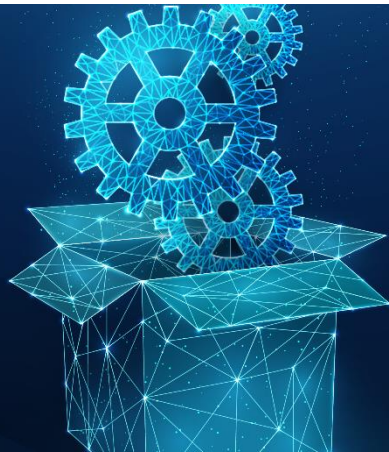




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of the European Union



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# MotivAction dynamic toolbox

## 1. Objectives and presentation

The MotivAction toolbox is designed to meet three of the four objectives of the project:

- Adapt and set up effective reporting tools at national levels, according to the existing manipulation risks;
- Build-up on the project experience to disseminate general knowledge and expertise on whistleblowing management and to adapt national platforms practices and tools beyond the 7 partner countries;
- Raise awareness on risk manipulation and whistleblowing within the Olympic movement through the Paris 2024 Olympic Games.

The toolbox must include all the tools which will encourage those involved in sports competitions to alert in the event of manipulation of sports competitions, and which will support national platforms in improving their whistleblower policies. The tools will mainly cover legal, managerial and communication aspects.

The Toolbox will be distributed to project partners during the Paris 2024 Olympic Games. It will also be presented during the Global Coaching House conference which takes place between August 5 and 7, 2024 in Paris, organized by the ICCE.

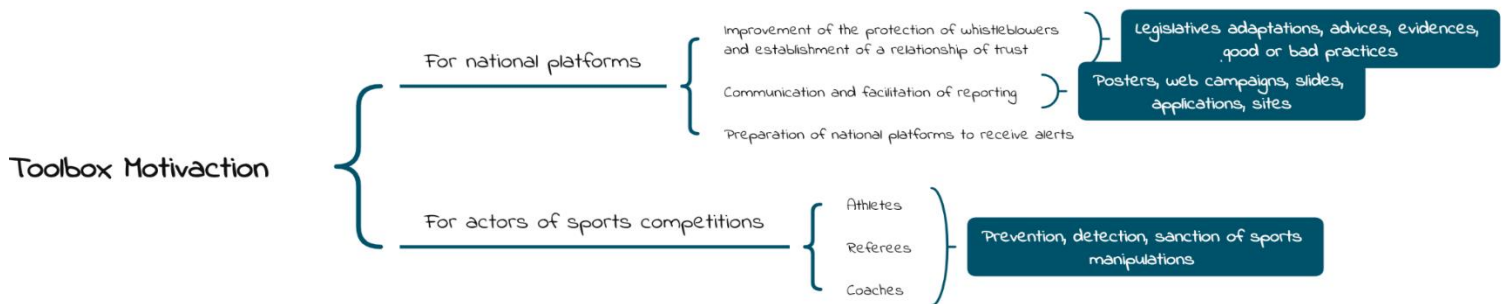
The Toolbox is intended to then be integrated into the Council of Europe toolbox on the fight against the manipulation of sports competitions.

The Toolbox is a tool that is scalable and collaborative. Its success will only be certain if all stakeholders in the fight against the manipulation of sports competitions adhere to the project.

## 2. Methodology

Two online brainstorming sessions were organized.

- The first brainstorming took place on Monday June 3 at 3 p.m. with 10 project partners, bringing together the 4 experts, the project coordinator, two national platforms and two sports organizations (coaches and referees). This meeting allowed partners to discuss expectations related to the toolbox and to collect different ideas. The framework of the structure has been validated.



**Table n°1 : first version of the toolbox structure**

- The second brainstorming took place on Friday June 14 at 9pm with 9 people, including the 4 experts, the project coordinator, two national platforms and two sports organizations (athletes and referees). This meeting made it possible to distribute tasks for each partner and to answer questions about the roadmap.

Tr	Find tools for ...	Pilot	Date de début	Date de fin
	Toolbox for national platforms supervision	Clémence Cathelain	03/06/2024	22/06/2024
	Legislative adaptations	Clémence Cathelain	03/06/2024	15/06/2024
	Advices	Corentin Segalen Henryk Janus	03/06/2024	15/06/2024
	Evidences	Jacek Potulski Lionel Bordes	03/06/2024	15/06/2024
	Good/ bad practices	Paulina Tomczyk	03/06/2024	15/06/2024
	Communication and facilitation of reporting	Marcelo Moriconi	03/06/2024	15/06/2024
	Preparing national platforms to receive these alerts.	Pim Verschuuren	03/06/2024	15/06/2024
	Toolbox for sports actors supervision	Pim Verschuuren	03/06/2024	22/06/2024
	Specific tools for athletes	Paulina Tomczyk	03/06/2024	15/06/2024
	Specific tools for coaches	John Bales	03/06/2024	15/06/2024
	Specific tools for referees	Patrick Vajda	03/06/2024	15/06/2024

**Table n°2 : repartition of tasks**

### 3. Results

Two toolbox entries are :

- one for **national platforms**. The goal is to support them using reliable resources so that each country with a national platform can draw inspiration from it in its policy for whistleblowers
- one for **those involved in sports competitions**, with separate tabs for athletes, referees and coaches. This is an innovation compared to tools that were created in previous projects.



### 4. Dissemination

This dynamic toolbox will be accessible on the Group of Copenhagen website, to enable all national platforms wishing to improve the reporting of manipulation in their countries to find advice, materials, best practices and ideas on the website:

<https://www.coe.int/en/web/sport/macolin-tools>



## I. NATIONAL PLATFORMS TOOLBOX

The first part of the toolbox is intended for national platforms wishing to improve their whistleblowing policy in sport. On the one hand, this involves improving the protection of whistleblowers and establishing a real relationship of trust to enable whistleblowing to be encouraged (A). On the other hand, it is also about communicating and facilitating reporting (B) and preparing national platforms to receive alerts (C).

### A. Improvement of the protection of whistleblowers and establishment of a relation of trust



#### 1 - Legislative adaptations

As a preliminary remark, state legislation is complementary to the disciplinary and private law arsenal of the sports movement, particularly arbitration.

The national (state) legislation of each country which creates a national platform must provide **a sufficient legal framework of protection to encourage**, or at least not to hinder competition stakeholders from alerting in the event of manipulation of competitions.

Legislation is expected for the **legal consecration of the national platform**. Within the Article 13 of the Council of Europe Convention on the manipulation of sports competitions, each state must be able to determine the objectives, the legal status of the platform, the composition of the platform and its operation.

*Ex : (France) Legal status from Law n°2022-296 of March 2, 2022 ; Composition and functioning from Decree No. 2023-1432 of December 29, 2023 relating to the organization, operation and exchange of information of the national platform to combat the manipulation of sports competitions. The national platform is chaired by the minister responsible for sports or his representative. It includes eight representatives of the State (Ministry of Justice, Interior – Police, Finance, and Sports), two representatives of the French National Olympic and Sports Committee, one representative of each sports federation designated by order of the Minister responsible for sports due in particular to its action in favor of the fight against the manipulation of sports competitions and exposure to the risk of manipulation of the competitions that it organizes or authorizes, the number of these representatives cannot exceed eight; a representative of the National Association of Professional Sports Leagues; a representative of sports referees and judges, designated by the French Association of Multi-Sport Referees; representatives of sports betting operators*

*(Greece) Law 4639 in 2019 created the National Platform against the manipulation of sports competitions (EPATHLA). It is led by the General Secretariat for sports (sports ministry) and regroups four other organisations: the police, the Hellenic Gaming Commission, the National Transparency Agency and the Hellenic Olympic Committee.*

National federations, player syndicates, betting operators are also invited to the meetings.

