**Follow-up Committee on Manipulation of Sports competitions (T-MC)**

Council of Europe Convention on the Manipulation of Sports Competitions (CETS No. 215)

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# Follow-up Committee on the Manipulation of sports competitions

## Council of Europe Convention on the Manipulation of Sports Competitions (CETS No. 215)

## Guidelines on Reasonable betting

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## INTRODUCTION

### 1. Safeguarding sport integrity through the Macolin Convention

The primary objective of the Macolin Convention is to protect the integrity of sport.

To achieve this, and to prevent criminal infiltration into sports competitions, the Convention encourages States to adopt effective measures to combat illegal betting, to promote reasonable betting and to ensure proper oversight of the sports betting market.

Under Article 9 of the Convention, each signatory is required to designate a public authority responsible for addressing competition manipulation related to sports betting. This may include, where appropriate, a limitation on betting offers, especially for events involving minors or competitions with inadequate organisational standards.

### 2. Towards practical guidance for regulating the betting offer

This document aims to provide guidelines based on clear, simple, and practical criteria to support betting regulators in adopting appropriate measures. The goal is to help shape a reasonable and proportionate betting offer, while considering each country's historical, cultural, and economic context.

To this end, and in line with a risk-based approach, the Follow-up Committee encourages States Parties and relevant regulators to reflect on the use of objective benchmarks to inform decisions regarding possible limitations.

## WHY IS IT IMPORTANT TO HAVE A BALANCED APPROACH TO REGULATING THE OFFER OF SPORTS BETTING

### 1. Manipulation of sports competitions can generate substantial profits through sports betting

While not new, instances of known or suspected competition manipulation have become more prevalent with the growth of contemporary betting. Over the last decade, match-fixing has increasingly affected the world of sport, with several cases reported across regions and disciplines.

These manipulations often aim to generate significant profits by exploiting the opportunities offered by sports betting markets[1].

### 2. The expansion of sports betting

Several factors have contributed to the rise in sports betting:

- **Increased accessibility**, driven by the widespread use of online platforms and mobile phones.
- Liberalisation across many countries, often through the introduction of licensing systems.
- **Expansion and diversification of betting offers**, with operators seeking to enable betting on almost anything, at any time, at all levels, even in lower tiers.

### 3. Matches in lower tiers are an easy target for match-fixers[2]

It is commonly accepted that fixing lower-league games is significantly easier than manipulating matches at the highest level. These sporting events often escape close scrutiny, with fewer regulations, limited media coverage, and minimal oversight. The environment creates space for interference to go unnoticed.

Players at this level are typically underpaid or may experience delays in payment and are more exposed to external pressure. In many cases, a relatively small sum is enough to influence the outcome. Criminal networks are well aware of this and know exactly how to take advantage of the vulnerabilities in the sports betting market.

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[1] Betting-related competition manipulation is not a new phenomenon, but its prevalence has grown significantly in parallel with the expansion of the global sports betting market. This correlation is documented in Europol's 2020 situation report (*The Involvement of Organised Crime Groups in Sports Corruption*), which highlights how modern betting platforms, especially online and live betting, have facilitated the operations of organised crime groups (available here). Similarly, the UNODC's 2021 report, *Understanding the Manipulation of Sports Competitions*, p. 16, emphasises that the rise of betting-related corruption has closely followed the rapid development of the sports betting sector (available here).

[2] Organised crime groups primarily target lower-tier competitions across different sports, as these events tend to involve lower-paid athletes, receive limited media coverage, and attract less scrutiny—making them easier and cheaper to manipulate. Despite these characteristics, such competitions are widely offered on betting markets, especially online and in live-betting formats. This pattern is detailed in Europol's 2020 report, *The Involvement of Organised Crime Groups in Sports Corruption*, p. 9 (available here).

### 4. Sports betting is a market driven primarily by supply[3]

In most countries, only a small proportion of the population shows any real interest in betting, with even lower rates in jurisdictions where cultural or moral reservations about betting exist.

Bettors tend to belong to a very specific demographic group: mostly young men aged 18 to 35, often students or working adults in big cities, who are drawn to risk and strategy. However, these patterns may vary between jurisdictions. Demand is influenced by the availability and promotion of betting products. Most betting activity emerges once these products are actively offered and made easily accessible, especially online.

