

31 JANUARY 2022

KEEP CRIME OUT OF SPORT +



FINAL REPORT

EXECUTIVE SUMMARY

The Keep Crime Out of Sport+ project (KCOOS+) was the operational arm of the Macolin Convention. The project was running for 4 years from January 2018 to December 2021, providing multiple avenues of support to 48 countries from 5 continents. Through various activities, the project assisted public and private stakeholders from across the world, namely public authorities (those responsible for sport, for the regulation of betting, law enforcement and prosecution) and private entities (sport and betting actors). These activities included, in particular, 8 technical and legal assistance exercises, 7 seminars and webinars, 4 awareness-raising activities and 3 study visits. As a consequence of these activities, the impact of the project can be summarised along two main aspects, namely the promotion and the implementation of the Macolin Convention. The contributions from Australia, Cyprus, Denmark, France, Norway, and Switzerland, together with the European and World Lotteries associations, have entirely financed the project. Partnerships with EUROPOL, FIFA, GLMS, INTERPOL, IOC and UEFA enriched the potentialities of activities implemented.

The KCOOS+ project has considerably influenced the development of policies and the governance of the fight against competition manipulation in participating countries and created a solid basis for transnational co-operation. The project contributed to the entry into force of the Macolin Convention and helped address challenges related to the manipulation of sports competitions. Thanks to entry into force of the Convention and international co-operation within the framework of KCOOS+, the environment of the fight against sports manipulation has known a very positive and fast evolution.

The challenges identified at the beginning of the project remain current, namely, to facilitate better understanding and awareness about the phenomena of competition manipulation as well as to provide systematic and sustainable support that help main stakeholders set up efficient structures and procedures for the co-ordination of the fight against competition manipulation at national and international levels.



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ACRONYMS/ABBREVIATIONS

EL	European Lotteries
EUROPOL	European Law Enforcement Agency
FDJ	Française des Jeux, French betting operator
FIFA	Fédération Internationale de Football Association
GLMS	Global Lottery Monitoring System
GUAM	Georgia, Ukraine, Azerbaijan, Moldova
INTERPOL	International Law Enforcement Agency
IOC	International Olympic Committee
KCOOS+	Keep Crime Out Of Sport+
UEFA	Union of European Football Associations

GENERAL INFORMATION

PROJECT DONORS

Sports Integrity Australia
Department of Health, Australia
Cyprus Sport Organisation
Ministry of Culture, Denmark
Ministry of Sport, France
Ministry of Culture, Norway
Federal Office of Sport, Switzerland
National Olympic Committee of France
National Gambling Authority, France
European Lotteries
Française des Jeux (French betting operator)
World Lottery Association

PROJECT PARTNERS

Project partners:

European Law Enforcement Agency
Fédération Internationale de Football Association
Global Lottery Monitoring System
International Law Enforcement Agency
International Olympic Committee
Union of European Football Associations

Associated partners with partnership agreement:

CSCF Sport Integrity Group
EU Athletes
Ethisport
UK Gambling

DURATION OF THE PROJECT

48 months

TOTAL EXPENDITURE

328 129.93 Euros

GEOGRAPHIC SCOPE OF THE PROJECT

47 Member States of the Council of Europe

LOCATION OF THE PROJECT

Worldwide

SOURCES OF JUSTIFICATION

Council of Europe Programme and Budget – Action against crime, security, and protection of citizens – Sport Conventions

LINK TO STRATEGIC CO-OPERATION DOCUMENT

Macolin Convention on the Manipulation of Sports Competitions

TARGET GROUPS

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

END BENEFICIARIES

Athletes
International Sports Movement
International and Regional Law Enforcement Agencies
National Public Authorities

NEED OF FOLLOW-UP

Challenges identified during the project remain current. Countries must be able to count on a practical tool that assist them in raising awareness, enhancing the capacity of stakeholders, and facilitating co-operation for jointly addressing competition manipulation. For it, the competencies and networks of countries, partners, and experts must continue to be developed and strengthened.

PROJECT MANAGER RESPONSIBLE

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PROJECT DESCRIPTION

PROJECT CONTEXT

The Council of Europe Convention on the Manipulation of Sports Competitions is the only internationally binding legal instrument on the manipulation of sports competitions. It requests public authorities to cooperate with sports organisations, betting operators and competition organisers to prevent, detect and sanction the manipulation of sports competitions. It proposes a common legal framework for an efficient international cooperation to respond to this global threat. The Convention was open for signature and ratification on 18 September 2014 in Macolin (Switzerland).

The Macolin Convention is a ground-breaking tool that sets the basis for a legally established co-operation at national and international levels. Specifically, Article 13 of the Convention calls for the establishment of National Platforms, which are the key national hubs dedicated to the co-ordination of the fight against the manipulation of sports competitions. The Council of Europe-established the Network of National Platforms, the Group of Copenhagen, which pools the representatives of National Platforms and has been functioning since 2016 as a global network of operationally engaged experts, working together, and supporting each other to detect, sanction and prevent sports competition manipulation, as defined in the Macolin Convention (the Group of Copenhagen became an Advisory Group to the Follow-up Committee of the Macolin Convention in 2021).

Since the adoption of the Macolin Convention in 2014, the general international environment related to the fight against sports manipulation has been considerably strengthened. Nevertheless, there has been significant differences between countries regarding the level of understanding about the operational implications of the Macolin Convention. This situation was reflected through various national and international initiatives that had been multiplying. Still, the general opinion was that there were too few international programs proposing assistance to States. In this context, the “Keep Crime Out Of Sport+” (KCOOS+) was a Council of Europe project aimed at promoting and accelerating the ratification and implementation of the Convention on the Manipulation of Sports Competitions (the Macolin Convention, CETS n°215).

Since the project started in 2018, the environment of the fight against sports manipulation has known a very positive and fast evolution. The Macolin Convention entered into force on 1 September 2019. It has been ratified by Greece, Italy, Norway, Portugal, the Republic of Moldova, Switzerland, and Ukraine. It has been signed by 30 other European States, as well as by Australia and Morocco. On 24-25 November 2020, the Macolin Committee has been set up to monitor the implementation of the Convention by its States Parties. In November 2021, the Group of Copenhagen has become the Advisory Group of the Macolin Convention’s Follow-up Committee to enhance the establishment, operation, and development of National Platforms.

PROJECT OVERVIEW

KCOOS+ aimed at providing technical assistance for relevant stakeholders in setting up efficient structures and procedures that facilitate sustainable co-operation. Since its start in 2018, the project contributed to creating a solid basis for national and transnational co-operation by proposing common references and

practical guidance, which has built the capacity of national actors and structures to effectively address the fight against the manipulation of sports competitions.

The contributions from Australia, Cyprus, Denmark, France, Norway, and Switzerland, together with European and World Lotteries associations, have entirely financed the project. Partnerships with EUROPOL, FIFA, GLMS, INTERPOL, IOC and UEFA enriched the potentialities of activities implemented.

