

DIRECTORATE GENERAL OF DEMOCRACY

Directorate of Human Dignity and Equality

Sport Conventions Division

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Last update : 3 May 2017

T-MC(2017)16 (Anglais seulement)

## **Convention on the Manipulation of Sports Competitions (Macolin Convention)**

### **Mapping of Actors involved in Fighting the Manipulation of Sports Competitions**



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## A. List of acronyms

ACU	Anti-Corruption Unit (ICC)
AFC	Asian Football Confederation
CAS	Court of Arbitration for Sport
CIES	International Centre for Sports Studies
CoE	Council of Europe
ECA	European Club Association
EGBA	European Gaming and Betting Association
EL	European Lotteries
EPAS	Enlarged Partial Agreement on Sport (Council of Europe)
EPFL	Association of European Professional Leagues
ESSA	Sport Betting Integrity (formerly European Sport Security Association)
EU	European Union
EU Athletes	European Elite Athletes Association
EUROPOL	European Law Enforcement Agency
FIFA	Fédération internationale de football association
FIFPro	World Football Players' Union
GLMS	Global Lottery Monitoring System
IAGR	International Association of Gaming Regulators
IBIS	Integrity Betting Intelligence System (UNESCO)
ICC	International Cricket Council
ICSS	International Centre for Sports Security
IF	International Sport Federation
INTERPOL	International Criminal Police Organization (or ICPO)
IOC	International Olympic Committee
KCOOS	Keep Crime Out Of Sport
MINEPS	International Conference of Ministers and Senior Officials Responsible for Physical Education and Sport
NGB	National Sports Governing Body
NGO	Non-Governmental Organisation
NOC	National Olympic Committee
OCDE	Organisation for Economic Co-operation and Development
RGA	Remote Gambling Association
SD Europe	Supporters Direct Europe
TI	Transparency International
TIU	Tennis Integrity Unit
UEFA	Union of European Football Associations
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organisation
UNODC	United Nations Office on Drugs and Crime
WLA	World Lotteries Association



## B. Introduction

The number of actors engaged in fighting sports manipulation grows ever larger, with many new initiatives having been launched in recent years. However, while the increased interest in contributing to the action is both welcome and necessary, it can be more difficult to get a global picture of all actors involved, their exact role and responsibilities, the relationship between them and the range of new initiatives being launched.

To help clarify the situation, the Secretariat of the Convention on the Manipulation of Sports Competitions (*Macolin Convention*)<sup>1</sup> in the Council of Europe started to collect basic information from actors in order to:

- Achieve an overview of the key national and international stakeholders involved;
- Describe their responsibility (in relation to manipulation of sports competitions);
- Set out their principal initiatives / projects in the field.

This mapping report of national and international actors involved in fighting the manipulation of sports competitions is a comprehensive account to date of the principal public and private bodies / organisations working against the sports manipulations phenomenon, which is currently a cross-border, multifaceted, international pandemic. It builds, amongst other previous contributions, upon the results of the European Union Experts Group on Match-Fixing (which culminated at its 5<sup>th</sup> and last meeting held in Helsinki on 8-9 June 2016), with the additional objective to examine the actors in the field on a worldwide basis.

This is only an initial version, which requires continuous up-date from actors themselves who are invited to comments and complete the present draft in order to nurture the flow of information.

The Secretariat looks to see this as a contribution to a forthcoming process to building a comprehensive database, which is envisaged as a key tool for the future implementation of the *Macolin Convention* by the Parties. The mapping will also contribute to the indispensable analysis of the current situation, which has to be done in order to help countries to implement the *Macolin Convention*, and to detect possible ways to improve national and international co-operations. This is especially so as to avoid a duplication of work and efforts in this relatively young field, which it is hoped will in-turn deliver more targeted, efficient and coordinated actions.

Section C presents a generic description of actors involved. Because the responsibilities of national actors can vary slightly from country to country, part 1 only proposed for the moment a simple logical framework. The more detailed database of national actors will be developed further using this framework, in integrating the information already collected through the Council of Europe and European Union joint project “Keep Crime Out of Sports” (KCOOS). Part 2 presents a description of the main international actors and their activities. This section will also need to be developed further.

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<sup>1</sup> With the contribution of Oxford Research and Captivate – Legal and Sports Solutions



## C. Actors involved in fighting the Manipulation of Sports Competitions

### 1. National Actors

Each country has its own unique structure to combat corruption and organised crime, which was often used for addressing manipulation of sport competitions. In more recent years, legal reforms have contributed to strengthen the system, especially in developing specific tools to deal with corruption in sport. Four different groups are generally used for identifying the main actors involved in the fight against manipulation of sports competitions and their responsibilities.

- Public authorities - ministries, institutions and agencies, betting regulatory authorities;
- The sports movement - national Olympic committee, international federations, continental / regional federations, national governing bodies, athletes, match officials (i.e. referees), sport event organisers;
- Betting operators – both public and private;
- Law enforcement – the police, investigators, prosecutors, judges.

The level of cooperation between the four groups varies significantly from country to country. The adoption of the Macolin Convention has solidified the need to develop further such co-ordination, and urges countries to implement a systematic approach. The centerpiece of which being to establish “National Platforms”, which shall, in accordance with domestic law, inter alia:

- a. serve as an information hub, collecting and disseminating information that is relevant to the fight against manipulation of sports competitions to the relevant organisations and authorities;
- b. co-ordinate the fight against the manipulation of sports competitions;
- c. receive, centralise and analyse information on irregular and suspicious bets placed on sports competitions taking place on the territory of the Party and, where appropriate, issue alerts;
- d. transmit information on possible infringements of laws or sports regulations referred to in this Convention to public authorities or to sports organisations and/or sports betting operators;
- e. co-operate with all organisations and relevant authorities at national and international levels, including national platforms of other States.

#### 1.1 Public authorities

Public authorities are responsible for designing policies, adopting legal framework, standard setting, and international co-ordination related to fraud, corruption, money laundering, data protection, sport governance. That therefore involve all Ministries responsible for these subjects (the list of Ministries may vary from one country to another. The list below is indicative, as well all relevant public institutions / bodies with specific competencies, including especially the regulatory authorities in charge of monitoring the betting markets.

##### 1.1.1 Ministry responsible for Sport

This public authority is generally responsible for formulating sports policy and also provides financial support to sports. In most countries, sports enjoy large degree autonomy to set up their own rules and structure, however they may operate under or refer to some form of framework set up by the responsible Ministry/Department. The objective of sports can be to strengthen the opportunities for the population to engage in sports and exercise and to support sports culture through clubs and associations. This ministry is often also engaged in tackling challenges in sport, including integrity issues such as competition manipulation. This ministry can instigate debates on integrity issues with the relevant sports organisations and represent their country in relevant international fora and coordinate regional and international cooperation.

### 1.1.2 Ministry of Justice

This public authority is responsible for the administration of the justice system to uphold the rule of law which may include: organizing the court system, upholding the independence of judges and overseeing the police and public prosecutor. It is also responsible for applying legislation made by a country's parliament which can be used to convict and sentence those guilty of competition manipulation offences.

### 1.1.3 Ministry of Finance

The Ministry of Finance for a particular country often benefits from betting on sports through taxation meaning it is another public authority which has a role in relation to competition manipulation. The Betting Regulatory Authority is placed under the Ministry of Taxation or Finance in some countries. In addition, the Ministry of Finance will be responsible for the budget and spending generally for a state and will decide the financing available for other public authorities, such as the budget for the Betting Regulatory Authority.

### 1.1.4 Ministry of Taxation

The Ministry of Taxation is often separate to the Ministry of Finance. This is because the Ministry of Finance sets the types and levels of taxation whilst it is the responsibility of the Ministry of Taxation to collect the tax and institute enforcement mechanisms for those individuals or organisations who fail to pay when due. As a result, this public authority will often have important roles in combatting tax fraud, money laundering, corruption, etc., all of which are offences linked to competition manipulation.

### 1.1.5 The Betting Regulatory Authority

This public authority will only exist where sport betting is legal in whole or in part (e.g. pre-match fixed odds betting legal but in-play betting not legal). In the context of match manipulation the Betting Regulatory Authority will be responsible for regulating sports betting operators and activity within the state. Within this mandate will often fall responsibility for maintaining the integrity of the betting market, which is of paramount importance to the prevention and investigation of match manipulation. Betting Regulatory Authorities may have various powers / tools / approaches at their disposal to combat the manipulation of sports competitions and protect the integrity of the betting market, for example: real time access to betting transactions, intelligence gathering, powers of administrative and criminal investigation / prosecution and coordinating the actors in an investigation when suspicions arise/allegations are made (i.e. the police and the national governing body for the sport in question).

### 1.1.6 Data Protection Agency

Data and privacy are sensitive areas of state regulation and for that reason protection and enforcement varies across the globe. The strictest data protection regimes are to be found in Europe and North America. However, many other countries in other countries have varying levels of protection. A public authority's Data Protection Agency will typically be responsible for handling complaints about the illegal sharing of personal data and will through its policies and decisions establish when and how information can be shared. This is highly relevant for competition manipulation as the effective and efficient sharing of information between actors is paramount to prevent the activities of those intent on corrupting sport for their own personal gain. It is important to note that although data protection laws and regulations are in place to safeguard peoples' privacy, they are not there to protect those accused of manipulation activities, or persons of interest, against thorough investigation.

## 1.2 Law Enforcement

The term 'law enforcement' is most often considered to be the general police force of a state, and although the police is in general the actor closest involved in fighting the manipulation of sports competitions, it must be remembered that 'law enforcement' also encompasses specialist law enforcement agencies (e.g. a national anti-corruption unit), prosecutors, the courts and judges.

### 1.2.1 Police & Specialist Law Enforcement Agencies

The responsibility of the police in relation to competition manipulation is to enforce the applicable laws (which vary significantly across states), investigate alleged criminal activity and make arrests where

they believe sufficient evidence exists that a manipulation offence of a criminal nature has been committed. Whereas 'smaller' level offences might be handled by sport organisations themselves, more serious offences should be investigated by the police. State police can also be involved in cross-border police cooperation since competition manipulation is often conducted across multiple borders.

Specialist law enforcement agencies within a state be it a national anti-corruption force or financial crimes unit, will usually have competence to lead on an investigation where there is evidence of organised crime involvement or large sums or number of people are alleged to be involved in the manipulation conspiracy.

The decision as to what level of 'the police' will be involved and/or lead on a particular investigation into alleged manipulation will depend usually on two factors: the evidence and the public interest.

There might be different divisions and level of competences which have to be identified (including custom, federal police, local police, specialised police, etc.)

### 1.2.2 Prosecutor Offices

The overall duty of the prosecutor is to make sure that the right person is prosecuted for the right offence and to bring offenders to justice wherever possible. The prosecutor is responsible for determining the charge in all but minor cases, advising the police during the early stages of an investigation, reviewing cases submitted by the police for prosecution, preparing cases for court and presenting those cases at court. In each case reviewed, the prosecutor will consider whether there is sufficient evidence and, if so, whether the public interest requires a prosecution.

The prosecutors' office/department may have a special unit responsible for handling serious, sophisticated economic crimes such as money laundering, bribery, corruption etc. Large-scale competition manipulation would often be characterised as organized crime and be investigated and prosecuted by a special unit for economic crime.

### 1.2.3 Courts and Judges

The courts of a state hear both civil and criminal cases. Such cases are presided over (heard) by judges, and in some jurisdictions in conjunction with a jury. The majority of competition cases will be matters of criminal law and if the case is proved beyond reasonable doubt by the prosecutor may carry a prison sentence as one of the possible punishments.

## 1.3 Sport movement

At the sports level the Confederation of sport generally coordinates with the sports federations/associations and they coordinate with the clubs. The competition organisers can have contact to clubs, federations and confederations depending on the type of event.

### 1.3.1 National Olympic Committees (NOCs)

The mission of the National Olympic Committees (NOCs) is to develop, promote and protect the Olympic Movement in their respective countries. The NOCs promote the fundamental principles of Olympism at a national level within the framework of sports. NOCs support the development of athletes and the development of sport for all programmes and high performance sport in their countries. The National Olympic Committees also ensures that athletes from their respective nations attend the Olympic Games. Only an NOC is able to select and send teams and competitors for participation in the Olympic Games. The National Olympic Committees can establish an overall framework (or implement a framework established by the International Olympic Committee) for fighting the manipulation of sports competitions, which sets out rules that all Olympic sports and athletes must follow.

