

INTERIM PROJECT REPORT

This report provides a clear overview of the status of the activities of the project at the halfway point. The report also contains data and conclusions that impacted the strategic direction of IntegriSport Next and steered the Project towards the issues that needed to be addressed for the second half of the Project.

The report outlines the distinct phases of the project, highlighting the key elements of the phases completed in the first half of the project (Preparation, Implementation, Monitoring). The Preparation phase is summarized, namely the desk research, the fact-finding missions, and surveys. The report then moves on to the Implementation phase, which includes the awareness raising sessions and peer-to-peer meetings. Finally, the Monitoring phase is described in detail, which includes the various Board Meetings, project administration, and evaluation of training effectiveness (Survey 2 – IO10).



FOUNDATION FOR
SPORT INTEGRITY
www.cscfsport.com



INTEGRISPORT NEXT – INTERIM PROJECT REPORT



FOUNDATION FOR
SPORT INTEGRITY
www.cscfsport.com



IntegriSport

NEXT

Co-funded by the
Erasmus+ Programme
of the European Union



INTELLECTUAL OUTPUT 11
LED BY CSCF



Co-funded by the Erasmus+ Programme of the European Union 

Project Number: 622596-EPP-1-2020-1-NL-SPO-SCP

For two years (2021-2022) IntegriSport Next Erasmus+ contribute to catalyse the efficiency of sport manipulation-related crime investigations and prosecution activities by providing awareness raising on all aspects of the manipulation of sports competitions for the law enforcement, judiciary and other important stakeholders of the partner countries.

Coordinator



Partner Organisations



Supporting Partner



Country Partner



We stand against manipulation in sport!

Disclaimer: This project has been funded with support from the European Commission. This publication reflects the views only of the author, and the Commission cannot be held responsible for any use which may be made of the information contained therein.

Table of contents

Foreword.....	5
Acknowledgement.....	6
1. Project Introduction	7
2. Project Partners.....	7
3. Report Objectives	8
4. Description of the main developments and evaluation of activities happening in the first half of the project.....	9
4.1 Preparation Phase	9
4.2 Implementation Phase.....	18
4.3 Monitoring Phase.....	21
5. IntegriSport Next: Year Two	27
5.1. Preparation Phase	27
5.2. Implementation Phase.....	28
5.3. Dissemination phase.....	29
5.4. Evaluation Phase.....	30
6. Visibility	31
7. Conclusions.....	32
8. Recommendations	32

Foreword

CSCF Sport Integrity Group and its foundation CSCF Foundation for Sport Integrity coordinates an educational concept, IntegriSport. This concept has had as its main objective to offer theoretical and practical support to **Law Enforcement Agencies (LEAs), Judicial Authorities (JAs) and other relevant stakeholders to fight against sport manipulation and corruption in sport**. This program is the first of its kind that focuses in helping these groups understand the different approaches to the phenomenon to lead effective investigations and prosecution activities, as well as create effective cooperation between public and private organizations at the national and international levels.

The concept has been implemented so far through two projects since 2018 - co-funded by European Commission (Education, Audiovisual and Culture Executive Agency and its Erasmus+ Programme) - and it is projected to be consolidated as a permanent project between these stakeholders. IntegriSport Erasmus+ (2019-2020), being the first project, brought together police authorities and their national platforms from 7 European countries (Slovakia, Portugal, Hungary, Lithuania, Finland, Cyprus, and the Netherlands). Likewise, IntegriSport Next (2021-2022), being the second project, supported Malta, Cyprus, Finland, Estonia, Sweden, and Georgia. The success of these programs has already translated into channelling with 6 other European countries with our recent EU Commission funding approval for the continuation of a third project - Integrisport Erasmus+ 3.0 (2023-2024) - that will run until 2024, having an impact on almost all of Europe.

Some of the main outcomes are the **comprehensive research, the awareness sessions in program countries and the peer-to-peer operational experience information sharing**, which have led not only to customized action plans for each partner organization, but also to trigger cooperation by bringing together all the main actors working directly or indirectly to combat this phenomenon, not only locally but also internationally.

This report is one of the results of the project, impacting the strategic direction of Integrisport Next and helped to evaluate the capacity of the Project during the first year of implementation and guides towards the topics that should be covered for the second part of the project. Many of the topics covered in this report were inserted into the Integrisport Next Practical Guide, including the analysis on the development based on these results.

We invite you to read this document and see what contribution IntegriSport Next Erasmus+ provided to the problem of sports manipulations.

Acknowledgement

The final report was prepared between Q4 2021 and Q1 2022. The report was built on the activities coordinated by CSCF and implemented together with representatives of program countries and partners.

CSCF Foundation for Sport Integrity (CSCF) acknowledges with gratitude the European Commission - Education, Audiovisual and Culture Executive Agency and Its Erasmus+ Programme - and all those who have contributed their expertise and knowledge to the development of this report, in particular our project partners and the valuable contributions and expertise of the CSCF experts and staff members.

IntegriSport Next Erasmus would not have been possible without **ALL OF THEM!**

1. Project Introduction

Integrisport *Next* is a project which provides theoretic and practical support for law enforcement and judicial authorities to fight against sport manipulation and corruption in sport. The Project helps law enforcement and judicial authorities understand the different approaches (sport, betting, virtual currencies) of the phenomenon in order to lead effective processes against the criminals who commit sport manipulation and create effective cooperation between private and public organizations at national and transnational level.

Integrisport *Next* also gives practical support. It offers peer-to-peer meetings for law enforcement and judiciaries from different countries, allowing them to discuss the proper investigative techniques and the use of legal instruments at national and international level to be effective in the criminal procedure regarding match fixing. Also, it creates an opportunity for law enforcement and judiciaries to invite experts who can support their criminal procedures with expertise of law, law enforcement, sport, betting, and virtual currencies.

2. Project Partners

<p>Coordinator:</p> <ul style="list-style-type: none">• CSCF – Counter Sport Corruption Foundation for Sport Integrity <p>Country Partners:</p> <ul style="list-style-type: none">• The Cyprus Police• Estonian Police and Border Guard Board• Finnish Center for Integrity in Sports (FINCIS)• The Ministry of Culture, Sport, and Youth of Georgia• Malta Police Force• Swedish Sports Confederation	<p>Partner Organisations:</p> <ul style="list-style-type: none">• Katholieke Universiteit Leuven (KU Leuven)• The Global Lottery Monitoring System (GLMS) <p>Supporting Partner:</p> <ul style="list-style-type: none">• Fédération Internationale des Footballeurs Professionnelles, Division Europe (FIFPro)
---	---



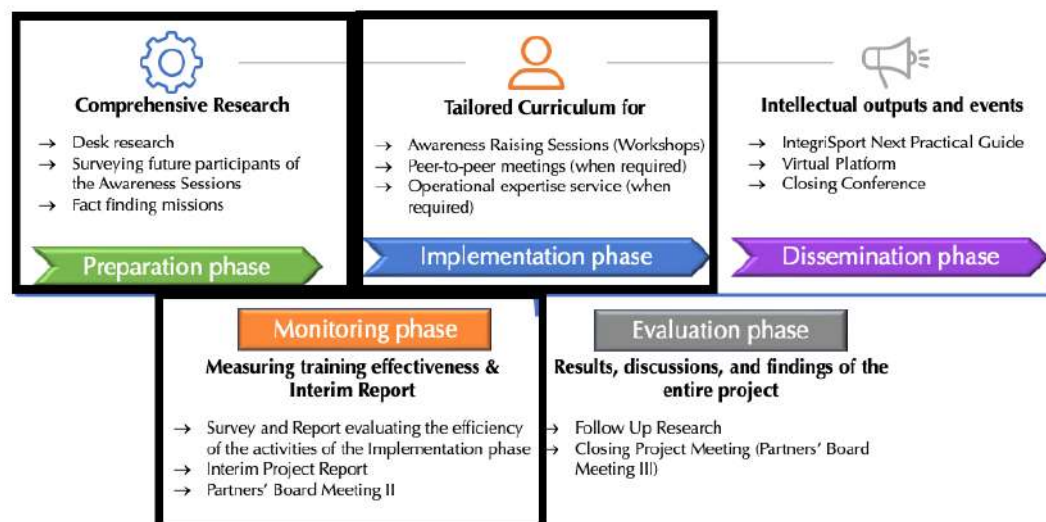
3. Report Objectives

The purpose of this report is to provide a clear overview of the status of the activities of the project at its halfway point, allowing the consortium to provide feedback for adjustment for future training activities. The report also contains data and conclusions that will formulate the basis of the Integrisport Next Practical Guide. This report affects the strategic direction of Integrisport *Next* and steers the Project towards the issues that still need to be covered. The Interim report comprises the following activities from the different project phases.