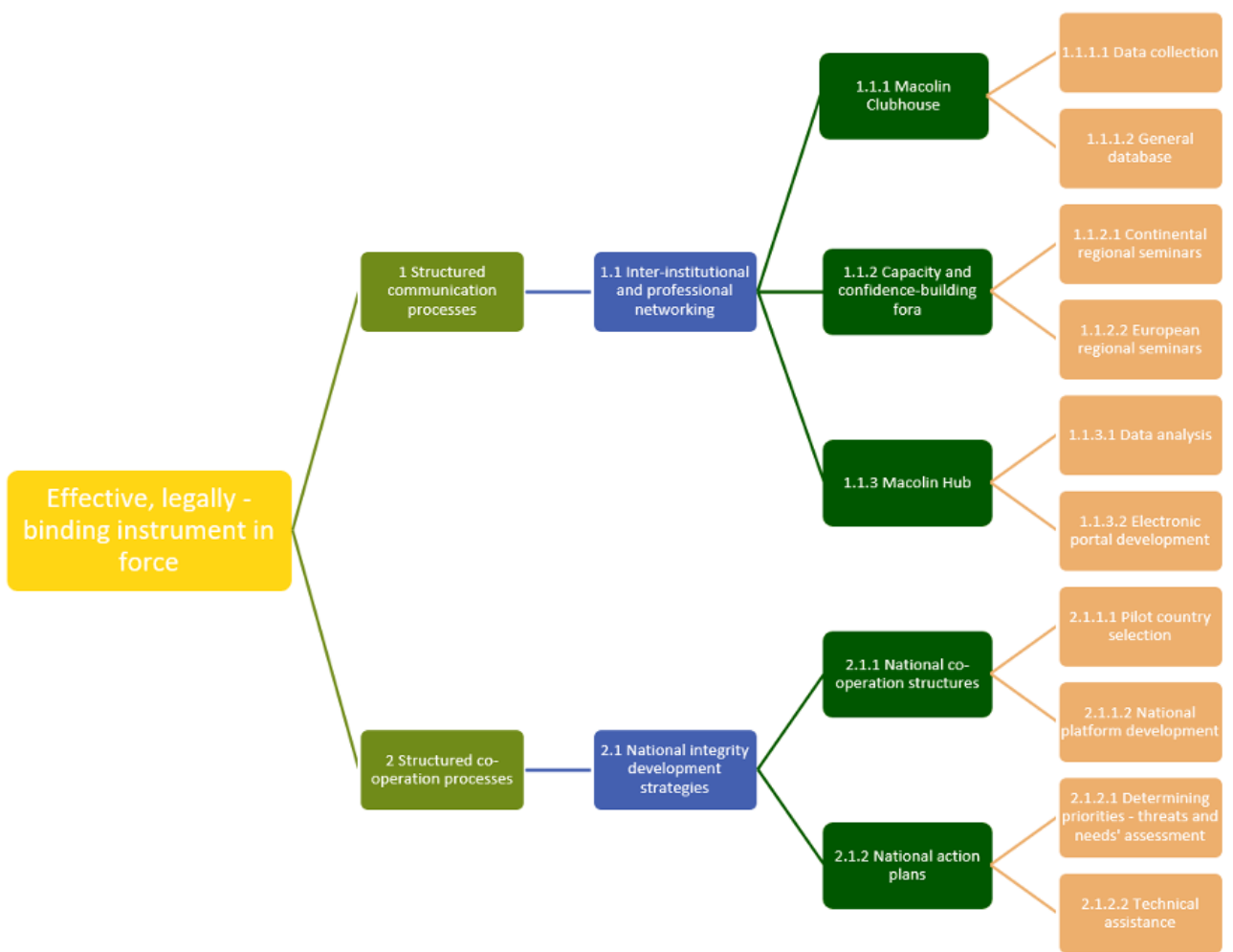


Figure 1 Methodology: Activities Breakdown

METHODOLOGY USED

KCOOS+ focused on the implementation of assistance in "pilot countries" capable of establishing effective co-operation structures and coherent action plans, and likely to serve as examples for the reproduction of the "Macolin Process" in more countries. The two main expected outcomes of KCOOS+ were linked to different geographic scales:

1. In countries that generally had reduced knowledge of the Macolin Convention and where initiatives against sports manipulation were mainly carried out by individuals within their own institutions or organisations, "structured communication processes" (intermediate outcome 1) were developed. They focused on "inter-institutional and professional networking" (1.1) enabling an effective exchange

of information and knowledge. Planned activities included the "Macolin Club House" (1.1.1), the organisation of a "forum for capacity building and trust" (1.1.2, 5 outside of Europe and 3 European events, 8 fora total) and the "Macolin Hub" (1.1.3).

2. In regions where it was assumed that most countries had a solid understanding of the challenges and requirements of the Macolin Convention, "Structured cooperation processes" (intermediate outcome 2) ensured that "national integrity development strategies" (2.1) provided specific expertise and assistance programmes tailored to each national situation. To this end, "national cooperation structures" (2.1.1) and "national action plans" (2.1.2) were planned to be put in place in 20 pilot countries to enable the least developed or least active countries to have operational assistance to align their policies and strategies with those of the most advanced countries.



ASSESSMENT OF PROGRESS

ASSESSMENT OF ACHIEVEMENTS



STRUCTURED COMMUNICATION PROCESSES

The “Inter-institutional and professional networking” (1.1) has been developed through three activities:

MACOLIN CLUB HOUSE

The “Macolin Club House” (1.1.1) general database provided stakeholders with information about their counterparts in other countries and about other categories of stakeholders. It encouraged exchange of data, especially about initiatives in progress.

The “data collection” (1.1.1.1) activity was leading to the development of the “general database” (1.1.1.2) of key actors, activities, and good practices: the Macolin Club House. Data was assured through the “capacity and confidence-building fora” (1.1.2) and “technical assistance” activities (2.1.2.2) targeted at main stakeholder groups (Ministries, Sport betting Regulatory authorities, Law enforcement agencies, sports movements, sports betting operators) in a maximum of countries in Europe and worldwide. Data collected was reassessed and updated in 2021 to ensure topical relevance of the data published on the Council of Europe website.

CAPACITY AND CONFIDENCE-BUILDING FORA

The “capacity and confidence-building fora” (1.1.2) aimed at providing meeting and working opportunities for international stakeholders.

Two “Continental / Regional seminars” (1.1.2.1) were organised:

- In South America, 11-14 December 2018, with the support of the Spanish Ministry of Sports, Participant countries: Argentina, Bolivia, Chile, Colombia, Dominican Republic, Guatemala, Honduras, Paraguay, Peru, Puerto Rico
- In the Pacific Region, 8-10 April 2019
Participant countries: Australia, Fiji, Papua New Guinea, Samoa, Solomon Islands, Tonga, Vanuatu

Three “European / Regional seminars” (1.1.2.2) were organised:

- For Visegrad countries, 10-11 September 2018
Participant countries: Bulgaria, Czech Republic, Hungary, Poland, Slovak Republic
- For GUAM countries, 14-15 February 2019
Participant countries: Georgia, Ukraine, Azerbaijan, Moldova
- European online networking session, 8 October 2021
Participant countries: Azerbaijan, Belgium, Bulgaria, Cyprus, Estonia, Finland, France, Germany, Greece, Hungary, the Netherlands, Norway, Moldova, Poland, Portugal, Slovakia, Spain, Sweden, Switzerland, United Kingdom
Participant partners: Française des Jeux, European Lotteries, Global Lotteries Monitoring System, UEFA

MACOLIN HUB

The “electronic portal development” (1.1.3.2) did not appear to be justified due to the relatively limited number of good practices collected, as work focused on identifying main concerns and priorities.

“Data analysis” (1.1.3.1) identifying first-hand experience and good practices was based on data collected during the “capacity and confidence-building fora” (1.1.2) and “technical assistance” activities (2.1.2.2). It aimed at helping stakeholders in identifying their gaps and their needs. The analysis was completed especially within the Network of National Platforms (see outcome 2.1.1.2).



OUTCOME ON BENEFICIARIES AND TARGET GROUPS

- The KCOOS+ project encouraged common understanding among beneficiaries and target groups about the sports manipulation phenomenon in 39 countries and developed trust between international stakeholders, encouraging contacts and synergies between them and their initiatives.
- Australia signed the Convention in 2019 and Fiji mobilised national stakeholders in promoting the Convention in the Pacific region. Public authorities from Australia and Fiji engaged towards the ratification process and joined the Group of Copenhagen.
- Following the seminar in the GUAM region, Moldova has ratified the Convention in 2019 and progresses were made in Azerbaijan and Georgia in that direction, all joining the Group of Copenhagen.
- Several networks have been developed as part of KCOOS+ or with its support: for Betting Regulatory Authorities, Prosecutors, and Sport movement – thanks to the International Olympic Committee –, and Law Enforcement – thanks to INTERPOL.
- KCOOS+ has notably provided a key operational support to the development of the Network of National Platforms, the Group of Copenhagen, (see outcome 2.1.2) which has increased its members until reaching 33 participating countries and with its new status of Advisory Group to the Follow-Up Committee, potentially all signatories of the Macolin Convention (i.e. 39 countries). The nature and diversity of the topics it covers imposed the Network as one major international actor, in a particularly active and competitive context.
- A key element of the online peer-to-peer workshop format of the European online networking session allowed for interactive participation as well as input from National Platform representatives and partners, to share experiences on their indispensable work on implementing the Macolin Convention.
- The capacity and confidence-building fora facilitated exchange of key strategic and operational information and experience in addressing the manipulation of sports competitions and helped develop synergies between national and international public and private actors.

