

**DIRECTORATE GENERAL OF DEMOCRACY**

**DIRECTORATE OF ANTI-DISCRIMINATION**

CHILDREN'S RIGHTS AND SPORT VALUES DEPARTMENT

Sport Conventions Division

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**3<sup>rd</sup> International Conference on the fight against the manipulation of sports competitions –  
Promotion and implementation of the Macolin Convention  
Strasbourg (France), 24-25 September 2018**

**Conclusion report**

***General considerations***

The 3<sup>rd</sup> Strasbourg Conference was organised around 11 workshops involving approximately 160 participants from 37 countries and 23 public and private international organisations. The current climate of trans-sectorial discussions has triggered a new practical and result-oriented format of meeting.

The level of representation and aptitudes was high; exchanges were positive and constructive, reflecting the mutual respect that stakeholders nurture towards their counterparts over the recent years. All interventions focused on the threats represented by sports manipulations, a phenomenon that is still too often common-place in politics and society. While some views remain constant and uncompromising, the general impression however is that the majority have understood and accepted that citizen's expectations regarding the combat against all forms of corruption continue to rise. Not surprisingly, the process is laborious due to a number of undesirable reasons, especially regarding the delayed entry into force of the Macolin Convention, and most of participants regret this. It is encouraging however that the "Macolin Community" is vibrant and clear in its determination to move towards more morality in ethical sport and society and is ready to be engaged into a more energetic concerted action that will only be sustainable by the Macolin Convention.

***Introduction***

The main objective of the 3<sup>rd</sup> Strasbourg Conference was to create the relevant framework nudging actors into a new generation of coordinated action.

National situations may be diverse and challenging when developing fight against sports manipulations, but stakeholders globally face similar problems. These problems need to be addressed adequately, thus requiring more engagement and improved action. For that purpose, the 3<sup>rd</sup> Strasbourg Conference has strengthened public authorities as leading forces in the upcoming phases of the "Macolin Process". International actors have on their side delivered a clear message, confirming their support to fostering a more consistent process, declaring with a unified voice the necessity of the enforceability of the Macolin Convention.

The general spirit of the Conference called for more transparency and honesty in actions, expecting that international actors to collaborate positively and engage each other's competencies and initiatives, as well as acknowledging individual contributions towards a single, common goal – the Convention and its correct implementation. New partnerships are expected to be designed in respect of each partner's domain of competencies, establishing clearer complementarities. This attitude should avoid useless and

counterproductive competition and should rather lead to a more coherent and appeased narrative, enhancing general co-operation instead of individual positions.

This “*Conclusion report*” contains two main parts:

1. “Lessons learned” from the Conference, clarifying certain key strategic issues and explanations of main problems faced by the Macolin Community that have to be taken into account in order to elaborate the “Macolin Roadmap”<sup>1</sup>.
2. “Next steps”, which will be two-fold, including ‘General objectives’ shared by the majority of Conference participants and ‘priorities for the future’ based on workshop discussions.

“Priorities for the future”, once confirmed by feedback to the Conclusion report will be subject to additional effort with the view to elaborating a concrete list of actions. That will then implemented through a collective effort within the “Macolin Roadmap” which will multiply opportunities for exchanging experiences and capacity building, in the spirit of all aspects of the Macolin Convention

### **1. Lessons learned**

i. In the enduring climate of inability for EU Member States to ratify the Macolin Convention, the 3<sup>rd</sup> Strasbourg Conference helped in distinguishing two schools of action that have evolved over recent years concerning the way to envisage the fight against manipulations of sports competitions:

- “Pragmatics” feel that because the Convention is not yet in force (and in many cases in Europe, the member states are unable to ratify it anyway), they need to implement actions using currently available opportunities. This approach thus favours classical bilateral co-operation agreements, ad hoc transitional tools and procedures (e.g. Alert and Surveillance System), sectorial capacity building and so on, although, in many cases, they support the Convention’s principles.
- “Macolinists” underline that they are forced to rely on specific legislation that is often insufficient to address all aspects of sports manipulations, and therefore find themselves blocked from carrying out global efficient actions. For them, only the Macolin Convention can provide the international legal background and integrated responses necessary to carry out the ensemble of reforms and changes to establish the necessary innovative conditions and partnerships.