The report outlines these distinct phases of the project, highlighting the elements of the phases completed in the first half of the project (Preparation, Implementation, Monitoring). The Preparation phase is summarized, particularly the desk research, the fact-finding missions, and surveys. The report then moves to the Implementation phase, which includes the awareness raising sessions and peer-to-peer meetings. Finally, the Monitoring phase is described in detail, which includes the various Board Meetings, project administration, and evaluation of training effectiveness (Survey 2).

4. Description of the main developments and evaluation of activities happening in the first half of the project

The first year of the project involved the research phase, monitoring phase, and implementation phase, as described in the graphic below. The dissemination and evaluation phase of the project will be completed in the second year of the project.



4.1 Preparation Phase

4.1.1 Desk Research

The **objective** of the research report was to understand, for each partner country, the mitigating factors, authorities responsible, and any issues related to sport competition manipulation. The manager consulted with the research coordinator to ensure the compliance of the procedure in line with the project strategy.

A 250+ page report was produced in September of 2021, with the bulk of the research for the report occurring between February 2021 and August 2021. The research was coordinated by Leuven University and built on the support of representatives of all local program countries. This report includes academic

research involving a systematic review of the match-fixing literature, analysis of media reports, legal documents, information provided by partners, and the various interviews and reports from the partner countries.

The **outcomes** supported the work of the project experts in shaping the fact-finding missions, guided the ARPS, and informed the country's curriculums. This was possible because the desk research achieved comprehensive understanding for each partner country's situation regarding sport manipulation. The desk research will be widely used in the final phases including the Integrisport *Next*

Practical Guide, and it will support Integrisport *Next* and all the interested Parties and stakeholders through EU in any research or other future activities, including political decisions in the area of sport manipulation.

Estonia: Football and tennis are the only sports mentioned in connection to sport manipulation in Estonia. The problem of sport competition manipulation in Estonia is largely one of awareness, education, and experience. There is a lack of knowledge and acceptance of the problem that manifests in a variety of ways. Dealing with sport competition manipulation is very low in the priorities of the Ministry of Justice, possibly because there is only one recorded major incident of sport manipulation in Estonia. The methods of discovering and investigating incidents is severely lacking. The risk factors in Estonia are similar to other European countries: The league is not a wealthy one, which means players and referees are paid poorly. Some of the sports leagues are even semi-professional.

Finland: Given the small number of exposed and discovered cases in Finland, sport competition manipulation is quite rare. The current situation of sport competition manipulation in Finland is supposedly under control given the lack of reported cases requiring serious investigations. The Finnish Sports Betting Association in 2020 states that there are no signs of sport competition manipulation in Finnish sport where gambling was a motivating factor. Currently, attempts to combat manipulation of sport competitions in Finland is a cooperative endeavour between the police, sports community, betting company, and

judicial authorities. There are several risk factors. The poor financial situation of Finnish football clubs and the time of year in which the league is paid is a risk factor. The overall risk and cost of participating/organizing sport competition manipulation in Finland is minimal. Penalties and sanctions, by the sporting authorities and the legislative bodies, are rather low.

Sweden: Swedish authorities believe their legislation and preventative efforts can handle the issue of sport manipulation, which explains why they have not signed the Macolin Convention. However, there are risk factors. The sport most at risk for sport competition manipulation is football, which is played during the summer months. The dismissive attitude of Swedish authorities is another risk factor, with research revealing multiple anecdotes of incidents that have been brought to the attention of various Swedish authorities with little evidence that the incidents were taken seriously. Encouragingly, 2020 was cited as the year that Sweden began properly to address the seriousness of sport competition manipulation in their sporting culture.

The **limitations and challenges** of this desk research included the lack of academic information related to sport competition manipulation overall, and particularly in the relevant countries. In addition, public knowledge and access to relevant legal documents was lacking. The language barrier and lack of translation of documents was particularly challenging during the research phase. These limitations were mitigated by the information and support provided by the partner country representative

4.1.2 Fact-Finding Missions

The COVID pandemic resulted in the fact-finding missions being conducted online instead of on-site as originally planned. Despite the unusual circumstances created by the pandemic, these missions were conducted as per the original timeline proposed in the Project Application. It was ensured that the interviewees, particularly the experts and the CSCF representatives, had enough time and content for collecting meaningful information without losing out on the quality. The online nature also had advantages. Substantial resources were saved, and it was ensured that the number of stakeholders interviewed were kept at a moderate level. This came at the obvious expense of losing the individualized touch and personal interaction of on-site missions.

The fact-finding missions involved Integrisport experts conducting interviews with stakeholders (e.g.: ministries, judicial authorities, sport associations, betting regulators, etc) regarding the local situation, strategy, experience, and current practices. The missions were Coordinated by CSCF and built on the support of experts visiting the program countries. Integrisport *Next* selected and deployed experts who interviewed the representatives of each Program Country and any other stakeholders who were able to contribute to the result of the report. Each interview included three parts:

- Understanding the interviewee’s point of view,
- Reviewing the situation experienced in the program country,
- Additional comments of the interviewees and their experiences

Name of meeting	Status	Format	Participants
1. Fact finding missions (Online) - Cyprus	Completed on May 31 and June 01, 2021	Online	9 people
2. Fact finding missions (Online) - Estonia	Completed on April 21 and 22, 2021	Online	10 people
3. Fact finding missions (Online) - Finland	Completed on April 8 and 9, 2021	Online	7 people
4. Fact finding missions (Online) - Georgia	Completed on May 27 and 28, 2021	Online	11 people
5. Fact finding missions (Online) - Malta	Completed on June 10 and 11, 2021	Online	8 people
6. Fact finding missions (Online) - Sweden	Completed on May 5 and 6, 2021	Online	11 people

The **outcome** led to increasing knowledge of the situation in each partner country and understanding the roles of stakeholders involved. The information gathered was used to customize the

awareness sessions (to decide which part of the awareness sessions should be emphasized more, on which topics the participants may have a serious lack of knowledge, etc.). This information also

facilitated the comprehensive desk research report (Intellectual Output 2). In addition, the information gathered will be used during the second half of the project to inform the Integrisport Next Practical Guide and support the ARPS curriculums. The report will be freely available to participants of the Closing Conference, and published electronically on the project website and Virtual Networking and Information Platform. As follows are key findings from each country:

Cyprus: Sport manipulation is unquestionably a reality for Cyprus. It is quite an entrenched situation, in the last few years there was a stark increase in sports manipulations. It was mentioned that although the Police try to have a separate office to deal with sports manipulation, this is not reflected in reality. In general, the key organizations needed are not defined clearly. The Ethics Committee works closely with the police and is seen as an important contributor to solving the problem.

Estonia: There is a general thought among most of the participants from different stakeholders that Estonia is a safe place for sport. However, some participants stated that Estonia is not dealing with the issue appropriately. For example, 35 football players have been banned by soccer regulations and these players have not received any punishment from the national penal code. The question remains whether the current Estonian criminal law is good enough to handle this phenomenon. The cooperation between sports organizations that ESTCIS (Estonian Center for Integrity in Sports) should centralize, and coordinate is still an ongoing process

Finland: There is a general feeling of the need for specific legislation on sports manipulation, but Finland regards the

current situation of sport manipulation as very calm. There is an environment of trust and effective measures towards sports manipulation, including profound respect and trust in the police for sports manipulation cases. The Football Players' Union is seen as a key organisation that can connect players and law enforcement. However, there are still risk factors that creates some uncertainty among stakeholders, such as the lack of a specific criminal provision in this subject, that the ratification of the Macolin Convention is not a political priority, the tendency of the new growing bets in esports, and the bad economic situation in many sports. Finland does show willingness to ratify the Macolin Convention; however, if the situation is calm, it will not be the top priority at the political level.

Georgia: There were some opinions that Georgia is a small country representing a small market, so sports manipulations does not pose a great threat. However, others disagreed and stated it remains a significant challenge. Only a few manipulation cases go beyond the disciplinary committee (if there is any disciplinary committee) because there are difficulties in collecting quality evidence. The main problem lies in the lack of awareness of the seriousness of the problem and the limited interest in tackling it on the part of non-sports organizations. Sports federations have begun to view the Ministry of Sports as a necessary mechanism of cooperation between the different stakeholders.