KCOOS+ ACTIVITIES 2018-2021

STRUCTURED COMMUNICATION PROCESSES

STRUCTURED COOPERATION PROCESSES

Awareness Raising	Capacity & Confidence-building Fora	Technical Assistance	Study Visits
FRANCE 15-17 MAY 2018	VISEGRAD COUNTRIES 10-11 SEPTEMBER 2018	MOROCCO 17-18 APRIL 2018	LIBERIA - FRANCE 20-21 JUNE 2019
AUSTRIA 5 JUNE 2018	SOUTH-AMERICA 11-14 DECEMBER 2018	CAPE VERDE 19-20 APRIL 2018	USA – AUSTRALIA, BELGIUM, FRANCE 20 JUNE 2019
THE NETHERLANDS 30-31 JANUARY 2019	GUAM COUNTRIES 14-15 FEBRUARY 2019	SWEDEN 14 MAY 2018	FIJI – AUSTRALIA, FRANCE 26 NOVEMBER 2019
MACOLIN CLUB HOUSE RE-LAUNCH 10 DECEMBER 2021	PACIFIC ISLANDS 7-10 APRIL 2019	UK 16 OCTOBER 2018	
	EUROPEAN ONLINE NETWORKING SESSION 8 OCTOBER 2021	QATAR 21-22 JANUARY 2019	Webinar
		AZERBAIJAN 25 NOVEMBER 2019	IOC-COE WEBINAR 27 OCTOBER 2021
		MOLDOVA NOV-DEC 2021	
		LIBERIA NOV-DEC 2021	

Figure 2 Overview of Activities

STRUCTURED COOPERATION PROCESSES

The “pilot countries selection” (2.1.1.1) met the initial objective of selecting 20 pilot countries (5 outside Europe and 15 in Europe). This was due to an alternative approach that identified pilot countries from the list of countries of the Network of National Platforms. The criteria set up for this activity included: political engagement towards the implementation of the Macolin Convention; assured political priority given to the fight against manipulation of sports competitions; key national stakeholders mobilised (critical mass); and general capability to decide upon a systematic action plan. Not only the pilot countries, but all members of the Network of National Platforms assured the respect of these criteria.

The implementation of “national Integrity development strategies” (2.1) included two main activities:

- The establishment of National Co-operation Structures, and
- The development of National Action Plans

NATIONAL COOPERATION STRUCTURES

The establishment of National Co-operation Structured or “National Platforms development” (2.1.1.2) was carried out within the framework of the Network of National Platforms. The work of the Network enabled to clarify concepts related to the Macolin Convention and its application, the nature and types of sports manipulations, the functioning of the National Platforms and the way to organise an effective exchange of information. Through this work, pilot countries gained specific expertise and experiences, which enabled them to better mobilise actors, getting institutions closer, clarifying the threats represented by sports manipulations and therefore establish or strengthen their National Platforms. One major result is the detailed guidance and thematic reference documents produced that were instrumental for the establishment of common references (see the “Macolin toolbox” on the council of Europe website).

NATIONAL ACTION PLANS

National Platforms, participating in regional seminars, were expected to elaborate coherent and systematic “national action plans” (2.1.2) covering all issues required by integrity strategies and the organisation of an effective fight against sports manipulations. However, most of the efforts have been concentrated on building on a common understanding about the problems and on securing a general mobilisation of actors toward common objectives. The identification of well-defined priorities for action, and their subsequent implementation, will therefore require more time.

Some countries however proceeded with “threats and needs assessments” (2.1.2.1), which led to identifying key national priorities and planning relevant action. The implementation of the “methodology for Sport Risks Assessment” in Belgium, Denmark, Fiji, Georgia, Norway, and Portugal provided an important contribution to this process in 2019 and 2020.

As part of the “technical assistance” activities (2.1.2.2), several on-site and online events took place with the involvement of 15 countries. Country visits and working meetings were carried out in six countries, namely Morocco (17-18 April 2018), Cape Verde (19-20 April 2018), Sweden (14 May 2018), UK (16 October 2018), Qatar (21-22 January 2019), and Azerbaijan (25 November 2019). It was naturally expected that more countries would define their needs and forward assistance requests, but the global pandemic impacted the pace of requests.

Three study visits were organised based on the principle of peer-to-peer work for Liberia (20-21 June 2019), USA (20 June 2019), and Fiji (26 November 2019) in Strasbourg and Paris, with the direct involvement of INTERPOL as well as National Lottery and National Platform representatives from Australia, Belgium, and France.

Within the framework of the technical assistance, a webinar jointly organised by the International Olympic Committee and the Council of Europe took place on 27 October 2021 to deepen the expertise of 110 participants from across the world on effective ways to address the manipulation of sports competitions. The webinar focused on the co-operation between public authorities and sport actors, especially National Olympic Committees, and their role within a national cooperation structure, that is the national platform prescribed by Article 13 of the Macolin Convention.

Targeted technical assistance was carried out in Liberia and Moldova from November to December 2021 with the involvement of local coordinators as well as local and international consultants. In respect of Moldova, the assistance aimed at supporting the establishment of the governance of the National Platform, including mobilising stakeholders and facilitating better co-operation at national and international levels.

In Liberia, targeted support was carried out in two phases. A Roadmap and Action Plan was developed in 2020. The assistance carried out in 2021 aimed at the review and further implementation of the roadmap by re-mobilising stakeholders and strengthening the applicable legislation. Over November and December 2021, the technical assistance included the assessment of existing laws relevant in the fight against corruption as well as cases prosecuted in relation to competition manipulation. Legal gaps and needs were evaluated to define whether the existing laws were sufficient or specific amendments or new legislation would be needed, criminalising competition manipulation and sports betting related offences. Furthermore, compliance with the Macolin Convention's provisions was also assessed and summarised in a national report that was accompanied by presentations for the mobilisation of national stakeholders.



OUTCOME ON BENEFICIARIES AND TARGET GROUPS

- The assistance provided offered opportunities to national stakeholders from 15 countries to work together, study and exchange experiences, so they could get familiar with solutions implemented in the different countries, which enabled them to take their own decision for action, according to the specificity of their situations.
- Belgium, Denmark, Fiji, Georgia, Norway, and Portugal assessed threats and needs, which contributed to identifying key national priorities and planning relevant actions.
- National Action Plans were agreed in Fiji and Morocco and Roadmaps with Action Plans in Liberia and Moldova.
- Due to the technical assistance in Moldova, tasks to be performed by Moldovan authorities and institutions were identified as well as how the Group of Copenhagen and international partners can provide their support. The work was summarised in a Roadmap and Action Plan that defines priorities and expected results as well as milestones to reach concrete steps forward in the implementation of the Macolin Convention in Moldova from 2022 to 2023. The strategic plan enables the improvement of the effectiveness and operational capacity of the National Platform for the upcoming years.
- A Roadmap and Action Plan was developed for Liberia, and two priorities have been implemented, namely a stakeholders' mapping and legal assessment. Technical assistance provided in 2020 resulted in a Roadmap and Action Plan. The assistance carried out in 2021 reviewed and further implemented the roadmap. The technical assistance in Liberia has contributed to mobilising of stakeholders and creating the legal basis for establishing the National Platform.
- The importance of cross-sector cooperation among stakeholders from sport, law enforcement and state were reinforced, specifically the role of National Olympic Committees within national platforms was dealt with within the framework of the KCOOS+ project.
- Participating countries gained specific expertise and experiences, which enabled them to mobilise actors, getting institutions closer, clarifying the threats represented by sports manipulations and therefore establish or strengthen their National Platforms.
- The activities strengthened institutional and professional compliance with the Macolin Convention's principles and objectives.

MAIN OUTCOMES AND OUTPUTS

The Council of Europe has been striving to create change and assist countries develop concrete solutions to the challenges sport faces, such as the growing threat of the manipulation of sports results. Competitions' manipulation represents major challenges not only to the rule of law and democratic values that the Council of Europe safeguards, but also to the integrity of sport, undermining the confidence of society in sport organisations and major competitions. That is why, the Council of Europe with the KCOOS+ project has invested in actions assisting countries to change their policy, legislation, and practices for fair and safe sport, in line with Council of Europe standards, such as the Convention on the manipulation of sports competitions (Macolin Convention).