These two attitudes are not in contradiction, and even *de facto*, will have to coexist for a little longer. However by clarifying the two positions the Conference has paved the way to discuss the best way reconcile them; highlighting notably the two approaches should converge in preparation of the entry into force of the Macolin Convention.

ii. The Macolin Convention is still not fully understood due to an enduring sectorial mentality and protection of vested interests. There is still a general tendency to look for answers within the Convention not in the overarching interest of protecting against manipulations, but rather to only reply to issues faced within one’s own domain. This denying the fact that the Convention is designed to propose global solutions involving all stakeholders through an integrated approach and transversal co-operation;

iii. The obstacle to the Macolin Convention’s ratification created at the European Union level has encouraged certain stakeholders to act alternatively within the existing legal and institutional environment (see the “pragmatics”, § i. above). Admittedly, those stakeholders involved in the drafting process had tailored the Convention with the idea of its swift entry into force, hoping to

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<sup>1</sup> The Macolin Roadmap was developed following the 2<sup>nd</sup> Conference in September 2016 as a global framework that started to streamline actions and projects towards common goals. The update version will include a concrete action plan released in the coming months for the following 2 years.

immediately benefit from its legal framework including the establishment of transnational co-operation structures. Following the first encouraging flow of signatures in 2014, the subsequent EU decision *not* to ratify the Convention forced stakeholders to use aspects of the Convention and to improvise. This has led to a proliferation of partial solutions, at times responding to the most urgent problems, but failing to establish a systematic and consistent process;

- iv. Moreover, the delay between the adoption of the Convention and its entry into force have led certain national and international stakeholders to consider that some of the common issues debated during the drafting process of the Convention, could be re-opened for debate. Some of these issues were, to a certain extent, contorted by some “lobbies”, disguising the original terms of the Convention and confusing its ultimate goal.

In this environment, the promotion of the Convention faces a number of obstacles. Some stakeholders have convinced themselves that it may even be possible to avoid ratifying the Convention and that implementing its principles would suffice. However, discussions during the 3<sup>rd</sup> Strasbourg Conference made clear that it is simply not possible to proceed in the long-term without the Macolin Convention.

## 2. **Next steps**

### **General objectives**

Participants expressed a general consensus about the following objectives which concretely define the short-term and mid-term goals for the “Macolin Roadmap”:

- i. The Macolin Convention must enter into force as soon as possible; following the signature and ratification by a maximum of countries, Parties will be legally obliged to act;
- ii. The concept of “sports manipulations” must continue to be explained in order to include the entire scope of the domain and of the Convention. It should definitively include all types of manipulations as they are revealed by countries worldwide, and further develop a clear terminology further in order to help stakeholders develop a coherent narrative and an integrated approach to the phenomenon<sup>2</sup>;
- iii. Public authorities must take charge of the “Macolin Process”;
- iv. National Platforms must build confidence between their own national stakeholders in order to ensure the necessary operational co-operation;
- v. Trans-national co-operation must be developed between National Platforms, the Council of Europe Network of National Platforms (Group of Copenhagen) and international actors as far as possible to prepare for the legislative basis offered by the Convention;
- vi. Stakeholders in agreement with the Macolin Convention must manifest themselves clearly and work together more closely endeavouring to create synergies ;
- vii. Pragmatic approaches and coordinated field assistance must be developed in order to learn from field experiences (good practices);
- viii. Education and prevention (together on detection and sanction) must include an approach involving all stakeholders, in order to work on vulnerabilities and tackle the causes of corruption in sport;

In accordance to these “general objectives”, in the “pre-Macolin environment” (preparatory stage of the Convention), the “learning by doing” approach is encouraged as an effective means of understanding the phenomenon, one that allows actors and countries to experiment new ways of action in order to prepare the future implementation of the Macolin Convention. It is critical that efforts targeting enhanced awareness, education programmes, sharing of experience and so on, continue to be enhanced and strengthened. They should continue however, in a more transparent, coordinated and interchangeable manner, rising above rivalry and allowing specialised stakeholders to function without risk of competition and overlap but rather in a spirit of mutual aid in the name of protecting sport integrity.

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<sup>2</sup> See Updated Concept on the Manipulation of Sports Competitions, TMC(2018)87rev

### **Priorities for the future**

The “priorities for the future” are stated within the Macolin Convention and thus find their legitimacy therein. They aim at helping to prepare the Macolin environment, making possible the effective implementation of the Convention on its entry into force<sup>3</sup>. They are formulated below in broad terms, offering opportunities to “think out of the box”, and to establish an understanding of what may be done now and in the future to take full advantage of the opportunities presented by the Macolin Convention.