### 1.3.2 National Governing Bodies

National Sports Governing Bodies (NGBs) are responsible for all aspects of the sport they are governing within a particular state. In general, NGBs have jurisdiction both elite and amateur-level/recreational sports and safeguarding and representing the interest of organized sport within their country. NGBs often include specific rules for participants in their sport in regards to behaviour connected with and leading to competition manipulation, i.e. rules on betting behaviour. NGBs are also a competition organiser.

### 1.3.3 Clubs

Sports clubs have direct contact to players, coaches, officials etc. and have a responsibility to help enforce the rules established principally by the NGBs and also by the IFs. Such actions clubs can undertake are preventive and educational initiatives and they must report any information or suspicions of match-fixing to the relevant NGB/IF.

### 1.3.4 Competition Organisers

Competition organisers arrange sporting events and competitions. They often do not have a formal responsibility to combat competition manipulation however it is in their interest to work with the relevant IF/Regional confederation/NGB as they do not want their event associated with such a scandal. Competition organisers can gather intelligence and cooperate with other actors such as the police, betting operators and providers of betting monitoring systems to detect suspect activity. No to mention competition organisers can have a formal responsibility to report information/intelligence of competition to the national platform, Betting Regulatory Authority and/or other similar body. They also have the power, through the ticket terms and conditions, to remove any person from a venue who they believe to be linked to suspicious behaviour/activity.

### 1.3.5 Athletes Unions

As one of two groups of “direct influencers” on the field of play the athletes are of vital importance in effecting competition manipulation. Therefore athlete’s unions are an equally important actor to educate, guide and advise their members against the number of ways that unscrupulous individuals will use to try and corrupt a player. To date the most prevalent approach is to offer money in return for a player to attempt to fix a match. The sums involved will generally be determined by market value and the degree of risk being undertaken to fix the match.

### 1.3.6 Match officials

Match officials (e.g. referees, umpires, line judges etc.) are the second group of actors who have a direct influence over actions on the field of play and therefore are also prime targets for people or groups seeking to manipulate competitions for their own gain, be it directs financial gain through betting or for sporting reasons. Again money is a key tool in tempting match officials to consider illegally influencing the outcome of a sporting event. However, it is not the only method and there are recorded cases of match officials being offered hospitality in various forms (e.g. sexual favours or expensive merchandise) in exchange for a favourable refereeing performance. This hospitality could be in the form of offers of sexual favours or expensive merchandise.

### 1.3.7 NGOs

Some countries also have NGOs involved in sport, including in the fields of sport governance and ethics (e.g. Play Fair Game in Austria, an association supported by the Ministry of Sports, together with the Intelligence Service Austria as part of the Ministry of Interior, and acting as “national platform”). As manipulation of sports competitions has emerged as a major threat to sport, NGOs have also become involved in this area. NGOs will generally work to protect the integrity of sport and to combat for example corruption and fraud and advocate establishing efficient governance structures to protect sport from threats such as manipulation of sport competitions.

## 1.4 Sports Betting Operators and Monitoring Organisations

The private betting operators and the national lotteries often have internal monitoring systems but also coordinate through organisations such as ESSA and GLMS/ELMS.

### 1.4.1 National Lotteries

National lotteries operate games of chance for public benefit. Lotteries only operate in states they are authorised in by the competent public authority. National Lotteries have a long tradition in supporting both professional and grassroots sport. Each national lottery has some form of integrity operation and/or monitoring systems that seek to uncover irregular betting patterns and prevent competition manipulation. If national lotteries detect suspicious betting patterns they will (and in some countries have an obligation to) report it to the relevant regulators and sporting authorities. Many national lotteries have formalised exchange of information arrangements on suspicious betting patterns which organisations such as the Global Lottery Monitoring System (GLMS).

### 1.4.2 Private Betting Operators

Private betting operators also often have some form of integrity operation and/or monitoring systems that seek to uncover irregular betting patterns and prevent competition manipulation. If private betting operators detect suspicious betting patterns they will (and in some countries have an obligation to) report it to the relevant regulator and sporting authorities. Many Private Betting Operators have formalised exchange of information on suspicious betting patterns through companies providing monitoring / fraud detection services (see § 3.1.4.3 below).

Furthermore, many of the major private betting operators have committed to cooperating with IFs/NGBs in order to exchange information and improve the effectiveness of the fight against competition manipulation (e.g. International Olympic Committee's Integrity Betting Intelligence System).

### 1.4.3 Betting monitoring companies

In more recent times there has developed a new group of sub-actors within the betting arena, namely private companies establishing specialised monitoring systems to detect suspicious sports betting patterns. Such companies sell their services to sports actors such as IFs and NGBs. The evidence they can provide for both sports disciplinary and criminal cases is becoming an ever more recognised and important piece of the evidential jigsaw to prove the actions of those people involved in competition manipulation. Also importantly, while they are private companies, and therefore have no formal obligation or responsibility to assist in the fight against competition manipulation, they understand the paramount importance of sport being clean for betting operators (many of whom are monitoring company's clients for data).

## 1.5 National cooperation

So far, a total of 18 different national groups have been identified by the mapping, which typically have roles and responsibilities in relation to fighting manipulation of sports competitions. National actors within politics, sports, betting and law enforcement have their specific responsibilities and roles.

The division of responsibilities can vary from country to country. In some countries, for example, actors from the political level have an active role in all of the following areas: prevention, education and the investigation of suspicious betting patterns. Countries can (and do) thus decide to divide responsibilities differently. That is not to say one framework is better than another. Rather, what is more important is that it is clearly defined who is responsible for what tasks and that all the tasks and responsibilities are undertaken.

In order to fight manipulation of sports competitions effectively it is not only important that there is an efficient division of responsibilities but also that that all actors involved cooperate and coordinate their efforts. That is why the cornerstone of the Convention on the Manipulation of Sports Competitions is that signatory states establish cross-stakeholder national platforms in their countries. The national platforms will have an important role in this regard and will:

- Serve as an information hub, collecting and disseminating information;
- Coordinate the fight against the manipulation of sports competitions;
- Receive, centralise and analyse information on irregular and suspicious bets;
- Transmit information on possible infringements of laws or sports regulations to relevant actors; and

- Cooperate with all organisations and relevant authorities at national and international levels (see *Article 13 of the Convention and paragraphs 117 to 123 for further detail*).

Some countries have already, or are in the process of, setting up a national platform. It is up to each country to develop an efficient structure to fight manipulation of sports competitions but in general each of the actors identified here should be connected with the national platform.

Following the establishment of the national platforms, it is expected that future steps should aim at:

- Developing international coordination between the national platforms (the more national platforms that are part of a wider network, the more effective the fight against the manipulation of sports competitions will be); and
- Facilitating international networking activities between actors with the same category, in order to align principles and setting criteria and procedures for the effectiveness of their individual performances both as part of the national platforms and the broader international cooperation.

## 2. International actors

There are a number of specific international, regional and national actors involved in combating the manipulation of sports competitions. 33 specific key international actors have been identified so far in this mapping. They are connected with at least 67 initiatives and projects. Obviously, that list should be developed further in order to provide a better balanced overview about what exist in all parts of the world. The roles and responsibilities of these actors cannot be generalised and therefore only a specific description of their responsibilities are proposed. The description of each actor is followed by a description of the major initiatives they may have launched.

### 2.1 Political organisations / institutions

#### 2.1.1 United Nations Educational, Scientific and Cultural Organization (UNESCO)

UNESCO strives to build networks among nations to create solidarity by promoting education, building intercultural understanding, pursuing scientific cooperation and protecting freedom of expression. Through its involvement in cultural issues, UNESCO is also involved in sport and fighting match-fixing. UNESCO is mostly financed by its members. A states' membership of the United Nations (UN) also makes a country a UNESCO member, but countries outside the UN can also apply for UNESCO membership. UNESCO cooperates with a wide range of organisations and countries in various ways. In regards to the cooperation, UNESCO are working as advisors, financing initiatives and arranging meetings and conferences.

Initiatives/projects	Description
International Charter of Physical Education, Activity and Sport	<p>Preserving the Integrity of Sport was one of three themes of the 5th UNESCO International Conference of Ministers and Senior Officials Responsible for Physical Education and Sport (MINEPS V) in 2013 and was organised along with several partners. Here the Declaration of Berlin was adopted. The declaration is not legally binding but more than 130 countries globally have signed it. The declaration is intended to work as a political guide and also emphasizes the cross border nature of match-fixing. With the support of the International Centre for Sport Security (ICSS), work has begun to determine concrete follow-up activities that will lead into MINEPS VI, to be held in Russia in 2017.</p> <p>In 2015 a follow up meeting on MINEPS V was arranged in Qatar with support from mainly the International Centre for Sport Security. It focused mainly on dialogue and cooperation, exchange of information, models for resource mobilization and prevention.</p>

2.1.2 United Nations Office on Drugs and Crime (UNODC)

UNODC is a global leader in the fight against illicit drugs and international crime. UNODC operates in all regions of the world through an extensive network of field offices and relies on voluntary contributions, mainly from Governments, for 90 per cent of its budget. The UNODC’s involvement in the field of competition manipulation has mainly focussed on the legal elements of match-fixing and has conducted several studies on the jurisdictional limits in regards to combating match-fixing. Further, the UNODC also hosts international events in order to bring international shareholders together in the fight against match fixing. In this field the UNODC is cooperating with other actors including the IOC and ICSS.

Initiatives/projects	Description
UNODC Resource Guide on Good Practices in the Investigation of Match-Fixing (2016)	This Resource Guide has been produced in conjunction with the International Centre for Sports Security (ICSS). It is aimed primarily at law-enforcement officials but can also be used by the officials in sports organizations who work in this area. The Resource Guide was published in August 2016 with a view to conducting activities thereafter, such as training workshops.
UNODC-IOC Model Criminal Law Provisions for the Prosecution of Competition Manipulation (2016)	This is a follow-on initiative to the 2013 study carried out by the two actors (see below). This document uses this initial study and broadens its perspective by looking at specific legislation in 52 countries. This research revealed that during the last three years some national legislation has been further developed and more countries have adopted specific legislation aimed at criminalizing the manipulation of sports competitions. This booklet puts forward for consideration Model Criminal Law Provisions aimed at assisting countries in establishing effective legislation to prosecute those involved in competition manipulation. The harmonization of criminal legislation is key for international law enforcement and judicial cooperation and will further facilitate convergence in criminal justice responses.
UNODC-ICSS partnership (2015)	UNODC and ICSS announced a partnership at the 13th United Nations Crime Congress in an effort to strengthen cross-border investigations and prosecution in match fixing. The partnership seeks to establish: <ul style="list-style-type: none"> <li>• Capacity-building training programmes for key organisations from sport, government and law enforcement</li> <li>• The organisation of Sport Integrity Awareness Seminars;</li> <li>• Establishing a task force to provide ad-hoc specialist advice, including legal assistance</li> <li>• Developing technical tools and resources in the area of sport integrity</li> </ul>
Criminalization Approaches to Combat Match-Fixing and Illegal/Irregular Betting: A Global Perspective (2013)	The study contained in this publication was commissioned by, and completed under the supervision of, the UNODC, with the financial support of the IOC. This study analyzed the capacity of legal systems around the world to respond to match-fixing by reviewing 19 jurisdictions from around the world with civil or common-law systems. The study included an assessment of the basic criminalization options available in the fight against match-fixing (i.e. specific or ad hoc offences for illegal/irregular betting, match-fixing, or other offences that can serve the same purpose) and a review of other features such as jurisdiction, sanctioning of participatory acts and organized crime, liability of legal persons, whistleblowers’ protection, anti-money laundering measures and special investigative techniques.
Memorandum of understanding between UNODC and IOC in 2011	Through an MOU between the two organisations, the above mentioned projects and initiatives have been developed.

2.1.3 Organisation for Economic Co-operation and Development (OECD)

The mission of the Organisation for Economic Co-operation and Development (OECD) is to promote policies that will improve the economic and social well-being of people around the world. The OECD

provides a forum in which governments can work together to share experiences and seek solutions to common problems. *OECD works with governments to understand what drives economic, social and environmental change.* They measure productivity and global flows of trade and investment and analyse and compare data to predict future trends. The OECD covers topics related to match-fixing including money laundering, bribery and corruption, organised crime, illicit trading and taxation.