### 5. Betting regulation: a question of balance

Regulating the betting market requires a delicate balance between three interdependent elements: the supply of betting opportunities, demand, and risk management. An increase in the betting offer can drive demand, which can in turn raise risks such as manipulation, excessive gambling or other integrity-related concerns.

Regulation plays a dual role: setting clear rules through legislation and standards, and ensuring they are properly enforced through supervision. A sound regulatory framework must find the right balance by allowing controlled betting offers while limiting associated risks through targeted and proportionate measures.

### 6. Towards a risk-based approach to betting regulation

The risk of betting-related competition manipulation varies by country, sport, and level of competition. It can range from moderate to very high[4]. While any event may carry some level of risk, a risk-based approach enables regulators to tailor limitations appropriately, ensuring that measures remain proportionate, targeted, and effective.

## EXAMPLES OF LIMITATIONS ON BETTING OFFERS

### 1. Regulators' objectives are driven by public interest

Reuglator's top priorities include fighting illegal betting, protecting consumers, preventing money laundering, and supervising betting operators. These objectives are widely recognised as core public-interest responsibilities of regulators across jurisdictions.

Other important aims are ensuring fair betting operations, raising money for the state, and preventing criminal involvement and match-fixing. In contrast, economic goals such as making the market more attractive or creating employment are seen as less important for regulatory authorities.

### 2. Different types of betting limitations are used with the intention of protecting sport and limiting manipulation

Several types of limitations are applied in different jurisdictions with the intention of reducing betting-related risks:

- **Limiting competitions involving minors**: to protect young athletes and reduce the risk of manipulation in youth sports.
- **Limiting certain types of bets**: banning bets on very specific actions (like the first throw-in) that are more vulnerable to manipulation.
- **Limiting eligible competitions**: only allowing betting on professional and top-level amateur competitions (officially recognised) to ensure better oversight.

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[3] Organised crime groups primarily target lower-tier competitions across different sports, as these events tend to involve lower-paid athletes, receive limited media coverage, and attract less scrutiny—making them easier and cheaper to manipulate. Despite these characteristics, such competitions are widely offered on betting markets, especially online and in live-betting formats. This pattern is detailed in Europol's 2020 report, *The Involvement of Organised Crime Groups in Sports Corruption*, p. 9 (available here).

[4] According to the "Precrimbet" report (2017), the risk level of sports manipulation related to betting can be assessed by country, by sport, and by competition, with risk levels ranging from high to extreme, *Preventing Criminal Risks Linked to the Sports Betting Market – Final Report*, IRIS (available here).

- **Limiting certain sports**: banning betting on those considered particularly vulnerable, based on past cases or related evidence.

## 3. Examples of betting limitations used to limit integrity risks

Several countries have implemented targeted betting limitations with the aim of to reducing the risks of manipulation and protect the integrity of sport. These measures vary depending on the national context and perceived vulnerabilities:

- **No live betting**: partly banned in countries like Australia and Germany, as it is seen as more vulnerable to manipulation due to real-time opportunities and less oversight.
- **No fixed odds betting**: prohibited in countries such as Japan (and, until recently, Brazil), to limit forms of betting that may encourage excessive gambling or manipulation.
- **No betting exchanges or spread betting**[5]: restricted in countries like France and the Netherlands, as these formats can make it harder to trace suspicious behaviours or winnings.
- **No "negative" markets**: banned in several countries (e.g. Finland, France, Germany, Portugal, Switzerland), these are bets on negative outcomes, such as a football player receiving a yellow or red card, which can be easier to influence.
- **No bets on local competitions**: restricted in places like Greece, Hong Kong, and Turkey to avoid risks linked to betting by sports participants and conflicts of interest.
- **No betting on risks identified in the Macolin Convention**: countries like Belgium, Greece, and Hungary limit bets where minors are involved or where the organisational framework is too weak to ensure integrity.