The “priorities for the future” are structured in line with the three complementary components – or policy levels of the integrated approach defining the “Macolin Process” which public authorities must implement simultaneously in order to develop efficient responses to sports manipulations and related corrupt practices<sup>4</sup>:

1. A national integrated approach dealing with sports manipulations and associated corrupt practices;
2. A National co-operation involving key actors;
3. Coordinated trans-national and international mechanisms to protect the integrity of sport and combat corruption in sport.

The “priorities for the future” are also defined as responses to five main challenges identified by the Conference participants:

- A. Understanding the threat of sports manipulations to sport and society within the full context of the Convention;
- B. Building trust and confidence among and between National Platforms and critical stakeholders, particularly with respect to collecting, sharing and dealing with information;
- C. Creating a legal and cultural environment to enhance the legitimacy and effectiveness of reporting;
- D. Maximising the impact of education and outreach in an effort to focus more on prevention;
- E. Encouraging uptake of the Macolin Convention.

challenges	A. Understanding the threat of sports manipulations to sport and society within the full context of the Convention	B. Building trust and confidence among and between National Platforms and critical stakeholders, particularly with respect to collecting, sharing and dealing with information	C. Creating a legal and cultural environment to enhance the legitimacy and effectiveness of reporting	D. Maximising the impact of education and outreach in an effort to focus more on prevention	E. Encouraging uptake of the Macolin Convention
Macolin Process					
1. A national integrated approach dealing with sports manipulations and associated corrupt practices					
2. A National co-operation involving key actors					
3. Coordinated trans-national and international mechanisms to protect the integrity of sport and combat corruption in sport					

These priorities do not comprehensively cover all issues dealt with in the Macolin Convention. Instead they focus on subjects which participants have raised to be of particular importance, to be the subject of future collective work. Discussions also highlighted several other subjects which may be used for longer term developments. It falls to each stakeholder to develop or pursue additional priorities relevant to its competencies and interests, while consistently ensuring coordination and coherence in action in the objectives of the Macolin Roadmap.

<sup>3</sup> controversial issues have not been considered for formulating priorities; the priority about these issues is to pursue the dialogue

<sup>4</sup> these components served as the basis for the thematic discussions (session 3)

The 14 “priorities for the future” presented henceforth do not specify defined actions; the determination of actions will require further discussions between partners and participants as part of the Macolin Roadmap. They are however accompanied by contextual ideas or positions defended by participants during the workshops, which might help later in defining the scope of the actions to be decided.

The 14 “priorities for the future” are the following (see summary in appendix 1):

## **1. A national integrated approach dealing with sports manipulations and associated corrupt practices**

***Challenge A: Understanding the threat of sports manipulations to sport and society within the full context of the Convention***

***Priority 1.A.1: To define trans-sectorial / transversal common “risk assessment / analysis” methods***

- There is a lack of culture to anticipate; stakeholders prefer to react to major situations (following a press alert for example) rather than to engage in risk identification and prevention (perhaps due to the requirement for additional resources and planning in order to do it);
  - Certain aspects of problems and threats represented by sports manipulations have been well studied, resulting in the development of several reports and reference documents which provide key background information on the current situation (EUROPOL, UNODC, IOC, etc.) from certain perspectives;
  - There are no updated syntheses available and no overarching approach or methodology established;
  - Risk assessment is about identifying and understanding the problems, and clarifying what each actor is currently doing in order to tackle these problems (provide a state of play);
  - Risk assessment provides exposure of the threats, and helps in identifying priorities for action. The objective is to help develop strategic or operational decisions as an integral tool essential for public authorities, especially when setting up National Platforms (purpose, responsibilities, form, status, etc.);
  - Risk assessment is an ongoing process, as a source for defining “risk management” measures, eventually relating to the definition of annual action plans;
  - A comprehensive approach (including all fields of interest) is required that embraces a wide-perspective (sectorial reports, public and sports’ opinion / perception, law enforcement approach to investigators, betting industry feelings about trends of the market, etc.) and a “needs assessment” approach identifying what actors are doing or could currently do within existing legal and institutional frameworks, as well as what they are missing;
- There is a requirement to know more in detail about what was done and how in further areas related to manipulations in order to propose standard basic measures which may lead to the adoption of National Action Plans (national strategy) to tackle sports manipulations, enabling actors to commit towards common objectives, and the clear definition of their responsibilities

***Challenge A: Understanding the threat of sports manipulations to sport and society within the full context of the Convention***

***Priority 1.A.2: To organise relations between stakeholders***

- Some countries have not yet nominated their regulatory authorities or are struggling in defining their exact role, thus either not clearly understanding the tasks of a regulatory authority or expecting this entity to carry out tasks beyond its competencies;