Initiatives/projects	Description
OECD Task Force on Countering Illicit Trade (TF-CIT)	<p>The OECD Task Force on Countering Illicit Trade (TF-CIT) aims to co-ordinate international expertise in the quantification and mapping of illicit markets to enable a fuller understanding of the connections between different forms of trafficking, and underpin analysis of the public policies that successfully increase economic and societal resilience to this threat. The TF-CIT is organised in the context of the OECD High Level Risk Forum. It provides a platform for international public and private stakeholders to analyse how to incentivise compliance with laws and regulation to promote legitimate trading networks. By drawing attention to the scope of illicit activities and the interconnections between them, the Forum and the TFCIT can also help countries focus and co-ordinate efforts to drive criminal entrepreneurs and illicit networks out of business. TF-CIT is currently focusing on:</p> <ul style="list-style-type: none"> <li>• Mapping the economic activities of transnational criminal networks, by gathering data on volume and flow of illegal trades and agreeing to common methodological approaches;</li> <li>• Examining the conditions and policies that encourage or inhibit different sectors of illegal trades, whether at the level of production, transit or consumption;</li> <li>• Developing visualisation tools to help public and private sector decision makers better target prevention and mitigation efforts in strategic markets<sup>2</sup>.</li> </ul> <p>In April 2016, OECD published a report - <i>Illicit Trade: Converging Criminal Networks</i> - which assesses the magnitude, flows and drivers of illicit trade and the illegal economy including: narcotics, human trafficking, wildlife, sports betting, counterfeit medicines, alcohol and tobacco. The report includes a specific 20-page section on sports manipulation as an economic crime, calling for a co-ordinated global approach.</p>

#### 2.1.4 Council of Europe

The Council of Europe addresses match-fixing and the defence of ethical sport issues, including threats to the rule of law and democracy. Two specific Council of Europe’s Conventions in the field of corruption and money laundering (1999 and 2005) provide standard-setting reference points in the definition of the mechanisms and legal means needed to tackle criminal organisations. With the support of the Parliamentary Assembly, the Committee of Ministers adopted a Convention in 2014 which specifically deals with cases involving manipulation of sports competitions (the Macolin Convention) which was elaborated and negotiated within the Enlarged Partial Agreement on Sport (EPAS). The Council of Europe Sport Division is currently promoting the Convention to assure its entry into force, and assists countries in implementing its principles through a joint project and various other events.

Initiatives/projects	Description
Convention on the Manipulation of Sports Competitions (Macolin Convention)	The Convention is the first legally binding instrument that aims to combat the Manipulation of Sports competition. EPAS led the negotiations towards the drafting of the new international convention on the Manipulation of Sports Competitions (match-fixing). Over 40 states were involved in the drafting process. The Convention opened for signatures in September 2014.
Keep Crime Out Of Sport (KCOOS)	KCOOS aims to raise awareness on the issues of match fixing and sports betting risks, promote the Council of Europe Convention on the Manipulation of Sports

<sup>2</sup> <http://www.oecd.org/gov/risk/oecdtaskforceoncounteringillicittrade.htm>



	Competitions and to assist countries in implementing the various measures of the Convention within their national systems, in particular, in the fight against match-fixing and in the regulation of sports betting.
International Conference on the Promotion and Implementation of the Convention on the Manipulation of Sport Competitions	Each year Council of Europe organises a conference to promote the Convention on the Manipulation of Sport Competitions and its implementation. The conference provides information on the on-going progress of signatures and ratifications and facilitates discussion and sharing of good practice on effective implementation of the convention. Council of Europe undertakes a number of activities continuously to promote the Convention.

### 2.1.5 European Parliament

The European Parliament has addressed match-fixing in a number of resolutions (online gambling, match-fixing and corruption in sport and so on) amongst others urging member states to better coordinate their efforts, share best practices in stamping out corruption in sport, make match-fixing a criminal offence in national legislation and enhance cooperation across borders. The European Parliament has repeatedly called on sports organisations to adopt a zero tolerance policy on corruption and to set a 'common definition of sport fraud and cheating'.

Initiatives/projects	Description
Sport Intergroup	In 2015 the European Parliament initiated a Sport Intergroup. An intergroup is an informal working group, assembling MEPs interested in the same subject from various political groups. They hold regular meetings – usually 1 or 2 every month, External stakeholders are also invited to the meetings to promote exchanges between the parliamentarians and civil society. On 6 April 2016 the Sport Intergroup organised the conference “Match-fixing: a threat to sport”.

### 2.1.6 European Commission

The European Commission has become increasingly involved in match-fixing and has responsibility for two relevant areas: supply of online gambling and cooperation within sports. For the first time in the history of the European Union, the Treaty on the Functioning of EU (TFEU) gave the EU specific competence in the field of sport. This is to be found in Article 165 of that Treaty, with one of the specific areas for Union to focus on being, “developing the European dimension in sport, by promoting fairness and openness in sporting competitions and cooperation between bodies responsible for sports.” The Commission has the power to initiate actions such as to propose recommendations, propose regulations or directives in other policy areas which may affect sport, publish Green Papers or White Papers on sport related issues. Competition manipulation has specifically been addressed in a Communication on Sport (2011), a Green Paper on Online Gambling (2011), and a Communication on a comprehensive European framework on online gambling (2012). Moreover, the European Commission has financed a number of competition manipulation related projects and studies including those listed in the table below.

Several Directorate Generals (DGs) within the EU have responsibility for competition manipulation. The overall responsibility for sport falls within the Directorate General for Education, Culture, Multilingualism and Youth (DG EAC) (Sport Unit). However, as sport is affected by other EU policy areas as well, other DGs such as Internal Market (DG GROW), Competition (DG COMP), and Employment and Social Affairs (DG EMPL) are also of relevance for sport and match-fixing.

Initiatives/projects	Description
EU Experts Group on Match-fixing (subgroup under the Expert Group of Member States' Authorities in Charge of Sport)	Comprised of representatives from the public authority responsible for sport. The expert group set up under the EU Work Plan for Sport 2014-2017 focus on Exchange of best practices regarding the fight against match fixing, in particular on a possible Commission Recommendation on best practices in the prevention and combatting of betting-related match-fixing, followed by a report on state of play. The expert group is expected to produce its findings by the end of 2016.
DG GROW Expert Group	Comprised of representatives from the public authority responsible for gambling.

gambling services	The objective of the Group is: (a) to establish cooperation between Member States' authorities and the Commission on matters relating to gambling services; (b) to advise and assist the Commission in the preparation and implementation of policy initiatives relating to gambling services; (c) to monitor the development of policies and emerging issues in the area of gambling services; (d) to bring about an exchange of experience and good practice in the area of gambling services, including its international dimension. The group will assist the Commission in the preparation of legislative proposals and policy initiatives.
DG EAC studies on match-fixing	In 2013 DG EAC funded two studies on match-fixing. The first study covers risk assessment and management and prevention of conflicts of interest in the prevention and fight against betting-related match-fixing in the EU 28. The second study covers the sharing of information and reporting of suspicious sports betting activity in the EU 28. Both studies were published in September 2014. See <a href="http://ec.europa.eu/sport/news/2014/betting-related-match-fixing_en.htm">http://ec.europa.eu/sport/news/2014/betting-related-match-fixing_en.htm</a>
DG HOME pilot project on integrated mechanisms for cooperation between public and private actors to identify sports betting risks.	Four projects on match-fixing was funded: <ul style="list-style-type: none"> <li>• Keep Crime out of Sport (KCOOS) led by the Council of Europe</li> <li>• Preventing criminal risks linked to the sports betting markets (#PreCrimBet) led by IRIS</li> <li>• "Monitoring systems of sports betting and warning mechanisms between public and private actors (BETMONITALERT) led by Christian Kalb Consulting</li> <li>• ANTI-MATCH-FIXING FOMULA: Understand + Share + Methodize + Replicate led by the Italian Government Office for Sport</li> </ul>
2012 Preparatory Action European Partnership on Sports	Under the preparatory actions 5 projects on match-fixing was funded: <ul style="list-style-type: none"> <li>• Keep rugby onside: promoting integrity in rugby</li> <li>• Educating European Elite Athletes about Match Fixing</li> <li>• Don't fix it! An education &amp; prevention programme</li> <li>• Eduquer et reponsabiliser les gouvernements et les autorités sportives nationales à la menace des matches truqués</li> <li>• Staying on side: How to stop match fixing</li> </ul> See <a href="http://ec.europa.eu/sport/policy/preparatory-actions/preparatory-actions-2012_en.htm">http://ec.europa.eu/sport/policy/preparatory-actions/preparatory-actions-2012_en.htm</a>
ERASMUS+	The Erasmus+ programme supports the fight against match fixing under its Sport chapter and funds program every year, including: <ul style="list-style-type: none"> <li>• Fix the Fixing: Proactive quelling of sports events manipulation (Aristotle University of Thessaloniki, Greece)</li> <li>• True Basketball. Real Games (Latvian Basketball Association)</li> <li>• 2016 PROtect Integrity (EU Athletes, Netherlands)</li> <li>• European Rookie CUP (Austrian ice hockey league)</li> </ul>

## 2.2 International and Regional Law Enforcement Agencies

All of these law enforcement agencies have units specialised in organised crime, corruption and fraud. Certain agencies also have specific sub-units dedicated to the sport sector in these serious areas. Law enforcement is a crucial stakeholder, being tasked with the operational aspect of the process, conducting investigations, making arrests and building cases for prosecution. It is usually this actor that will identify whether legislation and other rules put in place are efficient and effective on an operational level.

### 2.2.1 INTERPOL

INTERPOL is the world's largest international police organization, with 190 members. Interpol works to improve the international police coordination and cooperation. Interpol mostly conducts a facilitating role and do not have authority in individual states. INTERPOL is heavily involved in the fight against match

fixing and is cooperating with a long range of partners and has initiated several projects seeking to fight match-fixing. It has a dedicated 'Integrity in Sport' Unit <http://www.interpol.int/Crime-areas/Crimes-in-sport/Integrity-in-sport> and released a bi-monthly bulletin to all Member States. INTERPOL has also a Match Fixing Unit in charge of the INTERPOL Match-Fixing Task-Force (IMFTF) and SOGA operations.

<b>Initiatives/projects</b>	<b>Description</b>
Protecting Integrity in Sport programme	Since the launch in 2011 of its Integrity in Sport programme – a global training, education and prevention initiative with a focus on match-fixing as well as irregular and illegal betting – INTERPOL has delivered training to more than 2 500 individuals from 160 countries. The programme target three main areas, which are governance, regulatory enforcement and awareness raising and training. Activities are based on five core principles: partnerships, information exchange, coordination, prevention strategies and proactivity.
Match fixing task force (IMFTF)	The task force works to bring law enforcement agencies together from around the world. IMFTF supports member states with investigations and alike, and also works to maintain a global network that shares information, intelligence and best practices. The membership number has risen from the original 8 in 2011 to 77. Europol is also a member.
SOGA (Soccer Gambling)	Is mostly an initiative that focuses on gambling related to soccer. It is a tactical operation under Interpol which seeks to dismantle international criminal syndicates especially during major football tournaments like the World Cup. During six waves it has managed more than 12,500 arrests, confiscation of USD 53,6 million in cash and closure of illegal gambling houses that handled more than USD 6,3 billion between 2007 and 2016.
Interpol and IOC Memorandum	Interpol and the IOC have had a Memorandum of Understanding since 2014 which provides four different types of Capacity Building Workshops namely National/Regional Workshops, Partnership Development Meetings, Train the Trainer Workshop and Sports Fact-Finders and Law Enforcement Investigators Workshops. Each are tailored to the unique circumstances of governments, law enforcement agencies, sport governing bodies and betting operators around the world. Since, this has resulted in a Handbook on Protecting Sport from Competition Manipulation and in a handbook for Fact Finders dealing with disciplinary procedures within sport.

### 2.2.2 The European Law Enforcement Agency (Europol)

The objective of Europol shall be to support and strengthen action by the competent authorities of the Member States and their mutual cooperation in preventing and combating organised crime, terrorism and other forms of serious crime affecting two or more Member States.