## 4. Protecting sports competitions by limiting the offer without hindering market growth

In France, the National Gambling Authority, after consultation the sports governing bodies, applies betting limitations based on several criteria. First, it considers the level of the competition, excluding events that lack media coverage, involve low athlete remuneration, or include underage participants. Second, it restricts certain types of bets, such as negative bets, bets with no real sporting relevance (like odd or even number of goals), or trivial bets.

In 2023, more than 80% of alerts analysed by the Group of Copenhagen concerned competitions on which French-licensed operators are not allowed to offer bets. This illustrates how national limitations can contribute to reducing exposure to suspicious betting within the scope of the national market.

It is important to note that these restrictions have not hindered market growth: between 2010 and 2024, turnover in the sports betting market in France increased thirtyfold, from €448 million to €14 billion, according to figures provided by the French regulator. Furthermore, the available estimates indicate that this has not fuelled the illegal market, which is thought to account for less than 3% of the sports betting market in France, according to a PwC (PricewaterhouseCoopers) study published in 2023.

National examples, such as the French system, illustrate how betting limitations can be applied in practice to reduce exposure to certain integrity risks within the scope of the domestic market. These approaches complement other integrity tools and do not suggest a universal model, as regulatory frameworks legitimately vary between jurisdictions.

## 5. The need to tackle the illegal betting market

The consideration of whether to limiting the supply of betting is a complex issue. Legal operators face fierce competition from operators offering bets without the required authorisation, which account for a large share of global betting revenue. These illegal markets are often a gateway for organised crime. Imposing betting limits on licensed operators alone is not sufficient to address the problem. Without a broader strategy to target illegal platforms, honest businesses are penalised while criminals thrive.

Illegal operators offer little to no oversight. With weak controls and no regulation, they provide the perfect cover for match-fixing. Odds can be manipulated, outcomes influenced — all with minimal risk of being caught. This lack of accountability allows organised crime to grow quickly, generating profits that are hard to trace and even harder to stop.

[5] **Betting exchanges** let users bet against each other instead of against a bookmaker, while **spread betting** involves wagering on the margin of a result rather than the outcome itself. Both are more complex and can carry higher risks, which is why some jurisdictions choose to ban them

## 6. The need for responsible gaming and athlete training/awareness raising

Given that many athletes and sports professionals are vulnerable to gambling addiction, it is essential that betting limits be complemented by strong measures against illegal gambling. In parallel, promoting responsible gambling and offering targeted education on the risks of manipulation are crucial to preserving the integrity of sport and supporting those involved.

Many stakeholders provide training to athletes and sports personnel. These programmes explain common vulnerabilities, how corrupters may approach them, and the betting rules they must follow. Because some athletes face higher gambling-related risks, such education helps them recognise illicit approaches and complements other measures to reduce manipulation risks.

## CRITERIA FOR A RESPONSIBLE BETTING OFFER

These criteria aim to help assess where and how betting should be allowed across sports and competitions. They encourage operators to prioritise high-integrity events and markets with real customer interest. They also promote cooperation with authorities when integrity risks arise. The criteria are flexible and can be applied to individuals or entire competitions, both in real time and retrospectively.

Decisions on permitted betting may be guided by two main criteria — **the level of competition and the level of betting activity**. These are supported by three secondary criteria: **the integrity of the competition, the broader global integrity context, and the commitment of stakeholders to preventing manipulation**. Together, these criteria help ensure that betting is offered in a safe and relevant environment.

It is important for regulators to note that, when interpreting and applying these criteria, they should consider that certain sports, competitions, or categories may, by definition, offer lower levels of athlete remuneration, media coverage, and/or betting activity. This fact alone should not lead to the conclusion that such competitions or events are inherently riskier than others. Therefore, regulators should focus on the underlying principles of these criteria, while also taking into account the significant disparities that exist across different sports and competitions.

### KEY CRITERIA #1 – LEVEL OF COMPETITION

Sport exists at many different levels, with varying skill, visibility, and financial reward. This standard aims to classify athletes and competitions into three groups: top-level elite athletes, a second tier of highly skilled competitors, and a third group with moderate skill levels. It considers the number of participants in each sport and the prestige of competitions. The use of percentiles in this classification is indicative and may be adapted depending on the specific characteristics of each sport.

