

KEEP CRIME OUT OF SPORT - AGAINST THE MANIPULATION OF SPORTS COMPETITIONS 2018-2020 (KCOOS+)

I. General Information

A. Executive Summary

KCOOS+ is a Council of Europe project aiming at promoting and facilitating the implementation of the Council of Europe's Convention on the Manipulation of Sports Competitions (CETS n°215). It is focusing on building the capacity of key stakeholders and promote multi-stakeholder's cooperation to fight manipulation.

KCOOS+ has created a solid basis for cross-continental cooperation positively impacting on the dynamics and actions against sports manipulations.

The ratification by 6 countries (Italy, Norway, Moldova, Portugal, Switzerland and Ukraine) triggered the Macolin Convention entry into force on 1 September 2019. Thanks to their participation in KCOOS+, these countries and the 32 others which have signed the Convention are better equipped and more motivated to fight manipulation.

KCOOS+ is developing clear and detailed guidance for national and international stakeholder's instrumental for the establishment of common references and for structuring debates and work, including as part of other parallel and coordinated processes, such as the Council of Europe Network of National Platforms (Group of Copenhagen).

KCOOS+ takes into account the global scale of the sports manipulation phenomenon, the lack of common references as well as the multiplication of projects by other actors. KCOOS+ addressed these challenges by promoting synergies and cross-fertilizations between continents and between stakeholders. Many new initiatives implemented in 2019 are directly or indirectly inspired by and connected to KCOOS+. Good coordination has resulted in mutually reinforcing results, serving KCOOS+ objectives and promoting its approach and outputs.

B. Project outline

Geographic scope of the project:

47 member states

Location of the project:

Worldwide

Target group(s):

National Law Enforcement Agencies (police, prosecutors, judges)
Sport betting monitoring systems (public, private)
National Public authorities
National Sport movement

End beneficiaries:

Athletes International political organisations / institutions (UN, EU - Commission, Parliament) Sport betting operators (public, private)
International Sports Movement International and Regional Law Enforcement Agencies UEFA Union of European Football Associations

(Likely) need of follow-up:

Technical assistance activities, as provided by the project, will continue to be indispensable to the States Parties as they will develop their national policies and programs against sports manipulation. The project will have to be continued after 2020

Duration of the project:

36 months

Budget:

900,000 Euros

C. Project description

The Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention) was open for signature and ratification by the member states of the Council of Europe, the European Union and the non-member states that participated in its drafting or enjoy observer status with the Council of Europe from 18 September 2014 in Macolin (Switzerland). So far three countries, Norway, Portugal and Ukraine, have ratified the convention and twenty-eight others have signed it (September 2017).

A minimum of five ratifications are required (at least three of which must be from member states) for the Convention to enter into force. Since then the situation has evolved considerably. Responses to the seriousness and complexity of the threats represented by the manipulation of sport competitions have been mainstreamed at international level into the sport movement as well as in intergovernmental co-operation. While it is not yet entered into force, the principal reference to these matters is indeed the Macolin Convention, which is the only legally binding instrument to exist. However, at national level, there are significant differences between countries regarding the adhesion to Macolin Convention principles.

Given the complex nature of the manipulation of sports competitions phenomenon, a number of ministries are relevant, including justice, interior, sport, customs, and finance. Therefore, mixed levels of understanding occur when considering operational implications of the convention. This situation is reflected through various national and international stakeholders' initiatives, which are multiplying in a rarely coordinated manner and quite often duplicate each other. Such actions lack vision, which in turn delay the elaboration of global strategies and the identification of good practices and unnecessarily increases resources needed for setting up the efficient and sustainable system required in order to fight the manipulation of sports competition.

Feedback from the pilot project KCOOS (2016-2017) revealed the importance of developing assistance project to countries. Most of the thirty-two countries which have participated in KCOOS have requested the extension of similar activities over a mid- or even long-term period. This is evidence that there is a certain political priority that is beginning to be instilled within national debates. A momentum has been created. The next step would be to strategically involve this topic within overall national action plans. Such expected technical assistance activities would directly help countries to justify the necessity of accession to the Macolin Convention.