*(Portugal) Law No 14/2024 of 19 January stipulates the creation of a platform to monitor the manipulation of evidence, with experts appointed by the Attorney General's Office, the Judiciary Police, the Portuguese Olympic Committee and the Portuguese Football Federation, among others, handing over co-ordination to the director anti-corruption unit of the Judiciary Police.*

Legislation is expected for **the sanctioning of cases of manipulation of sports competitions** linked with corruption, betting, money-laundering or organized crime. Reprehensible behavior must be punished by state judges, particularly in criminal law.

*Ex : (Greece) specific law on sports (Sports Law, 2725/1999 - Art. 132.1 and Art. 132.2) on active and passive bribery is relevant : it exists a dedicated offence for match fixing and allow the use of investigative techniques, including monitoring of telephone calls. People found guilty of bribery face imprisonment of at least three months.*

*(Portugal) Law on criminal responsibility for conducts that may affect the truth, loyalty and correctness of the competition and its result in sporting activity (Law nr. 50/2007), amended by the Law nr. 13/2017 (02/05/2017), approved the new legal framework on criminal liability for conducts likely to affect the truth, loyalty and correctness of sports competitions and its results/ established specific criminal offences in the context of manipulation, namely: passive corruption, active corruption, influence peddling, criminal association, unsporting betting and offer or improper receipt of advantage*

*(Poland) Act of 25 June 2010 on Sport provides for criminal liability for crimes against the principles of fair sports competition, including, in particular, crimes relating to corruption in sport.*

*(Bulgaria) article 307b, Criminal Code of the Republic of Bulgaria introduced provisions concerning crimes against sport in 2011.*

*(Moldova) In 2013 the Criminal Code of the Republic of Moldova was supplemented with two new articles: art. 242<sup>1</sup> "Manipulation of an event" and art. 242<sup>2</sup> "Fixed bets". Subsequently, the provisions of para. (1) art. 333 "Accepting of bribery" and from para. (1) art. 334 "Offering Bribery" of the same Code were amended, so that it becomes possible to apply criminal liability for taking a bribe by a participant in a sporting event or a betting event and, correlatively, for bribing a participant in a sporting event or at a betting event.*

Legislation is expected for **the protection of whistleblowers in sport.**

Taking into account the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union, and also the Convention of the Council of Europe on the manipulation of sports competitions (art. 7.2.c), several member states have promulgated national laws to enable its transposition.

*Ex : (France) Law No. 2016-1691 of December 9, 2016 relating to transparency, corruption and the modernization of economic life (modified) and Law No. 2022-401 of March 21, 2022 aimed at improving the protection of whistleblowers : the legal definition of whistleblower, the protection provisions (prohibition of reprisals, art 10-1-II) ; the civil (art. 7) and criminal irresponsibility of whistleblowers (art. 10-1) of ; criminal (1 year of imprisonment and 15,000 euros fine) art. 13-I) and civil penalties (Fine of 60,000 euros and damages, art. 13-II) are provided for people who go against whistleblowers ; financial and psychological aid (art. 14-1) ; confidentiality guarantees are reinforced (art. 9,; Art. 122-9 French Criminal Law). BUT the legal scope of application partially applies to the sport movement.*

*(Cyprus) The Protection of Persons Reporting Violations of the EU and National Law 2022 (February 2022) : transposition of the Directive (EU) too.*

But the laws for whistleblowing do not apply directly, or sometimes only partially, to the world of sport. **Specific laws are essential** to ensure the legal protection of whistleblowers in sport, in particular to avoid the risk of reprisals.

*Ex : (Portugal) Law No 14/2024 of 19 January is a specific law for sport which will take into account the protection of whistleblowers (art.6).*

*(France) Deliberation n° 2023-01 of February 9, 2023 establishing within the French Anti-Doping Agency the procedure for collecting and processing reports issued by whistleblowers.*

Legislation is expected to **regulate sports betting** which can lead to manipulation of competitions. The existence of approval or license for betting operators, the existence of a state fight against illegal offers, the ban on betting for those involved in sports competitions are for example relevant.

*Ex : (Portugal) The legal framework for Online Betting and Gambling (Decree-Law nr. 66/2015) ; The legal framework for Land-Based Sports Betting (Decree-Law nr. 67/2015)*

## 2 – Advices

### **Creation of a reporting system**

Several advices can be given to national platforms, particularly when they create a reporting system. Those involved in sports competitions must know whom they are talking to, and should have confidence in the fact that their report and their action will be dealt with confidentiality. The tool would include :

→ The possibility to sign an agreement between the whistleblower and the relevant institution, listing rights and responsibilities for both the whistleblower and the institution.

→ The provision of information and guidance to the whistleblowers about where to find help and support.

The answers to these following questions must be prepared and clearly showcased on the reporting tool platform:

- What are the guarantees of confidentiality, what are the guarantees of anonymity?
- What protections are offered? A clear prohibition of retaliation against whistleblowers (secured by law) potential physical protection measures, if relevant and possible, in cooperation with other authorities such as the police;
- What is the internal procedure in the event of an alert, and above all what feedback is given to the whistleblower?

### **Creation of an collaborative ecosystem**

- invite representatives of athletes, referees and coaches to national platforms

#### *3 – Evidences*

It is not up to those involved in competitions to assess whether or not they have enough evidence to report. It is the work of the police and the justice system, which, if necessary, may seek additional evidence. The platform is responsible for collecting this evidence in a secure manner.

Without being exhaustive, these may involve :

- screenshots of a discussion (sms, e-mail, social networks);
- a dereferencing of the competition on the sites of online gaming operators on a national or international scale;
- an abnormal amount of registered bets;
- an unexplained drop in rating;
- geographically concentrated bets;
- the decision to ban betting in other countries;
- alert received by reliable sources such as the competition organizer, the integrity delegate of the sports federation or national or international partners;
- rumors of fixing in the press or on social networks.

## **B. Communication and facilitation of reporting**



### *1 - Setting up a Protected Reporting System*

Protected whistleblowing is considered the best way to obtain data, evidence, and proof to investigate and sanction all types of corruption cases, such as the case of the manipulation of sport competitions, and specifically betting-related match-fixing.

But... There must be a clear commitment from sports organizations to establish and implement protected reporting systems.

**Recommendation:** If you are not prepared to listen to everything that can be reported, it is better to avoid setting up a protected reporting system and promote whistleblower practices. A protected reporting system to belittle or dismiss complaints received is the worst poison against the fight for integrity in sport.

## *2 - Who should manage it?*

Reporting systems can be implemented and managed by different institutions: sporting government bodies, governmental departments, judicial or law enforcement institutions, or completely independent organizations. The crucial issue to be considered is that every reporting system must be managed by institutions that generate full confidence in those who have to report.

**Recommendation:** Pay attention to the organizational cultures and perceptions of the actors whom you want to motivate to report. In different MotivAction partners' countries several sport stakeholders were reluctant to trust sport authorities. In these cases, it is important that reporting systems, in order to be effective, are implemented by actors outside sport or, at least, National Platforms should consider setting up more than one reporting system.

**Important:** In order to implement a good action plan it is crucial to have prior information on perceptions and attitudes of sport stakeholders. If there are limitations or lack of trust, it is necessary to recognise these problems to seek good ways to implement an environment in which reporting is technically possible and also culturally and ethically promoted by the management bodies or leaders of the organization.

## *3 - Allocation of Resources*

**Resources:** an efficient National Platform, as well as efficient protected reporting systems, must be supported by sufficient financial, human, and technological resources. Without resources, there is no efficiency. Concerns about the need for necessary resources - permanent staff, or sufficient funding to cover expenses and travel costs to participate in international forums and meetings - was an important issue that arose in meetings with some of the National Platforms that participated in the MotivAction data collection.