Lower-profile events, with fewer fans and less media attention, are generally more vulnerable to manipulation than high-profile events. This classification helps identify where risks may be higher.

This tiered structure is intended as general guidance. Regulators may adapt it to reflect the specific context of each sport, including the organisational conditions, integrity measures, and payment structures in place.

| | Standard of competition |
|---|---|
| Level 1 | **Top tier competition:**<br>▪ Highest international standard of sporting ability, featuring the top athletes (by percentile) and the most high-profile events<br>▪ Wage levels are extremely high, making manipulation highly unlikely<br>▪ Very high spectator attendance, extensive media coverage, and robust monitoring of irregular and suspicious betting |
| Level 2 | **High-tier competition**<br>▪ High international standard of sporting ability, featuring the best players (by percentile) and the most prominent events<br>▪ Wage levels are very high, though not entirely prohibitive to manipulation<br>▪ Strong spectator attendance, significant media coverage, and active monitoring of irregular and suspicious betting |
| Level 3 | **Mid-tier competition:**<br>▪ Medium to high standard of sporting ability, measured by percentile<br>▪ Wage levels are high, but not so high as to rule out the risk of manipulation |

| | | |
|---|---|---|
| | ▪ Good spectator attendance, regular media coverage, and general monitoring of irregular or suspicious betting | |
| **Level 4** | **Low-tier competition:**<br>▪ Low to medium standard of sporting ability, measured by percentile<br>▪ Wage levels at or below the local or global average, with remuneration based on salary or prize money; delays in payment may increase vulnerability<br>▪ Limited spectator attendance and minimal to no media coverage | |
| **Level 5** | **Bottom-tier competition:**<br>▪ Low level of sporting ability, measured by percentile and in comparison, to top-level athletes<br>▪ Wage levels at or below the local or global average, with a very high risk of corruption<br>▪ Limited or no spectator attendance, and minimal to no media coverage | |

The following indicators can be used to support the classification of competitions or to develop tailored assessment criteria:

- Average player remuneration within the sports division, compared to the national average remuneration (or, for international competitions, to the average remuneration of the players and countries involved);
- Level of media coverage of the division or competition;
- Level of interest among fans and supporters.

These indicators provide general guidance and may be adapted by regulators according to the specific characteristics, integrity safeguards and risk profiles of each sport or competition.

| | **Indicator #1**<br>**Average remuneration (players of the sports division vs country)** | **Indicator #2**<br>**Media coverage** | **Indicator #3**<br>**Fans interest** |
|---|---|---|---|
| Level 1 | **Very high remuneration level:**<br>The average players' remuneration is five times higher or more than the national average salary | **Extensive coverage:**<br>Widespread and regular media coverage at national and international level | **National interest:**<br>Followed by a large share of the national population, widely recognised and discussed |
| Level 2 | **High remuneration level:**<br>The average players' remuneration is two to five times higher than the national average salary | **Significant coverage:**<br>Frequent media coverage, almost always present during competitions | **Strong public interest:**<br>Significant attention from the public, though not nationwide |
| Level 3 | **Moderate remuneration level:**<br>The average players' remuneration is one to two times higher than the national average remuneration | **Moderate coverage:**<br>Media coverage for at least some matches, including at local level | **Moderate interest with sporting relevance:**<br>Attracts a niche audience but involves a meaningful sporting challenge |
| Level 4 | **Low remuneration level:**<br>The average players' remuneration is lower than the national average salary | **Minimal coverage:**<br>Occasional or exceptional media attention only | **Local or regional interest with sporting relevance:**<br>Mainly followed locally or regionally, with some sporting value |
| Level 5 | **Very low or amateur level:**<br>The average players' salary is more than 50% lower than the national average remuneration, or the competition is at amateur level | **No coverage:**<br>No media coverage identified | **Limited local interest, low sporting relevance:**<br>Low visibility and lacks a meaningful competitive challenge |

### KEY CRITERIA #2 – LEVEL OF BETTING ACTIVITY

Before allowing betting on a competition, it is important to consider whether the event presents an acceptable level of integrity risk. Sport is built on values of fairness and excellence, which are undermined by manipulation such as match-fixing.