- Each aspect of fighting manipulations – prevention, detection, investigations and sanctioning – has been siloed to certain stakeholders; for example, sport movement tends to bear the entire responsibility for education and prevention, although this should include knowledge on potential sanctions, what to do if approached or threatened, legal rights and responsibilities if on trial, etc.
  - There is a tendency in the wave of excitement to only focus on certain areas, such as monitoring of bets, without seriously considering other aspects that lead to or involve sports manipulations. This has in turn led to non-consideration of a number of relevant actors.
  - Identifying and engaging the national stakeholders is critical – all stakeholders should be involved in providing relevant solutions, demonstrating that public and private actors can work together;
  - Public authorities (including ministries, regulators, law enforcement and judiciary), and the private sector (including sport organisations and the betting industry) should be encouraged to work together and respect each other's roles and responsibilities;
  - The Sport movement includes not only sporting organisations and governance bodies, but also athletes, performance support personnel and members of the public; each have valuable information to share, be educated and protected;
  - The Betting industry (private and public operators) operating legally in the jurisdiction also has valuable information to share and responses in various key challenges (related to prevention, monitoring, etc.). Regulatory authorities should ensure that there is regular and formal exchanges with these stakeholders for appropriate representation of positions within National Platforms and also receive all relevant information;
  - It is important to understand that all stakeholders must be willing and able to carry out tasks in an integrated approach, always referring first to a national approach before looking outside;
  - National action plans will enable all stakeholders to carry out their roles and functions toward common and shared objectives;
- The development of clear guidelines outlining the roles and responsibilities of all relevant stakeholders is essential in establishing a good working relationship between entities and facilitating trust in the development of National Platforms

***Challenge C: Creating a legal and cultural environment to enhance the legitimacy and effectiveness of reporting***

***Priority 1.C.1: To create co-operation and coherence between reporting systems***

- How the best generate a sufficient flow of information capable of informing disciplinary and legal investigations and prosecutions and protect those that report?
- Security and efficiency of the reporting systems is critical: people report when they trust the systems;
- Many sports have reporting systems – either through organisations, or athletes unions; this together with reporting systems from law enforcement agencies can create confusion with regard to whom to report;
- Insufficiently communicated or established legislative measures do not reassure potential reporters of sufficient protection; there is also the question of pressure to reputation that discourages potential reporters;
- There are multiple tools / systems existing (individual sports or stakeholders) with different standards and procedures, resulting in confusing and complex processes for whistleblowers and informers (especially when athletes are transferred to different jurisdictions);
- What are the existing reporting systems? Who should deal with reports provided by sport? How can you align this amongst various sports and with other stakeholders, such as law enforcement?
- Consider funding possibilities pooling resources?

- Analysis of existing reporting systems is required to determine possible gaps and overlaps and should be used to inform the design specifications for a new system / application;
- A set of operational guidelines and policies should be developed to outline the requirements of individuals and organisations when reporting information – including that reporting is a legitimate moral duty for those holding information. An education strategy should also be developed to support the rollout of these guidelines and policies;
- Developing design specifications for overarching / centralized systems, including technological opportunities and evaluation / ongoing costs at national level;

***Challenge D: Maximising the impact of education and outreach in an effort to focus more on prevention***

***Priority 1.D.1: To inform / educate the public, etc. based on a positive narrative enhancing integrity and higher moral values***

- Insufficient importance and resources are given to the development of integrity educational programs;
  - Prevention and education are implemented through effective programs; however most of these are mainly focusing on elite sport. The high risks and vulnerabilities are observed more so at the sub-elite levels; developing political awareness may lead to key decisions (including the ratification of the Macolin Convention, adoption of the laws, etc.);
  - There is a lack of coordination resulting in many disconnected initiatives and inefficiencies across the sector; there should be opportunities for synergies;
  - Considerable pressure is placed on certain stakeholders to bear the responsibility of education and prevention, instead of an integrated approach;
  - Need to be pragmatic and use existing limited resources and tools appropriately, and to greatest effect (interactive systems, “face to face” programs);
  - Communication is important. A clear understanding of the topic should be generated amongst involved stakeholders in order to harmonise the message to the public, both in instances of apprehended sports corruptions and positive narrative (benefits of clean and safe sport);
- There is a sentiment reflecting the need to recalibrate efforts toward preventive aspects of the Macolin Convention, however there are few integrated contributions at this stage at national and international levels (there is rather a competitive climate) for detailing the challenge and specifying the priority aspects. A large assessment of what currently exists may present as the basis for elaborating possible agreement between stakeholders.