## *4 - Clear procedures*

The range of good practice on clear and precise procedures is determined by, and dependent on, national legislation, context, size and complexity of organisations, sector, etc. There are no universal prescriptions that determine effective procedures and communications in all cultures around the world.

However, scientific literature and implemented good practices have showed that there are pillars that are always important for establishing valid and effective whistleblowing systems.

***Who and what to report:***

- Establish who can use the reporting channel and who can (and under what circumstances) benefit from protection in case of reporting.
- Define criteria for what type of complaints, and on what issues, it is intended to receive, and promote the reporting system with clear messages on this point.
- The creation of Integrity Officers or Contact Points in sports federations, trade unions, associations, can help to address the above issues.
- Integrity Officers should be clearly objective, impartial, and independent of the management structure of the institution in which they operate.

***How to report:***

- There must be a very clear procedure in relation to how the complaint is to be submitted (written form, verbally, web platform, language, clear establishment of the essential elements that the complaint must contain, etc.).
- It must be clear and known to whom the report should be submitted or, in the case of reporting systems, who will receive and manage the report (direct complaint, integrity office, ombudsman, law enforcement, justice).
- The whistleblower should have a clear understanding of the system through which his or her complaint will travel until it reaches law enforcement and judicial institutions.
- There should always be alternative reporting channels, e.g. one within sport and one directly managed by the police.

***Awareness campaigns: Promotion, communication, and training:***

- The main cause of low reporting is the lack of trust in the institutions involved in the formalization of the reports/complaint, the development of the investigation, and the implementation of sanctions.
- A second issue that can lead to reluctance to report is the lack of clear information on where, how, and what to report and on the forms of protection available to potential whistleblowers.
- Ineffective or slow handling of complaints can increase distrust, impose a culture of fear, and contribute to a code of silence.

**Recommendation:** Prevention and awareness campaigns are very important in promoting the proper use of reporting channels. Messages should be clear. Sessions should be continuous. The European Commission has funded several projects, through the Erasmus+ programme, which have created e-learnings or educational materials to encourage reporting of competition manipulation. This toolbox presents several examples that can be used to be successful (see list in the end of the document).

**LA MANIPULATION**  
QUAND LA RENCONTRE SPORTIVE DEVIENT UN CAUCHEMAR

**DE QUOI S'AGIT-IL ?**

La manipulation sportive se produit lorsque les athlètes perdent ou ne donnent pas le meilleur d'eux-mêmes intentionnellement.

Elle survient aussi lorsque les officiels prennent délibérément de mauvaises décisions pour affecter le résultat de la rencontre.

**La manipulation est de 2 natures :**

- Liée au sport :** Pour modifier irrégulièrement le résultat ou le déroulement d'une compétition afin d'en tirer un bénéfice sportif.
- Liée aux paris :** Pour gagner de l'argent en pariant sur un résultat truqué.

**LES PARIS SPORTIFS : LE SAVIEZ VOUS ?**

En France, l'activité des paris sportifs est très réglementée et participe au financement du sport.

Avec Internet, les paris sportifs constituent un marché mondial.

Seuls les sites agréés par l'ANJ sont légaux sur le marché français. Attention, les opérateurs illégaux peuvent être en lien avec le crime organisé.

**QUI EST CONCERNÉ ?**

- Sportifs pro & de haut niveau
- Juges & arbitres
- Entraîneurs & encadrement
- Dirigeants & salariés
- Agents sportifs

**NE TRUQUEZ PAS !**

- Ne **pariez jamais** sur vous-même, votre équipe et votre sport.
- N'**acceptez jamais** de cadeaux, d'argent, de promesses ou même d'invitations en contrepartie d'une information ou de tout autre avantage.
- Ne **dévoilez jamais** d'informations privilégiées (problèmes de santé, tactiques sportives,...).
- Ne **participez jamais** au trucage d'un match, même en influençant une phase de jeu secondaire.
- Ne **pariez jamais** sur un site non agréé par l'ANJ.

Les sanctions prévues peuvent être disciplinaires (jusqu'à la radiation) et/ou pénales (jusqu'à 5 ans d'emprisonnement).

**SIGNALER PEUT TOUT CHANGER !**

Si vous êtes témoin ou suspectez une manipulation de compétition, vous devez le signaler.

**SIGNALE !**

Ensemble protégeons l'esprit et l'intégrité du sport.

Logos: ANJ, SCCJ, ANJ, FDJ

Example: the flyer of the French national platform



### Examples of posters of the Moldovan national platform

#### 5 - Handling of complaints and reports

- The procedures in place must ensure that complaints are acknowledged and dealt with in a timely manner. Protocols need to be in place to explain, clearly and consistently, why a complaint went forward or why a complaint was dismissed.
- A sense of impunity is one of the factors that may restrict future whistleblowing. In fact, inconsistency of reporting can be avoided by sharing and exchanging information at national and international level with law enforcement authorities that have criminal investigation powers, which sports organizations lack. At the same time, whistleblowers need to be kept informed of the status of their complaints and the outcome of investigations.
- Protection instruments should be extended to those who report in good faith and restricted to those who intentionally make a false report.
- The implementation of bonuses, rewarded whistleblowing or plea bargain may be a good practice.

#### 6 - Protection and support for whistleblowers

Fears of whistleblowing are not simply a whim of sports players. Several historical cases, such as Simone Farina in football or Marco Truogelliti in tennis, have shown that whistleblowers can see their careers complicated and even ruined. In an investigation into the code of silence, Moriconi and de Cima (2020) show that the culture of silence in sport is not simply a matter of a code of silence or code of honor. It is a set of public secrets that

deliberately acknowledge the existence of informal institutions that create and materialize these dangers within the sporting world. Danger that can end the sporting career of the whistleblower when it was not intended to be reported.

If cases like these were to happen again, the fight against the manipulation of sporting competitions would be greatly affected and delegitimize.

In that sense, the promotion of protected whistleblowing and protection of whistleblowers must be based on a clear demonstration and a real commitment to avoid any kind of retaliation and to sanction the actors or entities that could promote any attempt of retaliation.

Clear protocols (including standards, human, material and technological means and sanctioning frameworks) on how to proceed with the protection of whistleblowers (whether anonymously, confidentially or publicly) need to be determined and published. The whistleblower must have access to counseling (legal, psychological and criminal). Often, as in the cases mentioned above, career constraints (career stagnation, dismissal, demotion) prevent athletes from reporting illegalities or irregularities. Supporting the development of a dual career can prevent the subordination of these players to less positive sporting contexts.

#### *7 -Evaluation and Review*

Whistleblowing mechanisms should be subject to periodic reviews and evaluations to help the organization improve existing systems. The collection of data and related records should be done in a way that guarantees data protection.

In order to build confidence in those who must report, it must be made clear to whom the authorities that will manage the protected reporting systems are accountable. The eye of integrity cannot only target athletes, coaches or referees.

**CHECKLIST FOR SPORT ORGANISATIONS (inspired from the international standards - See the WHISTLE Report<sup>1</sup> p. 43).**

- **Preparation**
  - Have relevant internal and external stakeholders been consulted before designing the whistleblowing procedure?
  - Have applying national and international laws and regulations (relevant to whistleblowing, data protection, criminal laws, etc.) been reviewed?
  
- **Whistleblowing policies constitution:**
  - Is the whistleblowing recipient independent enough towards daily administration of the organization?
  - Is the recipient well-resourced and trained to handle the cases?
  - Are several reliable, confidential channels provided to the whistleblowers?
  - Are anonymous reports possible?
  - Is there a clear internal document detailing the responsibilities and modalities for handling the alerts?
  