Technical assistance would be providing a forum for debate discussion on targeted topics and exchange of information on an international level allowing countries to increase awareness and knowledge on proceeding further nationally. Consequently, KCOOS+'s will entail to design activities in view of the needs of all target groups to be rendered compliant to the Convention: all relevant ministries, including national agencies; Law enforcement agencies and justice (police, prosecutors, justice); Sport governing bodies (national and regional sports federations); Sport betting regulators and operators. KCOOS+ will provide an indispensable contribution to assisting active stakeholders to get in contact and form networks.

It will ensure that all relevant ministries are sufficiently informed of the gravity of the phenomenon and its links to criminal offences and thus raise awareness of the priority to sign, ratify and implement the Convention. KCOOS+ will also increase opportunities for these countries to actively participate in ongoing work, reports, studies and exchanges, via the various networks being established and thanks to contacts made in the project's terms, in order to increase knowledge of other good examples, possible solutions and good practices.

Experiences and good practices should be better shared from Europe to other continents so they can make their own choices reflecting the specificity of their situations. The transfer of experience from Europe to the other countries is crucial in order to accelerate the action of well- prepared and determined actors, who could rapidly become good partners for Europe. It will also allow European countries to increase their awareness on the manipulation of sport competitions across continents, learn new successful practices and work together towards tackling the global phenomenon. For those purposes, the KCOOS Guidebook will provide the essential material to KCOOS+. The KCOOS guidebook addresses from the point of view of countries some key topics:

- Understanding the complexity of the phenomenon (priority, resources, risk analysis)
- National coordination and co-operation (national platforms, coordination meetings)
- National approach to tackling the phenomenon (actors involved, legislative tools used, betting priority, criminal priority, i.e. money laundering, bribery, fraud, etc.)
- Impacts and threats to society
- Sharing of information (tackling sensitive data, between private and public stakeholders)
- Recommendations and conclusions based on countries' experiences

This essential background document will in particular enable the assisting of national institutions and actors with a view to setting up efficient structures and procedures facilitating sustainable co-operation between national institutions, regulatory authorities, law enforcement agencies, sports governing bodies, and sport betting operators. KCOOS+ will continue the work of the pilot project as a major contribution to countries in providing an operational tool completing the planned Council of Europe Convention activities, notably the "Macolin Roadmap".

The main international stakeholders were already involved actively as associate partners of the KCOOS pilot project and have confirmed their support to the new project. Moreover, most of the Member States have also already confirmed their willingness to support and participate in KCOOS+, notably those states that participated in the pilot project, as they understood it will be the main tool for conducting practical activities related with the implementation of the Convention.

II. Assessment of progress

A. Assessment of achievements

Assessment of the results of the project

1. Rationale: KCOOS+ is a Council of Europe project aiming at promoting and facilitating the implementation of the Council of Europe's Convention on the Manipulation of Sports Competitions (CETS n°215). It is focusing on building the capacity of key stakeholders and promote multi-stakeholder's cooperation to fight manipulation.

2. Main results: KCOOS+ has considerably strengthened its network of countries, partners and experts, enriched its toolbox, built capacity and clearly influenced the development

of policies and legislation in the participating countries. It has also created a solid basis for cross-continental cooperation. Thanks to the project and the synergies established with other CoE activities as well as with other relevant international projects in the field, the global environment of the fight against sports manipulations has known a very positive and fast evolution.

A larger number of countries have engaged in the Macolin Process. The ratification by 6 countries (Italy, Norway, Moldova, Portugal, Switzerland and Ukraine) triggered its entry into force. 32 additional countries have signed (including Australia) and some others are considering joining. Thanks to their participation in KCOOS+, countries are better equipped and more motivated to fight manipulation, including by participating in international cooperation through the Convention's framework.