***Challenge E: Encouraging uptake of the Macolin Convention***

***Priority 1.E.1: To improve messaging / reporting to government and to public***

- NPs and / or other public authorities have a direct responsibility to produce consistent and regular reporting;
  - Communication is important, both in instances of apprehended sports corruptions, and positive narrative (the benefits of clean, safe sport);
- The process to developing a national policy is directly contributing to the promotion of the Macolin Convention, which in turn assures the political support to provide the relevant resources and means for implementing the national. This priority which has been underlined requires implementation at the very early stages

## 2. National co-operation networks involving key actors

**Challenge A: Understanding the threat of sports manipulations to sport and society within the full context of the Convention**

**Priority 2.A.1: To identify the basic requirements / standards for National Platforms**

- Ensure that all stakeholders involved at operational, strategic and political levels understand the origin and full nature of the National Platforms. This may require analyses, exchanges with relevant stakeholders, in-depth consultation of the Convention;
  - Building an effective national co-operation system may follow diverse paths;
  - The initiative may start from a single actor, but as the process progresses, and the complexity of the problem is understood, more actors should be involved, and ultimately, public authorities must take the lead;
  - Initial non-official initiatives might be associated to “National Platforms” approach;
  - First stages are always about understanding the problem (“risk assessment” concept) in order to decide what priorities are to be integrated into national strategy. This stage presents an opportunity to gradually identify and engage the different stakeholders;
  - Objectives and responsibilities assist in defining the required form and status of the National Platforms, noting that this may be evolved and further developed over time;
  - It is critical to determine what the National Platforms need to achieve (operationally) before deciding the form they should take and the legal status they should have;
  - National Platforms should bring added value to stakeholders’ daily responsibilities. Their role is to strengthen what individual actors are doing and to increase their impact;
  - National Platforms allow for a different approach (risk management), which focus more on upstream issues (prevention), while managing enforcement processes;
  - In defining roles and responsibilities of stakeholders, National Platforms have to consider the opportunities involved in establishing different levels of competencies, for example, enabling prosecutors to act at early stages when dealing with information (triage processes);
  - National Platforms are at the core of the exchange information system; the Council of Europe revised data protection convention CETS 108+ and the GDPR is changing the existing rules, and adaptations are necessary.
- The process for setting up the National Platforms can be described through a systematic but non constraining approach (stages of development), providing indicators and criteria which helps public authorities establish the relevant relationships between actors, defines legal requirements, coordinates action, as well as builds capacity and shares of experience. Due to requirements for trans-national co-operation between National Platforms, there is a need to present the same legal and operational guarantees.

**Challenge B: Building trust and confidence among and between National Platforms and critical stakeholders, particularly with respect to collecting, sharing and dealing with information**

**Priority 2.B.1: To develop national information exchange frameworks that encourages consistency and reliability**

- A culture of common objectives must be generated amongst national stakeholders – the overarching objective of the National Platforms should be to protect the integrity of sport – this is the main aim of the Convention;
- There must be conditions in place for law enforcement to share intelligence with the sport movement: An integrity unit or platform must have the appropriate legal foundation in place, so as to ensure information will be handled correctly – specific legislation will overcome basic data protection restrictions that may be obstacles;



- The key question is about defining at what moment certain information will have to be circulated;
- Sport has to be convinced that the information warrants circulation to other stakeholders – in order to reassure this group of stakeholders, appropriate legislative measures need to be in place, especially when transnational exchange of information and data is involved;
- Standardization of national operational policies and procedures for exchange of information should include: what information is shared (threshold), when information is shared (triggers), how information is shared (format / platform), how information is used (appropriate controls);
- Assessing legal solutions;
- Assessing legal solutions in place or envisaged;
- Transitional procedures for facilitating information flows from third party national stakeholders that do not have associated National Platforms (this may have a broader application when considering expansion into other world regions);
- The information sharing framework and particularities enabling information sharing between members of the National Platforms must ensure the respect of international data protection rules.