- **Does the communication clearly detail:**
  - Who can use the procedure, for which kind of information?
  - Why whistleblowing is a valuable behavior?
  - The follow-up procedure?
  - Procedures for handling concerns, i.e. actions taken to record and investigate claims?
  - The types of feedback whistleblowers can expect, while respecting the confidentiality of those being investigated?
  - That reports made in bad faith will be subject to disciplinary action?
  - That deterring employees from raising concerns or victimizing them for doing so will be subject to disciplinary action?
  
- **Openness, confidentiality and anonymity**
  - While respecting confidentiality, does the policy outline instances where this may be compromised, i.e. in matters of criminal/civil law?
  - Does it encourage open disclosures and outlines the key drawbacks to remaining anonymous, i.e. difficulties investigating, providing feedback and protecting an individual's identity?
  - Does it state that anonymous disclosures are preferred to silence about serious wrongdoing?
  
- **Commitment, clarity and tone from the top**
  - Did top leadership clearly communicate a commitment to maintain high ethical standards and taking concerns seriously?
  - Is there a clear whistleblowing policy document, outlining the goals, responsibilities, implementation and assessment modalities?
  - Are internal legal documents covering the scope of the whistleblowing policy signed by all organization members? Do they clearly state that all members are expected to raise concerns they become aware of? And that it is the organization's responsibility to investigate them?
  
- **Access to independent advice**
  - Does it address the point of how to obtain independent advice, and lists possible contacts (e.g. a nominated Confidential Integrity Manager, NGOs, Trade Unions, etc.) with relevant contact details?
  - Is there an alternative grievance mechanism (at least a relevant contact) in place for the whistleblower regarding the whistleblowing policy?
  
- **Assessment and publicity:**

<sup>1</sup> <https://www.iris-france.org/wp-content/uploads/2022/04/WHISTLE-report.pdf>

- Are the results of the reporting system regularly reviewed and assessed?*
- Are some results published?*
- Are the prevention, education and awareness policies regularly assessed, especially to make sure that they include information on the whistleblowing procedure and policy?*
- Is the level of knowledge and trust towards the whistleblowing system and its management regularly measured?*

### C. Preparing national platforms to receive these alerts



Handling sensitive information while triggering assessments and investigations is a challenging task. It is one of the key responsibilities and rationale for national platforms. It is therefore of utmost importance that National platforms be well established, with a clear distribution and understanding of responsibilities. Authorities need to trust each other, and be able to exchange information and cooperate on specific assessments and investigations.

**Who shall receive (and handle) the reports?** Generally speaking, the recipients of the reports need to be limited to a strict minimum. This will contribute to keep the information confidential and improve the procedure efficiency. Both the recipients and the investigators need to be properly trained. For example, on manipulation cases, betting regulation or addiction issues can become complex. In any case, the whistleblower should find an informed recipient at the other end of the system. This recipient should have enough resource and be able to mobilise any relevant person or organization within the national governance. He or she also needs to be relatively independent from sport governing bodies, so if an alert concerns his/her superior, or the organisation's top-management, (s)he should have the capacity to find another person or unit to contact and relate with.

(S)he should be able report to the one executive body once a year, but without being formally controlled. Independence also means theoretical impartiality when dealing with the reports. If possible, it is preferable to separate the person who relates with the whistleblower from the person who investigates the content of the report. These two functions require different skills. The former needs to have human and social experiences which make him/her suitable to listen and properly understand the whistleblower's personal experience. Specific skills and training exist on psychology and social assistance. One possibility is to nominate a recipient who sits outside the organizations. It could be the work of an outside "ombudsman" or "care unit" to receive the reports. Her/his role would be to relate with the whistleblower and pass the information on the sport authorities or to law-enforcement depending on the content and target of the report.

**How to handle the alerts?** Before receiving any report, there should be agreed procedures in place within the National platform which define what to do with it. This is even more relevant if the recipient is external to the organization. As a minimal standard: Each report should be given a unique reference number and recorded on a database. Criteria should be determined within the National platform as to when a report is not worthy of further action. Initial analysis

and assessment (“pre-assessment”) should be conducted to corroborate the information. If the information is corroborated, identify the proper body to further investigate the alleged wrongdoing. Depending on their content and the first investigatory results, reports may be referred to:

- A responsible legal department.
- The legal adviser to the whistleblower representative body.
- An ethics commission or committee.
- The relevant law-enforcement agency.
- A public regulatory agency.
- Any other relevant organisation or person.

**When the content of reports is shared with other organisations,** it is very important to ensure that the source of information is properly protected. All parties need to have a clear understanding of what will be done with the information. It could be made mandatory that the receiving organisation should inform and obtain the agreement of the giving organisation before acting on the basis of the given information. Of course, this applies differently when the information is given to law-enforcement agencies. Another concern is to ensure that contacts and solicitations with the whistleblower are limited to a strict minimum and, preferably, to have only specifically trained and skilled persons to relate with him or her.

#### **Whistleblower protection policy**

At the start of any procedure, a whistleblower protection risk-assessment should be conducted to measure to what extent the whistleblower might be exposed to retaliation and anticipate such risks by adapting the whistleblowing management process.

When information regarding retaliation behaviour arises, either through complaints from the whistleblower or any other source of information, an assessment should be conducted and if relevant, an investigation triggered by the relevant body. Meanwhile, protection measures should as much as possible be applied to the concerned whistleblower.

It is important that at all stages of the information management process, a line of communication stays open with the whistleblower.