In line with the priorities of the Council of Europe Programme and Budget 2020-2021 regarding Sports Conventions, the changes among target groups and beneficiaries as a consequence of the delivery of outputs can be summarised along two main aspects: the promotion and the implementation of the

Macolin Convention. The end products or services directly resulting from the activities are listed in Figure 3 and can be found in the Appendices.



- SIGNATURES: 2 (Australia, Morocco)
- RATIFICATIONS: 1 (Moldova)
- THE GROUP OF COPENHAGEN MEMBERS INCREASED TO: 3
- COUNTRIES DIRECTLY INVOLVED IN COMMUNICATION ACTIVITIES: 39
- COUNTRIES DIRECTLY INVOLVED IN TECHNICAL ASSISTANCE ACTIVITIES: 15
- COUNTRIES CARRIED OUT SPORT RISK ASSESSMENT: 6
- ROADMAP WITH ACTION PLAN ADOPTED: 2 (Liberia, Moldova)
- NATIONAL ACTION PLAN ADOPTED: 2 (Fiji, Morocco)
- THEMATIC REFERENCE DOCUMENTS CREATED: 6
- MACOLIN CLUB HOUSE ONLINE DATABASE ENTRIES: 94

Figure 3 Overview of Outputs

AWARENESS-RAISING AND EXCHANGE OF INFORMATION AND EXPERIENCE, PROMOTING THE MACOLIN CONVENTION

The awareness-raising activities, especially the five capacity and confidence-building fora organised in Europe, Pacific Islands and South America, contributed to increased awareness and a better understanding among national public and private stakeholders from 39 countries about the phenomena of competition manipulation and common approaches in addressing it.

The regional seminars and online events (for example the European Online Networking Session with 40 participants from 33 countries and the Webinar on the Role of National Olympic Committees in a National Cooperation Framework/Platform with 110 participants from 80 countries) facilitated exchange of information and experience by providing peer learning and participation opportunities to stakeholders to share good practices. The online data base of the Macolin Club House with 94 entries (in December 2021) has provided stakeholders with opportunities to establish contacts and receive information about their peers and other relevant stakeholders in other countries, thus enabling exchange of information, expertise, experience, and good practices among interested stakeholders.

FACILITATING THE ESTABLISHMENT OF NATIONAL GOVERNANCE STRUCTURES, IMPLEMENTING THE MACOLIN CONVENTION

The project supported public and private stakeholders from 15 participating countries in setting up efficient structures and procedures in line with the Macolin Convention's provisions and principles. Thanks to technical assistance activities, study visits, seminars and webinars, national stakeholders increased their capacities to co-operate in an environment of trust. Several countries begun to establish formal or informal National Platforms, which are the key national hubs dedicated to the co-ordination of the fight against the manipulation of sports competitions (Art. 13 of the Macolin Convention).

Some of the technical assistance activities produced a strategic plan – a roadmap or action plan – that defined priorities and expected results as well as milestones to reach concrete steps forward in the implementation of the Macolin Convention. The development of roadmaps or actions plans in Fiji, Liberia, Moldova, and Morocco aimed at facilitating the mobilisation of stakeholders, supporting the establishment of the governance structures at national level, and enhancing co-operation at international level.

Belgium, Denmark, Fiji, Georgia, Norway, and Portugal participated in a “sport risk assessment” pilot activity, which enabled to assess the integrity threats and associated potential areas of vulnerability in specific sports. The methodology, which was initially developed by Australia and was further tailored for participating countries, was concluded in three phases: (1) completion of a questionnaire, (2) interviews with representatives of National Sport Federations participating in the assessment, (3) drafting of a Sport Risk Assessment report. The activity was supported by Sportradar Integrity Services through the development of betting market liquidity assessment, which provided a vital understanding of the scale of the threat emanating from domestic, Asian-facing, and other bookmakers around the world. In total, more than 35 sports were assessed across the pilot countries.

As a result of these activities, participating countries mapped and mobilised their stakeholders, identified tasks to be performed by authorities and institutions, and defined whether the existing laws were sufficient or specific amendments or new legislation would have been needed criminalising competition manipulation and sports betting-related offences. Participating countries also gained a greater understanding of the scale of wagering and the size of the sport betting market, which were critical factors in understanding the threats – as well as their different types - to the integrity of sport. Most importantly, countries stepped on the road towards the establishment of National Platforms.

INTERNATIONAL AND CROSS-SECTOR CO-OPERATION, IMPLEMENTING THE MACOLIN CONVENTION

With the Republic of Moldova ratifying the Convention further to the cooperation in the KCOOS+ project, the Macolin Convention could achieve the necessary number of ratifications for the Convention to enter into force. Signatory countries, such as Australia and Morocco, became members of the Group of Copenhagen (unique Network of National Platforms). Through providing a key operational support to the development of the Group of Copenhagen, the project contributed to the evolution of the international environment. The international collaboration within the framework of the Network further enhanced the establishment, operation, and development of National Platforms and increased stakeholders' knowledge and capacity not only in the initially 15 participating countries, but in all member countries, which increased to over 30 participating countries during the project.

In addition, the project enhanced cross-sector co-operation at international level. For example, the study visits allowed trans-national exchange of different stakeholders from law enforcement, lotteries and

betting and public authorities. The webinar jointly organised by the International Olympic Committee (IOC) and the Council of Europe was dedicated to the role of National Olympic Committees within National Platforms. The European Online Networking Session allowed key European stakeholders from lotteries and football to share good examples on cross-sector co-operation.



- Better understanding about the phenomena, common approaches
- Participation opportunities to share good practices
- Exchange of information and experience
- Development of networks
- Development of trust
- Development of National Platforms through:
 - Stakeholder analysis and mobilization
 - Legal assessment
 - Sport betting market analysis & sport risk assessment
 - Capacity-building of stakeholder groups
- Enhancement of cross-sector cooperation

Figure 4 Overview of Outcomes

KOOS+ has also developed guidance for international stakeholders, which is instrumental for the establishment of common references. During the project, reviews were undertaken, key concepts were clarified, and a set of thematic reference documents were prepared. As a result, the Secretariat could extend the tools to provide more evidence and experience-based technical and legal assistance, which can build the capacity of different stakeholders. Such thematic reference documents included the:

Guide to transnational seminars to be organised in a continent and specifically in Europe (T-MC(2018)45 and T-MC(2018)47) which helps countries in the organisation of awareness-raising events that facilitated exchange of information and regional co-operation catered to the needs of key stakeholders in a specific region of the world.

- Guidance documents to set up a National Platform (T-MC(2018)98 and T-MC(2019)07).
- Legislative Framework (T-MC(2018)99) that provides summary to key stakeholders regarding their legal obligations provided in the Macolin Convention.
- Exchange and sharing of information and co-ordination and co-operation (T-MC(2018)100) that explains key elements for exchanging sensitive information.

- Sport risk assessment action plan (T-MC(2019)31) to clarify the process of assessing the integrity threats and associated potential areas of vulnerability to specific sports, as well as the Sport risk assessment methodology (T-MC(2019)52) which is the questionnaire to be used in the sport risk assessment. These documents could enable further implementation of the methodology.
- Technical sheet template (KCOOS+(2019)xx) that facilitates States to gather data on compliance with the Macolin Convention articles.

The KCOOS+ project has considerably influenced the development of policies and the governance of the fight against competition manipulation in participating countries and created a solid basis for transnational co-operation. The project contributed to the entry into force of the Macolin Convention and helped address challenges related to the manipulation of sports competition. Thanks to the entry into force of the Convention and international co-operation within the framework of KCOOS+, the environment of the fight against sports manipulation has known a very positive and fast evolution.

ACTIVITIES THAT HAVE NOT TAKEN PLACE

Although the project has brought change, the challenges identified at the beginning of the project remain current, namely, to facilitate better understanding and awareness about the phenomena of competition manipulation as well as to provide systematic and sustainable support that help main stakeholders set up efficient structures and procedures for the co-ordination of the fight against competition manipulation at national and international levels.

Among the challenges faced during the project, COVID imposed a major challenge on the stability of the management team, impacted the implementation of the activities and delayed the conclusion of the expected results. Due to the pandemic, it was impossible to organise activities during 2020. Hence, the originally planned 8 capacity and “confidence-building fora” (1.1.2) were reduced to 5 (2 continental and 3 European seminars) and not organised in America, Africa, Middle East, and Asia.