Licensed betting operators have a role to play in preventing these risks, especially in lower-tier competitions. Allowing betting on competitions with limited visibility or organisational safeguards may increase opportunities for manipulation.

While betting is part of cultural life in many countries the level of customer activity varies significantly across competitions. Lower-profile matches with limited public exposure or monitoring may therefore present additional integrity concerns.

| | Bettor demand for sports betting |
|---|---|
| Level 1 | **Very high demand**<br>▪ Events of such magnitude that a betting offering is inevitable<br>▪ Commercial and media exposure reinforce public interest in the competition<br>▪ High customer demand, with gross revenue from these competitions representing over 70% of total gross betting revenue |
| Level 2 | **High to moderate demand**<br>▪ High-profile youth, amateur, development-level sports, or low-standard competitions<br>▪ Customer demand varies, with gross revenue from these competitions representing less than 20% of total gross betting revenue |
| Level 3 | **Low demand:**<br>▪ Low-standard competition<br>▪ Low customer demand, with gross revenue from these competitions representing less than 2% of total gross betting revenue |
| Level 4 | **Very low demand:**<br>▪ Amateur or development-level sport<br>▪ Minimal customer demand, with gross revenue from these competitions representing less than 0.5% of total gross betting revenue |
| Level 5 | **Negligible demand:**<br>▪ Youth-level sport (under 18)<br>▪ Minimal customer demand, with gross revenue from these competitions representing less than 0.5% of total gross betting revenue |

The following indicators can be used to support the classification of customer demand:

- A breakdown of gross win by sport, competition, and betting type ("market")
- An evaluation of each competition and market based

| | **Indicator #1**<br>**Breakdown of gross win by sport, competition and betting type** | **Indicator #2**<br>**Evaluation of each competition and betting type** |
|---|---|---|
| Level 1 | **Very high customer demand:**<br>The sport, competition, or betting type represents over 70% of total gross win | **Core market:**<br>The competition or market is considered strategically essential, with high visibility, high betting volume, and strong customer interest |
| Level 2 | **High customer demand:**<br>Represents between 20% and 70% of total gross win | **Key market:**<br>The competition or market is important, with consistent betting activity and customer engagement, though not dominant |
| Level 3 | **Moderate customer demand:**<br>Represents between 5% and 20% of total gross win | **Secondary market:**<br>Moderate relevance, with occasional betting activity and targeted interest, often limited to specific customer segments or periods |
| Level 4 | **Low customer demand:**<br>Represents between 0.5% and 5% of total gross win | **Marginal market:**<br>Low strategic value, with limited activity, usually included as a complementary offering or niche interest |
| Level 5 | **Very low or negligible demand:**<br>Represents less than 0.5% of total gross win | **Non-priority market:**<br>Very low or no interest, considered non-essential by the operator and rarely bet on |

The percentage thresholds presented above are indicative and serve as a general framework to support risk assessment. Regulators may adapt these thresholds according to their market structure, available data, and integrity objectives. Customer demand is used here as an indicator of exposure and monitoring needs, not as a justification for permitting or prohibiting betting markets.

### KEY CRITERIA #3 – LEVEL OF COMPETITION INTEGRITY

Betting should never be offered on events suspected of manipulation. To prevent this, it is important that betting operators, sports bodies, regulators and governments maintain a clear understanding of corruption risks across all sports.

Although criminal prosecutions are rare and disciplinary sanctions occasional, integrity levels can still be assessed using reliable indicators. These include betting market data analysed by industry-led groups such as ULIS and IBIA, sports organisations like the IOC or UEFA, and private companies such as Sportradar.