***Challenge D: Maximising the impact of education and outreach in an effort to focus more on prevention***

***Priority 2.D.1: To develop multidisciplinary capacity building programs for all stakeholders***

- Many public and private actors carry out their own educational programs with limited to no, coherence;
  - Existing programs may not be permanent, or not covering all sports / countries;
  - These programs have a cost, and as such, funding is an important issue for certain sports and countries;
  - Important to raise awareness about the risks and the consequences of manipulating sports competitions;
  - The “face to face” educational program is considered as one of the best ways to educate; direct contact with players and staff (professionals and non-professionals), as well as future players;
  - In order to tackle funding issues, depend on programs offered by partners or combine resources;
- Considering the large number of existing systems / experiences, it will be useful to compile and assess the existing programs and arguments, make a comparative study and produce guidelines in order to target a higher level of coordination between existing initiatives

### **3. Coordinated trans-national and international mechanisms to protect the integrity of sport and combat corruption in sport**

***Challenge A: Understanding the threat of sports manipulations to sport and society within the full context of the Convention***

***Priority 3.A.1: To develop a comprehensive approach to sports manipulations***

- There is political reluctance to deal with sports manipulations, due to the principle of autonomy of sports, lack of sufficient understanding of the topic, etc.;
- It is difficult to identify high risk vulnerability situations (no democratic system, bad finances, no decision control system, no exterior control system, lack of or low remuneration, sexual abuses, etc.). However, this should be a preliminary stage and should enlarge the scope of

- sport corruption which are too often limited to sport betting issues, thus resulting in incomplete legislation and actions by National Platforms;
- Criminals are fully aware of potential benefits that sport can generate, while public authorities do not have the same awareness concerning vulnerabilities and risks;
  - Criminals are determined, well organised and well informed, while public authorities do not invest equally;
  - Criminals are very professionals and involve experts, while public authorities do not face the situation with the same level of expertise;
  - Criminals put in place vast and complex networks involving all relevant actors, while public authorities do not have a symmetrical and equivalent structured approach;
  - Is the lack of political focus or willingness to link important crimes to sports manipulations making easier to not consider tackling manipulations of sports competitions as a key area for additional resources or the transitional legal protection provided by ratifying the Macolin Convention?
  - Sport manipulations corruptions is just as important as others forms of corruption, and should be tackled accordingly – the manner of communication can greatly impact on how sport manipulations can be received at the political level;
  - Sports manipulation includes corruption. Most countries are subject to international obligations to deal with all forms of financial crimes (UN + CoE treaties), and therefore public authorities might consider action as part of those frameworks – the attempt to separate corruption from manipulations can create confusion when it comes to prosecution and other court procedures;
  - Instead of artificially separating the term corruption from manipulations, the distinction, when considering the Convention, may be made with regard to links to affecting the course or result of Competitions from other types of corruption (such as bidding processes, etc.);
  - The development of a consistent typology of sports manipulation taking into account *modus operandi* and criminal, administrative and other offenses would lead to providing guidelines about the relevant responses to be given;
  - Consider assessing nationally and transnationally across regions why sport attracts criminals (legal gaps)? What are internal sport vulnerabilities that leave space for exploitation?
- It is crucial to better understand manipulation processes and to find the right responses to each specific types of manipulations (including for example, betting prescriptions)

***Challenge A: Understanding the threat of sports manipulations to sport and society within the full context of the Convention***

***Priority 3.A.2: To strengthen the “network of networks”, placing the Council of Europe’s Network of National Platforms (Group of Copenhagen) at the core of trans-national co-operation system***

- The current network involves national platforms, almost all of which are not official with different basic legal standards;
- The lack of ratification of the Convention has generated a misunderstanding that practical action should only consider certain aspects, such as monitoring of bets during major competitions, instead of generating a transnational discussion to produce tools to tackle all aspects of the Convention, including prevention tools, inclusion of existing projects, etc.;
- Initiatives remain incoherent and duplicate each other, while vested interests lead to exclusion of valuable initiatives and a negative competitive climate.
- The excitement surrounding the Council of Europe’s network of national platforms has led to national platforms often forgetting to communicate at national level or between their own stakeholder group, leading to discrepancies in initiatives that is then transmitted transnationally.
- National Platforms are de facto networks of national stakeholders. They are solving problems at a national level, and facilitating the co-operation between national stakeholders