The confidence-building fora were expected to serve the development of contacts within and beyond Europe and to increase the interest of potential pilot countries. Although the “pilot countries selection” (2.1.1.1) met the initial objective of selecting 20 pilot countries (5 outside Europe and 15 in Europe), this was due to an alternative approach that identified pilot countries from the list of countries of the Network of National Platforms. The alternative approach was necessary to guaranty concrete and immediate impact due to the obstacles in establishing co-operation contacts and a solid database.

Consequently, the “threats and needs assessments” (2.1.2.1) received were not as numerous and detailed than expected and the identification of priorities in countries with the adoption of consistent action plans were delayed (2.1.2). As a direct consequence, the majority of “pilot countries” were not in the position to request clear technical assistance demands and it was impossible to implement specific tools as Perfintegrity missions or Integrisport missions.

The “Macolin Hub” (1.1.3) was subject of one experts’ meeting to envisage needs and opportunities, including technical options. However, due to the absence of database and the relatively limited number of good practices collected, the Macolin Hub electronic portal development did not appear to be justified and the decision was taken to suspend this activity.

All in all, KCOOS+ could not systematically deploy its full capacities.

ADDED VALUE

The Council of Europe's standard-setting activities, which are aimed at the elaboration and adoption of legally binding norms, such as the Convention on the Manipulation of Sports Competitions, allowed for the Organisation to act simultaneously at political, strategic, and technical level to address the increasing threat related to the manipulation of sports competitions. The Council of Europe has been the ideal forum for preparing the Macolin Convention, uniting a diversity of international and national partners working together. The Convention's importance comes into play at addressing the criminal aspects of the manipulation of sports competitions as well as providing a legal basis for transnational and national co-operation.

In line with the Council of Europe's "dynamic triangle", the unique advantage of KCOOS+ lies in facilitating co-operation as the operational arm of the Convention, preparing countries functionally for the implementation of the Macolin Convention. Within the three types of activities that the Council of Europe's programmes cover (standard setting, monitoring, and co-operation), the project implemented co-operation activities that aimed at:

- Raising awareness about standards and policies, namely the Macolin Convention;
- Assisting states in reviewing their laws and practices in the light of the Macolin Convention to increase the commitment of stakeholders in implementing its provisions and principles; and
- Enhancing the capacity of stakeholders to implement the standards set in the Macolin Convention.

With the KCOOS+ project, the Council of Europe provided a crucial support to countries in the implementation of the Macolin Convention, helping countries develop concrete solutions to the challenges related to competition manipulation. This way, the Council contributed to strengthening democratic and participatory governance in the field of sport, especially in the co-ordination of the fight against competition manipulation. It also promoted transparency, integrity and accountability through a multi-stakeholder policy approach that promoted trust in institutions for private entities, such as sport and betting actors.

STAKEHOLDERS

ENGAGEMENT DURING THE REPORTING PERIOD

DONORS

The project allowed for the meaningful involvement of several stakeholder groups. The strategic involvement of donors and partners was ensured through continuous consultation. Apart from continuous bi- and multi-lateral internal communication, the following meetings were specifically organised to seek for strategic advice from donors and partners:

- The 1st Steering Committee meeting for KCOOS+ partners and contributors took place on 9 March 2018 in Strasbourg, France. The meeting kicked off the project and validated the strategy and activity plan.
- The 2nd Advisory Board Meeting for KCOOS+ contributors and partners took place on 8 March 2019 in Brussels, Belgium. The meeting focused on reporting on the 1st year's achievements, evaluating lessons learned, drawing conclusions, and validating the activity plan for 2019.
- The 1st Donor Meeting of 2021 took place on 2 September in an online format to introduce priorities for July-December 2021 and validate the action plan.
- The 2nd Donor meeting of 2021 took place on 10 December 2021, once again in a online format, to report on the activities carried out and their outcomes, as well as to discuss lessons learnt and possible follow-up activities.



PARTNERS

The project attracted a growing number of organisations that has gradually increased the number of partners contributing to the project. The involvement of EUROPOL, FIFA, GLMS, IOC, INTERPOL, and UEFA in various activities has been a key factor of success, as they have provided constant and active support for the development of activities, allowing the adjustment of the project according to the evolution of the situation. Other entities, such as Integrisport, UK Gambling, Ethisport and EU Athletes contributed as associated partners. With their involvement, the project ensured civil society participation and developed synergies among different actors, opening prospects for more consistent and better articulated co-operation. Partners could also provide the specific stakeholder groups a follow-up mechanism related to sports manipulation.

TARGET GROUPS

The engagement of target groups, such as public authorities, sports organisations, law enforcement agencies and public or private sport betting actors was a key principle for developing KCOOS+ activities, since its first and foremost objective was to respond to requests for assistance. Thus, national stakeholders played a crucial role in the development of activities. Depending on the countries' specific situation, public authorities, law enforcement, sports organisations or betting actors offered the point of entry into the national environment, from which it was possible to develop contacts, mobilise stakeholders and build good co-operation framework. Project partners assisted in contact-making: national law enforcement agencies could be better engaged through INTERPOL and EUROPOL, national sport umbrella organisations through IOC, national football federations through FIFA and UEFA, while betting regulators and sport betting operators through WLA, EL and GLMS.

LINKS AND SYNERGIES

KCOOS+ contributed both directly and indirectly to the development of new projects, especially as part of the European Union's ERASMUS+ Programme. Project partners such as Ethisport and CSCF Sport Integrity Group were involved through partnership agreement exclusively to implement follow-up activities through Perfintegrity and Integrisport missions. The Perfintegrity project assessed the level of performance of national public policies to Ministries, while the Integrisport project, funded by the European Union, raised awareness among law enforcement and judicial authorities and supported them in the fight against manipulation in sport. Both projects helped strengthen institutional and professional compliance with the Macolin Convention's principles and objectives in several countries. KCOOS+ attempted to co-ordinate with these as much as possible; however, such missions were not implemented within the framework of the project. KCOOS+ also pursued co-operation with initiatives delivered by project partners and lessons learned were be used in priority for individual interest and obligations.

KCOOS+ also contributed to sustaining the dialogue with the European Union and respective bodies, looking towards a prospect of ratifications of EU member States in the future.

COMMUNICATION AND VISIBILITY

Sharing and disseminating KCOOS+ activities were considered a key to keep all those involved and interested in the project informed, but also to generate visibility amongst different stakeholders. KCOOS+ communication activities focused on conveying key messages to achieve the project's communication objectives, reaching specific target audiences while using appropriate communication channels and tools. The visibility activities of the project aimed at creating a specific identity and branding for KCOOS+, including the design of visuals, and the use of templates in alignment with Council of Europe visual identity guidelines.



COMMUNICATION

The KCOOS+ communication aimed at building support for the project, improving stakeholders' engagement and gathering inputs from the project team. In this sense, the project communication was divided into internal and external communication.

The target audience of internal communication included project donors, partners and experts participating in the project as well as relevant internal departments of the Council of Europe, while the external communication targeted at the project target groups and possible beneficiaries.

The key information conveyed for internal communication included sharing the project plan, status of implementation, budget, risk mitigation, achieved outputs and outcomes. For doing so, advisory group and donors' meetings, online meetings and email correspondence sharing activity plans and reports were used. An important aspect of internal communication was the storage of project documentation, which was undertaken by the Secretariat using its internal document repository system.

The main messages of external communication constituted of information about project milestones, main activities, and their outcomes. Methods used included participation in events for awareness-raising, online meetings, email correspondence with stakeholders, and online presence. In addition, the capacity and confidence-building fora were also used to disseminate information to stakeholders.

The following capacity and confidence-building fora were used to promote the Macolin Convention and disseminate information about the project, its activities, and interim outcomes. Each event where KCOOS+ were presented, either in organisational or promotional capacity, all donors have been introduced systematically.

A more detailed description of these can be found in the "Assessment of achievements" Section.