This document does not aim to explain how manipulation occurs, but rather to identify where risks exist. Additional tools such as video or performance analysis can help build an integrity profile for a sport, team or individual.

| | Current level of integrity |
|---|---|
| Level 1 | **Not known integrity issues:**<br>▪ No evidence of manipulation by any person or party within the past three years<br>▪ No credible indications of suspicious activity reported by recognised integrity monitoring system |
| Level 2 | **Isolated suspicion:**<br>▪ A limited number of suspicious betting cases reported within the past three years, with no non-betting-related evidence to support any case of manipulation<br>▪ Information originates from recognised integrity monitoring systems, but does not indicate corroborated risks |
| Level 3 | **Moderate concern:**<br>▪ A limited number of suspicious betting cases reported within the past three years, alongside non-betting-related evidence of suspicious activity<br>▪ Authorities have been informed<br>▪ Indicators suggest a need for increased vigilance, pending further assessment |
| Level 4 | **High concern:**<br>▪ Multiple instances of suspicious betting evidence reported within the past three years<br>▪ Authorities have been informed and investigations are ongoing<br>▪ Converging indicators point to heightened integrity risks |
| Level 5 | **Proven manipulation:**<br>▪ Multiple instances of manipulation reported within the past three years<br>▪ Criminal prosecutions and/or disciplinary sanctions are likely to have occurred or be pending |

The categories above provide indicative guidance for assessing integrity risks. They are not intended as a substitute for formal investigations. Integrity assessments should rely on credible information from recognised monitoring systems, competent authorities, and established integrity bodies. Suspicious betting alerts do not constitute proof of manipulation, but they may signal vulnerabilities that merit further attention.

The following indicators can be used to support the classification of the level of competition integrity:

- Proven or organised manipulation efforts, involving multiple individuals across one or several events, widely reported and actionable even before any criminal prosecution.
- Criminal or disciplinary sanctions issued to one or several players or team officials for a specific match or competition.
- Confession by a player or official regarding manipulation within the last three years, even without formal criminal or disciplinary action.
- Suspicious betting alerts reported to sports organisations or authorities (e.g. Sportradar, ULIS, IBIA, Group of Copenhagen).

| | Indicator #1<br>Organised crime involved in fixing one or more matches | Indicator #2<br>Group of individuals fixed matches (no organised crime) | Indicator #3<br>Suspicious alerts reported to sport or law enforcement | Indicator #4<br>Criminal or disciplinary sanction involving a player, official, or team |
|---|---|---|---|---|
| Level 1 | **Never occurred:**<br>No known incident has ever been reported | **Never occurred:**<br>No known incident has ever been reported | **Very low:**<br>Fewer than 3 alerts in the last 5 years | **Very rare:**<br>Occurred at most once in the last 5 years |
| Level 2 | **Exceptional rare:**<br>One isolated incident reported in the past | **Exceptional rare:**<br>One isolated incident reported in the past | **Low:**<br>Between 3 and 10 alerts in the last 5 years | **Rare:**<br>Occurred 1 to 3 times in the last 5 years |
| Level 3 | **Occasional:**<br>Has occurred once or twice over a long period | **Occasional:**<br>Has occurred once or twice over a long period | **Moderate:**<br>Between 10 and 25 alerts in the last 5 years | **Occasional:**<br>Occurred 3 to 5 times in the last 5 years |
| Level 4 | **Repeated:**<br>Has occurred several times, but not recently or not systematically | **Repeated:**<br>Has occurred several times, but not recently or not systematically | **High:**<br>Between 25 and 50 alerts in the last 5 years | **Frequent:**<br>Occurred 5 to 10 times in the last 5 years |
| Level 5 | **Frequent or recuring:**<br>Has occurred multiple times and/or shows signs of recurrence | **Frequent or recuring:**<br>Has occurred multiple times and/or shows signs of recurrence | **Very high:**<br>More than 50 alerts in the last 5 years | **Very frequent:**<br>Occurred more than 10 times in the last 5 years |

These indicators provide general guidance for assessing integrity risks and may be adapted by regulators depending on data availability, monitoring capabilities and the national context. Suspicious betting alerts are not proof of manipulation and must always be interpreted in conjunction with other relevant information from competent authorities or recognised monitoring systems.

### KEY CRITERIA #4 – LEVEL OF GLOBAL INTEGRITY

This section assesses long-term integrity in sport by considering historical context, reputation, and corruption levels in a sport or country.

General governance indicators such as Transparency International's Index or reports from GRECO or MONEYVAL may provide contextual information that complements sport-specific integrity data.

Corruption risks may also exist at the ownership or administrative level. In such cases, national corruption levels can serve as useful indicators, though they may not reflect risks linked to foreign ownership.