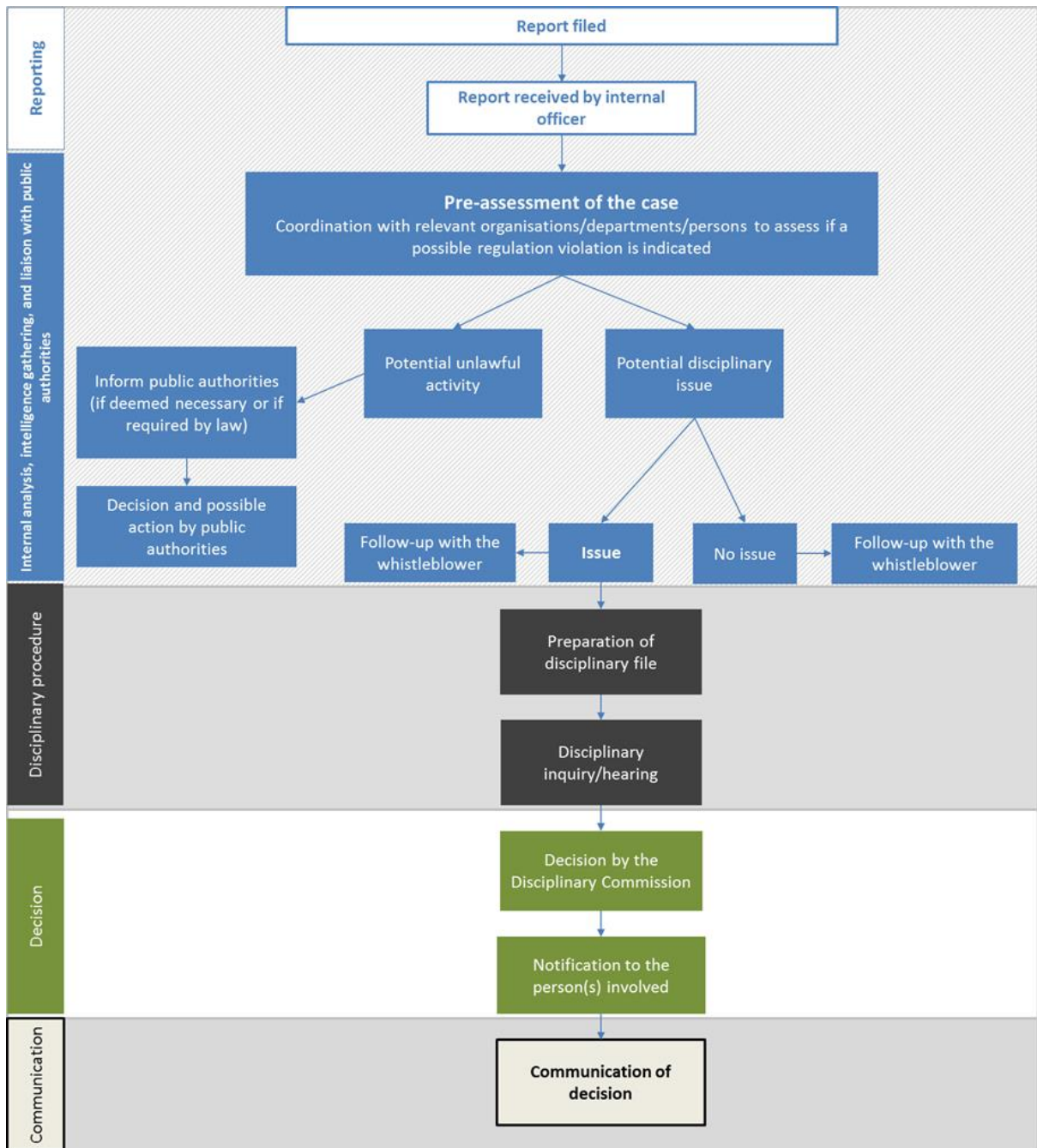


Figure: Flowchart of alert management[1].

[1] Inspired from: IOC. (2016). Safeguarding athletes from harassment and abuse in sport. IOC Toolkit for IFs and NOCs, p.51. The document can be downloaded here: <https://www.olympic.org/news/ioc-launches-toolkit-for-olympic-movement-to-safeguard-athletes-from-harassment-and-abuse-in-sport>



## II. ACTORS OF COMPETITION TOOLBOX

The rounds of consultation of sport stakeholders across the MotivAction partner countries have highlighted the difficulties for athletes, coaches and referees to envision blowing the whistle on manipulation or other forms of wrongdoing. The seven country reports have underlined the individual, contextual, organizational and cultural variables that influence this reluctance to report.

To convince bystanders to become whistleblowers, national platforms and their respective members need to articulate specific tools, measures and policies that will promote, help and protect the act of reporting. It includes long-term and coherent communication, awareness-raising and education campaigns.

Such holistic and structured whistleblowing strategy may increase the number of reports but also their quality, since whistleblowers are likely to feel more confident in providing critical information, providing their identity and agreeing to testify in judicial or disciplinary proceedings. In the previous section we have detailed what such a strategy details. In this section we present specific measures and communication content that have to be addressed to the three key targets of sport reporting policies, namely athletes, coaches and referees.

### **A. Athletes**



**Elements to be included in education** should, at minimum, cover understanding of rules and obligations related to:

- the applicable rules – both sport and criminal ones
- what constitutes a competition manipulation and that its strictly prohibited at all levels (for example, including spot fixing)
- the restrictions related to betting
- the obligation to report
- the inside information

**When it comes to reporting:**

- What are the obligations when it comes to reporting (what do you need to report, how, to whom, when etc)
- What kind of information should you include for the report to be helpful
- How are the athletes reporting protected (both from the match-fixers and in the context of their sport careers)
- What happens after the report is received and how will it be acted upon.

### Examples of education materials:

- PROtect Integrity Online <https://www.protect-integrity.com/>
- PROtect Integrity, previous projects: <https://euathletes.org/resources/match-fixing/>
- FIFPRO Don't fix it Guide <https://fifpro.org/en/supporting-players/safe-working-environments/anti-match-fixing/match-fixing-don-t-fix-it>
- Match fixing in friendlies project <https://www.unrf.ac.cy/projects-item/combating/>

## **B. Coaches**



Coaches can play an important role in preventing match-fixing by establishing a team culture that is open and transparent with a clear set of values that emphasizes fair play and is intolerant of cheating. However, with the proliferation of betting in sport the temptations to cheat are strong. Coaches need clear direction, education and support in three specific areas if they are to play a lead role in preventing match fixing and helping athletes deal with situations that may arise.

### **1. The rules related to betting in sport**

It is clear from the MotivAction project that the rules around betting in sport are not well understood. What is an athlete, coach or other team support member legally able to do with regard to betting? What is illegal or against the rules of the sport?

### **2. The consequences of match-fixing**

Examples of successful prosecutions of people who have manipulated sport activities can serve as a deterrent to this behaviour and should be publicized and provided to coaches to use in educating their teams.

### **3. The process of reporting match fixing (whistleblowing) – and trust in the system.**

Coaches need a thorough understanding of the reporting process and the steps – and limitations – of maintaining confidentiality and protection of whistleblowers.

It is not sufficient for coaches to be passive observers of sport manipulation. Their role as leaders requires them to be proactive in preventing match fixing, to take a clear stand against sport manipulation.

To help coaches prepare to provide effective leadership outlined below are some scenarios coaches may face:

#### **1. Game put on alert**

It's 30 minutes before game time and you, as head coach, have just been informed that because of betting irregularities the upcoming game is under suspicion, and there will be a league official watching for any indications of match fixing.

What will you say to the team before the game begins?

#### **2. Suspicion reported from a player**

The night before a game a player comes to you and says he heard two players talking about having their friends bet on the game, and the money they hope to make if their team doesn't score in the first half.

What do you say to the player who has reported this situation, and what do you do about the reported discussion between the two players?

### 3. Owner questions

The owner of the team has made it clear that the team is nearing bankruptcy and he is open to any solution to keep the team solvent and meet payroll. You've seen several people going to the owner's office who aren't part of the team and he's been holding private meetings with several individual players. You are suspicious about what is going on but don't have any evidence of wrongdoing. What's your next step?

### 4. Prevention

There have been several cases of match fixing in your league and you are determined to avoid this problem with your team. You have called a meeting with the team to address this issue directly. What will you say to the team and what specific steps will you take to try to ensure this problem doesn't happen with your team?

## **C. Referees and sports judges**



Match-fixing is identified in most local laws as a corruption offense, but corruption is strongly punished by criminal law, up to and including prison time. It is also important to remember that sports betting is prohibited in some countries and that betting on a foreign site in a country where betting is prohibited is also punishable by criminal laws.

### **Some examples of what not to do and for which sanctions were taken:**

A referee knows that an athlete is not going to defend his chance because, having qualified for the next round, he intends to slow down: you communicate this information to a third party who will bet taking this information into account: you are in a prohibited situation.

A referee knows that an athlete is injured, but the latter has not announced it; by communicating this information externally you are putting yourself in contradiction with the law Former referees who are no longer active bet on the results of certain matches: they are condemnable and swear condemned by the jury set up by the FI because it is forbidden to bet on your sport.

"Influenced" by a bettor, you make a bad decision on the first point of the match: it has no impact on the result of the match but it saves the bettor money, you are perfectly blameworthy even if you have not received any money.

A referee of a team sport bets, during half-time, on the match he is refereeing! in addition to the reprehensible and prohibited aspect of such an action, he risks being disbarred for life.

A federation communicates the name of the referee of the match or fight, as well as his backup in the event of injury to the first named, some bettors will do everything to prohibit the chosen referee from refereeing, going so far as to injure him. This is to favor the second who they know has accepted their conditions!

