influencing these games

In some cases, the organised crime group can be just national, but it does not necessarily always have to be the case.

There are two types of bets:

- Sport-related crimes can just be a consequence of opportunity for general criminals
- It can be a specifically-targeted crime

France uses certain types of methods of investigations: it depends on the legislation and articles. The current legislation prohibits using the whole variety of tools. An additional crime needs to be defined in order to send undercover agents, etc. For example, article 445-1-2 Criminal Code allows for certain aspects of phone tapping, but other articles are needed for more precision.

b. Interest of a specific offence in MSC

In Italy they have a specific legislation in this domain. The Criminal Code distinguishes between various forms of match-fixing, up to 9 years for serious offences.

In Hungary, they have a new crime: previously under bribery cases; now there is a new offence section for match-fixing. It is more detailed and some investigations have started yet. There is no outcome yet. But it sanctions also no profit. In Poland, they amended their 2010 act in 2015, there has been no feedback so far. They have started cooperation with polish football associations. 2010-2016 they had received 69 files in Cyprus. In December 2016, a new draft bill is under discussion.

There is no specialized prosecutor in France. It depends on the topic and the location. Education of judges and prosecutors is needed. There was recently a training on sports corruption for judges.

The example of Cesson-Montpellier handball match from a few years ago. The case is still under appeal 4 years later. The appeal took a week, involving 16 lawyers. The players never recognized any wrongdoing. The risk is that the final result will be unimpressive. The sentences were fairly weak.

There is an awareness raising effort that is being made for sporting stakeholders. A little more needs to be done, however.

It is very important within the NP to have dialogue with the sport movement and the athletes.

The NP should coordinate all the information and data in order to maximize efficiency.

- i. The establishment of secure mechanism for data collection on sports events related topics and protection of whistleblowers

Protection of whistleblowers:

There is a new mechanism in place – need to see if it works. There is also a lighter system in place.

- c. Prohibition of betting for certain actors in competition: how to implement and monitor

Prevention: information and education of sporting educators

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 organised 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 linked to betting

- 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.

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 Swiss table tennis player was contacted by a French player to lose a set for 2000 Eur.
 - o Chain of contact:
 - The player notified the Swiss TT Federation who then told the French TT Federation who then told 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.

6. NATIONAL PLATFORM IN EURO AND RIO 2016 and brains (presentation in annex)

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.
 - 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.
 - The German system for next year's Ice hockey championships will be the same.
 - They will do something similar for the 2017 Handball World championship in January 2017 as well.
 - 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.

Case study – Handball World Championships

Types of bets offered in different countries:

- Cyprus: the highest risk bet is spread betting; it was forbidden but now it will be introduced according to legislation. Betting exchange is forbidden. Online betting has recently been introduced. Currently they have 10 applications for licencing. Bet365 has been licenced. The rest are still required to fill prerequisites. There is a block list: any operators that have not applied in Cyprus (even if they are licenced elsewhere), for example Parismatch.
- Poland: information is still being gathered. Only police and football federations have this information for the moment.
- Hungary: they received alerts at the police from the football association, etc. this is usually triggered by lower level leagues (e.g. U19).

MOCK ANALYSIS AND COORDINATION GROUP

What do they do?

- Daily meetings
- Information on matches of the day

TOP TABLE EXERCISE

Conclusions

Feedback from countries

Hungary: It was useful to meet the French national platform to have a general view of how the platform works in platform. In Hungary it will be a different structure, with different participants. They received many useful ideas which will be shared in early February internally. The Ministry of Sport supports the establishment of the Hungarian national platform. The aim of internal meetings is to make a proposal for the ministry of sport. The regional seminar and study visit has helped a lot in identifying main stakeholders, leadership, etc. for a national platform. They appreciate the opportunity to share and exchange information. It was useful for previously marginalized actors to place themselves.

Poland: This meeting was inspiring for Poland. This problem is a new issue for them. They want to acquire expertise and experiences as well as good practices to find a good way to establish the national platform. This is one good example.

Cyprus: This was an experience to gather information for their eventual national platform. Interest in experts mission. This is an effective manner of working because it is interactive and operational. Reports will be prepared and it will help the discussion for the legislation draft that is currently in place.

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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.
- The manipulation of sports competitions is NOT only linked to betting; this is just one form of the manipulation of sports competitions
- 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.

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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.