Malta: Athletes and other stakeholders understand the importance of fighting sports manipulations. Malta is making great strides to protect integrity, with an excellent spirit of cooperation across partner organisations and the introduction of regulations and legislation that supports the planned national

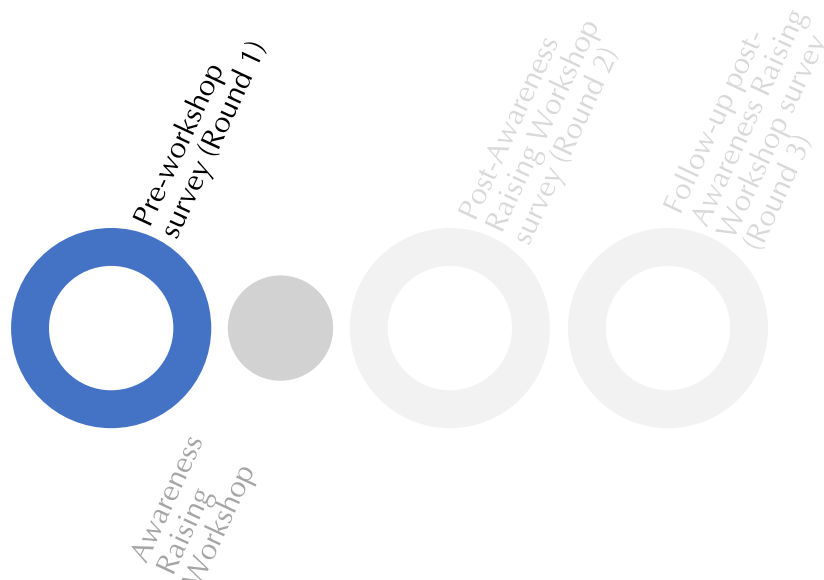
platform. There is widespread support for the principles in the Macolin Convention; apart from the illegal betting definition, which is preventing signature and ratification. There seems to be a genuine desire amongst respondents to resolve the problem, but it was acknowledged that this was something that required resolution at a political level. Education is seen as the main defence against sport manipulations, but it is lacking. More generally, Malta shows good reactivity, but proactivity could be improved.

Sweden: There is a good awareness and will to fight against match-fixing, which is considered a significant threat. The

situation is steady, with increased media attention. The most active stakeholders in the fight against match-fixing from the sport domain come from football: The Swedish Sports Confederation, the Football Association, and the Football League. The Swedish Sports Confederation are preparing education programs for sport federations. In recent years there has been a lot of suspicious reports in Swedish football, and the cases are committed presumably by a few select criminal groups. There is space for improvement in cooperation for domestic cases, but it is exceedingly difficult to cooperate internationally.

4.1.3 Surveying Future Participants of the Awareness Sessions

This Report provides an overview of the findings from the first of the three surveys (Fig 1) from all three countries (Estonia, Finland, Sweden). The aim of this survey was to explore the experience, awareness, knowledge, and views about Manipulation of Sport Competition (MSC) among the future participants of the Awareness Raising workshop, to tailor the workshop content to the exact needs of the participants.



Procedure:

The survey was available in Estonian, Finnish, Swedish, and English. The survey was administered via a closed, subscription-based online survey platform (Qualtrics). Participants were invited to participate via email which contained the survey link and password. Completing the survey took approximately 40 minutes. The surveys platform allowed for completion in segments, with participants given the option to complete the

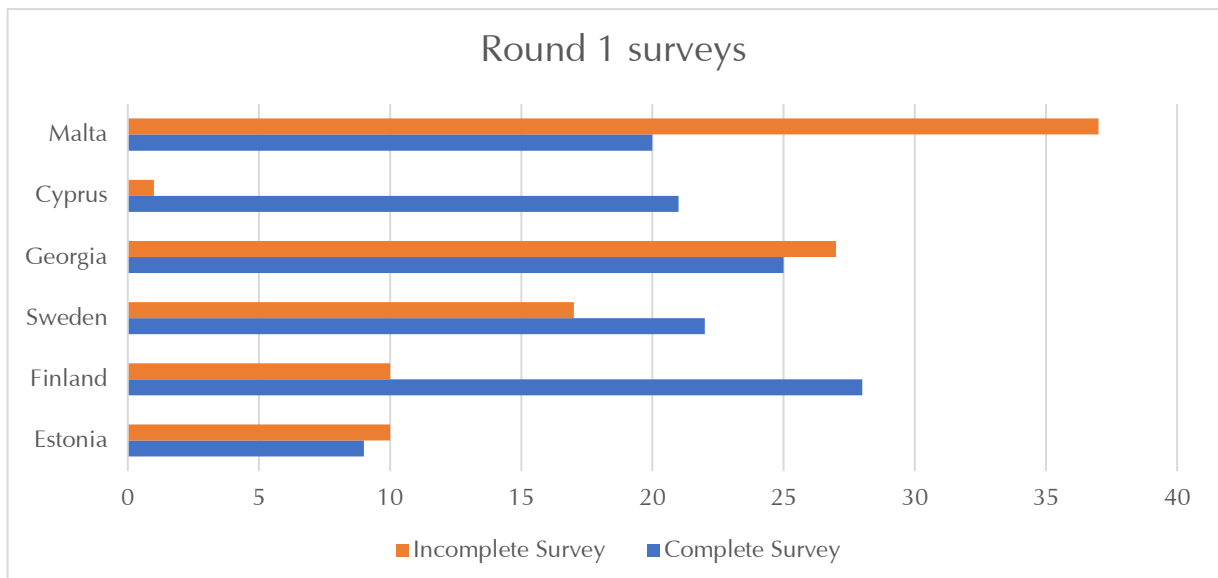
survey in 'one go' or revisit the survey page on different days. Survey data was recorded anonymously according to the following dates:

Survey opens in Estonia	Friday, 6 August 2021
Survey closes in Estonia	Monday, 6 September 2021
Data analysis report in Estonia	Thursday, 16 September 2021
Survey opens in Finland	Tuesday, 31 August 2021
Survey closes in Finland	Tuesday, 12 October 2021
Data analysis report in Finland	Friday, 22 October 2021
Survey opens in Sweden	Monday, 20 September 2021
Survey closes in Sweden	Monday, 1 November 2021
Data analysis report in Sweden	Thursday, 11 November 2021

Operational issues:

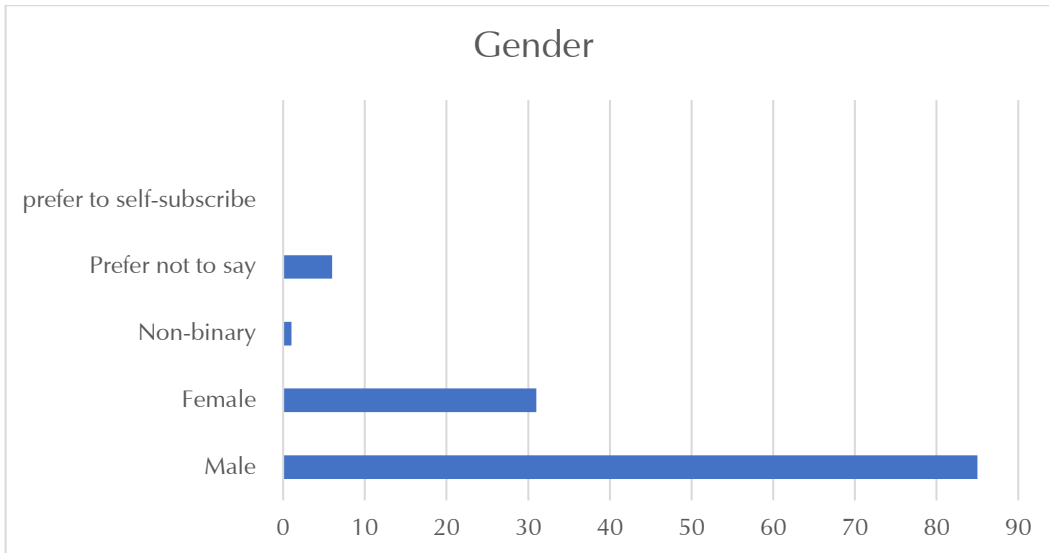
Many participants recruited for this investigation did not complete the round 1 survey (Estonia n = 10; Finland n = 10, Sweden n = 17) In total there was n = 37 incomplete surveys. The incomplete surveys were completed to various points.