These governance indicators are not intended to measure sports integrity directly. They provide contextual background on broader governance conditions that may influence integrity risks and must therefore be used alongside targeted, sector-specific integrity monitoring data.

| | Global historical level of integrity |
|---|---|
| Level 1 | **Very high integrity:**<br>▪ The country has long been considered a clean state, with national characteristics that reinforce this perception<br>▪ There is little or no evidence of manipulation in sport |
| Level 2 | **High integrity:**<br>▪ While there is little or no evidence of corruption in sport, the country as a whole is not considered entirely free from corruption |
| Level 3 | **Moderate integrity:**<br>▪ The country has generally been regarded as a clean state, although instances of corruption in sport have occurred |
| Level 4 | **Low integrity:**<br>▪ Frequent instances of corruption in both sport and the broader national context, alongside multiple sports scandals<br>▪ Criminal activity remains widespread |

| | |
|---|---|
| Level 5 | **Very low integrity:**<br>▪ Corruption in both sport and the wider country context is deeply rooted in daily life<br>▪ Multiple sports scandals have occurred without meaningful action, and criminal activity remains widespread and largely unpunished |

One possible contextual indicator is the Corruption Perceptions Index published annually by Transparency International, which can help provide a high-level understanding of the wider governance environment. These CPI thresholds follow the standard scoring methodology of Transparency International and are intended as indicative ranges to support a high-level assessment.

| | **Indicator #1**<br>**Corruptions Perception Index (Transparency International)** |
|---|---|
| Level 1 | **Very high integrity:**<br>More than 70 points (23 countries in 2023) |
| Level 2 | **High integrity:**<br>Between 60 and 69 points (15 countries in 2023) |
| Level 3 | **Moderate integrity:**<br>Between 50 and 59 points (20 countries in 2023) |
| Level 4 | **Low integrity:**<br>Between 35 and 49 points (56 countries in 2023) |
| Level 5 | **Very low integrity:**<br>Under 35 points (66 countries in 2023) |

## KEY CRITERIA #5 – LEVEL OF ENGAGEMENT IN PREVENTING THE MANIPULATION OF SPORTS COMPETITIONS

In a globalised and fast-changing world, sports organisers must adapt quickly to prevent and address corruption. Clear rules and procedures are essential. However, not every organising body, whether a sports federation, private company, or entertainment-focused entity, has the resources to implement them effectively.

Providing transparent and auditable information such as fixtures, results, venues, and finances can help strengthen integrity.

Another key factor is the role of officials. Referees, who directly influence the outcome of matches, must be properly appointed, trained, paid, and protected. Despite existing safeguards, manipulation involving referees has occurred, even at the highest levels of sport.

Another point is addressing gambling-related harm with sports. Athletes who gamble and develop gambling problems – especially those facing financial difficulties – are more vulnerable to manipulation. When gambling becomes normalised in the sports environment, the likelihood increases that athletes themselves will engage in betting. Therefore, clear regulation – specifying what and when an athlete is allowed to gamble – is essential for promoting a healthy attitude toward gambling, including betting.

This standard can be applied at local, national, and global levels. A common global approach to governance and transparency would greatly support the fight against corruption in sport.

These levels provide indicative guidance to support a high-level assessment and may be adapted by regulators or sports bodies depending on the specificities of each sport, the information available, and the national context. They are not intended to constitute a prescriptive or exhaustive framework.

| | **Level of engagement in preventing sports manipulation** |
|---|---|
| Level 1 | **Strong engagement:**<br>▪ Free from corruption, with adherence to rules and principles aligned with the Olympic Movement Code on the Prevention of the Manipulation of Competitions (OM Code PMC) and IPACS<br>▪ Regular awareness-raising efforts, strong collaboration with law enforcement and/or national platforms, and a high level of player understanding in avoiding manipulation<br>▪ Full transparency with the public |
| Level 2 | **Moderate engagement:** |