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Annexes

Annex I: KCOOS Update 1 year on



- ❖ Month 13 of Project KCOOS
- ❖ Questionnaires –over 150 replies
- ❖ Regional Seminar 1 (June 2016): **Albania-Belgium-The Netherlands-Slovenia-Spain-Switzerland** -The United Kingdom
- ❖ Regional Seminar 2 (September 2016): Austria-Bosnia Herzegovina-Croatia-**Germany-Hungary-Ukraine**
- ❖ Regional Seminar 3 (October 2016): Denmark-Estonia-Finland- **Latvia -Lithuania**-Norway-Sweden
- ❖ Regional Seminars 4 (Bucharest: Oct 2016) : **Azerbaijan-Bulgaria-Georgia**-Ireland-Moldova-Poland-Romania-Slovakia
- ❖ Regional Seminar 5 (Athens: Nov 2016): **Cyprus**-France-Greece-Italy-Montenegro
- ❖ Study Visits France 14-15 Nov 2016: Germany-Lithuania-The Netherlands-Switzerland & Jan 17-18 2017: Cyprus – Hungary - Poland
- ❖ Study Visit UK (UK GC) 13-15 Dec 2016: Belgium-Germany - Ukraine and 7-9 March 2017: Azerbaijan – Georgia - Latvia

Regional Seminars – A few conclusions

- ❖ More stringent legislation tackling this issue is required
- ❖ It is not a priority police issue, often due to lack of awareness of underlying problems such as organised criminality and financial crimes
- ❖ Assistance is requested from many States for guidelines on implementing measures as well as establishment of the national platform
- ❖ Interactive events such as regional seminars and study visits are very welcome for learning, networking and improving bilateral relations, as well as exchange of information
- ❖ Steps closer to entry into force and building national platforms
- ❖ Support for the Convention as a legal basis for implementation of measures



- ❖ Across the board understanding of the political situation by operational actors
- ❖ Concrete examples of establishing platforms and tackling the human and financial resources question
- ❖ All key stakeholders-including private- are invested in the integrity of sport
- ❖ Integration of previously marginalised stakeholders

Mapping

- ❖ Initial mapping conducted by Council of Europe T-MC Secretariat and KCOOS Partner, Oxford Research
- ❖ In continuous development

National Platforms

Article 13 –National platform

117. Article 13 provides for the identification of a national platform responsible for the fight against the manipulation of sports competitions by each Party.

118. The identification of the body fulfilling the function of national platform will be made in accordance with national law, and at the Parties' discretion, taking into account existing structures and the distribution of national administrative functions. A public authority would provide a neutral framework for co-operation between private stakeholders from different sectors and a suitable framework for the exchange of information. Therefore, national platforms are also implicitly covered by the generic references made to "competent public authorities". However, this feature is not explicitly specified in the provisions of the convention, so as to give the Parties a margin of discretion in identifying their platform.

119. The national platform serves as an information hub, collecting and disseminating information relevant to the fight against manipulation of sports competitions to the relevant organisation and authorities (paragraph 1.a).

120. In particular, the national platform is responsible for receiving, centralising and analysing information on irregular and suspicious bets placed on sports competitions taking place on the territory of the concerned Party and, where appropriate, issuing alerts (paragraph 1.c) and transmitting information to public authorities, sports organisations, and/or sports betting operators, in connection with possible breaches of legislation or sports regulations (paragraph 1.d). The information may, for instance, concern the placing of bets by a person involved in the competition or irregular or suspicious bets. However, this article does not involve a strict requirement to transmit specific types of information.

121. The national platform, the name and address of which must be communicated by each Party to the Secretary General of the Council of Europe (paragraph 2), is responsible for the co-ordination of the fight against the manipulation of sports competitions at national level (paragraph 1.b) and must co-operate with all organisations and relevant authorities at national and international level, including national platforms of other states (paragraph 1.e).

This may include co-ordinating the diffusion of public information. Given the transnational nature of the risks related to the manipulation of sports competitions, it is very important for information to be exchanged quickly between the Parties.

122. When the information exchanged constitutes personal data, it should be processed subject to the relevant national and international personal data protection laws and standards, as set out in Article 14 of the convention, in particular those defined under the Convention 108.

123. Paragraph 2 requires the Parties to communicate to the Secretary General the names and addresses of the national platform. According to the practice on such notifications, Parties are expected to notify this information, by means of a declaration addressed to the Secretary General of the Council of Europe, at the time of signature or when depositing its instrument of ratification, acceptance or approval. They subsequently may, at any time and in the same manner, change the terms of their declaration.