Europol does therefore support national law enforcement agencies in Europe with gathering of information, analysis and dissemination of criminal intelligence as well as coordinating operations related to the mentioned criminal phenomena. Europol facilitates the exchange of information with its participating Member States and cooperation partners through a dedicated and secure communication platform. Europol has in place a dedicated team, Focal Point Sport Corruption, engaged in delivering operational support to MS in this particular field; furthermore, Europol has signed a number of memorandum of understandings (MoUs) with other relevant stakeholders active in this field (e.g. sports governing bodies, sports integrity units). It also supports a wide range of strategic activities in the EU and contributes to various projects related to fighting sports corruption, including KCOOS.

<b>Initiatives/projects</b>	<b>Description</b>
Focal Point Sports Corruption	In 2014 Europol created a dedicated operational project under the name of Focal Point Sports Corruption to tackle Organised Crime Groups (OCGs) involved in sports corruption and associated crimes. This allows using a unique platform to collect, exchange, analyse and disseminate criminal intelligence received from law enforcement of EU Member States and cooperation partners in regard to

	sports corruption related investigations
Europol Memorandum with UEFA and Tennis Integrity Unit (TIU)	In 2014 Europol has signed a Memorandum of Understanding with UEFA and in 2015 with the Tennis Integrity Unit (TIU) in order to increase cooperation in the fight against match-fixing. In this context mutual support will be given in education programmes, and Europol, UEFA and the TIU will also liaise on matters concerning individual relations with law enforcement bodies, as well as with UEFA and tennis member associations.
Europol Memorandum with Sportradar	In 2015 Europol has also signed a Memorandum of Understanding (MoU) with the betting monitoring company Sportradar. Under the terms of the MoU, both parties will actively engage in the exchange of expertise, statistical data, information and/or trends as they relate to sporting integrity. Moreover, the two parties will be exploring projects that they can collaborate on or support each other on.

### 2.2.3 Eurojust

Eurojust was set up in 2002 and strives to strengthen judicial cooperation in criminal matters and promote the coordination of investigations and prosecutions between the competent authorities of EU countries. It is an institution with relevance to the prosecution of sports corruption affecting two or more Member States. Along with Europol, Eurojust is the judicial organization in charge of cross-border cooperation. Eurojust is composed of national prosecutors, magistrates and police officers from each member state. The main tasks of Eurojust consists of asking national authorities to investigate specific acts or cases, facilitate communication between member states, assist Europol and assist in investigations. Eurojust is in the early stages of collaboration with the Council of Europe Sport Division on this topic of competition manipulation.

<b>Initiatives/projects</b>	<b>Description</b>
The VETO operation – in cooperation with Europol, Eurojust, Interpol, and police units from 13 EU countries.	A concrete example of European cooperation in criminal matters is an action conducted between 2011 and 2013, by joint investigation teams from Europol, Eurojust, Interpol, and police units from 13 EU countries, and which resulted in the dismantling of a complex criminal network involved in widespread football match-fixing. It concerned over 380 professional football matches and 425 match and club officials, players, and criminals from over 15 countries. Betting profits generated by this wide-scale fixing operation amounted to more than EUR 8 million, while corrupt payments to people involved in matches reached over EUR 2 million.

### 2.2.4 Court of Arbitration for Sport (CAS)

The Court of Arbitration for Sport (CAS) is a specialist independent dispute resolution institution for sport disputes. Note that it is not a competent criminal court and does not hand down any criminal sanctions (i.e. prison sentences). It has to interpret the rules and regulations of the particular sport before it.

It has three principal services: arbitration, mediation and giving advisory opinion. The CAS also sets up non-permanent tribunals, which it does for the Olympic Games, the Commonwealth Games and other similar major events where it is asked to do so. To take into account the circumstances of such events, special procedural rules are established on each occasion.

For the purposes of cases of competition manipulation, arbitration is the only relevant procedure. The CAS hears cases and then pronounces arbitral awards that then can be enforced in the courts of almost every country in the world. For a dispute to be submitted to arbitration by the CAS, the parties must agree to this in writing. Such agreement may be on a one-off basis or appear in a contract or the statutes or regulations of a sports organization.

An increasing amount of high profile cases of competition manipulation have come before the CAS in recent years with some important principles/recommendations being developed (some of those cases from 2010 onwards are listed below). The case brought forward by UEFA against KS Skenderbeu (2016, Albania) is a pretty important match fixing case in that it relates to the impact of betting monitoring reports and their credibility as evidence in cases. One such CAS recommendation being the use of the unique “comfortable satisfaction” standard of proof to apply to cases of competition manipulation. CAS awards are not binding on subsequent arbitral Panels but are often persuasive.

Sanctioned Party	Role	Sport	Sports Body	Offence(s)	Sanction(s)	Date of Award
Mohammed Asif	Player	Cricket	International Cricket Council	Match manipulation	CAS upheld 7-year suspension (with 2 years suspended provided he participated in an education programme).	April 2013
Besiktas	Club	Football	Union of European Football Associations	Match manipulation	CAS upheld the 1-year suspension from European competition.	Aug 2013
Salman Butt	Player	Cricket	International Cricket Council	Match manipulation; Failure to report (an approach)	CAS upheld 10-year suspension with 5-years suspended provided he participated in an education programme).	April 2013
David Savic	Player	Tennis	Association of Tennis Professionals	Match manipulation	CAS upheld his permanent suspension from the sport (i.e. life ban)	Sep 2012
Eskişehirspor	Club	Football	Union of European Football Associations	Match manipulation	CAS upheld 1-year suspension from European competition.	July 2014
Fenerbahce	Club	Football	Union of European Football Associations	Match manipulation (club officials & manager)	CAS upheld 2-year suspension from European competition	Aug 2013
FK Pobeda	Club	Football	Union of European Football Associations	Match manipulation	CAS upheld 8-year suspension	Apr 2010
Aleksandar Zabrcanec	President	Football	Union of European Football Associations	Match manipulation	CAS upheld his permanent suspension from the sport (i.e. life ban)	April 2010
Guillermo Olaso de la Rica	Player	Tennis	Association of Tennis Professionals	Match manipulation; Failure to report	CAS upheld 5-year suspension and c.£17,500 fine.	Sep 2014
Daniel Koellerer	Player	Tennis	Association of Tennis Professionals	Match manipulation; Failure to report	CAS upheld his permanent suspension from the sport (i.e. life ban) but set aside the c.£70,000 fine imposed by the first instance tribunal.	Mar 2012

Sanctioned Party	Role	Sport	Sports Body	Offence(s)	Sanction(s)	Date of Award
Oleg Oriekhov	Referee	Football	Union of European Football Associations	Failure to report	CAS upheld his permanent suspension from the sport (i.e. life ban)	Jan 2011
Kevin Sammut	Player	Football	Union of European Football Associations	Match manipulation	CAS reduced his suspension from a life ban to 10-years.	May 2014

## 2.3 International Sports Movement

### 2.3.1 International Olympic Committee (IOC)

The International Olympic Committee is the supreme authority of the Olympic Movement. The IOC strives to protect clean athletes and the integrity of sports by engaging in the fight against doping and the manipulation of competition and related corruption. The IOC Ethics Commission is charged with defining and updating a framework of ethical principles, including a Code of Ethics, based upon the values and principles enshrined in the Olympic Charter. To streamline different initiatives, the Olympic Movement Unit on the Prevention on the Manipulation of Competitions was launched in 2017 year during the 2<sup>nd</sup> edition of the International Forum for Sports Integrity (IFSI). This Unit is the IOC’s flagship in fighting the manipulation of competitions through regulation/legislation, awareness raising/capacity-building, and intelligence/investigations.

Initiatives/projects	Description
Olympic Movement Code on the Prevention of the Manipulation of Competitions	The Olympic Movement Code on the Prevention of the Manipulation of Competitions was approved by the IOC Executive Board in December 2015. The Code aims to provide the Olympic Movement and its members with harmonised regulations to protect all competitions from the risk of manipulation. The Code is a regulatory framework defining the different kinds of violations, minimum standards of disciplinary procedures and the scope of sanctions. All National Olympic Committees (NOCs), International Federations (IFs) and their respective members at the continental, regional and national levels, as well as IOC recognised organisations, are called upon to implement regulations in compliance with the Code.
The Integrity Betting Intelligence System (IBIS)	The IOC IBIS is a system for the exchange of information/ intelligence which allows for information and intelligence related to sports betting to be collected and distributed for use by all stakeholders of the Olympic Movement. A large number of betting operators and regulators, national platforms and diverse sports betting monitoring entities have signed MoUs with the IOC. They are responsible for monitoring betting activity during the Olympic Games and major sports events and alerting IBIS directly when suspicious activity is detected.  The system went operational for the first time for the Sochi 2014 Olympic Winter Games. IBIS remains operational between editions of the Olympic Games for the benefit of International Federations (IFs) to use at their major international events and other multisport events. In the event that an IF suspects one of its events has been jeopardised, the IF may ask IBIS for information on the betting market.
Agenda 2020 Recommendation creates 10 million dollar fund	A dedicated ten million US dollar fund was created as one of the Recommendations of the IOC’s Agenda 2020 process. The fund is to be used “to protect clean athletes from any kind of manipulation or related corruption”.
INTERPOL-IOC Global Integrity in Sport Capacity Building and Training Programme	Following the signature of an MOU with INTERPOL in January 2014, a Global Integrity in Sport Capacity Building Programme was launched that involves the delivery of tailored Workshops and Trainings in countries around the world (see INTERPOL section).
INTERPOL-IOC Handbook on Protecting Sport from Competition	This Handbook is a tangible result of the partnership between Interpol and the IOC. It provides stakeholders in the sports movement with important information on how to protect clean athletes from competition manipulation, while also

Manipulation (2016)	outlining ways how sports organisations and law enforcement agencies can cooperate effectively. The Handbook is also a useful tool for every sports club, association and federation to understand the dynamics of competition manipulation; and to learn how to put in place internal measures to prevent match-fixing and other corruption, as well as to protect the dignity of athletes.
INTERPOL-IOC Handbook on Conducting Fact-Finding Inquiries into Breaches of Sports Integrity (2016)	A key element of the initiative between the IOC and INTERPOL is the training of individuals at international and national sports federations and organisations to conduct fact-finding inquiries into breaches of integrity, in particular, those related to competition manipulation and to present the outcome of such inquiries to initiate disciplinary proceedings and, where appropriate, criminal proceedings. This Handbook aims to provide a solid process for conducting a fact-finding inquiry. Using the Handbook and the recommended steps will help to make a complex, challenging inquiry more manageable, transparent and accountable. This Handbook should be read in conjunction with the <i>IOC-INTERPOL, Handbook on Protecting Sport from Competition Manipulation, 2016</i> .
IOC-UNODC Criminal Law Provisions for the Prosecution of Competition Manipulation (2016) (see above)	The UNODC-IOC Study aims to assist countries in establishing effective legislation to prosecute those involved in Competition Manipulation. A booklet based on the extensive legal analysis of 52 national jurisdictions found that 28 incriminate competition manipulation and provides a check-list of “good-practice” elements and proposes Model Criminal Law Provisions and additional guidelines for consideration by national legislators. The detailed study is available online and was launched in February 2017.
The Integrity and Compliance Hotline	A reporting mechanism for potential cases of competition manipulation as well as other violations of the integrity of sport. The web-based hotline is open to athletes, coaches, referees and the public, and guarantees anonymity. Anyone can report suspicious approaches or activities related to competition manipulation and/or infringements of the IOC Code of Ethics or other matters – including financial misconduct or other legal, regulatory and ethical breaches – over which the IOC has jurisdiction.
International Forum for Sports Integrity (IFSI)	Aims at strengthening and coordinating all activities to protect clean athletes from match-fixing, manipulation of competitions and related corruption, IFSI takes place every 2 years with the second IFSI taking place in February 2017 in Lausanne. The outcome Declaration of IFSI outlines the activities focusing on the 3 pillars of Education and Capacity Building; Intelligence and Investigations; and Legislation and Regulation.
Olympic Movement Unit on the Prevention of the Manipulation of Competitions	During the 2 <sup>nd</sup> IFS in in 2017, the Olympic Movement Unit for the Prevention of the Manipulation of Competitions was launched. With the aim of supporting the Olympic Movement in safeguarding their sports from competition manipulation and will be housed within the IOC.
E-learning platform to educate athletes on issues related to competition manipulation	A new International Olympic Committee (IOC) e-learning platform providing information to athletes on issues related to competition manipulation was launched in 2016 at the Rio Olympic Games. The e-learning is available in over 10 languages and uses a scenario-based learning approach to teach users how to safeguard the integrity of their sports. The e-learning will become mandatory for all participants at the Olympic Games.