**A summary of the main messages** that should be remembered to encourage the referees to alert in the event of manipulation of the competition:

### **1. You cannot be the "tool" of a cheat!**

Remember: it is forbidden to deliberately make an incorrect decision that affects the result of a match or competition, in order to gain a financial or measurable financial advantage.

Such action is punishable under criminal law!

### **2. The vicious circle of manipulating the referee or judge**

Criminals are perfectly organised to try to get you to "fall for it" by

- By offering gifts
- By becoming friends and creating a relationship of dependency
- By offering you money directly.

### **3. The risks**

Prison

Fine

Disbarment/exclusion from your sporting family

### **4. Never forget**

You never bet on your sport and in multi-sport events you never bet on any sport.

Never talk about anything that could have an impact on the outcome of the match, and in particular anything to do with the state of health of the player or athlete.

Even if there is no approach or no risk, it is important to know immediately what to do in the event of an approach. There may be local, national or international mechanisms provided for by law or by your federation; having an address or number in your telephone avoids tedious searches if you are approached.

If you are approached in a suspicious manner, don't hesitate to inform the relevant authority or organization, without publicity, but doing so is essential; it protects you and your sport.

## **5. Multi-disciplinary platforms to combat match-fixing**

The idea here is to bring together on a virtual platform all those responsible for preventing, investigating and punishing match-fixing: the police/justice system/national betting authority/sports betting companies....

If many referees or judges think that there is no follow-up in denouncing elements of match-fixing, they are mistaken, because denouncing such an act leads to an investigation, sometimes without result for lack of evidence, but often with convictions at the end of the day.

## **6. Multidisciplinary platforms are organized internationally**

That's what's important: your report may not have an immediate impact in your own country, but it will be part of the evidence that will be useful elsewhere.

## **7. By denouncing reprehensible acts, you protect yourself, your discipline and your colleagues:**

- You protect yourself because the guilty party often tries to blame you.
- You work together to ensure the integrity of the competition result.
- You prevent this pattern of corruption from happening again



## Resources

### List of previous projects



#### **FIX THE FIXING – Proactive quelling of sports events manipulation (2016-2017)**

<https://www.iris-france.org/fixthefixing/>

*Fix the Fixing will implement state-of-the-art scientific knowledge and methods to deliver the expected outputs. The design of the project involves the following steps:*

- 1. Understand match fixing in sports: A mixed method design will be employed to collect data about match fixing. Athletes, coaches, executives, journalists and people involved in sports will complete surveys and take part in focus group interviews to better understand the psychological process underpinning match fixing and how it is done.*
- 2. Develop an educational tool: Based on produced scientific evidence from our surveys and interviews, we will develop an innovative, web-based, and user-friendly educational tool. Our tool aims to provide updated information and resources about abstaining from match fixing.*
- 3. Educate stakeholders and end users: The developed educational tool will be used by stakeholders, and anyone involved in sports, education and policy-making, to educate people involved in sports about the harms of match fixing and how to abstain.*

#### **WHISTLE – Sport Whistleblowing of Harmful Irregularities in Sport through Learning &**

**Education (2017-2018)** <https://www.playfaircode.at/en/tasks/erasmus;> <https://www.iris-france.org/wp-content/uploads/2022/04/WHISTLE-report.pdf>

*Sensitization and awareness raising on sport strategic manipulations, especially about the prevalence of sporting-related (i.e. non-betting related) match-fixing, simulate moral judgment regarding sporting-related match-fixing and share and transfer this knowledge.*

*These objectives will be pursued by conducting a questionnaire on the prevalence of match-fixing in seven European countries, developing country specific action plans and workshops against match-fixing and disseminating these results to as many stakeholders in the sport as possible.*

#### **PROTECT INTEGRITY – (2016-2018)**

<https://www.protect-integrity.com>

<https://euathletes.org/?project=protect-integrity-2>

*The “2016 PROtect Integrity” Erasmus+ project will provide face-to-face education to close to 15,000 European elite level and youth athletes in 11 countries (Denmark, Greece, France, Iceland, Italy, Ireland, France, Norway, Slovenia, Spain, United Kingdom) and at least 10 different sports (basketball, cricket, cycling, football, Gaelic sports, handball, ice hockey, indoor football, rugby, water polo, individual sports). All 22 participating player associations have taken part in a Train the Trainer conference co-organised with Interpol in Lyon (France). Smaller meetings have also been held to tackle specific issues and follow up on the implementation of the project. The education has been supported by athlete-friendly key messages on posters, social media and an upgraded version of the internet site. The research conducted during the 2016 PROtect Integrity project confirmed the special relationship and trust between players and their associations, also when it comes to reporting anything suspicious.*

## **PROTECT INTEGRITY + – (2018-2019)**

*PROtect Integrity Plus was built upon and developed the previous project. By educating athletes across Europe on the dangers of match-fixing it has become clear that there is a real need to provide the first European wide, athlete-led reporting system for professional and elite athletes to securely report suspicions of match-fixing.*

*Therefore, PROtect Integrity Plus introduced the proven Red Button reporting App, initially developed by the Professional Footballers Association of Finland (JPY) and FIFPro, to professional athletes from 7 EU countries (UK, Ireland, France, Denmark, Greece, Italy, Spain), and 5 different sports (rugby, basketball, handball, volleyball, futsal).*

*The new version of the App, adapted for the project partners, was rolled out in June 2018.*

*During the course of the project, almost 2800 professional athletes across Europe downloaded the App, whilst 4700 players were provided with education on sport betting integrity, the dangers of match-fixing, the requirement to report anything suspicious and how to use the Red Button App. The education was supported with the updated Code of Conduct posters and leaflets that were provided in different language versions during team visits.*

*In addition, a social media campaign conducted by all the project partners and spearheaded by #PROtectIntegrity has been essential to spreading the word about the PROtect Integrity Plus project and the dangers of match-fixing to a wider audience.*

## **T-PREG – Training on Protected Reporting for Professional and Grassroots Sport (2018-2021)** <http://www.tpreg-training.eu/>

*The key objective is to introduce, in a structured way, the use of protected reporting systems in the anti-match fixing policies and actions of sport bodies and institutions, not only for reporting in itself, but also as vehicle for changing approaches to prevention, governance and information sharing. The project aims to assess existing reporting systems, to collect evidence of sport actors about attitudes and perception on misbehaviors within the world of sports, while establish best practices and conduct training to create better protection for whistle-blowers.*

## **AMATT – Anti Match-Fixing Top Training (2017-2019)**

*The project proposal has the following goals: 1. To consolidate and enlarge the network previously constructed thanks to the EU funded Stop Match-Fixing project and the EU Milan 2014 Seminar; 2. To construct a tailored training pattern strongly linked to the specific needs of two targets (top decision-makers of sport organizations and media operators) and based on relevant data that allow specific knowledge and understanding of the phenomenon; 3. To build capacity of sport organizations top decision makers for effective policies, including a very efficient role of Ombudsmen/whistleblowing services providers; 4. To involve sport spectators in a first step of a proactive role through tailored training of media operator; 5. To elaborate structured guidelines to EU Commission for effective short/medium/long term policies against Match-Fixing in sport, based on a specific comparable data matrix about illegal behaviour and a tailored training model shared by the network coalition managing the project; 6. To create a permanent European dissemination platform of these tailored training platform, thanks to the direct involvement of CONI, in the perspective of enlarging the model/practice to other sports.*

## **AMFIX – Against Match-fixing (2018-2020)**

<http://againstmactfixing.com>

*Academic and practical development of internationally applicable action guidelines to combat and prevent match-fixing and fraud.*

## **INTEGRISPORT – (2019-2020)**

<https://www.integrisport.org>

*IntegriSport Erasmus+ is an EU-co-funded project that aims to raise awareness amongst law enforcement and judicial authorities and support them in their fight against manipulation in sport.*