Importance of networks

- ❖ Other projects, including PRECRIMBET and BETMONITALERT – highlight technically specific needs, including monitoring report elaboration, etc. The needs should be in the framework of coordination of the strategy implemented by the CoE Secretariat.
- ❖ With regard to needs following various stages of project KCOOS:
 - Need for a platform within the NP to exchange sensitive information
 - Need to regularly communicate and know each other
 - Knowing each other + trust = developing further common activities, such as those proposed by Betmonitalert and Precrimbet – not just among regulators, but also in cooperation with other stakeholders
 - A network will allow for more harmonised or at least a better understanding of various obligations and rules proposed to betting operators for better exchange of information.
 - Common training and awareness-raising activities presenting a more united front can be exchanged and developed.
 - A network will help develop an informal system on exchange of information for illegal betting.
 - Regional and international networks of different stakeholders in order to enhance exchange of information.

Group of Copenhagen (Network of National Platforms)

- ❖ 1st Meeting: July 2016 (Copenhagen)
 - 2nd Meeting: 13-14 December 2016 (Helsinki)
 - 3rd Meeting: 30-31 March 2017 (Paris)
- ❖ Network of National Platforms to enhance international cooperation and put in place concrete action plans for projects, work programmes and accompanying new and upcoming NPs.
- ❖ Current actions: developing the roadmap of concrete actions for the next couple of years

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Importance of a study visit

- ❖ A more customised version of assistance
- ❖ Developing on from regional seminars and questionnaires
- ❖ Encouraging thought and reflection on the establishment of a national platform
- ❖ Learning from the experience of an existing national platform
- ❖ Interaction – networking – questioning
- ❖ Building co-operation and trust

Looking Long-term

- ❖ Currently: 3 ratifications (Norway-Portugal-Ukraine)
- ❖ Entry into force of the Convention
- ❖ Risk and legal assessments at national level
- ❖ Setting up of national platforms
- ❖ Creation of thematic and stakeholder networks of networks
- ❖ Developing the Copenhagen Group
- ❖ Developing a second 'KCOOS' project in an updated format

Annex II: The French National Platform



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



Organisation of the French national platform

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

Coordination Board

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

Operational and Monitoring Board

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



3

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 organisations 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 organisations and/or sports betting operators**, in compliance with **personal data protection laws and standards**;
- **Co-operate with all relevant organisations and authorities at national and international levels**, including national platforms of other States.

Security of Communication and Protection Measures

- Data exchanges within the platform comply with personal data protection laws and regulations. Personal 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.

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;
- **Organise 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;
- **Organise a system enabling to share and circulate information among stakeholders in charge of detection** of manipulations, namely the **Monitoring Board**;
- Ensure an **advisory and orientation mission for whistle-blowers**;
- Propose all relevant **legal evolutions**;
- Set 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**.
- The Coordination Board meets annually or more regularly in small working groups on various subjects (whistle-blowers protection, sports clubs vulnerability, training sessions with sport associations...);
- The 1st meeting of the Coordination Board took place on May 30th 2016.

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 organiser (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**).

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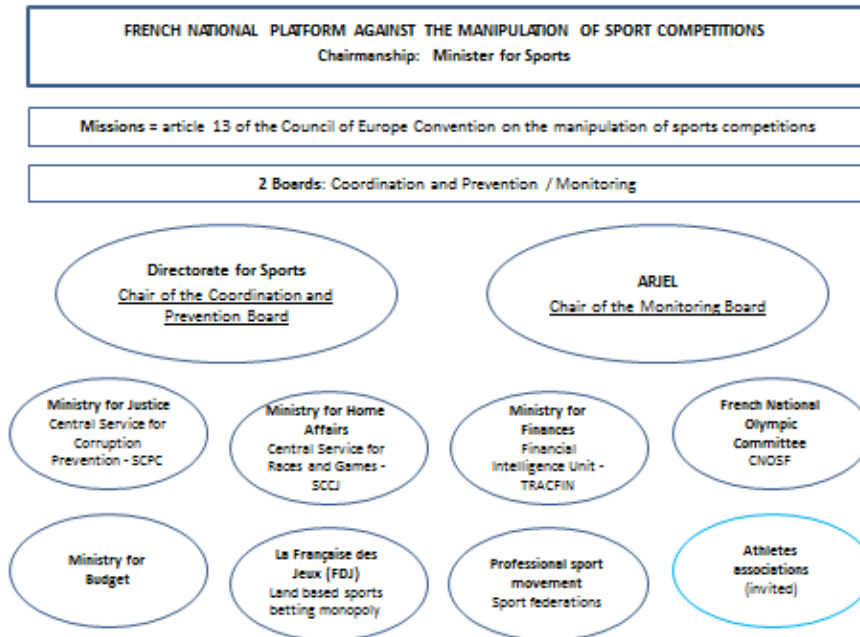


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Annex III: Diagram of the French National Platform layout



Annex IV: Overview of the French National Platform's actions in 2016

- How to create a national platform against match fixing?
- How is the national platform against match-fixing organised in France?
- What is the frequency of our meetings?
- How is the national platform organised during global sports events?
- How many alerts we handle and how we treat them?
- What are the main issues we face?
- What is the Copenhagen Group?