The incomplete surveys were a limitation of the overall findings. They were the result of the language barrier, complexity of the survey items, and the overall length of the survey. These challenges made it difficult for the participants to understand and respond appropriately to the survey items.

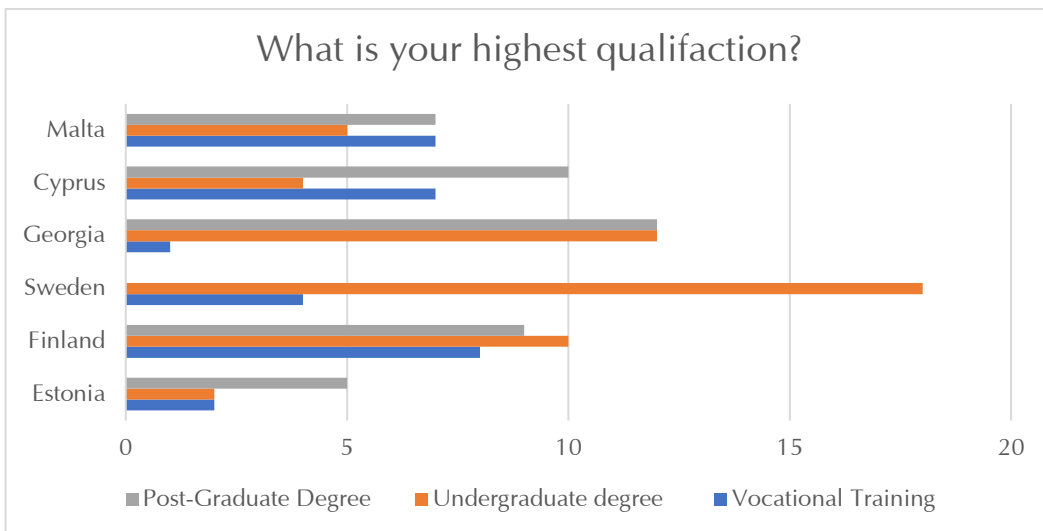


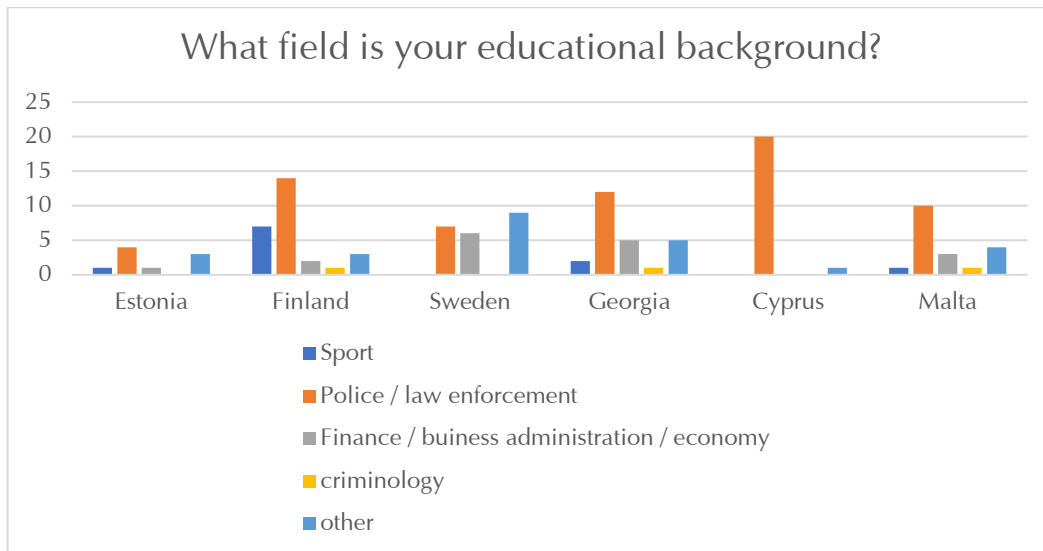
Demographics:

- According to mean age, participants from Sweden were the oldest (43.86 years). This was closely followed by Finland (43.15 years), and Estonia (40.56 years).
- Importantly, Sweden had the best gender balance with (n = 11) males and (n = 11) females.



- Sweden was the only country where no individual had a postgraduate qualification.



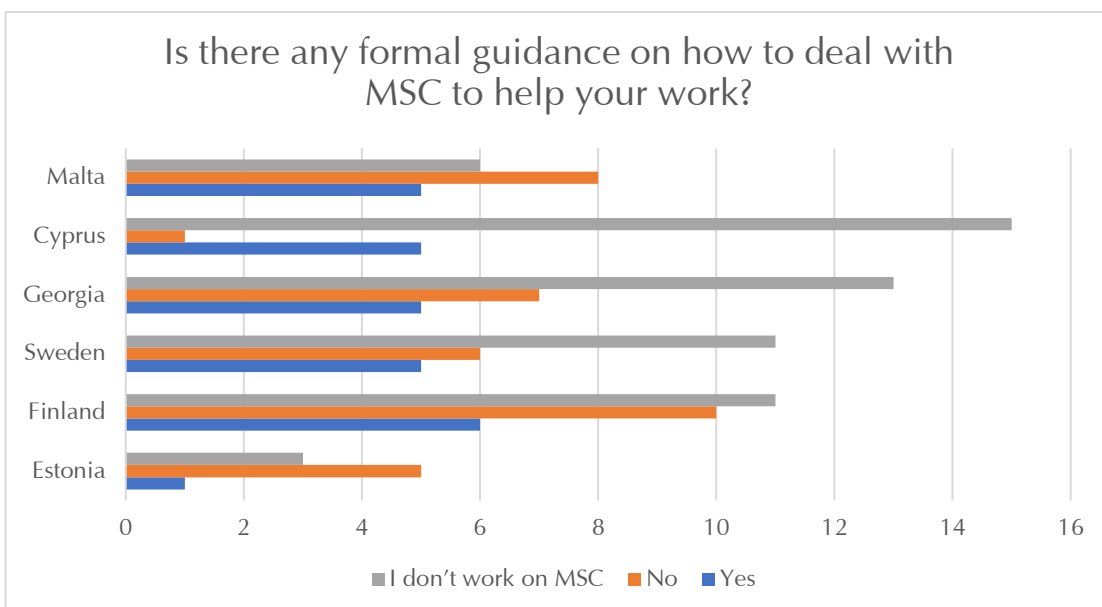


Key findings:

- In response to which sports are most at risk from MSC, all three countries (Estonia, Finland, Sweden) identified football as the single most at risk sport to MSC within their countries. Basketball, Esports and Tennis were sports also commonly identified.
- Countries rated how serious a threat MSC was against the integrity of sport in their country (1-10 – 1 = not at all serious / 10 = very serious). Finland (5.74) ranked the seriousness of MSC the lowest when compared to all six countries. This was followed by Estonia (5.89); and Sweden (8.23).
- In terms of the greatest threats to the integrity of sport: Finland (29.63%) and Estonia (44.44%) reported doping as the greatest threat; Sweden (54.05%) reported match fixing as the greatest threat.
- All three countries (Sweden (68.18%), Finland (51.85%) and Estonia (66.67%)) perceived Second & Third league (Men) were most at risk of being targeted for MSC.
- With regards to the biggest challenges in the fight against MSC, all three countries reported a lack of knowledge to be a problem. In addition, a lack of manpower was reported by Finland and a lack of information was reported by Sweden and Finland. Furthermore, Estonia reported lack of priority as the biggest challenge.
- Participants perceived that athletes play the most crucial role in tackling MSC. This was reported by two countries (Finland (40.74%), Estonia (33.33%)), the betting industry was reported by one country (Sweden (36.36%)); and international sport organizations were reported by one country (Estonia (33.33%)).
- Participants were asked whether they believed their organization has access to the necessary information to tackle MSC. Sweden (n = 3) had the most 'definitely not' responses.



- Sweden (68%) was the most likely to deter recommending a career investigating MSC. Concerning the country most likely to recommend a career investigating MSC, Estonia (33%) provided the most positive response.
- Perception of the least organizational support was ranked as follows: Sweden (4.68), Finland (3.93) and Estonia (3.89). These findings were also mirrored in perceived support at a national political level, with all countries perceiving low support at a national political level with Sweden (4.00), Finland (3.48) and Estonia (3.22).
- Responding whether there is any formal guidance on how to deal with MSC, Finland had the most 'no' answers (n = 10) and the most 'yes' answers (n = 6).