## **EPOSM – Evidence-based prevention of sporting related match-fixing (2020-2021)**

<https://www.playfaircode.at/en/tasks/erasmus>

<https://www.eposm.net>

*Sensitization and awareness raising on sport strategic manipulations, especially about the prevalence of sporting-related (i.e. non-betting related) match-fixing, simulate moral judgment regarding sporting-related match-fixing and share and transfer this knowledge.*

*These objectives will be pursued by conducting a questionnaire on the prevalence of match-fixing in seven European countries, developing country specific action plans and workshops against match-fixing and disseminating these results to as many stakeholders in the sport as possible.*

## **SEE Countries for the integrity of football clubs (2020-2021)**

<https://www.playfaircode.at/en/tasks/erasmus>

*Design and roll-out of workshop materials regarding match fixing, sports betting, sports ethics and corruption, in co-operation with South-Eastern European Football-Leagues.*

## **BITEFIX - Building innovative tools for the exchange of information and awareness raising against match-fixing on sport (2021-2023). <https://bitfix.eu/>**

*Although match-fixing and betting-fraud are fast moving international crimes, deeply infiltrated in the sports universe, they still face an anachronic lack of coherent, systematic and articulated response from sports, governments or society at large. Heterogeneous legal frameworks, reluctance or even rejection to adopt enforcement measures, difficulties in assessing what should be the right approach and lack of thoughtful and efficient cooperation, all favour the continuous and infamous success and profit for organized crime in recent years. Match-fixing, in fact manipulating the results of matches and contests around the world for the purpose of betting-fraud, is more prevalent today than ever, but in a direct relationship to the increasing prevalence of on-line internationally available gambling on it, and to the clear and virtually unchecked vulnerability of gambling to criminal control and fraud or the lack of adequate and timely mechanisms for information exchange. As identified by several authors, widespread match-fixing occurs in great measure due to the lack of information and awareness of the athletes and/or of adequate and efficient capacity building programs of sport organisations and/or the lack of proper interexchange of information among the key-actors to enable them to counter criminal infiltration. In this framework, BITEFIX project aims to develop and provide innovative and practical tools to enable committed stakeholders (law enforcement authorities, betting regulators and operators, government agencies and sport governing bodies, mainly) to work together against match-fixing and betting-fraud in sports through the exchange of timely, secure and reliable information and raise awareness about the importance of safeguarding the integrity of sport and of its irreplaceable role in European society, with a special focus on grassroots sports.*

## List of materials



- Policy Recommendations (<https://bifefix.eu/policy-recommendations-io4/>).
- Guide of Good Practices on the Fight Against Match-Fixing (<https://bifefix.eu/guide-of-good-practices-io1/>)
- eLearning: The e-learning tool enables committed stakeholders to work together against match-fixing and betting-fraud in sports. (<https://www.bifefix.eu/e-learning/>)
- Podcast: <https://bifefix.eu/podcast/>
- *Guidelines accessible on pp. 40-45 of the WHISTLE report:* <https://www.iris-france.org/wp-content/uploads/2022/04/WHISTLE-report.pdf>
- *IOC- UNODC Report* [https://www.unodc.org/documents/corruption/Publications/2019/19-09580\\_Reporting\\_Mechanisms\\_in\\_Sport\\_ebook.pdf](https://www.unodc.org/documents/corruption/Publications/2019/19-09580_Reporting_Mechanisms_in_Sport_ebook.pdf)
- Guidelines and examples for designing and implementing awareness-raising and education programmes here: <https://euathletes.org/wp-content/uploads/2023/07/PIO-Report.pdf>
- Guidelines for optimising EU policies related with the creation, promotion and proper use of protecting reporting systems in wrongdoing at grassroots level and professional sport, mainly match fixing.
- Guidelines for optimising EU policies on whistleblower protection in sports.
- Flyers about Match Fixing and the importance to report (T-preg training)
- Perceptions on Match-Fixing & Reporting of Behavioural Problems in Sport (Different Countries) (<http://www.tpreg-training.eu/node/42>)
- Guidelines for optimising EU policies in order to enhance their effectiveness in promoting sport bodies top decision makers capacity and specialized competences for preventing and countering match/fixing and other crimes in sport.
- Presentation video: <https://www.youtube.com/watch?v=jf5DzaezHpM>



## Bibliography

CATHELAIN-COLLON C., **Manipulation of sports competitions : conceptualization essay and legal framework in French law** , Aix-en-Provence Cedex 1, Presses Universitaires d'Aix-Marseille, Centre de droit du sport, 2023, 550p.

*The manipulation of sports competitions is a notion that emerged within the sports movement and states with the emergence of the global sports betting market. While an international legal instrument has been developed specifically for this issue of sports integrity, there is no clearly identified legal concept. There then persists a legal vagueness relating to its content and scope. Several additional and specific criteria constituting said sports cheating could facilitate its qualification. A national fight is essential since the manipulation of sports competitions undermines the fundamental values of sport, but also public order and criminals can be involved or bets placed. The material and structural organization of this struggle is unique in France. There are rules of prevention, detection and sanctions directly or indirectly related to sports cheating. Disparate actors, such as sports organisations, public authorities and betting operators, are structuring themselves in order to create new modes of cooperation. Nevertheless, although it is advanced, the French fight against the manipulation of sports competitions remains perfectible.*

McNamee, M., & Moriconi, M. (2024). **Sports integrities: a conceptual and methodological framework for analysis and policymaking.** *Sport, Ethics and Philosophy*, 1-23.

<https://www.tandfonline.com/doi/abs/10.1080/17511321.2024.2354295>

*Since the manipulation of sport competitions became one of the main threats to sport integrity, both the academy and international organizations have sought to establish a coherent conceptual framework that defines what criteria determine a manipulation and what are the factors that might cause it. Although the literature has shown that the manipulation of sport competition is a multifaceted phenomenon that includes individual, relational, organizational and institutional variables, most of the authors have focused their explanations on individual factors, and institutional prevention campaigns continue to understand match-fixing as a problem of moral failure of on-field sports actors. This work proposes a novel dynamic framework for analysis based on the theoretical roots on Morin's paradigm of complexity and Archer's critical realism. In addition to articulating the micro, meso, and macro factors together, the paper defends the idea of three conceptions of integrity, personal, competition and institutional, often operating simultaneously in the same space. Each one of these integrities, operates across individual, organizational and structural levels, acting recursively on the others, generating the gears of the global sports integrity. We then discuss the reasons, structures, opportunities and incentives that each of these integrities creates and fuels. We argue that the errors and ineffectiveness of the fight against the manipulation of sport competitions are largely due to a lack of understanding of, and appreciation for, the different conceptions of integrity and their interactions that require different approaches and differentiated public policies. We conclude with innovative possibilities for more effective policy-making processes in this space.*

Moriconi, M. (2024). **What are they talking about? Dislocations between institutional narratives and on-field sports actors' perspectives on match-fixing.** *Deviant Behavior*, 45(3), 301-317.