How to create a national platform against match-fixing?



28 January 2016: Launch of the National Platform

10 May 2016: Integrity Delegates' Meeting

A meeting was organised 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.



May 30th: 1st meeting of the Coordination Board

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16 September 2016: 2nd Meeting of the operational board

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



November 30th: 3rd meeting of the Operational Board

Operational board



11

Missions

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Operational Board during the Euro 2016



07/07/2017

12

Operational Board during the Olympics



07/07/2017

13

As head of the Operational board, ARJEL served as contact point between the IOC and the French National Platform against match fixing.

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 organised crime
- Big difference of level between opponents

Level of alerts

Red

Orange

Yellow

Green

A yellow alert is launched in case when an anomaly in odds or bets, or rumor concerning match fixing are detected. The yellow alert suggests that more investigation is needed, and enables bilateral communication. If the anomaly cannot be explained, an orange alert is activated and forwarded to the National platform. Other national platforms or international partners (such as ESSA) can be alerted when needed. A red alert indicates that we are certain a manipulation has occurred or is happening. Communications with the other stakeholders focus on collecting evidence for a prosecution.

Alert levels

| Alert level | Description | Procedure |
|--------------|---|--|
| Normal | <ul style="list-style-type: none"> - Absence of anomaly in the monitoring system. - No rumors on social networks. - No articles in the press. - No information from the competition organizer. | <ul style="list-style-type: none"> - All stakeholders who received an alert must be informed of the return to normal. |
| Yellow alert | <ul style="list-style-type: none"> - Anomaly in odds or stakes that cannot be explained. - Rumors regarding match fixing on social network. | <ul style="list-style-type: none"> - More investigation is needed through bilateral coordination with other members of the National Platform (eg. La Française des Jeux) and betting operators (to cross check the numbers). - The alerts are not communicated to the National Platform (or other national platforms), but are recorded. |
| Orange alert | <ul style="list-style-type: none"> - Anomaly that remains unexplained. - Whistle blowing. - Sourced and serious allegations in the media. - Precise information from the sports movement concerning a risk of manipulation. | <ul style="list-style-type: none"> - The risk of match fixing is severe, but more investigation is still needed. - Alert is forwarded to the National Platform. - Other national platforms are alerted if needed. - International partners are alerted if needed. |
| Red alert | <ul style="list-style-type: none"> - Match fixing is underway or has occurred certainly. | <ul style="list-style-type: none"> - Collecting evidence for prosecution. - Communications with other stakeholders focus on this task and are therefore limited to avoid leaks. - Bets can be suspended. |

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.

2- 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.

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.

The Group of Copenhagen

- . What is a national platform against match fixing?
- What is the Copenhagen group?
- How to request assistance to build your platform?
- How to report a risk concerning an event?
- How to send an alert?
- How is this alert dealt with?

Annex V: 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 primarily of the responsibility 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 organisers).

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' organisers
- in case of capitalistic links between the operators and the organisers of the competitions on which those operators offer bets
- in case of partnership/sponsorship agreements between operators and competition organisers
- 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 organisers 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 **organisation 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 organisers.**
- 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).
- 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.
- A **Bill on sports ethics, regulation and transparency of professional sport** is currently discussed in the French Parliament. **Two amendments, adopted on January 12th 2017**, in first reading at the National Assembly, aim at preventing the offer of bets on competitions that present high risks of manipulation :
- The first amendment introduces the concept of manipulation of sport competitions into the Gambling Act by providing that, **when determining the list of sports competitions and types of results on which bets can be offered by authorized operators, ARJEL shall take into account the associated risks of manipulation.**
- The second amendment **entrusts ARJEL Chairman with the administrative police power to prohibit**, for the time he determines, possibly at the request of a sport competition organiser, **all bets on a sport competition on which sufficient reliable and consistent evidence suggest that it is manipulated.** Preservation of public order and online bettors' protection require swift interventions namely when the manipulation occurs abroad.
- The **Bill is expected to be adopted in February** following the Senate's assent.