- (trust and confidence, co-ordination of action, exchange, access and monitoring of information, good governance policies, betting market regulations, etc.) ;
- The Council of Europe Network of National Platforms (Group of Copenhagen) enables National Platforms to address their concerns and receive global solutions. This ensures efficient threat responses that are compliant with the Macolin Convention. The Group of Copenhagen works on harmonisation of functions and procedures between the National Platforms, assuring the principle of reciprocity which guaranty the good trans-national co-operation;
  - The Group of Copenhagen addresses specific questions and problems met by the individual National Platforms, and digest them at a collective level in order to deliver common solutions;
  - Sectorial Networks should continue because individual sectors are facing specific problems that require common positions to be agreed upon before dialoguing at national or international levels. Sectorial Networks are expected for Sport Movement, Law Enforcement (Police) and Prosecutors / Judiciary Authorities. Sectorial Networks (including Regulatory Authorities or Betting Industry) might be ready to respond to specific questions coming from the Group of Copenhagen or National Platforms;
  - Thematic Networks (multidisciplinary, trans-sectorial) should however be developed with a view of addressing complex questions. Their contributions should nurture collective and integrated debates as part of the Group of Copenhagen;
  - International stakeholders encourage inclusion, co-operation with other initiatives and integration in the Macolin Roadmap, rather than generating conflict and overlap. The interest of the National Platforms and protection of sport integrity should always prevail.
- The Network of Networks will play an important role into the implementation of the “Macolin Roadmap”.

***Challenge B: Building trust and confidence among and between National Platforms and critical stakeholders, particularly with respect to collecting, sharing and dealing with information***

***Priority 3.B.1: To build an international information exchange framework that encourages consistency and reliability***

- Limited ratification and the as yet non enforceability of the Macolin Convention paired with enthusiasm to tackle manipulations of sports competitions has led to differing levels of basic standards for respect of data protection principles when collecting, sharing and dealing with various information;
- Thus enduring lack of trust in each other’s national legal systems results in still limited free exchange.
- international operational policies and procedures should be understood – UN and Council of Europe Conventions should be understood by all stakeholders, as well as regional regulations, such as the GDPR when dealing with EU Member States;
- a thorough legal analysis of the impact of the GDPR (national and international levels), including any perceived impediments to information sharing, and development of practical solutions that might be implemented at the national level (including development of appropriate national legislative frameworks) should be carried out;
- to assess Established and possible future legal solutions should be assessed put in place or in order to define information sharing frameworks and specificities enabling NPs to agree with other NPs presenting the same legal guaranties;
- The Macolin Convention provides a key added value to tackling restrictions in sharing information as it provides a specific legislation on the area of tackling manipulations of sports competitions; specific legislation is almost always a requirement to override certain data exchange and protection standards as defined within international legal texts and regional regulations such as the GDPR.

**Challenge C: Creating a legal and cultural environment to enhance the legitimacy and effectiveness of reporting**

**Priority 3.C.1: To foster collaboration between existing regulations regarding whistleblowing and defining minimum standards**

- Varying reporting systems make reporting on international competitions or competitions involving various countries very unstable and difficult;
  - Too many systems make it difficult for potential reporters to know to whom to report;
  - Lack of agreement or limited agreement (And awareness) of protection for reporters reduces the potential for reporting on potential or ongoing manipulations.
  - What are the risks faced by whistleblowers? What tools are available? Existing legislations?
  - What are experiences in the different countries?
  - The system must generate legitimacy (legitimate the act of reporting), implying solid and accurate management of the information collected;
  - Minimum common standards are also required regarding whistleblowing. Regulations and legal prescriptions are defined at national and international level and are already implemented for other sectors of activity. Efforts should be made with regards to sports manipulations (how to proceed, how to organise the follow-up and contacts with whistleblowers);
  - This goes together with changing the mindsets / fostering a culture of modifying the usual priority of loyalties which should be to society (which in turn can only be generated if everyone better understands the threats of sports manipulations to society);
  - Relevant education / training providing competencies to those in charge of analyzing reports;
- Adoption of common standards would enable a new step forward in that specific and crucial field of action. The Macolin Convention places a positive obligation on States to facilitate the development of effective reporting systems.

**Challenge D: Maximising the impact of education and outreach in an effort to focus more on prevention**

**Priority 3.D.1: To develop coherence and collaboration in the creation and delivery of harmonized and consistent education / awareness rising programs**

- Participants noted that resources are strained, resulting in incapacity to deliver programs where they might have the most significant impact – at the sub-elite and junior levels of competitions;
- Competition between organisations and stakeholders has led to overlapping projects in a limited number of areas and vested interests have marginalized creative initiatives – all this to the detriment of countries themselves.
- Ensuring, with limited resources available to relevant stakeholders, that critical education and awareness programs aimed at preventing manipulation of sporting competitions reach a greater number of athletes and participants - in particular, below the elite level;
- It was recognised that education and awareness raising is critical to the fight against the manipulation of sports competitions – particularly as a means of eroding traditionally recognised 'causes' of corruption;
- To achieve the maximum benefit from the limited resources available to public authorities and other stakeholders (including sport);
- This might include cooperation in respect of: Development of education products, creation of a single consolidated education and awareness platform for public authorities, sports, participants, consideration of requiring participation in mandatory education programs as a

condition of participation in sport as well as coherence in ongoing projects instead of competition.