- Responding to how significant betting activity was in their country (1 = not significant / 10 = very significant), Sweden (6.59%) perceived betting activity as the

as the most significant when compared with the other five countries. Sweden was closely followed by Finland (5.85%). Estonia perceived betting activity to be the least significant within their countries (3.56%).

4.2 Implementation Phase

This phase is the backbone of the project given how it supports the target group: Law Enforcement and the Judiciary. This phase involves Awareness Raising Practical Sessions (ARPSs) and peer-to-peer meetings. These activities educated law enforcement and the judiciary specifically, while evaluating the situation in each country. The other participants in these meetings learned how they could assist and support law enforcement to combat this problem. These sessions were carried out in Estonia, Finland, and Sweden. The second half of the project will involve Malta, Cyprus, and Georgia.

The ARPSs and peer-to-peer meetings were combined into one single session for each country. This change in plans occurred because it was quicker and more cost-effective to do both in the same session. All participants were already in attendance for the ARPS, so the peer-to-peer meetings were held with law enforcement directly after.

Multiplier Sport Events	Date	Format	Participants
Awareness Raising Practical Session and Peer-to-Peer meeting - Estonia	Sep 28-29, 2021	Onsite	42 people
Awareness Raising Practical Session and Peer-to-Peer meeting - Finland	Nov 2-4, 2021	Onsite	45 people
Awareness Raising Practical Session and Peer-to-Peer meeting - Sweden	Nov 24-25, 2021	Onsite	76 people



A customized curriculum for Estonia, Finland, and Sweden was developed for each of the awareness sessions based on the research performed in the previous phase (Intellectual Outputs 4-9). These curriculums explain all relevant aspects of the situation of match-fixing in each country. The five key topics covered in the curriculum (sport, betting, legal,

technology and national + international cooperation) are formed into an integrated approach focusing on how to investigate, prosecute and judge criminal activities in sport manipulation more effectively.

The Awareness Raising Practical Sessions had two key goals:

- Sharing knowledge on the 4 modules (Sport, Law Enforcement and Prosecution, Betting Industry, Cybercrime and Virtual Currencies) involving international experts, seminars, and case studies
- Enable and promote cooperation to support law enforcement and the judiciary in tackling sport manipulation. This happened through national cooperation (by inviting representatives of local sport and betting organizations) and international cooperation (by inviting peers from other countries to share their best practices and learn from each other)

After developing the customized pedagogical materials, the appointed experts were deployed to each country to deliver a 2-3-day workshop – based on the information gathered during the Preparation Phase. The sessions culminated with experts providing practical solutions and recommendations for sport manipulation. In active collaboration with the Program Organization, Integrisport invited representatives of such organizations:

- The host partner organisation
- Local Guest Organizations (LEA and JA (Judicial Authorities))
- Local Guest Organizations (Sport and Betting)
- Guest/exchange international expert
- GLMS (Sport betting Expert)
- Interpol
- CSCF Virtual currencies Expert
- CSCF Related criminal procedure Expert
- FIFPRO

One key outcome of these activities was that the target groups were observed building connection with the other participants, such as sport organizations, scheduling meetings for future collaboration and support.

The experts were selected and coordinated by CSCF, who deployed them to support the project goals. The expertise of the international experts can be found below, any further information about local experts can be found on the ARPS agendas.

- **Lorraine Pearman**
Betting integrity expert, working for the gambling commission for a decade as the Betting Integrity Programme Lead. This work involved leading the Sports Betting Intelligence Unit, with the aim to protect sport from match-fixing and other betting related corruption
- **Claudio Marinelli**
INTERPOL's Criminal Intelligence Officer at their Financial Crime and Anti-Corruption Center. He is also the project manager of INTERPOL's Match-fixing Task Force (IMFTF).

- **Cassandra Fernandes**
Legal and Projects Manager of GLMS. Cassandra is a jurist, with an LLM from UC Berkeley, Masters in European law and in Sports law, an LLB in Law and French from Cardiff University. Her professional career in sports law and consultancy includes law firms in Paris, Lisbon, and the European Commission. She has advised football clubs and agents on transfers and contracts and represented players' interests at the FIFA Dispute Resolution Chamber.
- **Frederique Winia**
FIFPRO expert, which is the global football players union. Frederique is the Director Member Services and General Secretary for Asia/Oceania region, and she has worked for FIFPro for almost 20 years.
- **Roy Vermeer**
Legal Director of FIFPRO. Roy is a lawyer and a member of the FIFA Players' Status Committee and the FIFA Dispute Resolution Chamber.
- **Daniel Chan**
GLMS Operations Manager, liaising with the General Secretariat. He is also a monitoring and analysis coordinator sitting in GLMS' Asian hub in Hong Kong. He spent years in the Sports betting industry and had worked as a football trader in Hong Kong Jockey Club from 2014-2017, when he joined GLMS.
- **Gergely Vesszős**
Hungarian blockchain and cryptocurrency expert.

Estonia

The event took place at the Hotel Hestia Europa in Tallin from 28 to 29 of September 2021. CSCF coordinated with the hosting country partner, the Estonian Police and Border Guard Board, to execute the ARPS. The Estonian Police and the Border Guard Board is responsible for manipulation of sports competitions manipulations and other criminal activities related to sport.

The ARPS crucially covered the implementation of the Macolin Convention. An Estonian case was discussed, and FINCIS contributed importantly in the event to share an example of good practice from Finnish cases.

Finland

On November 2, 3, and 4, 2021, CSCF, in coordination with the hosting country partner, the Finnish Center for Integrity in Sports (FINCIS), executed the local event. The session was supported by presentations and exchanges by local and international experts, namely CSCF; the project partner - Finnish Center for Integrity in Sports (FINCIS); a few Finnish speakers; the Global Lottery Monitoring System (GLMS); the supporting organisation FIFPro; and Interpol and the Council of Europe, who are supporters of the project.

Participants included the National Bureau of Investigation, who explained the challenges and learnings from the JIT VETO case, and the Spanish Football Federation, who shared experiences from one of their cases. Both cases gave a well-rounded perspective of different approaches in the fight against sport manipulation.

Sweden

The session on November 24-25, 2021, was supported by presentations and exchanges from local and international experts, namely CSCF; the project partner - the Swedish Sports

Confederation; a few Swedish speakers; the Global Lottery Monitoring System (GLMS); the supporting organisation FIFPro; and Interpol and the Council of Europe, who are supporters of the project.

This session focused specifically on methods of collecting and using information during investigations of sports manipulation. A stimulating exchange of thoughts and ideas were presented on developing the capacity and cooperation for their investigations and prosecution techniques in sports manipulation cases.

4.3 Monitoring Phase

The monitoring phase involves measuring the effectiveness of the training sessions, with the feedback providing a means of monitoring. This information comes from the post-training survey after the ARPSs and peer-to-peer meetings. Changes in attitudes are compared to pre-training surveys, the training and trainers are evaluated, and overall feedback is collected.

4.3.1 Partner's Board Meetings

Board Meeting 1: Kick Off-Meeting (2021 Q1 – 2021 Q2)

Every Partner Organization was represented at the meeting. The purpose was for those responsible for delivering the Project to familiarise themselves with each other and their responsibilities, and to discuss the details of the implementation of *Integrisport Next*. The five phases of the project were outlined, including the expected deliveries and project timeline with its different components.

The visibility and communication strategy were presented, highlighting three crucial elements: **1)** Virtual Networking and Information Platform, **2)** The commitment to create as much visibility as possible for the Project and its activities. **3)** There is a plan to have ambassadors (high profile athletes) to promote the project through videos, photos, press releases, etc.