-The betting right

- According to the betting right (also called the ownership right of the sports competition organiser), **sport betting operators shall obtain the organisers' 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 contracts**, 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 organiser 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 analysing 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** organises 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)

III. 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**.

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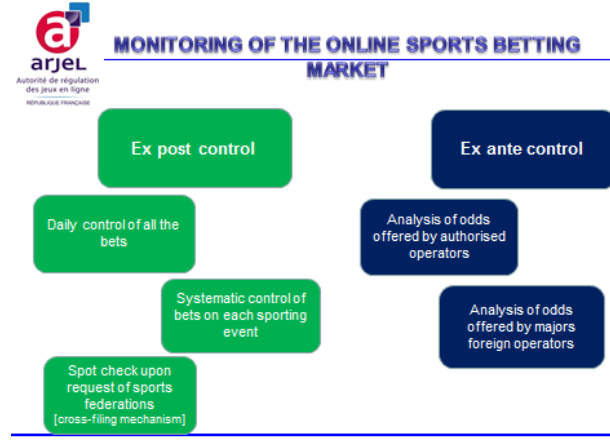


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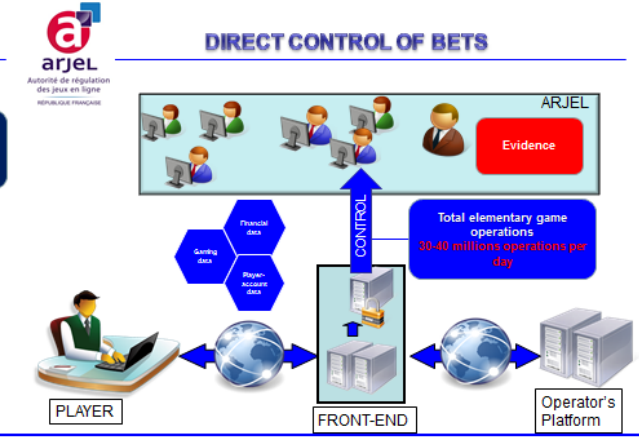


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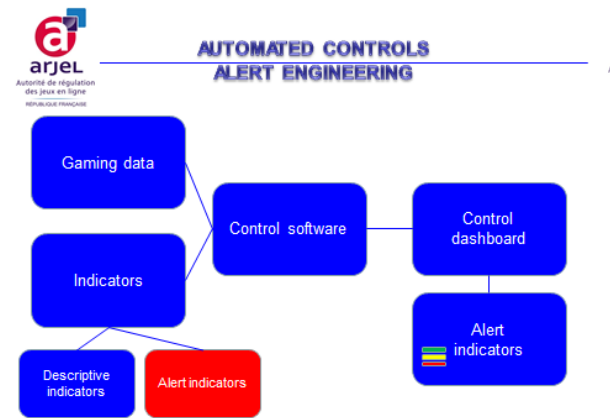
Annex V a: Monitoring of the online sports betting market



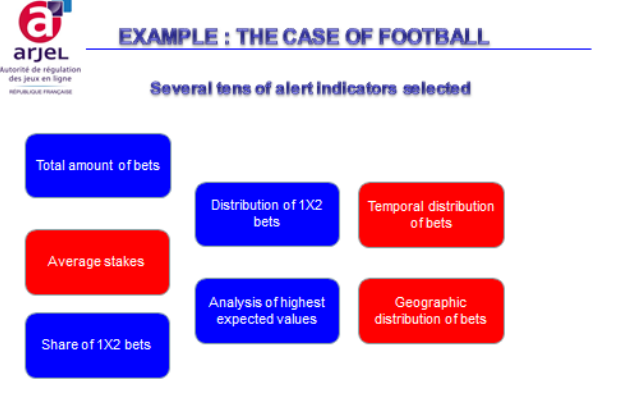
KCOOS – 17/01/17



KCOOS – 17/01/17



KCOOS – 17/01/17



KCOOS – 17/01/17

EXAMPLE : AUTOMATED MONITORING Football

ARJEL logo: Autorité de régulation des jeux en ligne, REPUBLIQUE FRANÇAISE

| Team 1 | Team 2 | Date | Compétition | Nombre de paris | Stake moyen | % de paris gagnants | % de paris perdants | % de paris nuls | % de paris gagnants | % de paris perdants | % de paris nuls | % de paris gagnants | % de paris perdants | % de paris nuls | Score | Matché |
|-----------|-------------|------------|-------------|-----------------|-------------|---------------------|---------------------|-----------------|---------------------|---------------------|-----------------|---------------------|---------------------|-----------------|-------|--------|
| BARCELONA | REAL MADRID | 2017-01-14 | ESPAGNE L1 | 1200 | 15.00 | 51.67% | 30.00% | 18.33% | 51.67% | 30.00% | 18.33% | 51.67% | 30.00% | 18.33% | 3-0 | 1 |
| PSG | LYON | 2017-01-14 | FRANCE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 1 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 1 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 15 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 2 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 3 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 4 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 5 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 6 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 7 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 8 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 9 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 10 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 11 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 12 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 13 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 14 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 15 |