- South America, 11-14 December 2018, with the support of the Spanish Ministry of Sports,
- Pacific Region, 8-10 April 2019
- Visegrad countries, 10-11 September 2018
- GUAM countries, 14-15 February 2019
- European online networking session, 8 October 2021

The following events were used for raising awareness of the project and the reinforcement of partners' commitments:

The 19th edition of the yearly EL/WLA Sports Betting Seminar "Winning in Sport Betting", Lyon, France, 15-17 May 2018

The event with the great support of the hosting lottery, La Française des Jeux (FDJ), allowed for 140 participants to exchange experience and ideas about the sports betting market. A panel discussion with representatives from the Council of Europe and the KCOOS+ Project, IOC, INTERPOL and GLMS, was dedicated to the integrity of sport, emphasising the importance of legal frameworks and good procedures in place to detect and alert irregularities in sports betting. Thanks to the participation of a Council of Europe representative, KCOOS+ could extend its contacts to other continents.

UNODC's conference "Safeguarding Sport from Corruption", Vienna, Austria, 5-6 June 2018

The two-day event organised by UNODC brought together 250 participants from national law enforcement agencies, anti-corruption, and sport organisations as well as private sector entities from over 60 countries. The conference addressed challenges, including detecting corruption and enforcement, overcoming corruption in public procurement, addressing match-fixing and countering convergences with other crimes. As a result of the awareness-raising at the event, new partners joined the project, such as INTERPOL, FIFA and UEFA, and some countries, such as Czech Republic, Slovak Republic, and Morocco, confirmed interest in the organisation of regional seminars.

Launch of the Integrisport Erasmus+ Project, the Hague, the Netherlands, 30-30 June 2019

The meeting, hosted by the Dutch Ministry of Justice and Security, brought together Integrisport partners to kick-off the EU-funded project that became an associate project of KCOOS+. Partners of both projects confirmed their commitment and agreed to co-ordinate both project to increase the impact of KCOOS+ and its economies of resources.

VISIBILITY

Sharing and disseminating KCOOS+ activities were considered a key not only to keep all those involved and interested in the project informed, but also to generate visibility amongst different stakeholders. The project team made every effort to create a brand identity to the project, designing visuals and templates for presentation, reports, press releases, etc. The Council of Europe's website and social media channels were used for online presence and visibility.

The Council of Europe's website on the Macolin Convention has provided online space for visibility. The website was newly designed and restructured within the framework of the project, so it could share relevant information about the provisions of the Macolin Convention, its stakeholders, Council of Europe tools as well as co-operation initiatives, including the KCOOS+ project.

The website acknowledged the contribution of donors and gave visibility to public and private stakeholders, such as law enforcement, sport, and sports betting actors. Especially, the Macolin Club House database, hosted on the website, provided stakeholders with information about their peers in other countries as well as other categories of stakeholders in different regions, enabling exchange of information, expertise, experience, and good practices.

The Council of Europe's Sport Twitter provided platform not only for disseminating project's achievements, but also sharing relevant information from partners and other projects, creating synergies with stakeholder's initiatives. The schedule of news item publication mostly corresponded to the major milestones of the project and included information about project activities and their outcomes. The list of news items published on the Council of Europe's website can be found in VIII. Appendices.

To increase visibility, the project also produced leaflets and publications circulated to Group of Copenhagen representatives, Council of Europe member state representatives and participants following KCOOS+ events.

Through the communication and visibility activities, the "KCOOS+" abbreviation has become affiliated with a well-equipped programme to provide experience-based technical and legal assistance as an operational arm of the Macolin Convention.

CROSS-CUTTING ISSUES

GENDER MAINSTREAMING

“Women’s sport is an expression of the right to equality and the freedom of all women to take control of their bodies and participate in sports publicly, regardless of nationality, age, disability, sexual orientation or religion” - Declaration by the European Parliament following the report on “Women and sport” (2003).

Despite the increasing interest in sports and the growth in sports participation, disparities and inequalities continue to affect the physical and sporting activities of women, which is a genuine problem in the view of the social, educational, and cultural role of sport and its potential benefits for European citizens. Because of inequalities in sports participation, the struggle for gender equality in professional sport is also highly prevalent. The factors of gender stereotypes in and about sport, the under-representation of women in technical or administrative responsibilities in sports organisations, the gender imbalance in the management of professional sport governing bodies, the inadequate dissemination of sports information and image, the little coverage of women’s sport and of sportswomen in various media outlets (Council of Europe (2011): Gender equality in sport. Good practices Handbooks, No. 2 and European Commission (2014): Gender equality in sport. Proposal for Strategic Actions 2014-2020), the disparity in pay compared to men’s sports, the lack of support from fans, the lower number of available professional teams and the smaller sport market value of women sports, these all contribute to the fact that women’s sports in general is not considered as targets for manipulation.

Even if the project team was aware that taking into consideration the concerns, experiences and needs of women and men could enable stakeholders to better address challenges and increase the efficiency, quality and impact of their policies and programmes in the fight against competition manipulation, the gender-blind nature of competition manipulation was the wider issue that the KCOOS+ project management needed to consider. Thus, KCOOS+ gender mainstreaming aimed at avoiding the increase of the inequality of women in sport and considering the equal representation of target groups and project team members by sex, age, and disability. In this respect, the core project team included women and project activities always encouraged a mix of female and male representatives. The project also worked on raising awareness of the importance of tackling manipulations in women’s sports competitions. Due to the inconsistent data aggregation during the implementation of the project, evidence cannot be provided in this field. More consistent gender analysis, impact assessment and monitoring in future projects could add a considerable added value of the Council of Europe in improving gender equality in sport, especially in the field of competition manipulation.

CIVIL SOCIETY

One of the special features of the Macolin Convention is that it requires Parties to encourage sports organisations and competition organisers to adopt and implement rules, principles of good governance and appropriate measures as well as to apply disciplinary sanctions and measures regarding the prevention, detection, and sanctioning of the manipulation of sports competitions. The Convention also requires Parties to encourage sport betting operators to play a role in the fight against competition manipulation. Due to these aspects, civil society’s involvement, especially from the sport and sport betting sectors, is a core aspect in the fight against competition manipulation. This is also reflected through the

concept of “National Platform” (Art. 13), which requires the co-operation of all relevant authorities and organisations, including civil society organisations.

The project team is perfectly aware of the importance of civil society organisations, as they play not only an essential role in the fight against competition manipulation, but also mediator role between public authorities and citizens, serving the general interest, and thus constituting an important element of the democratic process. Therefore, it encouraged civil society involvement in the KCOOS+ project from the beginning.

In addition, the KCOOS+ project ensured the participation of civil society experts, speakers and participants in several project activities and made sure that civil society organisations were regularly asked for comments, views and feed-back. Whenever possible, the project also developed the capacity and skills of national sport and sport betting organisations and made clear to participating public authorities that sport and sport betting organisations should be involved in their activities at national level.



SDGS

KCOOS+ has made contribution toward the Sustainable Development Goal 16 “Peace, justice and strong institutions”. The United Nation’s 2030 Agenda for Sustainable Development “recognises the need to build peaceful, just and inclusive societies [...] that are based on respect for human rights, on the rule of law and good governance at all levels and on transparent, effective and accountable institutions”. Factors which give rise to violence, insecurity, and injustice, such as corruption, poor governance and illicit financial flows are addressed in the agenda. Regarding the global targets and indicators that have been set for each goal, the following targets are relevant in the fight against the manipulation of sports competition:

16.4 By 2030, significantly reduce illicit financial (and arms) flows, (strengthen the recovery and return of stolen assets) and combat all forms of organised crime,

16.5 Sustainably reduce corruption and bribery in all their forms,

16.6 Develop effective, accountable, and transparent institutions at all levels,

16.7 Ensure responsive, inclusive, participatory, and representative decision-making at all levels.

These targets include issues related to anti-money laundering, fight against organised crime, anti-corruption, whistleblowing mechanisms, as well as transparency, integrity, and good governance in public administration. These issues in the field of sport are addressed by the Macolin Convention.

The KCOOS+ project as the operational arm of the Convention preparing countries functionally for the implementation of the Convention was indirectly capable of contributing to the reduction of corruption in sport and the promotion of good governance in the fight against competition manipulation.

There is lack of data available to provide evidence at what extent KCOOS+ contributed to these targets. Nevertheless, there is also lack of baseline data on these indicators in sport. For example on the value of inward and outward illicit financial flows in sport (indicator 16.4.1), the proportion of persons who had at least one contact with athletes or sport official and who paid a bribe to an athlete or sport official, or were asked for bribe by sport officials, during the previous 12 months (indicator 16.5.1), the proportion of private stakeholders satisfied with their last experience of public services (indicator 16.6.2) or the proportion of sporting population who believe decision-making in sport is inclusive and responsive, by sex, age, disability, and population group (indicator 16.7.2).