KCOOS+ has continuously engaged with relevant stakeholders helping them to identify gaps and needs allowing KCOOS+ to better target its assistance. It has developed clear and detailed guidance for national and international stakeholder's instrumental for the establishment of common references and for structuring debates and work, including as part of other parallel and coordinated processes, such as the Council of Europe Network of National Platforms (Group of Copenhagen). In 2019, key concepts were clarified, ambitious reviews undertaken and the package of KCOOS+ tools enriched. As a result, KCOOS+ is better equipped to provide more evidence and experience-based technical and legal assistance.

Australia's appreciation for KCOOS+ as a tool for international cooperation and capacity building resulted in an important financial contribution which, together with other contributions from Cyprus, France, Norway, Switzerland as well as the European / World Lotteries associations, secured about 2/3 of the expected budget. KCOOS+ strengthened its partnerships with key stakeholders (including with GLMS and FIFA) which are going to play a key role in developing KCOOS+ worldwide activities. INTERPOL and IOC have also opened new prospects for a reinforced co-operation and coordination.

3. Challenges: KCOOS+ had to take into account the global scale of the sports manipulation phenomenon, the lack of common references as well as the multiplication of projects by other actors. KCOOS+ addressed this challenge by promoting synergies and cross-fertilizations between continents and between stakeholders. Many new initiatives implemented in 2019 are directly or indirectly inspired by and connected to KCOOS+. Good coordination has resulted in mutually reinforcing results, serving KCOOS+ objectives and promoting its approach and outputs.

Through the 2 regional seminars which have involved about 12 countries in 2019, the activities undertaken have clearly built a more favorable environment, led to concrete national commitments toward the Macolin Process and created a solid basis for a more efficient and better targeted intervention. With these new resources, the impact of KCOOS+ can be maximized in 2020.

Outcome on beneficiaries and target group

Activities focused and involved national public authorities, which are final beneficiaries and main target group. They include Ministries, law enforcement agencies, and gambling regulatory authorities. These key stakeholders are expected to take an active part in the setting up and development of National Platforms.

Activities responded to each of these groups' specific expectations, but also provided opportunities for them to develop their co-operation. Their individual actions are expected to gradually merge into a well-coordinated approach organized in reference to the Macolin Convention.

Groundwork is expected to address specific needs expressed at national levels. Technical assistance activities are at the disposal of countries. In 2019 the main efforts have been invested on an international level: National Platforms or national actors supposed to join their forces as part of National Platforms were integrated into international co-operation processes with the view of encouraging them to speed up the adoption and implementation of national mechanisms. Customized technical assistance could then

more effectively be defined according to the needs identified in terms of international responsibilities and expectations.

Intermediate outcome 1

“structured communication processes” are used worldwide by actors fighting the manipulation of sports competitions

KCOOS+ has largely contributed to create "communication processes" that are structured, clear and consistent. This has strengthened stakeholders' capacity to establish efficient contacts with others both at national and international levels. This is an on-going process that needs time, but for example the development of the Macolin Club House accelerated in the second part of 2019, as well as the involvement of key stakeholders which adhered to common references produced.

KCOOS+ has provided a key operational support to the development of the Group of Copenhagen (Network of National Platforms).

2019 was a crucial year for developing "communication processes", confirming the KCOOS+ footprint in the global landscape of the fight against manipulation of sport manipulations.

Immediate outcome 1.1

Inter-institutional and professional networking developed worldwide for efficient exchange of information and knowledge

With the development of National Platforms in several countries came a wealth of information about the challenges they are facing. This was used to develop further guidance on topics included in KCOOS Guidebook. A set of thematic reference documents were prepared and will be integrated in the future revised version of the Guidebook.

Efforts have targeted as a priority, the strengthening of the National Platforms. Several countries have developed systematic approaches and strategies to fighting sports manipulations and joined the Group of Copenhagen (now counting 32 countries). KCOOS+ has consistently promoted this kind of strategies and provided national stakeholders with the relevant tools and information. KCOOS+ tools and methodologies are largely used by countries joining the Macolin Process, even in the case they have not (yet) requested direct assistance from the project.

Reference documents elaborated by the Group of Copenhagen (for example the Typology of sports manipulations) are also enriching the KCOOS+ toolbox.