Partner's Board Meeting 2: Interim Meeting

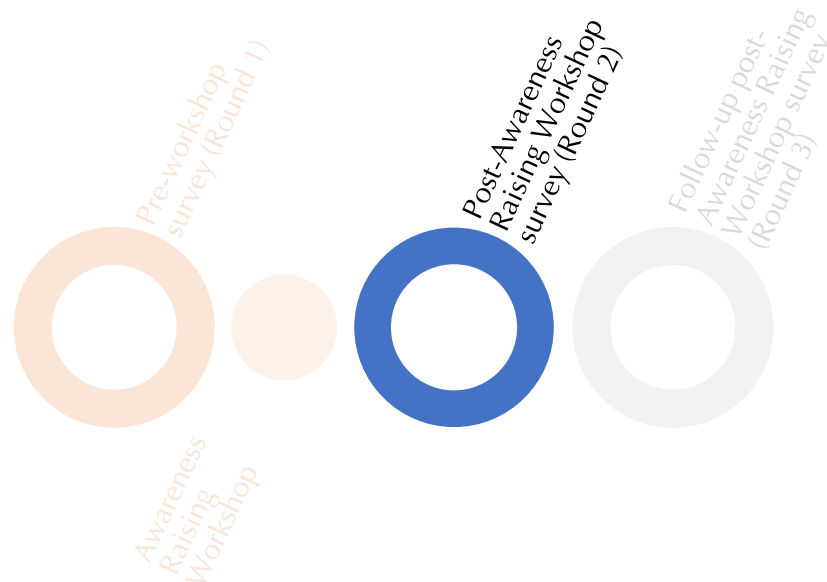
The Coordinator and the Partner Organizations met to discuss and fine-tune the activities of *Integrisport Next*, Evaluate the previous project steps against the qualitative aspects, and cover financial and administrative issues. The managers of the various activities in the Partner Organizations reported on their achievements, and the Coordinator followed up with the representatives of the other partners on the state of play of *Integrisport Next*.

This meeting covered the Awareness Raising Sessions (ARPSs) of the Multiplier Sport Events and the Intellectual Outputs (IOs) that need to be fulfilled for the project.

4.3.2 Evaluation of Training Effectiveness - Survey 2

A report was developed to present the results from Estonia, Finland, and Sweden in the second (post awareness raising session) of the three surveys set for each participant (Fig 1). The aim of the survey was to assess project implementation, provide feedback on the awareness raising session (ARS), and to inform the development of the proposed strategy document and conference materials (knowledge received, and attitudes and experience about the ARPS/workshop and operational support carried out). Specifically:

- To collect feedback on the trainings themselves (KPIs (Key performance indicators): meeting Satisfaction NPS and meeting Usefulness NPS)).
- To compare the knowledge of participants to that of the Survey 1, as a form to track the effectiveness of the trainings,
- To gather information for quantifiable KPIs that can help track and compare after the trainings (to be tested in Round 3).



Research design

Procedure:

The survey was available in Estonian, Finnish, and Swedish (default languages, respectively), and English. The survey was administered via a closed, subscription-based online survey platform (Qualtrics). Participants who took part of the ARS were invited to participate via email which contained the survey link and password after the awareness raising session according to the dates shown in the table below. The survey was open for 1 month¹. Completing the survey took approximately 20 minutes. Survey data were recorded anonymously but linked to the Round 1 survey responses via a respondent-generated alphanumeric code.

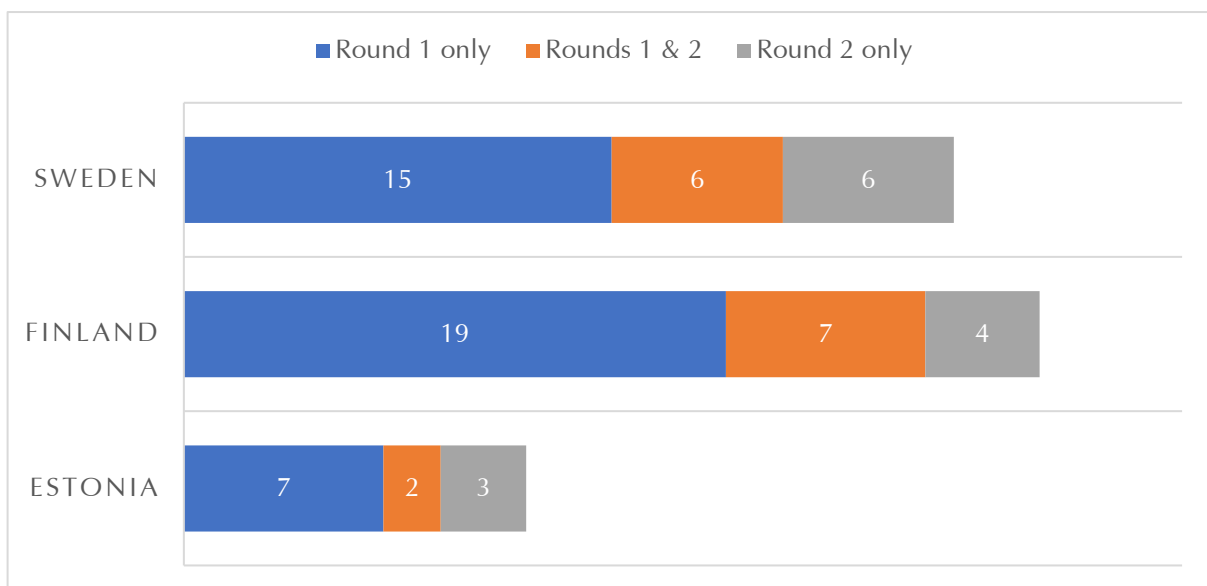
¹ Extension of the survey from 1 week to 1 month was requested by the Project PI against the advice of the research team in KU Leuven. The extended period introduced an uncontrolled variable (time elapsed between the ARS and the feedback).

Implementation of the survey to evaluate the effectiveness of the ARPSs + "event satisfaction/feedback" survey in Estonia	Survey opens: September 27, 2021 Survey closes: October 22, 2021
Implementation of the survey to evaluate the effectiveness of the ARPSs + "event satisfaction/feedback" survey in Finland	Survey opens: November 1, 2021 Survey closes: November 26, 2021
Implementation of the survey to evaluate the effectiveness of the ARPSs + "event satisfaction/feedback" survey in Sweden	Survey opens: November 22, 2021 Survey closes: December 17, 2021

Operational issues:

The response rate was low in all three countries (Estonia n = 5; Finland n = 11, and Sweden n = 12). Only 15 participants (Estonia = 2, Finland = 7, Sweden = 6) completed both survey rounds (see Figure 2).

This low response rate is a limitation of the findings. This limitation can be explained by several factors. For example, the complexity of the survey items and the language barrier made it difficult for participants to complete the items. Additionally, the length of the survey and the timeframe of the project were challenges for the participants.



Sample sizes (data as of December 27, 2021)

In contrast to Round 1 surveys, a considerable proportion of the surveys accessed in English. The English completion often coincides with using the QR code (as opposed to the link) to access the survey. The landing page for the QR code is the English version, which means that respondents must manually switch to their respective language versions at the beginning of the survey, whereas the link is configured for the language version with an option to manually switch to English. This pattern also coincides with noncompletion. Statistical analysis suggests that the language in which the survey has started has an impact on completion: only 2/9 started in English (perhaps by accident because of the QR code

access), whereas those started in Estonian completed 4/10; in Finnish 11/16 and 12/12 in Swedish. This phenomenon is unique to Round 2 and requires attention in subsequent data collections to prevent sample attrition.

4.3.3 Key findings

Feedback on the Awareness Raising Section:

Most participants approved of the content and the delivery of the Awareness Raising Session. In terms of the content of the MSC awareness raising awareness session. Sweden (3.91) scored the content of the MSC awareness raising session the lowest of all six countries.

All but three participants (Sweden (n=3)), thought the survey was very organized or extremely well organized. Sweden (n=3) also recorded the most participants stating the session was 'extremely well organized'. Finland recorded (n=12) participants and Sweden (n=11) participant stating the session was 'very organized'. No countries thought the session was 'not so organized' or 'not at all organized.'

Most participants stated that the length of Awareness Raising Session 'about right.' Two participants from Sweden and two participants from Estonia thought it was too long. All (n=14) of the responses in Finland stated the session length was 'about right.' No participants stated the session was 'much too long' or 'much too short.'

Most participants stated the session was 'beneficial for their current job,' stated the session was 'beneficial for their present and future job,' (n=2) stated the session was 'beneficial for their future job'.

Participant from Estonia (40%) were the most likely detractors and the least likely to promoters (40%) of the awareness raising session.

Sport integrity:

After the awareness session, Finland and Estonia perceived the threat of MSC against the integrity of sport in their country to be greater than prior-MSC raising awareness session. Estonia witnessed the greatest improvement from (5.89) pre-MSC raising awareness session to (8.40) post-raising awareness session. Regarding the biggest threats to the integrity of sport, Estonia identified discrimination based on gender or ethnicity as the greatest threat to the integrity of sport. Sweden identified the over-commercialization, Finland identified doping.