- A mapping of existing initiatives at national and international levels would enhance coherence, collaboration and define the Macolin Roadmap to be proactive, concrete and eventually demonstrate through actions the importance of the Macolin Convention

**Challenge E: Encouraging uptake of the Macolin Convention**

**Priority 3.E.1: To encourage governments to pursue the ratification process based on a call for the sport higher moral values for society**

- Many national and international stakeholders are still not fully aware that the legislative basis for NPs lies in the Convention;
  - The Convention is still too often considered ‘a la carte’ instead of being treated as a whole – possibly because of its delayed entry into force and still non-existence of a statutory committee;
  - In many cases, operational and strategic activities are not consistently transmitted to the political level – therefore the added value and necessity of the Convention is often lost and there is also a tendency to not present coherent narratives at various events.
  - Operate a shift in mentality to encourage Governments to pursue the ratification process, based on a call for the higher moral value undertaken by sport for society (sports manipulation is a financial crime which should be addressed as such, while there is a political reluctance to deal with sport integrity - because the principle of sport autonomy?); Ensuring that NPs tackle the question of becoming official in legislation and transnationally – this requires a strategy to ensure political interest in ratifying the Convention;
  - NPs should, with the help of relevant organisations, understand the Convention as a whole in order to be fully effective and fully compliant;
  - Circulate information about cases and updates on the fight against sports manipulations, suitable for publication at international and national levels, always highlighting how the enforceability of the Macolin Convention would create desperately needed solutions;
- The process to developing a national policy directly contributes to the promotion of the Macolin Convention, which in turn ensures the political support to provide the relevant resources and means for implementing the national. This priority which has been highlighted requires implementation at the very early stages
  - The Macolin Community might develop a communication framework for States / National Platforms and other stakeholders, including national / international sporting organisations;

APPENDIX: summary table of “priorities for the future”

<p>challenges</p> <p>Macolin Process</p>	<p>A. Understanding the threat of sports manipulations to sport and society within the full context of the Convention</p>	<p>B. Building trust and confidence among and between National Platforms and critical stakeholders, particularly with respect to collecting, sharing and dealing with information</p>	<p>C. Creating a legal and cultural environment to enhance the legitimacy and effectiveness of reporting</p>	<p>D. Maximising the impact of education and outreach in an effort to focus more on prevention</p>	<p>E. Encouraging uptake of the Macolin Convention</p>
<p>1. A national integrated approach dealing with sports manipulations and associated corrupt practices</p>	<p>Priority 1.A.1: To define trans-sectorial / transversal common “risk assessment / analysis” methods</p>	<p>Priority 1.A.2: To organise relations between stakeholders</p>	<p>Priority 1.C.1: To create co-operation and coherence between reporting systems</p>	<p>Priority 1.D.1: To inform / educate the public, etc. based on a positive narrative enhancing integrity and higher moral values</p>	<p>Priority 1.E.1: To improve messaging / reporting to government and to public</p>
<p>2. A National co-operation involving key actors</p>	<p>Priority 2.A.1: To identify the basic requirements / standards for National Platforms</p>	<p>Priority 2.B.1: To develop national information exchange frameworks that encourages consistency and reliability</p>	<p>Priority 2.D.1: To develop multidisciplinary capacity building programs for all stakeholders</p>	<p>Priority 2.D.1: To develop multidisciplinary capacity building programs for all stakeholders</p>	<p>Priority 2.D.1: To develop multidisciplinary capacity building programs for all stakeholders</p>
<p>3. Coordinated trans-national and international mechanisms to protect the integrity of sport and combat corruption in sport</p>	<p>Priority 3.A.1: To develop a comprehensive approach to sports manipulations</p> <p>Priority 3.A.2: To strengthen the “network of networks”, placing the Council of Europe’s Network of National Platforms (Group of Copenhagen) at the core of trans-national co-operation system</p>	<p>Priority 3.B.1: To build an international information exchange framework that encourages consistency and reliability</p>	<p>Priority 3.C.1: To foster collaboration between existing regulations regarding whistleblowing and defining minimum standards</p>	<p>Priority 3.D.1: To develop coherence and collaboration in the creation and delivery of harmonized and consistent education / awareness rising programs</p>	<p>Priority 3.E.1: To encourage governments to pursue the ratification process based on a call for the sport higher moral values for society</p>