### International Federations

International Sports Federations (IFs) are non-governmental organisations administering one or more sports at world level and have overall responsibility for the integrity of their sport(s). The national governing body administering those sports is affiliated to the respective IF. The IFs also supervise the development of athletes practicing these sports at every level. Each IF governs its sport at world level and ensures its promotion and development. They monitor the administration of their sports at the regional and national levels, guarantee the regular organisation of competitions as well as respect for the rules of fair play.

2.3.2 The Fédération Internationale de Football Association (FIFA)

FIFA is the world governing body of football. One of the core objectives is to promote integrity and prevent match manipulation in football. FIFA works with the member associations (211) and confederations (6) to improve and strengthen governance standards and preventative measures within the global football community. The FIFA Integrity Initiative was launched in 2012 within FIFA Security Division, and has since evolved under the scope of the FIFA Legal & Integrity Division – Ethics Department. The Integrity Initiative adopts an integrated approach to tackle match manipulation through five key pillars: prevention, monitoring, information gathering, investigations, and adjudication. The initiative involves a range of projects and key external stakeholders worldwide. FIFA can sanction breaches to its codes and regulations and also can extend sanctions to have a worldwide effect.

<b>Initiatives/projects</b>	<b>Description</b>
FIFA's Specific Recommendations to Combat Match Manipulation – Guidelines for FIFA member associations	<p>In May 2014, FIFA issued a set of guidelines for its member associations to combat match manipulation and to ensure its disruption, through awareness-raising initiatives, education, fact-finding inquiries or investigations, prosecution and disciplinary sanctioning. These specific recommendations outlined a framework for the sustainable development of a tailored national integrity initiative.</p> <p>Also, these specific recommendations aimed to form structures with corresponding procedural guidelines to effectively handle incidents of match manipulation. These recommendations also enable the MA's to draft their own national regulations to combat match manipulation.</p>
Global Network of Integrity Officers	<p>Global Integrity Network of Integrity Officers and Analytical Hub FIFA is building a global network of Integrity contacts to coordinate the national implementation of the integrity initiative and enable the exchange of information. FIFA is also implementing a central information hub to enable the analysis of global trends and networks.</p> <p>FIFA continued this approach in 2016 by establishing regional integrity workshops to identify and train the network of "Specific Points of Contact" and/or Integrity Officers in the confederations and member associations to initiate national integrity initiatives.</p>
Capacity Building	<p>After implementing a wide range of awareness raising strategies FIFA takes a holistic approach to capacity building with training interventions in all areas of football from grassroots through governance, prevention and investigation. FIFA's capacity building programme aims to assist the entire football community to implement or enhance an integrity initiative to protect national football.</p> <p>To date, FIFA conducted numerous national and regional workshops and conferences designed to bring key stakeholders together in order to benefit the sports community, betting operators and law enforcement agencies.</p>
Cooperation with Sportradar in the context of FIFA's global football integrity programme <sup>3</sup>	<p>FIFA has concluded an agreement with Sportradar Integrity Services that will provide FIFA with a full suite of monitoring, education and intelligence services to further strengthen the integrity of football around the globe. Under the terms of the new agreement, Sportradar will use its Fraud Detection System to identify and analysis any suspicious betting behavior or patterns across a number of international and domestic competitions around the world. FIFA will work closely with its six continental confederations that comprise FIFA's member associations to ensure that any findings are provided to the appropriate organisations, and to support any relevant follow-up action or disciplinary proceedings.</p>
Protecting and preventing match manipulation in	<p>FIFA has established programmes including preventative measures and related proactive initiatives devoted to ensuring that the integrity of all FIFA related</p>

<sup>3</sup> N.B.: Prior to the cooperation with Sportradar, the FIFA Early Warning System (EWS), since its inception in July 2007, monitored and analysed the international sports betting market in the context of FIFA's competitions.



matches and competitions	matches and competitions are resolutely protected from match manipulation.
FIFA 2.0 and FIFA "Forward"	In October 2016, FIFA issued "FIFA 2.0 – The vision for the future" which has outlined the way forward from FIFA. It also outlined the objectives to promote the game of football, protect its integrity, and to bring the game to all. Included in FIFA 2.0 are recommendations to all associations to implement good governance and integrity programmes under FIFA "Forward" project with devoted funding sources to associations for the implementation of integrity projects.

### 2.3.3 World Rugby

This is the international governing body of Rugby. World Rugby has traditionally been a regulator and investor in the sport of Rugby which it continues to do. However, World Rugby has recently taken upon itself to promote Rugby to a new market through participation and engagement and thus promote Rugby more widely. To ensure the integrity of Rugby globally is maintained, World Rugby has entered into cooperation with Sportradar as well as their own anti-corruption program to fight match fixing.

<b>initiatives / projects</b>	<b>Description</b>
Cooperation with Sportradar and educational program prior to the 2015 World Cup	Prior to the World Cup in 2015, World Rugby signed a deal with Sportradar to monitor all games and betting patterns in relation to the World Cup. This was done as a part of a bigger anti-corruption focus which also included educational programs as described below. Further, all athletes, coaches and staff was required to participate in an educational program on match fixing and doping.
World Rugby Anti-corruption program	World Rugby has established an Anti-corruption program that also includes a webpage with information for everybody involved. The webpage presents information on all elements of match fixing from describing illegal actions to an example of a typical approach from a match fixing criminal. The program also includes MoU with the major betting operator and gives World Rugby access to information that it might require.

### 2.3.4 The Tennis Integrity Unit (TIU)

In September 2008 professional tennis became one of the first major sports to establish its own dedicated anti-corruption unit. The Tennis Integrity Unit is charged with enforcing the sport's zero-tolerance policy towards gambling-related corruption worldwide. The TIU is a joint initiative and funded by tennis's three governing bodies and four grand slam events. The TIU has put in place a Tennis Anti-Corruption Programme, which applies to all players and personnel associated with the sport. The Programme gives the TIU extensive powers to investigate possible corruption offences.

<b>Initiatives/projects</b>	<b>Description</b>
Prevention of match-fixing	TIU works with Governing Bodies and Tournament Directors to implement integrity protocols designed to restrict unauthorised access to players and maintain their privacy. Preventing corruption from taking place includes identification of would-be corruptors targeting players, coaches, officials or others with potential influence.
Education programme	TIU runs an education programme for education players and support staff where they explaining the tactics and approaches used by potential corruptors. All players are made aware of these risks and the responses required under the terms of the Uniform Tennis Anti-Corruption Programme. Another important function of the education programme is to protect players from unfounded and malicious allegations of corrupt practice.
Tennis Integrity Protection Programme	The Tennis Integrity Protection Programme is an interactive online video with questions and answers conceived by the TIU. It is designed to quickly familiarise players both with tennis's anti-corruption rules and the tactics typically employed

(TIPP)	by would-be corruptors.
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**2.3.5 International Cricket Council (ICC)**

The ICC is effectively the global body for the game of cricket. The ICC established its own Anti-Corruption Unit (ACU) in 2000 in the wake of match-fixing allegations and revelations about South Africa captain Hansie Cronje and the captains of India and Pakistan, Mohammed Azharuddin and Salim Malik. Eventually all three were banned for life from international cricket. Other players were suspended, fined and warned about their future conduct following judicial and Board enquiries in several major cricket countries. Yet this corruption crisis showed that the sport faced its gravest challenge globally for 30 years.

Betting on cricket in the legal and illegal markets continues to grow rapidly and, with many, many millions of dollars being bet on every match, the threat of corruptors seeking to influence the game has not gone away. It is for these reasons that the ACU continues to pursue the three objectives of investigation, education, and prevention.

Recent ‘successes’ for the ACU in terms of investigation are the hefty bans handed down to three Pakistani national team cricket players for manipulating an international fixture against England and suspending another international player, this time for Hong Kong, for two years and six months for a failure to report an approach to manipulate international matches.

Initiatives/projects	Description
ICC Anti-Corruption Unit	<p>The ACU's principal role is to assist the ICC and its members countries in the eradication of conduct of a corrupt nature prejudicial to the interests of the game of cricket; and to provide a professional, permanent and secure infrastructure to act as a long term deterrent to conduct of a corrupt nature prejudicial to the interests of the game of cricket.</p> <p>The Chairman of the ACU is a former high ranking senior police officer and acts in consultation with the ICC's Chief Executive. Day-to-day operational responsibility rests with the General Manager and Chief Investigator.</p> <p>Allegations of corrupt activity are probed thoroughly by the Unit's Investigators, sometimes with the assistance of national and international Police Officers. In support of their efforts, the ACU's Senior Operations Manager continues to build an international network of contacts in both the legal and illegal betting markets so that where concerns are raised, the Unit is able to activate these relationships and effectively investigate allegations.</p> <p>All players and officials that take part in the top level of international cricket pass through the ACU's education programme.</p> <p>As part of the education process, players are given details of the ways in which corruptors may seek to 'groom' them from an early age as well as the penalties that exist - not just for fixing all or part of a match but also for accepting money, benefit or other reward for the provision of information or failing to disclose the inappropriate conduct of others.</p> <p>The seven Anti-Corruption Managers coordinate the ACU's prevention measures. These experienced law enforcement professionals are present at every international series to ensure that strict anti-corruption protocols are enforced at all venues, collection information / intelligence, particularly around the dressing room areas.</p>
Integrity Working Party	<p>The latest of a number of reviews of the ACU and its operations over the years came in 2014 when the ICC constituted an Integrity Working Party to review the global risks for international and domestic cricket created by the threat of corruption.</p>

	<p>At its next Annual Conference in June 2015, the ICC Board reviewed and adopted the recommendations of the Integrity Working Party.</p> <p>This decision saw a greater role for the central Anti-Corruption Unit and paved the way for greater coordination of preventative and investigative activity around the world with a unified vision to 'keep cricket clean'.</p> <p>Key recommendations that were adopted included:</p> <ul style="list-style-type: none"> <li>• Confirmation that the ICC's Anti-Corruption Unit (ACU) will be the central focal point for all anti-corruption activities in international and domestic cricket and have enhanced intelligence capabilities;</li> <li>• Acknowledgement of the need for greater coordination between the ACU and national anti-corruption bodies;</li> <li>• Affirmation of the ACU's accountability for all international cricket with the ACU also serving as the central coordinator for multi-jurisdictional cases;</li> <li>• Renewed emphasis on a programme that encompasses prevention, disruption, investigation and prosecution in that order of priority;</li> <li>• A requirement for all Full Members and Associate Members with ODI and T20I status to review their anti-corruption resources and adopt an anti-corruption code which includes the core principles contained in the ICC's domestic template code within six months;</li> <li>• A requirement for all ICC Full Member countries and Associate Members with ODI and T20I status to review their anti-corruption resources to ensure they effectively protect domestic cricket;</li> <li>• An international panel to be established from which the Members may, and the ICC will, draw their anti-corruption tribunals;</li> <li>• The adoption of revised 'standard operating procedures' (SOPs) based on those formulated for the ICC Cricket World Cup 2015;</li> <li>• A thorough review of all training materials used for prevention, education and awareness to ensure that there is a consistency of message imparted, the most suitable and up to date techniques are used (such as video clips, scenarios and participative exercises) and records are retained of all those in receipt of training;</li> <li>• The ICC and its Members to take active steps to lobby for the criminalisation of match fixing in sport in all Member countries and strengthen relationships with other anti-corruption stakeholders, including law enforcement agencies and betting monitoring companies.</li> </ul>
<p>Anti-Corruption Oversight Group</p>	<p>Unit</p> <p>At the February 2016 ICC Board Meeting, the Board received an anti-corruption update from the Chairman of the ACU and, as recommended by the Integrity Working Party, took steps to formally appoint an Anti-Corruption Oversight Group.</p> <p>The oversight group will include the Chairman of the Executive Committee and will also include a prominent former captain of India, a legal expert and an independent anti-corruption advisor. The Chairman of the ACU and ICC Chief Executive will also be ex-officio members of the group.</p> <p>The group will meet once a year to review and provide independent input into the strategy adopted by the sport to tackle corruption and its implementation, and to offer its advice and guidance to the Chairman of the ACU where required.</p>

**Continental/Regional Confederations**

Continental/Regional confederations are umbrella organisations for a particular sport(s). They are usually delegated some responsibilities by the IF which can include integrity and match manipulation. They are often be involved in international cooperation to fight competition manipulation. Regional confederations also organise competitions for nations and clubs.