Output 1.1.1

The **“Macolin Club House”** webpage compiles all data collected, thus constituting both a general data base and a tool to increase opportunities for contacts between actors nationally and transnationally.

The Macolin Club House expended (more than 80 entries). Number of connections shows that the tool is currently used for developing contacts between stakeholders. There is still margin for growth since all potential national and international actors currently involved in activities have not yet registered.

Output 1.1.2

A **capacity and confidence building forum** provides meeting and working opportunities for stakeholders.

The strategic promotion of networks, especially the Network of National Platforms, has created new opportunities to exchange information, to share good practices and to identify measures to address expressed needs. KCOOS+ has also triggered multi-stakeholder's cooperation building confidence and momentum.

One "continental seminar" was organised for countries from the GUAM region (Georgia, Ukraine, Azerbaijan and Moldova - 14-15 February 2019). Participants worked on a large set of issues related to the involvement of sport movement in national measures and

legislation, the assessment of types of manipulation they are facing and setting up of operational National Platforms. Ukraine (hosting the seminar) was the only participating country having ratified the Convention at that point. The level of commitment triggered was reflected in the next signatures and ratification steps (ratification by Moldova in 2019 and progress achieved in Azerbaijan and Georgia in that direction).

One regional seminar was organised for Pacific Region, involving 7 countries (Australia, Fiji, Papua New Guinea, Samoa, Solomon Islands, Tonga, Vanuatu - 8-10 April 2019). Here again, the commitment triggered resulted in Australia signing the Convention in 2019 and Fiji succeeding in mobilising national stakeholders and taking the lead in promoting the Convention in the region. Australia and Fiji joined the Group of Copenhagen and engaged towards the ratification process. While Australia is assuring strong regional support to action, Fiji adopted an action plan which is expected to inspire future actions in other countries.

Two study visits were organised in 2019. The first, with the direct involvement of INTERPOL, enabled representatives from FBI (United States of America) to meet with National Platforms representatives from Australia, Belgium and France. A second study visit based on the same peer-toppers methodology was organised for Liberia representatives (national lottery representatives).

Under the supervision and direct involvement of the Australian National Platform, a methodology for Sport Risks Assessment has been elaborated through actions in four pilot countries (Belgium, Georgia, Norway and Portugal).

These meetings and working opportunities enabled stakeholders to exchange experiences and get informed about specific challenges addressed in other countries or by other actors. This enriched the common understanding about sports manipulation phenomenon, strengthened trust between actors and between countries and also contributed to better define foreseen objectives for KCOOS+.

Output 1.1.3

The “**Macolin Hub**” electronic portal is tested, and a detailed proposal is delivered for a fully operational implementation.

One experts meeting took place in order to envisage needs and opportunities (including technical options). Due to the relatively limited number of thematic workshops and seminars completed so far, too few good practices were collected and work focused on identifying main concerns and priorities. The development of the Macolin Hub consequently didn't appear to be justified.

Intermediate outcome 2

“**structured cooperation processes**” streamlining the fight against manipulation of sport competition at the national and trans-national levels

Cooperation processes at national and international levels were considerably strengthened in 2019 through the KCOOS+ project.

KCOOS+ principles and previous results inspired several new projects mainly implemented as part of the European Union ERASMUS+ program, multiplying the impact effects of KCOOS+. These other projects are not directly contributed to KCOOS+ but do help in rationalizing the general cooperation environment. Effectively, more countries are now defining and implementing consistent "integrity development strategies" in response to which the different activities can propose better operational assistance programs adapted to the national specific situations.

The design of tailored integrated assistance processes responding to the operational needs in the different countries is still going on.