| | |
|---|---|
| | ▪ Generally free from corruption, with adherence to some OM Code PMC and IPACS (www.ipacs.sport) rules and recommendations, although inconsistencies remain in the application of laws and regulations<br>▪ Player education exists but remains limited<br>▪ The organisation is mostly transparent with the public, though certain information is not disclosed |
| **Level 3** | **Limited engagement:**<br>▪ Ineffective administration in certain areas<br>▪ Generally transparent in public communication |
| **Level 4** | **Weak engagement:**<br>▪ Ineffective administration across multiple areas<br>▪ Limited availability of key information<br>▪ Weak oversight of referees and umpires, including their remuneration |
| **Level 5** | **No effective engagement:**<br>▪ Non-existent or flawed governance structure, potentially infiltrated by individuals with links to criminal networks<br>▪ Lack of player education and preventive measures against manipulation<br>▪ Inconsistent application of rules and practices across regions<br>▪ Absence of rules aligned with the Olympic Movement Code on the Prevention of the Manipulation of Competitions (OM Code PMC) |

As with all risk-assessment tools, these criteria are intended to assist decision-making rather than replace sport-specific analysis. They should therefore be interpreted alongside other relevant integrity information.

The following indicators can be used to support the classification of level of engagement in preventing sports manipulation:

- Adherence to international standards, such as IPACS and the Olympic Movement Code (OM Code PMC).
- Level of transparency and good governance.
- Commitment to preventing competition manipulation.
- Cooperation with international federations and law enforcement.

| | **Indicator #1**<br>**Adherence to international standards** | **Indicator #2**<br>**Level of transparency and good governance** | **Indicator #3**<br>**Prevention and awareness-raising** | **Indicator #4**<br>**Cooperation with international federations and law enforcement** |
|---|---|---|---|---|
| Level 1 | **Full adherence:**<br>All relevant rules and principles are fully implemented and consistently applied | **Very good:**<br>Widely considered as very good or good, with strong trust and performance | **Very active:**<br>Engaged in this area on an annual and structured basis | **Strong cooperation:**<br>Considered as very good or good, with established and trusted partnerships |
| Level 2 | **Significant adherence:**<br>Most key rules and principles are applied, with only minor gaps | **Satisfactory:**<br>Considered as correct, with acceptable standards and practices | **Active:**<br>Engaged regularly, though not necessarily every year | **Satisfactory cooperation:**<br>Considered as correct, with functional but limited collaboration |
| Level 3 | **Partial adherence:**<br>Some rules are in place, but application is inconsistent or incomplete | **Average:**<br>Perceived as average, with room for improvement | **Occasionally active:**<br>Some actions taken, but only occasionally (within the last 5 years) | **Moderate cooperation:**<br>Considered as average, with noticeable gaps (e.g. lack of trust with law enforcement) |
| Level 4 | **Minimal adherence:**<br>Very few rules exist, with little evidence of implementation | **Low:**<br>Considered as weak or unreliable in several key areas | **Rarely active:**<br>Minimal engagement, with very limited or irregular actions | **Weak cooperation:**<br>Minimal cooperation, informal or inconsistent |
| Level 5 | **No adherence:**<br>No rules or principles in place regarding integrity or governance | **Very low/High-risk:**<br>Very low reputation or trust level, with signs of dysfunction or possible criminal infiltration | **Inactive:**<br>No activity observed in this area | **No cooperation:**<br>No cooperation in place or observed |

## CONCLUSION

The Follow-up Committee encourages States Parties of the Macolin Convention and relevant betting regulators to introduce clear and objective criteria to guide decisions on offer the limitation of betting offers, in line with a risk-based approach. National and international sports organisations may also contribute to this effort within their respective mandates.

These criteria are intended to help authorities consider factors such as the level of competition, customer demand, integrity risks, and the capacity of organisers to prevent manipulation.

These criteria are not intended to impose a uniform regulatory model. Their purpose is to assist authorities in structuring their own assessments, taking into account local contexts, existing regulatory frameworks, and national priorities. In this sense, the elements presented, such as the level of competition, customer demand, integrity risks, and organisational safeguards, are tools to support decision-making, not prescriptive obligations.

The overarching aim remains to ensure that the betting offer remains proportionate, well-regulated, and supportive of the protection of sport integrity, as promoted by the Convention.