2.3.6 Union of European Football Associations (UEFA)

UEFA is one of the six regional confederations of FIFA and is the governing body of football in Europe. Its mission is to promote, protect and develop European football. The UEFA Statutes provide that a key objective of UEFA is to safeguard the regularity and proper functioning of sporting competition and to protect football from any form of abuse. Thus, it is also involved in combatting competition manipulation.

It has implemented a resolution entitled “United for the integrity of the game”, which was unanimously approved by all UEFA national associations at the XXXVIII Ordinary UEFA Congress in Kazakhstan in 2014. The resolution’s key objective is to protect football from abuse of any kind and protect the integrity of the sport. It has also developed a position paper and an action plan with the European Club Association (ECA); the Association of European Professional Leagues (EPFL) and FIFPro’s (the world football players’ union) Europe division. The action plan contains a number of concrete initiatives focusing on education, prevention, monitoring and disciplinary sanctions, designed to protect the integrity of football in Europe.

Further, UEFA promotes the importance of its national associations to combat match fixing through a number of national practices i.e. sharing of information, cooperation and punishment of offences through its network of Integrity Officers. UEFA also emphasises the importance of cooperation between its members and state authorities.

Recently, UEFA implemented one of the main pledges made by new President Aleksander Čeferin in creating a new solitary division entitled ‘Protection of the Game’ which started operations from the 1st March 2017. This new unit incorporates the whole area of activity of UEFA aimed at providing safeguards from any threats to the game of football in Europe. A pillar of this new division is the section called ‘Integrity’ which now incorporates disciplinary matters, anti-doping and anti-match-fixing. With this initiative UEFA is centralising all disciplinary and ethical issues that exist in European football providing a unified approach in tackling problems arising within the game at continental level. This unification of tasks is aimed at increasing the importance that UEFA has attributed to the fight against match-fixing over the years, making UEFA one of the principal international stakeholders in this issue.

Through the initiatives listed below UEFA has brought a number of successful cases against players, club officials and referees for various competition manipulation offences (see CAS table above).

Initiatives/projects	Description
UEFA Betting Fraud System	UEFA, in cooperation with the international company Sportradar, has since 2009 operated a betting fraud detection system (BFDS), which monitors and analyses betting activities on about 32,000 matches in Europe each year (comprising UEFA competitions and the top two domestic divisions and cup competitions of the member associations). The system has been fully operational since July 2009. The BFDS highlights irregular betting movements both pre-match and in-game (live) in all the core betting markets (Asian handicap, Totals and 1X2) from all major European and Asian bookmakers.
Network of integrity officers	UEFA has created a network of integrity officers within the each of its national associations, who are liaising with the local law enforcement and are also implementing education and prevention schemes in their respective countries.
European Football United for the integrity of the game – a joint action plan (UEFA; ECA, EPFL and FIFPro)	The European professional football stakeholders have developed and financed a number of concrete steps designed to protect the integrity of the sport. These initiatives form the cornerstones of the European football family’s joint action plan to combat this threat and includes: <ul style="list-style-type: none"> <li>• Code of conduct,</li> <li>• Education and prevention programmes,</li> <li>• Betting fraud detection and reporting systems,</li> <li>• Coordination and cooperation through integrity officers network and other persons specifically-dedicated to integrity matters at national level,</li> <li>• Investigation and prosecution</li> <li>• Contribution of betting industry.</li> </ul>

Confidential reporting platform	UEFA has an Integrity reporting platform, which is a multi-language platform that allows any person to report information on match fixing issues to UEFA. The information can be done anonymously and is confidential. Dialogue and information from the informant can be established through use of a personal incident number and password.
A mobile device app	UEFA has launched an Integrity app in seven languages with a wealth of information regarding manipulation of sport results. Through the app it is also possible to report incidents to the integrity platform.
Education programmes	UEFA has established onsite and online education programmes for players, referees and club coaches to inform, educate and provide them with general advice on the issues surrounding sports betting, including risks they may encounter and ways in which they can report suspicious approaches. It carries out integrity presentations in all youth tournaments organized by UEFA, both for males and females.
A permanent working group on match-fixing	In 2014, UEFA set up a permanent working group in order to analyse and tackle the phenomenon of match-fixing across Europe. The idea behind this working group is to involve members of law enforcement of other jurisdictions as well as Europol representatives, leading politicians and experts that have in the past contributed to the fight against match-fixing and are playing an important role in this field.

2.3.7 Asian Football Confederation (AFC)

The AFC is another one of FIFA’s six regional confederations. From the perspective of the manipulation of sports competitions it is an important body because a number of its member associations are countries with whom match manipulation and unregulated betting has unfortunately become synonymous, especially in relation to football.

However, in line with its Vision and Mission, the AFC strives to ensure that Asian football conforms to the highest ethical and sporting standards. To counter the threat and be proactive, the AFC has in place an Integrity Unit which has devised and implemented measures to prevent, detect and respond to match manipulation in Asian football.

Since 2014, the AFC Integrity Unit has ran (in conjunction with other actors) a number of successful investigations into competition manipulation leading to heavy disciplinary sanctions for 33 persons (players and officials) from 7 Member Associations, with the clear majority receiving life-bans from any future involvement in football-related activities. Among others, this includes the banning of two Thai referees for life for their involvement in the manipulation of four matches; banning a Tajikistani referee for life for conspiring to influence the result of the Maldives vs. Tajikistan match in the AFC U-19 Championship; banning of twenty-two players and officials from Laos and Cambodia for multiple matches, banning of four Nepal players and one official for life for match manipulation offences in relation to various friendly international A team fixtures during the period 2008-2012. The latter of those followed a year-long investigation coordinated between the AFC and its partner Sportradar, as well as the Metropolitan Crime Division of the Nepal Police and the UEFA integrity unit. Additional investigations by the AFC remain on going.

Initiatives/projects	Description
Integrity Measures	Having recognised the enormous threat of match-fixing to Asian football, the AFC being the governing body of the sport in Asia has implemented measures with an aim to prevent, detect and respond to match-fixing in Asian Football.  At the level of Prevention firstly, the AFC adopts and upholds good governance principles including having a regulatory framework in place that acts to effectively prevent and respond to cases of match-fixing. In line with its existing regulations, the AFC adopts a Zero Tolerance Policy on match-fixing and imposes sanctions

	<p>for involvement in match-fixing (including attempting, instigating or being an accomplice). Furthermore, involvement in betting connected to football, failure to report information linked to match-fixing, utilization of confidential knowledge to aid match-fixing/betting gains and association in a professional or sports-related capacity with an individual having violated AFC articles pertaining to match-fixing are all prohibited. Similarly, the direct and/or indirect involvement of any club in any activity aimed at arranging or influencing the outcome of a match at national or international level will result in that club being deemed ineligible to participate in AFC Competitions for one (1) football season by the Entry Controls Body (ECB). Finally, the AFC “Do the Right Thing Policy” aims to provide easily accessible and secure channels for anybody who has experienced or suspects wrongdoing or unethical behaviour in AFC competitions or activities to report this to a trusted Independent Head of Integrity that will not be controlled or unduly influenced by the AFC.</p> <p>The second aspect of good governance entails AFC’s pursuit to forge strong collaboration with key stakeholders as FIFA, other Confederations, AFC MAs, Law Enforcement Agencies and other national and international organizations committed to combating match-fixing primarily through the sharing of best practices and where possible, the provision of support in awareness raising initiatives and investigations.</p> <p>Secondly, at the same level of Prevention, initiatives are taken to impart necessary knowledge and training via various developed resources (booklets, presentations, videos, declarations, posters, circulars etc.) to all potential targets of match-fixing to enable them to recognise, reject and report all instances of match-fixing. This includes players, match officials, team officials, MA officials, integrity officers and all others subject to AFC rules and regulations. This information is also available for those outside the AFC’s jurisdiction via the AFC’s official communication mediums.</p> <p>At the level of Detection, monitoring and reporting mechanisms have been established which feed information in to the AFC Integrity Unit. These include the AFC Monitoring System (AMS) powered by Sportradar to identify suspicious irregularities during matches that could be linked to, or be indicative of, match-fixing. Other sources include the AFC Integrity reporting e-mail address (integrity@the-afc.com), the AFC Integrity Mobile App (under development), regular information exchange with key stakeholders detailed above, source network, in-stadium surveillance and daily monitoring of open source media.</p> <p>Where an allegation or suspicion is detected, a detailed Response process exists which entails investigations in line with the AFC’s regulations and the provision of support to the AFC judicial bodies in the imposition of sanctions.</p>
<p>Cross-stakeholder Integrity Action Plan for the AFC Asian Cup Australia 2015</p>	<p>The extensive integrity action plan and key stakeholder collaboration implemented to combat the threat of match-fixing during the recent AFC Asian Cup Australia 2015 was highly successful, with no evidence of match-manipulation uncovered at the tournament.</p> <p>The planning and cooperation between the Asian Football Confederation and its key partners, including the Australian Government and law enforcement authorities, Football Federation Australia, the AFC Asian Cup Australia 2015 Local Organising Committee and betting monitoring service provider Sportradar, was pivotal in proactively upholding the integrity of the tournament.</p> <p>The AFC Integrity Action Plan for the tournament was made up of several core elements, including awareness-raising and training of players, team officials and match officials before the event and detailed and technologically advanced monitoring of global betting markets through Sportradar’s Fraud Detection System.</p> <p>Other key components of the strategy were suspicious-activity reporting through AFC’s confidential reporting mechanism and utilisation of the Australian Crime</p>

	Stoppers program. In addition, collaborative incident response procedures between AFC and the Australian law enforcement authorities were established and tested, with unprecedented levels of cooperation and mutual support.
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International / regional Non-Governmental Organisations

As manipulation of sports competitions has emerged as a major threat to sport, NGOs have also become involved in this area. NGOs will generally work to protect the integrity of sport and to combat for example corruption and fraud and advocate establishing efficient governance structures to protect sport from threats such as manipulation of sport competitions.

2.3.8 SportAccord

SportAccord (a not-for-profit association) is the union for both Olympic and non-Olympic international sports federations as well as organisers of international sporting events. SportAccord’s mission is to unite and support its members in the co-ordination and protection of their common aims and interests, while preserving and respecting their autonomy. SportAccord encourage and facilitate knowledge sharing among members and provide resources and expertise in relevant areas such as anti-doping, integrity, good governance, social responsibility and digital media. By establishing several multi-sports games that group together similar sports, they aim to promote their members and increase their visibility and resources. As an organisation, SportAccord identify with the key values of neutrality, transparency and accountability while promoting sport’s ability to contribute to positive change in society.

Initiatives/projects	Description
Guide to Integrity in Sport	SportAccord’s Guide to Integrity in Sport provides insights into the problem of betting, crime and match-fixing. It is designed as a practical guide for sports federations and provides advice on how to tackle this challenge including what to do in a crisis and best practices to protect sports’ integrity.
Integrity Database	This Database presents legislation and regulations on betting issues that are defined by countries (national betting authorisations, characteristics, restrictions, etc.) and by sports (international sports federations rules in place, education and monitoring procedures, etc.) This Database aims at promoting a better knowledge globally about existing approaches taken to combat match-fixing in sport and how betting activities are regulated in countries around the world.
Global Programme to Stop Match-Fixing in Sport	The programme aims at raising awareness about what is responsible sports betting behavior and aims at helping athletes and officials to prevent match-fixing from destroying their career and sport.

2.3.9 FIFPro

FIFPro is the worldwide representative organisation for all professional footballers. The World Players’ Union currently has 58 national players’ associations as their members. FIFPro is the collective voice of the world’s professional footballers and its mission is to supports players. FIFPro’s specific intention is to pursue and defend the rights of professional football players. FIFPro is thus also involved in protecting players against the threats posed by match-fixing and is involved in information and educational activities targeted at players.