KCOOS – 14/01/16

EXAMPLE : AUTOMATED MONITORING Football

ARJEL logo: Autorité de régulation des jeux en ligne, REPUBLIQUE FRANÇAISE

| Equipe 1 | Equipe 2 | Date | Compétition | Nombre de paris | Stake moyen | % de paris gagnants | % de paris perdants | % de paris nuls | % de paris gagnants | % de paris perdants | % de paris nuls | % de paris gagnants | % de paris perdants | % de paris nuls | Score | Matché |
|-----------|-------------|------------|-------------|-----------------|-------------|---------------------|---------------------|-----------------|---------------------|---------------------|-----------------|---------------------|---------------------|-----------------|-------|--------|
| BARCELONA | REAL MADRID | 2017-01-14 | ESPAGNE L1 | 1200 | 15.00 | 51.67% | 30.00% | 18.33% | 51.67% | 30.00% | 18.33% | 51.67% | 30.00% | 18.33% | 3-0 | 1 |
| PSG | LYON | 2017-01-14 | FRANCE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 1 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 1 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 15 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 2 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 3 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 4 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 5 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 6 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 7 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 8 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 9 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 10 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 11 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 12 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 13 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1800 | 10.00 | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 55.56% | 27.78% | 16.67% | 3-1 | 14 |
| BARCELONA | PSG | 2017-01-14 | ESPAGNE L1 | 1500 | 12.00 | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 46.67% | 33.33% | 20.00% | 2-1 | 15 |

KCOOS – 14/01/16

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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)
24,60€

| 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€

KCOOS - 14/11/10

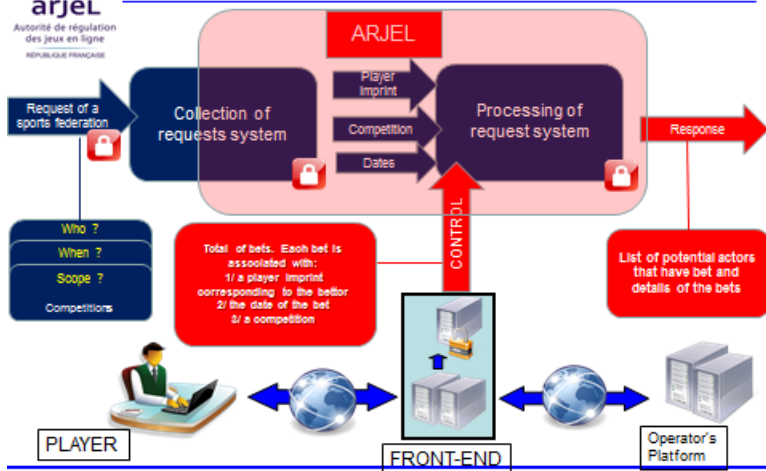
13

KCOOS - 14/11/10

14



CROSS-FILING MECHANISM



KCOOS - 17/01/17

12



Annex VI: Case Study: The implementation of the platform's monitoring Board during the 2017 World Handball Championship

- Handball World Championship France 2017
- Wednesday 11th - Sunday 29th
- The 24 qualified teams
- 4 groups of 6 teams
- President Cup