Awareness: Betting:

After the MSC raising awareness session, all countries received less 'I don't know' responses to the question 'is it possible for the betting authority to access individual betting accounts directly?' when compared to round 1 survey. It should be noted, however, that less participants took part in survey 2.

Q7.3 After the MSC raising awareness session, all received less 'I'm not sure' responses to the question 'if required, can you obtain a betting monitoring report to help your investigation?' when compared to round 1 survey. It should be noted, however, that less participants took part in survey 2.

Awareness: Organisation:

Post-MSC raising awareness session, no participant stated there was no measures in place to protect sports from MSC within their country.

Self-Assessment:

Generally speaking and according to the 'mean' values, post-MSC raising awareness session, participants were more (1) satisfied with their level of knowledge about MSC, (2) felt less useless investigating MSC, (3) were more confident to investigate MSC, (4) had a better grasp of what constitutes MSC, (5) thought they good at investigating MSC, and (6) felt less out of their depth when investigating MSC.

Perception: MSC:

Most countries witnessed improvements in their perception of the prevalence of MSC post-MSC raising awareness session. Sweden did not to witness these improvements were and perceived the prevalence of MSC outside of Europe, in Europe and within Sweden to be less than stated in round 1 survey

All stated football is the most at-risk sport prone to sports manipulation. Estonia differed slightly when compared to the other four countries. Estonia rated Football and Esport joint first. Esports was rated second by the other countries

Post-MSC raising awareness session, Estonia (80%) perceived National level / Premier league / First division (Men) to be the most prone to sports manipulation. Finland (63,64%) and Sweden (76,92), perceived second & Third league (Men) to be most prone to sports manipulation.

Betting:

Post-MSC raising awareness session, countries were asked how significant betting activity was in their country. Sweden (7.77 perceived betting activity the greatest, followed by Finland (7.55). Estonia perceived betting activity the lowest, at (5.00) respectively. Notably, however, Estonia also had the lowest response rates

Perception: Investigation:

Sweden identified athletes (41,67%) and the betting industry (33,33%). Finland identified sports clubs (27,27), athletes (18,18%), law enforcement (18,18%) and the betting industry (18,18%). Estonia identified international sport organizations (80%) and athletes (20%) to play the most crucial role in tackling sports manipulation.

4.3.4 Administrative Meeting

This meeting included the partners from Estonia (29/9/21), Finland (11/4/21), and Sweden (11/24/21). The purpose was to review the state of play of the project, including the relevant Intellectual Outputs, Multiplier Sport Events, and Transnational Project Meetings. The financial and administrative aspects of the project were also included, with budget and expenditure the focus of discussion. Finally, methods of increasing visibility and awareness of the project were reviewed.



INTEGRISPORT NEXT

YEAR TWO



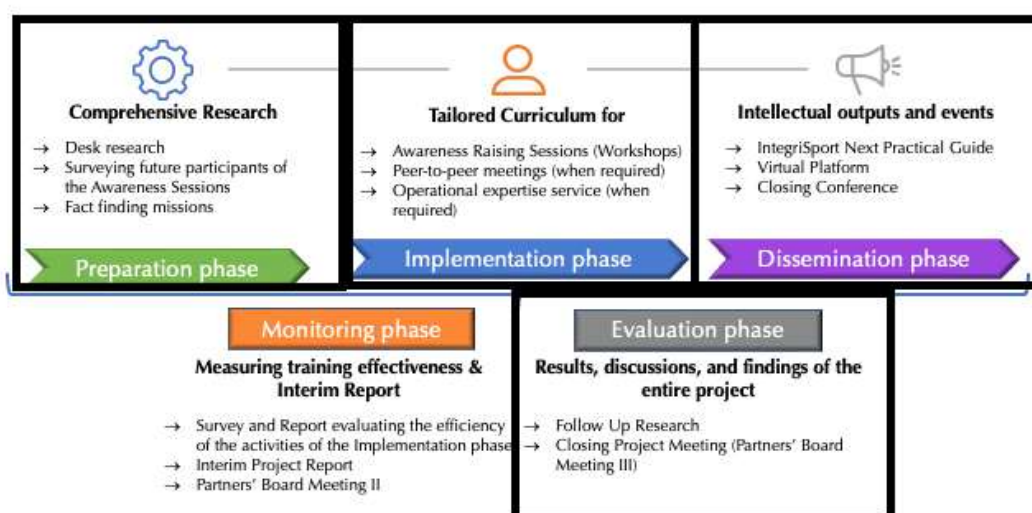
FOUNDATION FOR
SPORT INTEGRITY

5. IntegriSport Next: Year Two

Section 5 provides an overview of next steps for Integrisport, including future activities, proposals for adjustments, and recommendations from the previous year.

The project started with the **preparation** phase, a combination of expert knowledge gathering and active research into the current status, priorities, and gaps in the program countries. This solid base allowed for the **Implementation** phase to build a custom curriculum for each program country and use resources with the highest possible value-add during the Awareness Raising Sessions (ARPSs) and peer-to-peer meetings. The implementation phase has been completed for Estonia, Finland, and Sweden. Participants were surveyed directly after the ARPSs and the peer-to-peer meetings to collect feedback, deepen the learning experience and provide a means of **monitoring**. Quality delivery is the responsibility of the Partners' Board. This has completed for Estonia, Finland, and Sweden. Project **Evaluation** was then performed by a follow-up survey of participants 6-12 months after the ARPS to collect experience, measurable outcomes and KPIs.

These phases still need to be completed for Georgia, Cyprus, and Malta.



5.1. Preparation Phase

5.1.2. Surveying Future Participants of the Awareness Sessions (Cyprus, Malta, Georgia)

There remains the dissemination and collection of survey results from Georgia, Malta, and Cyprus. The same items and measures will be used as with the previous countries. A final report will be issued upon completion of the remaining surveys, which will contain the results and key findings of all the partner countries in a single document.

Survey opens in Georgia	Monday, 20 December 2021
Survey closes in Georgia	Monday, 31 January 2022
Data analysis report in Georgia	Thursday, 10 February 2022
Survey opens in Cyprus	Monday, 24 January 2022
Survey closes in Cyprus	Monday, 7 March 2022
Data analysis report in Cyprus	Thursday, 17 March 2022
Survey opens in Malta	Monday, 21 February 2022
Survey closes in Malta	Monday, 4 April 2022
Data analysis report in Malta	Thursday, 14 April 2022

5.2. Implementation Phase

The ARPS still needs to occur in Malta, Cyprus, and Georgia. These sessions will follow the same strategic guidelines of the three previous APRSs (Estonia, Sweden, Finland). 2-3 days of sessions will be delivered to the members of the national partners, educating them on how to address sport manipulation. The partner organizations will invite prosecutors and judges to participate in the training, as well as any other relevant stakeholders. In the second half of the project, the ARPSs will be hosted onsite, pending the unusual situation with the global pandemic

The peer-to-peer meetings in Malta, Cyprus and Georgia will occur jointly with the ARPS, due to the benefits discovered in the first half of the project of organizing the sessions this way. These will be offered to representatives of counterpart law enforcement agencies or judicial authorities to build on investigative and prosecuting techniques regarding sport manipulation. Integrisport *Next* will invite law enforcement officers and/or prosecutors from other countries who have already led successful investigations/prosecutions regarding sport manipulation to provide case studies.

Multiplier Sport Events	Date	Format
Awareness Raising Practical Session and Peer-to-Peer meeting - Georgia	Planned between June 27 and 30, 2022	Being planned onsite
Awareness Raising Practical Session and Peer-to-Peer meeting - Cyprus	Planned between March 28 and April 1, 2022	Being planned onsite
Awareness Raising Practical Session and Peer-to-Peer meeting - Malta	Planned between April 25 and 29, 2022	Being planned onsite

Curriculums have already been developed for Estonia, Finland, and Sweden. The tailor-made Curriculums for **Cyprus, Malta, and Georgia** will contain all the aspects, modus

operandi, legal and policy issues that should be used in sport manipulation related investigations. To fully understand the phenomenon and the motives of the match fixers, the curriculum will explain all relevant aspects of the situation. The five key topics covered in the curriculum (sport, betting, legal, technology and national + international cooperation) will be formed into an integrated approach focusing on how to investigate, prosecute and judge criminal activities in sport manipulation more effectively.