Initiatives/projects	Description
Say No To Match-Fixing	The aim of the campaign is to safeguard the integrity of football, to raise awareness of the dangers of match-fixing, to provide positive role models for players, and to protect and educate football players – and all other members of the football family – on how to recognise, resist and report any attempt to manipulate matches.
DON’T FIX IT! An education and prevention programme	FIFPro is preparing an education and prevention programme to fight match-fixing in football. To realize this project - which has received a European Union grant - FIFPro will closely cooperate with Birkbeck University and UEFA. The

to fight match-fixing in football	<p>specific aims of the project are:</p> <ul style="list-style-type: none"> <li>• To significantly raise awareness of the dangers of match fixing among players, referees, officials, administrators, organisations, and public authorities and to raise the ability of those involved in professional football to take effective action against match fixing.</li> <li>• To improve the structural environment of professional football and reduce the conditions that lead to match fixing. Conditions include workplace bullying, harassment and intimidation, poor reporting mechanisms, inconsistent standards of conduct, and lack of expertise and knowledge among key football bodies and public authorities.</li> <li>• To establish strong and relevant networks at national and European levels to take the lead in the fight against match fixing.</li> </ul>
FifPro Black Book	<p>The FifPro Black Book is a report on the working conditions for Eastern European football players, which documents how they struggle with lacking salary payments, violence, racism and match-fixing. According to the report players who do not receive their salaries are more likely to consider participating in match-fixing, and 11,9 percent of player's state that they have been approached by match-fixers, while 23,6 percent are aware of match-fixing taking place in their league. The report is based on a survey of footballers in 14 Eastern European countries.</p>

**2.3.10 EU Athletes - The European Elite Athletes Association**

EU Athletes is a federation of European players' associations and athlete unions representing more than 35 national associations and 25.000 professional and elite level individual athletes across the continent and sport disciplines.

EU Athletes was founded in 2007 and advocates for the athletes on various issues such as anti-doping, competition manipulation and education on the risks of sports betting, dual careers or good governance. EU Athletes is a stakeholder in the sport sector at the European Union, the Council of Europe, EPAS and other important sport and government committees.

EU Athletes is also a member of World Players Association and engages into the wider labour movement through UNI Global Union and its European branch UNI Europa.

Initiatives/projects	Description
The Code of Conduct on Spots Betting for Athletes	<p>The Code of Conduct on Sports Betting for Athletes was prepared by EU Athletes, the European Gaming and Betting Association, the European Sports Security Association and Remote Gambling Association. It's an athlete-friendly tool that helps educating players on match-fixing. EU Athletes is determined to make sure that players are informed about sports betting integrity issues and aware of the risks associated with their status.</p>
PROtect Integrity	<p>EU Athletes develops and promotes effective education programmes for players on sports betting integrity and the prevention of match-fixing. The most important part of our education programme is that it is delivered through face-to-face sessions at the sport clubs, by people the players know and trust – their player associations' representatives. Based on these points, PROtect Integrity project implemented by EU Athletes and its members, delivers match-fixing education to 15 000 athletes a year in Europe. #PROtectIntegrity social media campaign is a part of the project and allows to further disseminate the campaign and reach the grassroots sport.</p>
EU Sport Integrity Day (yearly event)	<p>This event, held on social media every year on the 15<sup>th</sup> of April, is the occasion to raise public and stakeholders' awareness on the issue of match-fixing but also to exchange good practices and reinforce key education messages about sports betting integrity.</p>



2.3.11 UNI World Athletes (UNI Sport Pro)

UNI World Athletes is a worldwide collective of 85,000 athletes through major player associations including FIFPro (the world footballers’ association), the Federation of International Cricketers’ Associations, the International Rugby Players’ Association, EU Athletes, the National Basketball Players’ Associations, the National Women’s Basketball Players’ Association, the National Football League Players Association, the National Hockey League Players Association, the Japanese Professional Baseball Players Association and the Australian Athletes’ Alliance.

Athletes under the umbrella of UNI World Athletes are based in over 60 countries and belong to over 100 different player associations. The mission of UNI World Athletes is to promote best practice in the collective representation of professional athletes, advance matters of common concern to those athletes and their unions, and to encourage athletes to organise. Central to this purpose is a clear commitment to ensure that the essence and integrity of sport are nurtured, and its social and cultural role in society is preserved.

Ongoing initiatives/projects	Description
One collective voice at the global level	The Executive Committee of UNI World Athletes has resolved to pursue six key policy areas as priorities. One of the six is “to advance the integrity of sport, especially through effective anti-doping measures and empowering the athletes to help combat external threats to the integrity of sport such as corrupted governance, match manipulation, racism and discrimination”.

2.4 Betting Operators and Organisations

2.4.1 International Association of Gaming Regulators (IAGR)

The IAGR consists of representatives from gaming regulatory organizations throughout the world. The mission of IAGR is to advance the effectiveness and efficiency of gaming regulation. They want to advance the effectiveness and efficiency of gambling regulation:

- By providing a forum in which gaming regulators and other organisations from various countries meet, exchange views, information and discuss policies
- By being the central point of contact for inquiries from governments, regulatory agencies and the international gaming industry
- By providing expert forums (including match fixing) to promote awareness and best practice.

2.4.2 World Lottery Association (WLA)

The World Lottery Association (WLA) is a member-based global professional organization to advance the interests of state-authorized lotteries and gaming organisations. It collects and disseminates information to its members in 80 countries (6 continents) about the lottery business and other areas of relevance; it establishes standards of best practice; establishes ethical standards; provides educational and professional development services.

2.4.3 European Lotteries (EL)

The European Lotteries is the umbrella organisation for European State Lotteries and Toto Associations who works to advance the collective interests of its members and provide a forum for the exchange of experience and information. EL brings together 73 Lotteries – from 43 different countries. EL members channel their profits to good causes and who always operate with a clear authorization in the jurisdiction of the consumer, fully in compliance with article 3 par 5 of the Convention on the manipulation of sport competitions. EL has been pro-actively addressing responsible gaming and security through high level certification procedures and educational programmes. The European Lotteries also work to address match-fixing, illegal gambling and related criminal activities. Driven by their core values, integrity, precaution and society, Lotteries seek to defend the European sport model against threats from match-fixing. In addition to its own initiatives EL has supported a number of initiatives led by other organisations.

EL has been also active contributor to relevant for a and expert groups, including the EU Expert Group on Match-Fixing, and the IOC IFSI Expert Group Education and Capacity Building in the fight against match-fixing (2016)

<b>Initiatives/projects</b>	<b>Description</b>
Global Lottery Monitoring system (GLMS)	Global Lottery Monitoring System (GLMS) is a not for profit organisation established in cooperation between the World Lottery Association and the European Lotteries (EL). The GLMS is built upon the European Lottery Monitoring System (ELMS) for sports betting, which was established by the European Lotteries (EL) and has been operational in Europe since 2009 (unofficially already since 2005). GLMS is the state lotteries' mutualised monitoring system on sports betting. It aims at detecting and analysing suspicious betting activities that could question the integrity of a sport competition. GMLS has full time operators to collect and distribute information to members and partners.
The European Lotteries Sports Integrity Action Plan	<p>European Lotteries has adopted the EL Sports Integrity Action Plan, the 7-point programme, a policy document that states the position of the European Lotteries, its commitment to the fight against match-fixing and its firm support to the EPAS initiative towards the adoption of an international convention against the manipulation of sports competitions. The document calls for 7 concrete actions in the field of sports integrity:</p> <ol style="list-style-type: none"> <li>1. Fight against illegal operators</li> <li>2. Strong legal framework &amp; Effective sanctions</li> <li>3. Education &amp; Prevention</li> <li>4. Corporate governance &amp; conflict of interest provisions.</li> <li>5. Monitoring against betting irregularities and match-fixing</li> <li>6. strong sports betting regulatory framework</li> <li>7. Cooperation &amp; Coordination at a national and international level</li> </ol> <p>Driven by the core lottery values, The European Lotteries has taken a number of initiatives to address match-fixing and has supported many of the different measures implemented by relevant organisations (including the Council of Europe, IRIS, Sport Accord, Interpol, UEFA, AIPS).</p>
EL Code of Conduct on Sports Betting	The main objective of the Code of Conduct, which should be seen as complementary to the jurisdictional, legal and regulatory requirements within each national jurisdiction, is to create responsible gaming standards and a sustainable model for the best protection of consumers and the guidelines for responsible advertising and marketing in sports betting. The EL Code of Conduct on Sports Betting addresses matters related to conflict of interests, underage betting, customers identification, sharing of information and monitoring of betting patterns and sharing of information with public and sport authorities.
Other Projects	<p>In 2013-2014, EL was a key partner in the project “<i>What are the national networks in the EU against match-fixing</i>”. The project, which was co-funded by the European Commission and the European Lotteries (EL) and its Members, had the objective to raise awareness among different stakeholders on sports integrity-related matters and create a platform for dialogue and further cooperation between representatives from different sectors, including sports authorities, public authorities, law enforcement and legal betting operators. The impact of the workshops, which were organised by IRIS and the respective Lotteries in 22 EU Member-States and were attended by approximately 900 participants, was significant. In many countries the concerned stakeholders met for the very first time and some workshops led to immediate cross-sector mobilisation.</p> <p>In 2016-2017, EL also been a key partner of the Keep Crime Out Of Sport (KCOOS) project led by the Council of Europe and co-funded by the European</p>

	Commission’s DG HOME pilot programme.
Education & capacity building	EL has a strong expertise in matters related to education and capacity building, as together with Sport Accord and the World Lottery Association (WLA), from 2011 to 2015, was running the Sport Accord Global Programme Against Match-Fixing, which sought to raise awareness among athletes and sport officials on risks related to the matter. Members of EL, have also been active in relevant initiatives through both the education and prevention of players in different sports (e.g. French Lottery, FDJ) and the creation of educational initiatives seeking to establish a general culture of values and integrity in sport (e.g. Greek Lottery, OPAP).

**2.4.4 Global Lottery Monitoring System (GLMS)**

Global Lottery Monitoring System (GLMS) is a not for profit organisation established in cooperation between the World Lottery Association and the European State Lotteries and Toto Association. The GLMS is built upon the European Lottery Monitoring System (ELMS) for sports betting, which was established by the European Lotteries and has been operational in Europe since 2009. GLMS supplies users with alerts regarding unusual activity and provide GLMS members’ with a platform to communicate with other lotteries and various organisations about suspicious matches.

<i>Initiatives/projects</i>	<i>Description</i>
GLMS utilises Sportradars’ Fraud Detection System (FDS).	Sportradar monitors odds movements and patterns worldwide to identify suspicious activities through their Fraud Detection System (FDS). FDS uses algorithms and a database of both odds and personal fraud scores, in order to detect possible match-fixing.

**2.4.5 Sport Betting Integrity (ESSA)**

ESSA (Sport Betting Integrity, former “European Sport Security Association”) is a not for profit organization whose members are mostly private sports betting operators. ESSA provides an early warning system with the aim of detecting and deterring the corruption of ESSA members’ betting markets through the manipulation of sporting events, by using real time information within ESSA members’ own internal systems to alert any suspicious betting transactions.

ESSA has betting monitoring systems that can locate who makes a bet and where. ESSA employs a two tier mechanism when monitoring irregularities in betting patterns. Tier 1 is an Internal Control System (ICS), while tier 2 is an Early Warning System (EWS). ESSA has signed MoU’s with 20 sport federations including the previously FIFA Early Warning System, the IOC, the Tennis Integrity Unit etc.

Members: 888.com, ABB, Bet365, Bet-at-Home, Betcliv, Betdaq, Betsson, Bet Stars, BetVictor, Betway, Bwin, Digibet, Expekt, Fonbet, Interwetten, LadbrokesCoral, PaddyPowerBetfair, Skybet, Sportingbet, Sporting Index, Sportium, StanleyBet, Stoiximan, Unibet, William Hill

<i>Initiatives/projects</i>	<i>Description</i>
Internal Control System	All ESSA members are required to have an Internal Control System (ICS). This legal requirement obliges ESSA members to maintain strict safeguards on “who

(ICS)	bets on what” and to retain records of all transactions thereby creating a digital fingerprint and detailed audit trail.
Early Warning System (EWS)	The EWS primarily works on the information provided by the ESSA members own ICS’s. The ESSA system is based upon real time information within ESSA members’ own internal systems. The process works the following way: a member reports suspicious patterns in tier 1 and then reports to ESSA which trigger an alert to all ESSA members. All members are then required to inform whether they have noticed similar patterns with as much information as possible.