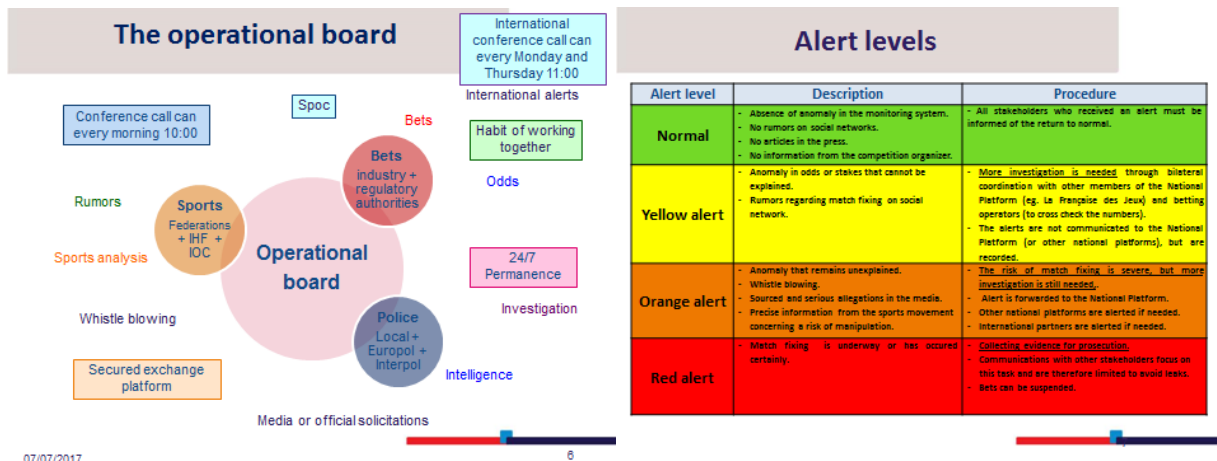
Involving international partners

Qualified Countries

Denmark
France
Norway
Spain
Sweden
Poland
Hungary

Non-qualified countries


Finland
Netherlands
Belgium
UK
Italy
Cyprus



Risk Analysis







Group A. France and Poland are the favourites of this group. Logically, Russia and Brazil should qualify for the Eighteenth, taking the 3rd and 4th place. The group B is weaker, so a team from group A could decide to lose its last match of group in order to choose its opponent.

Groupe A (Nantes)

-  France (tenante du titre, médaille d'argent Rio 2016)
-  Pologne (4^e aux JO de Rio 2016, bronze au Championnat du Monde 2015)
-  Russie (non qualifiée aux JO, 19^e au CdM 2015)
-  Brésil (7^e aux JO, 16^e au CdM 2015)
-  Japon (non qualifiée aux JO et CdM 2015, bronze aux Championnat d'Asie 2016)
-  Norvège (non qualifiée aux JO et au CdM 2015).

Group B. The weakest group of the competition. Spain is favourite but its team missed the Olympics qualification. Slovenia could have the opportunity to take the head of this group. Angola will probably be last of this group. If France terminates 2nd of its group, a team could be interested to be the 4th instead of the 3rd of this group for not playing the French team in a French arena.

Groupe B (Metz)

-  Espagne (non qualifiée aux JO, 5^e au CdM 2015, argent aux CdE 2016)
-  Slovénie (6^e aux JO, 8^e au CdM 2015, 14^e au CdE 2016)
-  Macédoine (9^e aux CdM 2015)
-  Islande (13^e au CdE 2016)
-  Tunisie (12^e aux JO, 14^e au CdM, argent au Championnat d'Afrique 2016)
-  Angola (première sélection depuis 2005)

Group C. Germany and Croatia are the two favourites of this group, they should easily win against the other teams. On the other hand, the 3rd and 4th places could be highly disputed.

Group C (Rouen)

-  Germany (3rd Rio 2016, 1st EC 2016)
-  Croatia (5th Rio, 6th WC 2015)
-  Belarus (18th WC 2015)
-  Hongrie (non qualified Rio and WC 2015)
-  Chili (23rd WC 2015)
-  Saudi Arabia (22nd WC 2015)



Group D. This is the tightest group. If the team from Denmark, the reigning Olympic champion, is the favourite, the teams from Qatar, Sweden, Egypt and Argentina are about the same level. Bahrain should logically finish 6th in this group.

Group D (Paris)

- Qatar (8th Rio 2016, 2nd WC 2015)
- Denmark (1st, 5th WC 2015)
- Sweden (11th Rio 2016, 10th WC 2015)
- Egypt (9th Rio 2016, 14th WC 2015)
- Bahreïn (first qualification since 2011)
- Argentina (10th Rio 2016, 12th WC 2015)

Format of the competition

- Last day of the groups (Thursday 19th and Friday 20th January).
- President's Cup (Saturday 21st to Monday 23rd).
 - Because the matches on the last day of the competition are not played simultaneously, some teams, with guaranteed qualification, could choose their opponent and their place in the table of direct elimination.
 - The President's Cup, which determines the ranking of teams from 17th to 24th, can be considered as purely honorific and therefore susceptible to manipulation in the context of sports betting. The fifth of the groups compete for places 17 to 20 and the 6th for places from 21 to 24. The President's Cup will run from Saturday 21 to Monday 23 January.

Rumours and Media Pressure

Appeal trial for match-fixing and illegal betting for the Cesson-Montpellier Game in 2012 in which the Karabatic brothers were involved.

Types of bets

Only 20 bets are available in France on Handball.

E.g. « Who is leading the score at half time? »,

is a bet now forbidden in France.

- Which bets are offered in your country?

- In your opinion, which ones are the most risky?