Ultimately, the number of countries improving their level of compliance with the Macolin Convention principles and objectives is expanding. Through the Group of Copenhagen, it is possible to note the rapid increase in the number of countries aiming to comply with the specific requirement of the Macolin Convention to set up national platforms, reaching

now 32 countries. New members are Australia, Austria, Azerbaijan, Canada, Fiji, Greece, Liberia, Morocco, Nepal, United States of America. They all have joined the process and engaged to develop national structured cooperation processes. Thanks to that, more countries outside Europe have better knowledge about the Macolin Convention and are encouraged to organise Macolin Processes. Countries like Australia and Fiji opened encouraging prospects for designing relevant national action plan (Fiji) and through this to better address regional needs. The same process has been consolidated in 2019 in the Maghreb region thanks to the involvement of Morocco and in Western Africa thanks to Liberia.

Practical tools and reference documents multiplied, especially through activities of the Group of Copenhagen which identified priorities amongst them and issues revealed through KCOOS+. Results have already enriched the KCOOS+ package of guidelines, especially regarding Typology (of sports manipulations), development of National Platforms and Data Protection, offering practical tools to be used by countries. This has been possible thanks to the involvement of the Consultative Committee for the Council of Europe Convention 108 (Data protection) which has included in its objectives the support to sport-related activities. This inter-Council of Europe co-operation is providing a considerable support to the process and will contribute to the development of the assistance tools.

Immediate outcome 2.1

“National Integrity development strategies” are implemented in order to optimize the fight against the manipulation of sports competitions

Preliminary phases pursued in 2019 aimed at setting up the key structures in countries in order to define precise needs and design the technical assistance, trainings and capacity buildings activities to be implemented.

The focus was put on the establishment of the National Platforms and the process took advantage of the Group of Copenhagen development with "pilot countries" identified amongst those joining the network of National Platforms. The establishment of National Platforms was considered as an indispensable pre-requisite for providing assistance to the implementation of future national action plans. In 2019, about 10 new countries engaged in establishing National Platforms and joined the Group of Copenhagen, through which they get practical assistance and support. Five of these countries are outside Europe (Australia, Fiji, Liberia, Morocco and Nepal). In Australia and Fiji, national action plans have been agreed, and the expected technical and legal assistance from KCOOS+. identified Liberia, Morocco and Nepal discussed criteria defined by the project and started national processes in order to mobilise the critical mass of stakeholders, assuring to these objectives the relevant political level of priority, etc.

B. Added value

The Council of Europe preeminent position in the fight against sports manipulations has been strengthened through the KCOOS+ project. Still few international stakeholders are implementing technical assistance exhaustive programs. The idea of proposing KCOOS+ as a global framework into which all relevant initiatives could fit and find consistent and comprehensive approaches responded to a need. The project has become an ideal and practical platform for international stakeholders to make the much-needed coordination possible. KCOOS+ proved to be the right format for attracting national stakeholders, starting with public authorities (thanks to the Council of Europe status as an intergovernmental organization, which provides access to all Ministries). Moreover, documents and tools produced or promoted as part of KCOOS+ get direct recognition considering both the inclusive way in which they are prepared and their integration into the CoE activities related to the fight against sports manipulations and benefitting from CoE networks and expertise in other areas (such as the fight against corruption and data protection) This has strengthened KCOOS+ authority.

III. Stakeholders

Engagement during the reporting period.

1. Partners: National partners have played a crucial role in the development of activities. Depending on the countries' specific situations, Ministries / government agencies, law enforcement, sports organisations or others have offered the point of entry into the national environment from which it was possible to develop contacts and build good co-operation framework. The engagement of national partners is a key principle for developing KCOOS+ activities since its first and foremost objective is to respond to requests for assistance. IntegriSport contributed to the KCOOS+ dynamics through several training sessions directed toward law enforcement.

2. GLMS has provided a constant and active support for the development of activities allowing the adjustment of the project according the evolution of the situation. The involvement of their experts in various activities has been a factor of success. The same applies for INTERPOL. FIFA has, joined the group of active and supportive partners. IntegriSport project has also constantly supported KCOOS+ objectives through its own law enforcement training activities.

KCOOS+ developed its links and established synergies with EU Athletes' project on reporting systems. Links were also developed with IOC activities, opening prospects for strengthening cooperation in the future.