2.4.6 Remote Gambling Association (RGA)

888.com, bet365, betfred, betway, Blue Print Gaming, Gala Coral, Gamesys, IGT, Ladbrokes, Microgaming, Meridian, NetEnt, Netplaytv, NYX Gaming Group, Openbet, Paddy Power Betfair, Playtech, Poker Stars, Rank Group, SBOBET, Skybet, Sportingbet, Sportech, Stan James , Stanleybet International, Tabcorp, Tipsport, Tombola, Unibet, William Hill

2.4.7 European Gaming and Betting Association (EGBA)

Bet-at-Home, Betcliv, Betsson, Expekt, GVC, Kindred (ex-Unibet), Zeal, Gibraltar Betting and Gaming Association

2.4.8 Federbet

Federbet is an international non-profit federation, which provides a monitoring system for detecting manipulation of sport competitions. Federbet monitors odds movements. If the changes are outside the range defined as “acceptable” a match is detected as suspicious. Federbet also provides match fixing educational services.

2.4.9 Sportradar

Sportradar’s Integrity Services offer a suite of services to sport federations, competitions, law enforcement and other international and national stakeholders. The company’s Fraud Detection System provides match fixing detection to leading stakeholders across 13 sports including FIFA, UEFA, AFC, CONMEBOL, NBA, NHL, World Rugby, ICC, ESL and MotoGP and works closely with Europol, Australian Federal Police, Austria’s Bundeskriminalamt and other police forces. The FDS Reports have initiated or supported over 200 successful sporting sanctions worldwide and tens of criminal convictions. The FDS, in a CAS-approved process, monitors betting patterns from across over 550 betting operators found in every corner of the globe, using a team of dedicated expert analysts to contextualise any anomalous odds movements or patterns. Sportradar also has an in-house Fraud Intelligence Unit that uses Open Source Intelligence gathering and analysis to uncover match fixing operators, processes and relationships and that team works with some European National Platforms already. Finally, the company provides education and prevention services, delivering workshops, e-learning modules, apps and other services to clubs, leagues, federations and police teams.

2.4.10 Genius Sports

Genius Sports is a private company funded by selling sports technology and data services to sports leagues and federations. Genius develops and manages Sport Integrity Monitor. Their system monitors live odds movements to compare against proprietary mathematical models / algorithms to help sports governing bodies, and other stakeholders, identify abnormal betting activity in real time. In addition, they work with trading teams and liaise directly with the operators who are able to inform them of suspicious activity seen at account level (high turnover, new account creation to circumvent limits, flagged accounts etc.) All irregular activity is passed to the Integrity Department for further analysis and confidential reporting to clients. They also work extensively with US-based sports leagues whilst providing training / advisory service to leagues, federations, law enforcement and government agencies to help prevent match fixing around the world.

## 2.5 International NGOs

### 2.5.1 International Centre for Sports Security (ICSS)

The International Centre for Sport Security (ICSS) is an international, independent and not-for-profit organisation based in Doha, Qatar. It was established in 2010 and formally launched in March 2011, with a global mission to promote and protect the integrity and security of sport. The ICSS plays an integral role in addressing the most prominent challenges facing the world of sport today, having assembled a team of top international experts in sport safety, security, integrity and good governance; the ICSS works with multiple sectors with the aim of safeguarding sport and primarily with organising committees, governments, bidding nations, infrastructure owners, sport associations leagues and clubs.

<i>Initiatives/projects</i>	<i>Description</i>
Betting and Match-Fixing Education	The ICSS Sport Integrity Directorate works with sports bodies to provide betting and match-fixing education to a wide range of stakeholders including players, coaches, and referees through to executives and administrators.
Partnership with Sorbonne University	In 2014, the ICSS and the University Paris 1 - Panthéon-Sorbonne released the results of a two-year work on the links between international gambling and sports results' manipulation for the purposes of betting fraud. The report containing Guiding Principles to combat the Manipulation of Sports Competitions – a set of practical recommendations for governments, sports organisations, betting regulators and operators to adopt in order to combat match-fixing and illegal betting.
Partnership with United Nations Office on Drugs and Crime (UNODC)	In April 2015 ICSS and UNODC have formed a partnership to help strengthen cross-border investigations and prosecutions into match-fixing and the manipulation of sports competitions. Programmes include: <ul style="list-style-type: none"> <li>• Capacity-building training programmes for key organisations from sport, government and law enforcement</li> <li>• The organisation of Sport Integrity Awareness Seminars;</li> <li>• Establishing a task force to provide ad-hoc specialist advice, including legal assistance</li> <li>• Developing technical tools and resources in the area of sport integrity</li> </ul> In August of 2016 the UNODC and ICSS published a comprehensive Resource Guide on Good Practices in the Investigation of Match-Fixing.
Handbook on sharing of information related to suspicious betting patterns	The ICSS and the Council of Europe (Enlarged Partial Agreement on Sport) have commissioned Sorbonne University to develop a handbook on sharing of information related to match-fixing. The handbook will provide guidelines (expected 2017) for information sharing and good practice examples of how information can be shared without violating the data protection laws.
Financial Integrity in Sport (FITS) Global Project	In November 2014 the ICSS launched the FITS Project assembling experts from the political, financial and regulatory world, along side sport stakeholders, regulators and key-stakeholders. In the framework of FITS, the ICSS supported an independent experts report (released in February 2016) led by Prof. Matt Andrews of the Harvard Kennedy School, with an in-depth analysis of the main threats and challenges posed to financial integrity and transparency in the sport, as well as proposals of solutions.
Sport Integrity Global Alliance (SIGA)	Launched in November 2015, SIGA multi-stakeholders platform became a non-for-profit association under Swiss Law on 31 January 2017. Thirty international organisations from sport, government and business signed the SIGA Statutes as Founding Members and Founding Committed Supporters <a href="http://siga-sport.net/siga-constitution/">http://siga-sport.net/siga-constitution/</a> . By promoting best practices, universal standards and creative global solutions, SIGA aims to usher in a new era in the governance and

	integrity of sport. Expert Steering Groups have developed first draft universal Standards to guide the development and implementation of reform <a href="http://siga-sport.net/siga-universal-standards/">http://siga-sport.net/siga-universal-standards/</a> related to three core areas of concern: Good Governance, Financial Integrity and Sports Betting Integrity. Four umbrella sports bodies have adopted the SIGA Universal Standards including the Caribbean Association of National Olympic Committee (CANOC), the European Professional Football Leagues (EPFL), esport Integrity Coalition (ESIC) and the European Aquatic Association (LEN).
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### 2.5.2 Football Supporters Europe

Football Supporters Europe (FSE) is an independent grass-roots network of football fans in Europe with members in currently 48 countries across the continent. FSE includes individual football supporters, informal fan initiatives, fan clubs, ultra groups, national team supporter groups and national as well as transnational supporter organisations. FSE members acts upon issues in modern football such as ticketing, fan culture, discrimination and policing in football and is encouraging football fans as key stakeholders to speak up with a powerful and united voice within the structures of the game.

Initiatives/projects	Description
Improving The Fight Against Match Fixing (position paper)	Supporters Direct Europe (SD Europe) and Football Supporters Europe (FSE) jointly promoted that supporters have a clear interest in joining the ongoing efforts to combat match fixing, something which can only be successful on the basis of a coordinated approach from all stakeholders involved. As a key stakeholder, supporters have a responsibility to address the current situation by engaging in the fight against match fixing; and wherever they can add value to the efforts being undertaken by other stakeholders and public authorities.

### 2.5.3 Supporters Direct Europe (SD Europe)

SD Europe is an organisation that assists democratic supporters’ groups in achieving formal structured involvement in their clubs and associations, and developing member ownership of football clubs. SD Europe works with supporters, member-run clubs and other stakeholders in more than 20 countries. Established in 2007 with support from UEFA, SD Europe also advises clubs on their ownership and governance structure and works with football governing bodies, leagues, UEFA, and European institutions.

SD Europe was amongst the organisations present at the third UEFA Football and Social Responsibility workshop at UEFA’s headquarters in Nyon in 2016. The workshop included presentations on aspects of UEFA’s work, including match-fixing, anti-doping, and communications.

Initiatives/projects	Description
The Heart of the Game: Why Supporters are Vital to Improving Governance in Football (Position paper)	Section 5 of the position paper focus on improving the fight against match fixing. Match fixing distorts competition, threatens the ethics and core values of sport, and risks the loss of commercial revenues and the confidence of the public. The position paper includes the following positions: 1) Supporters should play an active role in the prevention of match fixing, including disseminating information, awareness raising, and education. 2) Better governance of football clubs through supporter involvement and ownership will reduce the risk of match fixing. 3) The fight against match fixing needs a coordinated approach between all relevant stakeholders including supporters.

### 2.5.4 Play the Game

Play the Game is an international conference and communication initiative aiming to strengthen the ethical foundation of sport and promote democracy, transparency and freedom of expression in sport. It is run by the Danish Institute for Sports Studies (Idan), an independent institution set up by the Danish Ministry of Culture. The task of Idan is to create overview over and insight into the field of sport

nationally and internationally. Play the Game has made match-fixing one of main themes for their work and have a theme page on their website dedicated to the subject.

Ongoing initiatives/projects	Description
Play the Game biennial conference	Play the Game organises a biennial conference on ethics and integrity in sport. One of the main themes throughout the years have been match-fixing, with a number of prominent speakers presenting the latest research on match-fixing and initiatives to combat match-fixing.

### 2.5.5 International Centre for Sports Studies (CIES)

The International Centre for Sports Studies (CIES) is an independent study centre located in Neuchâtel, Switzerland. Using a multi-disciplinary approach CIES provides research, top-level education and consulting services to the sports world with the aim of overcoming the complexities of sport in today's society and improving how it is governed and managed across all sports. CIES' mission is to encourage continual progress and sustainable development in the management of sport around the world by utilising its international network of partners.

Ongoing initiatives/projects	Description
Scientific Symposium: "Manipulation of sports competitions" (2015)	CIES organised a symposium on manipulation of sports competitions marking 20 years of scientific and academic activities. The symposium gathered various speakers with expertise on the complex issue of manipulation of sports competitions and highlighted the steps which have already been taken or still needs to be introduced to detect and stop manipulations of competitions.
Round-table conference on match-fixing (2012)	The International Centre for Sports Studies (CIES) organised a round-table conference on "Sports betting and Match fixing: threats on sport?" to examine the issue of sports betting and match-fixing. The event was attended by a number of experts who outlined the problems to be faced and various potential solutions.

### 2.5.6 Transparency International (TI)

Transparency International (TI) is an international non-governmental organization which takes action to combat corruption and prevent criminal activities arising from corruption. It publishes for example the Global Corruption Barometer and the Corruption Perceptions Index. Transparency International serves as an umbrella organization and its members are – in addition to a few individuals - more than 100 national chapters which engage in fighting corruption in their home countries. It brings people together in a worldwide coalition to end the devastating impact of corruption. TI's mission is to create change towards a world free of corruption.

Initiatives/projects	Description
Staying on side: how to stop match-fixing (2014)	Staying on Side is a joint European Commission-funded project with Transparency International, the Deutsche Fußball Liga and the European Professional Football Leagues that is piloting education and prevention materials in Germany, Greece, Italy, Lithuania, Portugal and the United Kingdom.  As part of the project anti-corruption experts and professional football league representatives joined with experts in gambling addiction, sports betting and psychology to help identify the key risk factors associated with match-fixing and make recommendations on how to prevent it.
Transparency International's Global Corruption Report: Sport (2016)	The Global Corruption Report: Sport looks at the increasing sport corruption and what can be done to fix it. It examines the structures of sport and presents examples of good and bad practice. One chapter of the report is dedicated to match-fixing.

	The report also provides a series of recommendations put forward by Transparency International to governments, sports bodies and all participants on and off the field of play.
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