A considerable added value of the Council of Europe could be to gather data on these aspects in the field of sport, thus contribute more strategically to reaching the global targets of the Sustainable Development Goals.

RISK MANAGEMENT

Unexpected events that positively or negatively affected the people, processes and resources involved in a project constantly evolved, which the project team considered and, respectively, capitalised upon or minimised promptly.

FINANCIAL RISK

The main risk at the beginning of the project was the delay in the reception of funds to start the work programme implementation. This was caused, among others, by additional administrative procedures for non-state donors, including due diligence processes. As a result, contributions were not available until June 2018. To mitigate this risk, awareness-raising and preparatory activities were implemented in 2018 that had limited costs and could set the pace for the successful kick-off of the work programme. Through participating in conferences, such as the EL/WLA Sports Betting Seminar and the UNOSC conference on safeguarding sport from corruption, the project could reach a considerable number of stakeholders, who were strategically contacted and involved in project activities.

POLITICAL RISK

Major political risks that negatively affected the program delivery were the insufficient responses and the lack of commitment by the decision-makers of crucial national actors. In addition, many of these diverse actors had had existing practices based on individual actions without co-ordination. These factors made the mobilisation of key stakeholders complicated. The project team focused on international co-operation within the framework of the Group of Copenhagen that allowed for adaptation mechanisms and reforms regarding legal frameworks and institutional and professional processes at national level. These processes, however, required time before obtaining full political support and highlighting requiring progress from public authorities.

FORCE MAJEURE

COVID imposed a major challenge on the stability of the management team, impacted the implementation of the activities and delayed the conclusion of the expected results. Due to the COVID-19, it was impossible to organise activities during 2020. Therefore, the project team has demanded to donors to extend the duration of the project until 31 December 2021. Mitigating the unforeseeable circumstances due to COVID, approach was shifted so as many activities as possible were carried out using online solutions.

PROGRAMME/DELIVERY

The pandemic had a major effect in the implementation of the project's work programme and had a domino effect on the activities. Regional seminars could not be organised, which effected the selection of pilot countries that were not in the position to request clear technical assistance demands. Due to the limited number of technical assistance requests and good practices gathered, the electronic portal development was suspended. All in all, KCOOS+ could not systematically deploy its full capacities.

There has been a multiplication of activities by stakeholders, stimulating new initiatives, at the same time they created overlapping. As a way moving forward, it was agreed that partners pursue their own

programmes while they support common KCOOS+ actions and lessons learned from KCOOS+ would be used in priority for individual interest and obligations.

The growing needs and requirements from public authorities for support in the implementation of the Macolin Convention's provisions were also identified as risks, although these prove the increasing need for Council of Europe assistance. To capitalise on these, at the same time not to overload the Secretariat's human resources, more systematic and methodological planning of technical assistance activities will be needed in the future.

HUMAN RESOURCES/ADMINISTRATION

Apart from postponing the implementation of the work programme, COVID also imposed a major challenge on the stability of the management team. KCOOS+ witnessed changes in personnel in 2019 and 2020 with a longer gap in project management due to human resource shortages. As an immediate response, the Secretariat recruited new personnel. For long-term mitigation, the Secretariat looks for ways to implement an independent quality assurance system in future projects to ensure that the design and implementation of project activities, deliverables and outputs are at the best possible quality to reach the desired outcomes and impact.

COMMUNICATION/REPUTATION

One of the risks encountered at the beginning of the project was the absence of strong network of contacts beyond Europe. This was addressed through strategically timed activities, in co-operation with partners.

The lack of human resources negatively impacted both internal and external communication, which influenced stakeholder relations. The project team proposed priorities from July to December 2021 that engaged the main target groups and most of the project partners. The implementation of these activities required regular communication and collaboration with partners and stakeholders. The outcomes of these activities were systematically shared with a wider audience through online channels.



SUSTAINABILITY AND LEARNING

SUSTAINABILITY

The sustainability of the project can be viewed from a supply and demand perspective.

Regarding demand, challenges identified in the course the project remain current and include:

- Understanding the complexity and magnitude of the phenomenon, the level of challenges to sport and the level of threats to society,
- Establishing national coordination and co-operation (National Platforms),
- Sustaining national policy and governance to tackling the phenomenon,
- Efficiently sharing of information (tackling sensitive data, between private and public stakeholders),
- Providing recommendations and guidelines based on countries' experiences and responding to their needs,
- Streamlining the various national and international initiatives (developing a global vision, stimulating the elaboration of global strategies, securing resources needed for setting up the efficient mechanisms, etc.).



From this perspective, the project activities remain relevant, so countries must be able to count on a practical tool that assist states raising awareness, enhancing the capacity of stakeholders, and facilitating co-operation for jointly addressing competition manipulation.

Taking sustainability into account from a supply perspective, the project team has developed a well-equipped programme to provide technical and legal assistance. The project clarified concepts related to the Macolin Convention and its application, the nature and types of sports manipulations, the functioning of the National Platforms and the way to organise an effective exchange of information. It provided a platform for exchange of key strategic and operational information and experience in addressing the manipulation of sports competitions and helped develop synergies between national and international public and private actors, which enabled participating countries to mobilise actors, getting institutions closer, clarifying the threats represented by sports manipulations and therefore establish or strengthen their National Platforms. The project has strengthened its network, built the capacity of stakeholders, and enriched its toolbox with thematic reference documents and tools. The experiences gained made the Council of Europe a credible partner in supporting countries in policy and legislation development to effectively address the manipulation of sports competitions.

EVALUATION

The project team regularly reflected on the project's achievements and draw conclusions to allow the adjustment of the project according to the evolution of the situation. This agile method in project implementation required the project management to constantly collaborate with stakeholders and continuously improve the project activities.

The last Donor meeting, taking place on 10 December 2021, did not only made room for reporting on the activities carried out and their outcomes, but also discussing lessons learned and possible follow-up activities. Through assessing project activities and achievements as well as analysing results, the project team prepared a Lessons Learned Discussion Paper, which donors extended with additional comments and validated at this last meeting. The results of the feedback received are summarised in the following section.

LESSONS LEARNED

WEAKNESSES / ISSUES ENCOUNTERED

POLITICAL ASPECTS

Crucial criteria for effectively addressing the manipulation of sports competitions in countries includes political engagement towards the implementation of the Macolin Convention as well as assured political priority given to the fight against manipulation of sports competitions. Activities that have not been designed based on strong political will and institutional commitment could not produce long-term outcomes and sustainable impact. Promotional activities, explanation of the Convention or even trainings should be effectively implemented through

synergies to be established with other international partners, because too many actions carried out without coordination limit the results.

PROJECT CONTEXT

On the one hand, KCOOS+ contributed to revealing the unexpected global scale of the sports manipulation phenomenon and the lack of common references. On the other hand, KCOOS+ experimented the complexity of the processes to be engaged for reforming or adapting legal frameworks or institutional or professional

procedures. Within this context, the main issues encountered were the followings:

- The insufficient mobilisation of the key national stakeholders.
- The difficulties in identifying the needs for assistance.
- The obstacles in analysing and mapping the situation to set up a database.

KCOOS+ adapted as much as possible to the delays in actor's awareness raising, the slow changes of usual practices, etc. Even if certain risks were anticipated, they could not be entirely and timely addressed and have generated the difficulties in relation to the different activities.

The multiplication of projects by other organisations may have contributed to divert national actors from the KCOOS+ dynamic by creating overlapping and wasted energies or resources.

PARTICIPATION

The development of efficient contacts and sustainable collaboration among national and international actors will need more time. For example, the Macolin Club House expended up to

STRENGTH / EFFECTIVENESS

PROJECT CONTEXT

The meetings and working opportunities enabled stakeholders to exchange experience and get informed about specific challenges addressed in other countries or by other actors. These enriched the common understanding about sports competition manipulation, strengthened trust between actors and between countries. KCOOS+ facilitated a common approach among actors.

Through the capacity and confidence-building, the technical assistance and diverse activities involving 48 countries from 5 continents, KCOOS+ has clearly built a more favourable environment for co-operation and coordination, which led to concrete national commitments toward the Macolin Convention and created a solid basis for a more efficient and better targeted field

94 entries but there is still margin for growth. To better involve target groups and beneficiaries, more strategic stakeholder engagement, project board arrangements and communication activities are needed, in line with Council of Europe strategy and values.