5.3. Dissemination phase

5.3.1. IntegriSport Next Practical Guide

The Integrisport *Next* Practical Guide is a document targeted to Law Enforcement and Judicial professionals, containing information that assists with investigating and prosecuting sport-manipulation cases. It will outline the key findings of the project, covering the sport manipulation situation in all the Program Countries, with emphasis on history, legal background, and context-specific strategies.

Transferability is a key requirement. The document will be essential for spreading the findings beyond the project lifetime as it will be made accessible to those that did not participate in the current project trainings. This will be accomplished by making it freely available on the Integrisport *Next* website and Integrisport Virtual Networking and Information Platform.

The Practical Guide will be designed continuously during the project, via all the output reports, which will be incorporated in a synthetic manner. The final Practical Guide will be completed at the Project's end after final feedback from the project partners.

5.3.2. Virtual Platform

The virtual platform is available for invitees only, and the invitations will be sent by email. The development of the virtual platform has been ongoing since the start of the project. Uploading of documents and practical accessibilities will allow partners to access all the relevant documents in a single place. The platform will include document storage for administrative issues, document storage for trainers, and calendar for coordinating and following the ARPS and peer-to-peer meetings.

5.3.3. Closing Conference

Originally the closing conference was planned for Switzerland, but it was decided instead to host the conference in the Netherlands.

The project will be concluded by an international conference, during which the participants will report on their experiences in the project, discuss success stories and best practices and a continuation. Results and outcomes will be presented.

During the meeting, the final products of Integrisport Next will also be introduced. All the participant organizations and experts will be invited. In addition, the conference is open to external professionals and representatives of non-program countries as well. This aims to spread awareness of the initiative, as well as recruit further countries for the continuation of the project.

International Closing conference Netherlands	Planned for Q4 - 2022	Being planned onsite
---	-----------------------	----------------------

5.4. Evaluation Phase

The evaluation phase assesses the impact of the ARPSs and peer-to-peer meetings, collecting feedback from the project partners. This phase critically assesses how useful the sessions and support were, comparing attitude shifts from pre-training views, measuring cooperation, and re-activating topics learned. The findings of this phase contribute to improving similar projects in the future.

5.4.1. Closing Partners' Board Meeting

To be executed in Q4 along with the closing conference

The purpose of this meeting is to report on the results and findings of the entire project, discuss the Dissemination materials, and evaluate the project overall to strategize how the project will continue in the project countries, and how it can be expanded to future countries. The Coordinator and the Partner Organizations will meet to discuss and evaluate the activities of Integrisport *Next*, including any financial and administrative issues.

5.4.2. Follow-up survey and report on previous ARPS participants

A 45-60-minute survey will open on August 22, 2022, approximately 6-12 months after the workshops. The survey will be administered online, in a similar form to the previous surveys. The participants will be required to provide a report on the usefulness of the provided support of the peer-to-peer meetings. The survey will close on September 12, 2022. The final report of the findings from the survey's will be finished on October 14, 2022

The report will detail main findings, guidance, and suggestion for the partner countries. This information will be shared with the partners because it could affect the partners' LEA's and JA's strategy on fighting sport manipulation.

The challenges for this survey that are anticipated are those that presented in the previous surveys: Low response rate, the timeframe in which the survey must be completed, the length of the survey and the language. Unfortunately, the survey itself cannot be changed, otherwise findings cannot be generalized. CSCF will address these challenges by offering translators for survey documents, allowing for flexibility in the timeframe in which the survey is to be completed, and sending many more reminders to complete the survey.

6. Visibility

The Co-ordinator of the project, as well as the Project Partners, have made their best efforts to ensure a wide-reaching visibility and dissemination, as well as effective management of project activities and results. All information is available on the project website, and every project-related activity has been published on the Project's Twitter, Facebook and Instagram pages. Partner organizations have used their own social and other media platforms (press releases, press conferences) to disseminate the outcomes of the activities they were involved in.

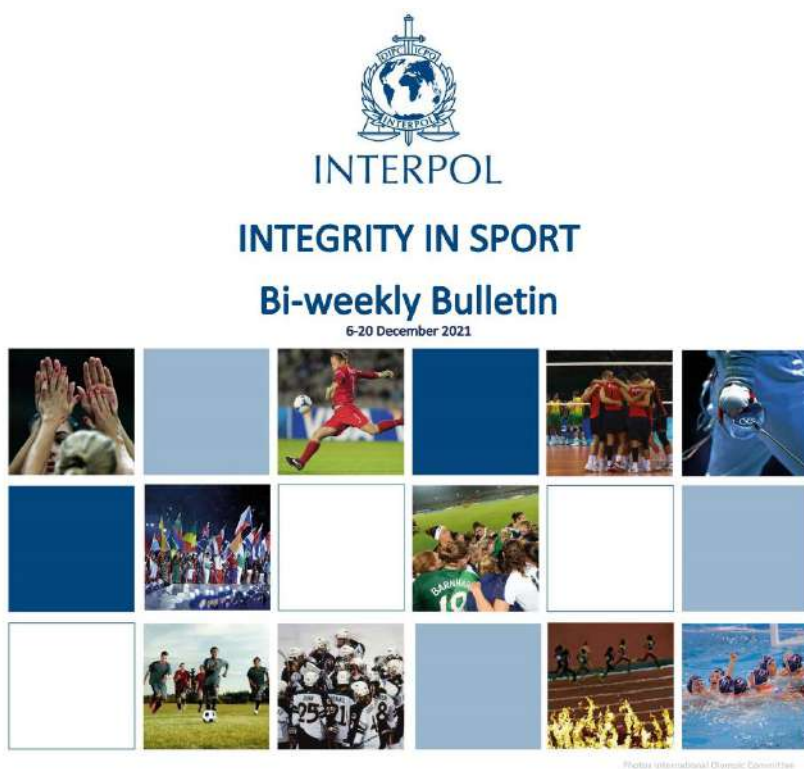
Communication channels are the following:

Twitter: @CSCF_Integrity

Facebook: @Sport Integrity Group Instagram: @CSCF_Integrity

LinkedIn: CSCF - Sport Integrity Group

Promotion of the Project:



INTERPOL IST Bi-Weekly Bulletin-2021-12-20T16 25 55.pdf (Línea de comandos)



INTERPOL IST Bi-Weekly Bulletin-2021-04-26T09 44 06.pdf (Línea de comandos)



INTERPOL IST Bi-Weekly Bulletin-2022-07-19T11 46 12.pdf (Línea de comandos)



INTERPOL IST Bi-Weekly Bulletin-2022-09-06T11 58 34.pdf (Línea de comandos)



INTERPOL IST Bi-Weekly Bulletin-2021-11-08T17 12 13.pdf (Línea de comandos)

7. Conclusions

We can look back with satisfaction on the first half of the project. As already explained in the report, the following IOs were developed: Desk Research, Fact Finding Mission, Awareness Raising Sessions, Peer-to-Peer Meetings, Survey 1, and Survey 2. These IOs were evaluated and discussed at the Multiplier sport events.

The statements of the project partners listed in the report indicate a good working atmosphere and show that all organisations are heard in the Integrisport project and that the partners assess the cooperation positively.

Due to the Covid situation we are a little behind in the project process, so in order that this does not affect the quality of the results, we will ask for a project extension.

We have evaluated the feedback from the partners and are incorporating the following ideas and wishes into our further procedure:

We try to hold all outstanding meetings in person as much as possible. We will also try to translate the workshop documents into the respective national languages if the budget allows. A precise schedule will be communicated for the second half of the project, as was the case at the beginning of the project. We will strive for an optimal distribution of this curriculum. At the final meeting, as requested, a detailed analysis of the project will take place.

It should also be noted that we will try to work out a strategy with the project partners on how the Integrisport concept can be continued sustainably over the project period and how the contents of the developed materials can be kept up to date.

8. Recommendations

There are a variety of internal recommendations to improve the second half outcomes of the project. These include:

- Increase follow-up survey response rates. This will be achieved by prioritizing communication and reminders, as well as communicating the importance of completing surveys on time.
- Prioritize strength of translation during activities and all relevant documents to avoid miscommunication.
- Given the unpredictable nature of the COVID pandemic, there will be a plan B to host all meetings and activities online if necessary. Preparations will be in place to adjust to Plan B at the last minute.