Risk analysis (4)

| 11/01/17 | 12/01/17 | 13/01/17 | 14/01/17 | 15/01/17 | 16/01/17 | |
|---------------|---------------|---------------|---------------|---------------|---------------|----------|
| Fra/Bra 20:45 | Slo/Ang 14:00 | Qat/Egy 14:00 | Bra/Pol 14:45 | Arg/Swe 14:45 | Egy/Brn 17:45 | |
| | Mkd/Tun 17:45 | Bel/Chi 14:00 | Isl/Slo 14:45 | Isl/Tun 14:45 | Slo/Mkd 17:45 | |
| | Rus/Jap 17:45 | Swe/Brn 17:45 | Nor/Rus 17:45 | Chi/Ger 14:45 | Hun/Chi 17:45 | |
| | Pol/Nor 20:45 | Ger/Hun 17:45 | Tun/Esp 17:45 | Brn/Qat 17:45 | Den/Swe 20:45 | |
| | Esp/Isl 20:45 | Jap/Fra 17:45 | Ang/Mkd 20:45 | Fra/Nor 17:45 | Pol/Rus 20:45 | |
| | | Cro/Ksa 20:45 | Hun/Cro 20:45 | Bra/Jap 20:45 | Cro/Blr 20:45 | |
| | | Den/Arg 20:45 | Egy/Den 20:45 | Ksa/Blr 20:45 | Esp/Ang 20:45 | |
| 17/01/17 | 18/01/17 | 19/01/17 | 20/01/17 | 21/01/17 | 22/01/17 | 23/01/17 |
| Nor/Bra 14:00 | Ksa/Hun 14:00 | Rus/Bra 14:00 | Brn/Arg 14:00 | 14:00 | 14:00 | 13:00 |
| Qat/Arg 17:45 | Arg/Egy 14:00 | Tun/Agn 14:00 | Chi/Ksa 14:00 | 16:00 | 16:00 | 15:00 |
| Pol/Jap 17:45 | Den/Brn 17:45 | Mkd/Isl 17:45 | Ger/Cro 17:45 | | | 18:00 |
| Ger/Ksa 17:45 | Blr/Ger 17:45 | Fra/Pol 17:45 | Swe/Egy 17:45 | | | 20:00 |
| Slo/Tun 17:45 | Swe/Qat 20:45 | Jap/Nor 20:45 | Qat/Den 20:45 | | | |
| Ang/Isl 20:45 | Mkd/Esp 20:45 | Esp/Slo 20:45 | Blr/Hun 20:45 | | | |
| Rus/Fra 20:45 | Cro/Chi 20:45 | | | | | |



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Annex VII: Final Agenda

Strasbourg, 16 January 2017

KCOOS (2017) 1

“Keep Crime Out Of Sport”

Study Visit 3

Dates and working hours:

Tuesday 17 January 2017 14:00 – 17:15
Wednesday 18 January 2017 09:30 – 16:45

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

FINAL PROGRAMME



TUESDAY 17 JANUARY 2017

- 13:30 – 14:00** *Arrival of delegations*
- 14:00 – 14:30** **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
- 14:30 – 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)
 - Presentation of ARJEL monitoring tools of the French online sports betting market (ARJEL Directorate for controls and information systems)
 - Front-end: technical regulatory device enabling the analysis of the stakes
 - Mascote: internally developed software 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 at the restaurant Le Café du Commerce*



WEDNESDAY 18 JANUARY 2017

- 9:30 – 10:00 *Arrival of participants*
- 10:00 – 11:15 **Exchanges with the Members of the National Platform** (issues to be specified)
- 11:15 – 11:30 *Coffee break*
- 11:30 – 12:30 **Overview of 2016 French National Platform action
Presentation of the works of the Copenhagen Group**
- 12:30 – 13:30 *Lunch*
- 13:30 – 16:00 **Case-study: the implementation of the platform's Monitoring Board during 2017 Handball World Championship**
- Presentation of alerts methodology
 - Mock "ARJEL analysis and coordination group"
 - Processing of information in the national platform's network : top-table exercise
- 16:00 – 16:15 *Coffee break*
- 16:15 – 16:30 **Country Feedback** (Tour de table of the delegations)
- 16:30 – 16:45 **Creating a 'handbook tool'** (Cassandra Fernandes)

Participating countries: Cyprus, Hungary, Poland



Annex VIII: Final List of Participants

CYPRUS

1. Mr Costas SOLOMOU (Cyprus Sports Organisation)
2. Ms Elena PROKOPIOU (National Betting Authority)

HUNGARY

3. Mr Peter VARGA (Rapid Response and Special Police Services)
4. Mr Janos ALMADI (Szerencsejáték Zrt., Hungarian National Lottery)

POLAND

5. Mr Henryk JANUS (Ministry of Sport and Tourism)
6. Mr Dariusz ROGOWSKI (Ministry of Sport and Tourism)

FRENCH NATIONAL PLATFORM

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

KCOOS SECRETARIAT

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