KCOOS+ contributed directly or indirectly in the development of new projects, especially as part of EU ERASMUS+ program. Preliminary discussions facilitated the design of these projects in order to avoid as much as possible overlapping and when possible extending the scope of activities of KCOOS+ and multiplying the impact of its results. Although it could not engage as "associated partner" to these projects, the Council of Europe supported them in various ways and expects to benefit from their results and the information therein generated.

Links and synergies

Synergies started to be developed with International Olympic Committee/INTERPOL Partnership Development Meetings program (against corruption in sports) in order to provide to beneficiary countries a more systematic follow-up mechanism related to sports manipulations.

IV. Communication and visibility

Regional Seminars in Ukraine (for the 4 GUAM countries) and in Fiji (Pacific Region) received relevant media coverage in the host countries and comments in the participants' countries of origin (interviews, websites, twitters).

The partners and associated partners have taken up information about KCOOS activities in their own communications processes (press releases and twitters).

The KCOOS brochure was circulated at the Copenhagen Group meetings and the 3rd International Conference (June 2019) as well as during the official journey of the Council of Europe's Deputy Secretary General to Australia, on the occasion of their signature of the Macolin Convention.

V. Risk management

The multiplication of activities focusing on international co-operation enabled to mitigate the delays in the decision-taking processes at national level regarding future action plan. Number of stakeholders in many countries took part and were contacted during 2018's activities. Awareness raising as well as reform / adaptation mechanisms regarding legal frameworks or institutional / professional processes have been initiated. These processes obviously require time before obtaining full political support and decisions. 2019 activities build on previous results in order to open new prospects (international co-operation) and highlight requiring progresses from national public authorities.

VI. Sustainability and learning

Sustainability

The project consolidated its approach and strengthened its impact. It is considered a major technical assistance reference tool, both by countries and international actors. Synergies continued to develop in 2019. The MoU between the Council of Europe and UEFA and FIFA, both mentioning joint actions to be carried out as part of the KCOOS+ project. Partnerships were strengthened for example with IOC-INTERPOL, opening prospects for more consistent / articulated co-operation binding together KCOOS+ and PDMs.

The objective is to make sure that countries will receive more targeted and better coordinated assistance in the future, either directly from the Council of Europe or from other actors.

KCOOS+ facilitated a common approach between actors when proposing assistance to countries, which in the long-term, it is expected to ensure a better understanding of what has to be done and how in order to generate a successful "Macolin process in a maximum of countries.

In 2019 the project created an important momentum in the Pacific Region. It facilitated the setting up of crucial co-operation with Australia and the adoption of a "Pacific Strategy". KCOOS+ will be the main channel for implementing that strategy. Through the co-operation with Fiji, it is expected that other countries in the region will follow the example and initiate successful Macolin processes.

Lessons learned

KCOOS+ specificity is based on deliverance of concrete and practical assistance to national stakeholders. Efficient activities must be designed on the basis of strong political will and institutional commitment. Promotional activities, explanation of the Convention or even trainings should be more effectively implemented jointly with other international partners as part of complementary projects. KCOOS+ should focus on specific and systematic approaches enabling to build solid middle- and long-terms processes in countries.

For that purpose, regional activities shall be organized in such a way that consistent and rational follow-up be anticipated and well defined in advance.

KCOOS+ activities are creating opportunities in countries and its legitimacy comes principally from its capacity to follow-up in due time. 2018 and beginning of 2019 activities have showed the limited impact of too many superficial events. Resources and efforts should be focused toward delivering more specific and groundbreaking contributions.

Follow-up

KCOOS+ is already a major piece of the complex international mechanism which is building up by international stakeholders. Until the end of the project (2020) the Council

of Europe must confirm the role of KCOOS+ and clarify its complementarities with other projects. In doing so, the Council of Europe will sustain a key and permanent mechanism which is indispensable for the countries engaging in a long-term fight against sport manipulations. Countries must be able to count on such practical tool.

It is therefore inevitable to consider the follow-up of the project after 2020.

VII. Recommendations for future projects

N/A

VIII. Appendices

Financial report

The interim financial report is attached as a separate document