[https://www.tandfonline.com/doi/abs/10.1080/01639625.2023.2246094?casa\\_token](https://www.tandfonline.com/doi/abs/10.1080/01639625.2023.2246094?casa_token)

[=sLvFwBM48QIAAAAA:milh--JXszyO-z7pfqOp2BYpalebczBnlktOTiTR1QDXzOTyuhAo6jqJHTbvbOaV0X5j5wizGzk\\_\)](https://www.taylorfrancis.com/chapters/edit/10.4324/9781003162681-14/assessing-public-sports-policies-tackle-match-fixing-c%3%A9sar-de-cima-marcelo-moriconi)

Since match-fixing is considered a major threat to the integrity of sport, the implementation of awareness campaigns has become one of the most recommended and enacted policies. Sports governing bodies and international political organizations have established programmes to morally educate on-field sports actors to recognize the problem, resist its incentives and proposals, and report any offer or case they may know. The homogeneity of the content of those prevention campaigns, which are forged and agreed upon in a top-down perspective by international and sports governing organizations, betting regulators and law enforcement institutions, has generated an official preventive narrative of the problem. Through interviews with on-field sports actors (athletes, players, coaches, referees) this article explores the dislocations between the contents of this official preventive narrative and interviewees' perceptions and experiences of match-fixing. Findings show how some cognitive limitations of the official narrative can lead to the delegitimizing of the educational programmes to fight against the phenomenon. The results also provide evidence to broaden the debate on the subject. The conclusions suggest a new road map for policy intervention, and for the set-up of new and more effective awareness initiatives.

de Cima, C., & Moriconi, M. (2022). **Assessing public and sports policies to tackle match-fixing.** In Constandt, B. & Manoli, E.: *Understanding Match-Fixing in Sport* (pp. 161-180). Routledge.

<https://www.taylorfrancis.com/chapters/edit/10.4324/9781003162681-14/assessing-public-sports-policies-tackle-match-fixing-c%3%A9sar-de-cima-marcelo-moriconi>

With the massive growth and spread of the sports betting industry, new structure opportunities and risk areas for match-fixing have emerged, particularly related to the infiltration of organised crime syndicates in sport. In view of the seriousness of the scenario and the inadequacy of existing public and sports policies to combat this "new" threat, sports governance bodies, intergovernmental institutions and national governments have coordinated efforts to reform the current legislative and disciplinary frameworks. The hegemonic solution was the adoption of a "zero-tolerance" policy based on three pillars: prevention (educational programmes), regulation (reform of the legal and regulatory framework) and monitoring (monitoring of sports betting). Using a taxonomic model, this chapter discusses the effectiveness of new public and sports policies to prevent and tackle match-fixing. We seek to understand the extent to which these policies have achieved behavioural changes at the level of three interconnected dimensions: sports betting practices, reporting wrongdoing in sport and manipulation of sport competitions. Since the Portuguese Football Federation has strictly followed the "zero-tolerance" policy and has promoted a new legal framework for combating the phenomenon, we consider Portuguese football as a strategic case to assess the adequacy of these measures.

Moriconi, M. (2020). **Deconstructing match-fixing: A holistic framework for sport integrity policies.** *Crime, Law and social change*, 74(1), 1-12.

<https://link.springer.com/article/10.1007/s10611-020-09892-4>

On the 1st of September 2019, the Council of Europe Convention against the Manipulation of Sports Competitions entered into force. This official mandate appears to confirm the significance of the issue on the political agenda. For sports governance bodies, the problem is one of the biggest threats against the integrity and sustainability of their industry. Despite this political-institutional situation, the phenomenon still remains under-studied in the academic world and several authors have emphasized the need for more and better empirical research to verify the premises (sometimes unfounded) on which the official preventive narrative of the problem is built. This special issue, *Deconstructing Match-fixing*, comes to light to address this issue. Systematizing the evidence presented along the contributions, this introductory article attempts to dispel some 'myths' in the official preventive narrative, offers some lessons for a better understanding of the phenomenon, and promotes recommendations for establishing more evidence-based public policies and educational campaigns.

Moriconi, M., & Almeida, J. P. (2019). **Portuguese Fight Against Match-Fixing: Which Policies and What Ethic?**. *Journal of Global Sport Management*, 4(1), 79-96. (<https://www.tandfonline.com/doi/abs/10.1080/24704067.2018.1493357>)

*Since 2015, several institutions have been implementing educational and awareness programs to fight against match-fixing in Portugal. This article gives an account of the political measures and campaigns implemented to tackle this problem. It addresses some ethical dilemmas that underline the preventative discourses and key cognitive limitations of the policy-making process. Prevention campaigns has often been created in a top-down approach where players, referees and coaches are guided to undertake attitudes and behaviours institutionally shaped, often determined by stakeholders out of the sports industry. Moreover, the problem tends to be confined as an exclusive issue of the sports industry. To counteract this limitation, the National Olympic Committee has developed an integrity program that comprehensively addresses good governance and institutional transparency as key factors to combat the phenomenon. However, the domestic policy-making process does not include integrity as a risk factor opening avenues to widespread trans-national organized crime infiltration in sport.*

Moriconi, M., & De Cima, C. (2020). **To report, or not to report? From code of silence suppositions within sport to public secrecy realities.** *Crime, law and social change*, 74, 55-76. (<https://link.springer.com/article/10.1007/s10611-019-09875-0>)

*One of the main obstacles to detect undesirable conducts such as manipulation of games and competitions, and to combat corrupt behaviour in the sports world is the existence of the so-called "code of silence" among the sport's actors. Therefore, integrity educational campaigns, codes of conduct, ethics and disciplinary norms include the obligation to report any suspicion, approach, tentative or case of match-fixing. In some countries, such as Portugal, the obligation to denounce is incorporated into criminal law. Although several protected reporting channels have been implemented for sport institutions and federations to encourage whistle-blowing practices, the level of denouncement is still low. Through the analysis of official discourses, ethnography and interviews with key informants, this article demonstrates that despite the formal norms, reporting on corruption in sport, mainly match-fixing, is a dangerous practice that can have serious consequences for the athletes' career. More than a code of silence within sports, what exist is a series of public secrecies that deliberately recognize the existence of informal institutions that create and materialize those dangers. However, while integrity actors show awareness of the situation, the official narrative and formal norms avoid considering these problems and, moreover, throw this evidence out of the integrity narrative framework. The result is a delegitimate and non-realistic narrative that pushes sports actors to keep quiet more than promoting ethical behaviours and whistle-blowing.*

VERSCHUUREN P., *Warning systems in international sport: Performance and perspectives*, thèse, Lausanne, 2020, 355 pages.

*The objective of this thesis is to understand a managerial phenomenon still unexplored by sports management sciences. By studying the implementation of alert systems, research will contribute to advancing knowledge on the role of these systems and more broadly on the wishes and capacities of international sports organizations in their ethical responsibilities.*

Visschers, J., Paoli, L., & Deshpande, A. (2020). **Match-fixing: Football referees' attitudes and experiences.** *Crime, Law and Social Change*, 74, 77-95.

*Match-fixing is increasingly perceived by both national and European policy makers and independent observers as a major threat to the integrity of sports, and in particular football. A series of recent scandals in different European countries seems to corroborate the perception of football's growing vulnerability to manipulations, suggesting that such vulnerability may be related to football's popularity, the huge related financial interests and the rapid growth of online betting. Nonetheless, the empirical research on match-fixing in football has so far been very limited. Against this background, we present in this paper the results of survey amongst 595 referees belonging to the Royal Belgian Football Association about their attitudes towards the incidence, disclosure and combatting, and*

*reporting of match-fixing, as well as their personal experiences with match-fixing. The main findings can be summarized as follows: (1) approximately 44% of the referees believes that at least one in ten Belgian football games is fixed; (2) 41% of the referees considers the likelihood of match-fixing in football being disclosed (very) low; (3) only 11% of the referees is aware of at least one protected reporting system for match-fixing; (4) 23.5% of the referees has already witnessed or suspected match-fixing in football; and (5) only 12% of the referees who witnessed or suspected match-fixing reported the only/last case of match-fixing they witnessed or suspected. Although our referee's perceptions might not correspond to reality, our findings suggest the need to introduce adequate protected reporting systems, conduct awareness campaigns and intensify law enforcement agencies' and sports bodies' cooperation and data sharing.*