TECHNICAL ASPECTS

The required common understanding between national stakeholders concerning the problems they were facing and their mobilisation toward common objectives required considerably more time than expected. For this, promotional and awareness raising material that practically explains the magnitude, threats and challenges related to the manipulation of sport competitions would be needed,

GOVERNANCE

More targeted actions with better project team arrangements could have created more outstanding quality in project implementation and opportunities for synergies. COVID imposed a major challenge on the stability of the management team, impacted the implementation of the activities and delayed the conclusion of the expected results.

interventions. The ratification by 7 countries (Greece, Italy, Norway, Moldova, Portugal, Switzerland, and Ukraine – 4 of them during the course of the KCOOS+ project) has triggered the entry into force of the Macolin Convention. 32 additional countries have signed the Convention (including Australia and Morocco) and are to join the Group of Copenhagen. These countries are today better equipped to fight manipulation and participate in international cooperation frameworks.

PARTICIPATION

The engagement of national partners, also from civil society, was a key principle for developing KCOOS+ activities, since its first and foremost objective was to respond to requests for assistance. National partners have played a crucial

role in the development of activities. Depending on the countries' specific situation, public authorities, 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.

TECHNICAL ASPECTS

KCOOS+ is considered a major technical assistance reference tool, both by countries and international actors. The specificity of the project was based on delivering concrete and practical assistance to national stakeholders, which created cooperation opportunities in countries. Its legacy comes principally from facilitating cooperation processes at national and international levels, which considerably strengthened the fight against the manipulation of sports competitions. The design of tailored assistance responding to the operational needs in the different countries is an indispensable mechanism for the countries that engage in a long-term fight against sports manipulations. Countries must be able to count on such practical tool.

FOLLOW-UP

The project's legacy lies in the commitment to make sure that countries receive targeted assistance that facilitates better understanding, increased competence, and co-operation among stakeholders for tailored solutions addressing the manipulation of sports competition. This legacy, with the values that the Council of Europe upholds in the field of the promotion and protection of human rights and good governance in sport, remains indispensable for the countries engaging in a long-term fight against competition manipulation. Sustaining the momentum and further accelerating the promotion of the implementation of the Macolin Convention is essential to maximise the impact of the work initiated under KCOOS and KCOOS+. Challenges remain, and the need to continue to engage and instil changes in laws and practices, in line with the Macolin Convention is a striking reality.

The main KCOOS+ initial hypotheses are more than ever confirmed for the next steps:

- National Platforms are a key concept, at the core of the whole system to fight the manipulations of sports competitions.
- National Platforms must oversee the elaboration of coherent and systematic action plans, covering all issues that can assure efficient national integrity strategies.

COOPERATION

The involvement of EUROPOL, FIFA, GLMS, IOC, INTERPOL, and UEFA in various activities has been a factor of success, as they have provided constant and active support for the development of activities, allowing the adjustment of the project according to the evolution of the situation. Thus, the project has contributed to develop synergies among different actors, as partnerships were strengthened, opening prospects for more consistent and better articulated co-operation. KCOOS+ also contributed directly or indirectly to the development of new projects, especially as part of the European Union's ERASMUS+ Programme.

FINANCIAL ASPECTS

Thanks to the efficiency of the management team, best value resources have been chosen, which achieved maximum results, despite the impossibility throughout 2020 to implement most of the planned activities due to the pandemic. The project budget closed with a positive balance since some of the foreseen activities could not be carried out.

- The identification of priorities for action requires to share a common understanding about the problems and to secure a general mobilisation toward common objectives.
- Countries must carry out baseline assessments to identify the legal and operational risks represented by sports manipulations at national level, the threats to society, as well as the legal and governing needs for addressing these risks in each country.
- The mobilisation of stakeholders should be facilitated and allowing the identification of needs and the planning of the relevant actions.

The Council of Europe will sustain a key mechanism that is indispensable for the countries engaging in a long-term fight against competition manipulation. Such a mechanism should have the capacity to explain the phenomena, provide evidence-based technical and legal assistance, build capacity, and clearly influence the development of policies and legislation in participating countries and beyond, and support their effective implementation. Countries must be able to count on such an instrumental support. For it, networks of countries, partners, and experts must continue to expand and a program that can effectively facilitate co-operation for addressing competition manipulation be developed.



RECOMMENDATIONS FOR FUTURE PROJECTS

PROJECT CONTEXT

- The main hypotheses of the KCOOS+ project need to be considered in the development of future programmes.
- Efficient activities must be designed based on strong political will and institutional commitment.
- Promotional activities and explanation of the Convention, more effectively implemented jointly with other international partners, should proceed any trainings or technical assistance.

- For the promotional activities, awareness raising material would be needed that practically explains the magnitude, threats and challenges related to the manipulation of sport competitions.
- More focus is needed on systematic approaches enabling to build solid middle- and long-term processes in countries. For that purpose, regional activities shall be organised in such a way that consistent and rational follow-up can be anticipated.
- More targeted and better coordinated assistance to countries should be a priority in the future. This assistance should be based on more systematic and methodological planning.

GOVERNANCE

- Agile project management methodology should continuously be used that allows the project management to constantly collaborate with stakeholders and continuously improve the project activities, allowing the adjustment of the project.
- The quality of the project and its governance should be assured through result-based project management methodology and human rights approach, a better co-ordinated stakeholders' engagement and project board arrangements in line with Council of Europe strategy and values.
- The project management should look for ways to implement an independent quality assurance system in future projects to ensure that the design and implementation of project activities, deliverables and outputs are at the best possible quality to reach the desired outcomes and impact.
- More consistent gender analysis, impact assessment and monitoring in future projects could ensure a considerable added value of the Council of Europe in improving gender equality in sport, especially in the field of competition manipulation.
- The added value of the Council of Europe as a promoter of human rights and a contributor the Sustainable Development Goals should be better mainstreamed into future activities and, in general, into the fight against the manipulation of sports competitions.

APPENDICES

LIST OF OUTPUTS

T-MC(2018)45 Guide to transnational seminars (continental)

T-MC(2018)47 Guide to transnational seminars (Europe)

T-MC(2018)98 and T-MC(2019)07 Guidance documents to set up a National Platform

T-MC(2018)99 Legislative Framework

T-MC(2018)100 Exchange and sharing of information and co-ordination and co-operation

T-MC(2019)31 Sport risk assessment action plan

T-MC(2019)52 Sport risk assessment methodology

KCOOS+(2019)xx Technical sheet template

T-MC(2020)27 National Action Plan Morocco

T-MC(2020)38 Fiji Action Plan

T-MC(2029)47 KCOOS+ Action Plan Roadmap Liberia

T-MC(2020)56 Liberia Expert Workplan

KCOOS+(2021)3 Revised Roadmap and Action Plan Liberia

KCOOS+(2021)4 Roadmap and Action Plan Moldova

KCOOS+(2021)5 National Report Liberia

[Macolin Club House](#)

LIST OF NEWS ITEMS PUBLISHED ON THE COUNCIL OF EUROPE WEBSITE:

[KCOOS+ 2018-2020 - combating manipulations of sports competitions. First Steering Meeting](#)

[Macolin Convention: overcoming the challenges](#)

[Slovak Republic signed the CETS 215](#)

[3rd International Conference on the fight against the manipulation of sports competitions](#)

[3rd International Conference on the fight against the manipulation of sports competitions](#)

[United Kingdom signed the CETS No. 215](#)

[KCOOS+ project goes global with tackling manipulations of sports competitions](#)

[Council of Europe meets the Australian National Platform against the manipulation of competitions](#)

[The Macolin Convention in operation at the KCOOS+ Regional Seminar for GUAM Countries](#)

[KCOOS+ Regional Seminar with the Pacific countries](#)

[The Macolin Convention has entered into force](#)

[Sport Risks Assessment Pilot Project: Sport Radar is associated with the Group of Copenhagen's works](#)

[European Online Networking Session to facilitate exchange of information and experience in addressing the manipulation of sport competitions](#)

[The Role of National Olympic Committees within a National Co-operation Framework](#)

[The Keep Crime Out of Sport+ Project reaches the Finish Line](#)